



**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 This 2019 report is the first one since Sky has made its EPG available on a set top box (“STB”) that qualifies in the definition of New TV Receivers. On 15 November 2019, we launched our 1TB UHD model of Sky Q STB and at time of writing this has just begun to ship to the first customers. As this STB is so recently launched and very much in its infancy, our primary STB models currently remain the Sky+ and previous model of Sky Q which have been the subject of the last two reports.
- 1.7 The new Sky 1TB UHD STB has launched with the same level of accessibility as our existing Sky Q STB. Therefore, highlighting and high contrast are available on the Sky+ HD STB, the existing models of Sky Q STB, and the new Sky Q 1TB UHD STB. Whilst these STB models are not capable of running magnification, Sky+ offers the option for larger or bolder font. Research is on-going with regard to text magnification across our STB models.
- 1.8 As our reports from previous years have shown, Sky takes its responsibilities in this area seriously and has already taken many steps to create EPG environments that are accessible. We



have done much work over the years innovating and investing to deliver accessibility functionality to customers. Consequently, our EPG areas already contain much of what Ofcom expects to see in terms of accessible features.

- 1.9 Making progress towards implementation of the Specified Requirements – in particular TTS – is both technically challenging and costly. It is important to stress that whilst we have not implemented all the Specified Requirements on the new Sky Q 1TB UHD STB, we have nonetheless been working and planning towards this. We have set a concrete timeline to deliver sign-language filtering and TTS. By the end of 2020 we expect these features to be available on Sky Q 1TB UHD (plus Sky Q and Sky+ where possible). As yet we do not have a firm timetable for the introduction of text magnification on Sky Q 1TB UHD. This is due to it being the most complicated area to fulfil and one that we are keen to ensure is done in a way that genuinely benefits users. Therefore, we are continuing to research how magnification should function, and this will be progressed once the priorities of TTS and Sign Language filtering have been implemented.

SECTION 2: SUMMARY OF AVAILABILITY OF FEATURES

2.1 Text-to-Speech (TTS)

- This feature has been accepted by Ofcom as one that is technically complex and expensive to implement. This was highlighted by the fact that in the 2019 report published by Ofcom no broadcasters were offering the feature.
- At Sky we recognise that TTS could be one of the most valuable features to customers who have accessibility needs. We have therefore been prioritising work towards this element.
- As TTS should be a very valuable feature, we want this to be widely available across our STB models and devices. Therefore, our planning is being undertaken with a view to TTS being supported across a number of STB models and other devices (e.g. iOS, Android, desktop Mac/Windows etc.) i.e. not just limited to the required New TV Receiver, Sky Q 1TB UHD.
- Based on the work we have done so far and solutions that we are looking at, we currently anticipate TTS being launched not just on Sky Q 1TB UHD, but also on the older Sky Q STB, by the end of 2020.

2.2 Filtering/Highlighting Audio Description and Signing

- Across all our STBs we have the facility to highlight programmes with Subtitles or Audio Description on the main TV guide listing.
- Across all our STBs 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.
- Across all our STBs we the display AD, S and SL (Audio Description, Subtitling and Sign Language) signs when a programme is selected on the TV Guide or when the 'i' button is pressed on the remote control.
- Currently highlighting programmes with Sign Language is not possible in the same way that it is for Subtitles and Audio Description. This is due to the flagging of Sign Language being done by individual broadcasters within the synopsis field. We are undertaking work intended to make this a customer experience that is consistent with the flagging of Subtitles and Audio Description. This would see a 'SL' icon being used alongside the ones already used for Subtitles (S) and Audio Description (AD). This would then provide the relevant metadata to allow proper highlighting of Sign Language programming.
- Again, based on the work we have done so far and our expectations of the requirements we anticipate this feature being launched by the end of 2020. And again, this is due to be rolled-out across all Sky Q STB, not just Sky Q 1TB UHD.

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 that we introduced previously and ensures that the font on the rich Homepage we offer can be adapted further.
- Both the older models of Sky Q STB and the new Sky Q 1TB UHD STBs offer a high-end user interface rich in imagery, displaying TV content art work or images. This helps customers navigate and find their content on screen.
- The image-led user interface and focus-based navigation of the Sky Q and Sky Q 1TB UHD STB makes text magnification a complex and expensive proposition to deliver successfully. We are keen to ensure that compliance with this feature does not become a "box-ticking exercise", but rather, sees us deliver an approach to magnification that is truly useful and user-friendly. To this end earlier in 2019 we ran a workshop session with stakeholders from technology and design areas of the business plus and a representative of the RNIB. The outcomes of this session are being used to shape our approach and we aim to make progress towards compliance with this feature once we have achieved TTS and Sign-language filtering as priorities.

2.4 High Contrast Displays

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

SECTION 3: ADDITIONAL ACCESSIBLE FEATURES AND PRODUCTS

All Sky STB Models

- 3.1 In addition to the features mentioned above, the following are also available on all Sky STBs:
- a) the ability to set audio description and subtitles on or off using the Accessibility Settings or via a shortcut on the remote control (help button);
 - b) the ability to select favourite channels making it easier to navigate between them for customers.

Sky+ HD STB

- 3.2 In addition to the features mentioned above, the following are also available on the Sky+ HD STB:
- a) accessibility at the heart of the Services Homepage, with clear images and tiles that are easy to identify and select;
 - b) The following features that facilitate the use of the EPG by all customers including those with accessibility needs:
 - Watch next: enabling easy playback of the next episode of a series that has been recorded (or downloaded) to your Planner.
 - Programme images: images are present in many areas of the EPG to aid content choice and recognition and there is constant work to make images more prominent and better quality.
 - Homepage Layout: Top Picks 'mosaic' of content on the Homepage.
 - 'Continue' tab in the Planner: highlights to customers partially viewed episodes in their Planner, or the first episode or the next episode of a series.
 - Viewing Progress Bar: displays how much of a programme has been viewed.

- Series Link from a Catch-Up show: ability to choose a Catch Up programme, either from the Catch Up area or one you've downloaded to your Planner, and press the green button to 'Series Link'.

Sky Q STB (including the Sky Q 1TB UHD STB)

- 3.3 In addition to the features mentioned above, the following are also available on the existing Sky Q and new Sky Q 1TB UHD STBs:
- a) A user interface rich in imagery, displaying TV content art work or images. This helps customers navigate and find their content on screen.
 - b) As with Sky+HD, we have made the accessibility settings easy to find all in one place.
 - c) Presence of a User Guide Video for the Sky Q accessibility settings, which is available to play (with subtitles) via the Sky Q and online. The user guide video is available at: <https://accessibility.sky.com/support-sky-q/tv-sky-q/accessibility-settings-sky-q/>
 - d) Sky Q Voice Search and Sky Q Voice Control both offer quick and easy methods of searching for content with a voice capable remote control paired to a Sky Q STB. Voice Control also allows the user to turn on/off the subtitles and audio description without needing to navigate menus. Other Voice Control features include the ability to launch apps, change channel, play content back from Recordings, fast-forward and rewind recordings and navigate to top-level menus such as 'Cinema' or 'TV Guide'
 - e) Whilst not strictly an accessible EPG feature, the ability to set a recording for a future linear episode of a series via the Mini Guide is a playback enhancement that facilitates the use of the EPG by all customers including those with accessibility needs.

Remotes

- 3.4 We offer a range of remote controls for our Sky+/HD and Sky Q (including Sky Q 1TB UHD) customers.
- 3.5 For Sky+/HD, in addition to our well-known Sky remote, we continue to make our Sky+ Accessible remote available free of charge for accessibility customers who request it from our dedicated contact service team. Customers can also use the Sky+ App to remotely control their STB, and this functionality is also compatible with Voiceover technology (as further described at paragraph 4 below).
- 3.6 For Sky Q (including Sky Q 1TB UHD), customers have a choice of three remotes:
- a) The Sky Q Touch Remote includes Bluetooth technology and therefore does not require the customer to point it at the STB. It has a traditional buttons and a round sensitive pad, allowing customers to navigate the EPG using swipe movements if they prefer. The remote can be made to beep if lost, by pressing a button at the front of the Sky Q STB. The remote also has a voice button to allow customers to use voice search and voice control. We also offer a silicone holder for the remote to make it easier to hold.
 - b) The Sky Q Remote has traditional buttons and is also compatible with the silicone holder. It has a dedicated search button and a sidebar button to launch apps.
 - c) The Sky Q Voice Remote is a traditional remote with the functionality of the Sky Q Remote, plus the added benefits of the voice search button and Bluetooth technology.
 - d) The Sky Q Accessible Remote is the same shape as the Sky+ accessible remote and has an easy grip back. It comes with subtitles and audio description buttons for easy access. It is also available free of charge via our dedicated contact service team. User guides for the remotes are available via the Sky Q STB.

Speaking Apps: Sky+ App

- 3.7 We have maintained the speaking navigation for the Sky+ App which we launched in 2014. The App is compatible with the Voiceover (TTS) technology embedded in Android and iOS devices. Through the use of touch, the Voiceover software describes to the user each item of text on the screen. Visually impaired customers can use the App to search, browse, select and record shows.
- 3.8 The app also allows customers to change channels on the STB and play content on the STB which is of particular use for blind customers using alternative navigation via TTS on the Sky+ App.

Speaking Apps: Sky Go App

- 3.9 Sky also makes a companion App available for Sky Q multi-screen customers. When using the App at home, customers can watch live TV, Catch Up TV and recordings; record shows and series to their Sky Q STB; download on-demand shows to their Sky Q STB and download recordings and on-demand shows to their device. When away from home, customers can use the App to watch live TV or Catch Up TV; download on-demand shows to their device using Wi-Fi and watch shows they've downloaded to their device.
- 3.10 Sky has worked hard to ensure the Sky Go App is compatible with accessibility settings on smart devices: for example, customers can invert colours for greater contrast, zoom to magnify the screen or use Voiceover to help find shows to watch, record or download. In order to further assist customers with accessibility needs, we have created a user guide for Voiceover on the tablet version of the Sky Go App.

SECTION 4: PROMOTING AWARENESS OF ACCESSIBILITY SERVICES

- 4.1 We have continued to promote our accessibility services on our accessibility website (<https://accessibility.sky.com/>), redesigned in 2017, including an accessible TV guide with remote record facility, weekly TV highlights, notifications of software updates in our News sections, information about Sky+ accessibility settings, and new articles about Sky products, as well as continued information about and access to our dedicated service team.
- 4.2 Our dedicated accessibility service team is specially trained to assist our accessibility customers, and we continue to offer a direct number through to them, as well as alternative methods of contact, such as Sign Language Video Relay, Textphones, email, online forms, and a dedicated accessibility live chat.
- 4.3 We continue to offer alternative formats (large print, braille, different colour paper, audio CDs) for our customer correspondence and bills where needed and have launched a new Welcome Letter for customers joining the accessibility team, giving an overview of the services and product features available. We have worked with the RNIB to ensure these alternative formats are now being sent to customers without plastic envelopes in our efforts to become single-use plastic free in our operations, products and supply chain by 2020.
- 4.4 We also ensure that the weekly emails that Sky sends to all customers (with programme recommendations and the ability to click through and remotely record) is fully accessible to customers using screen reader software.

SECTION 5: CONSULTANCY SERVICES, TRAINING AND ENGAGEMENT

- 5.1 We have continued to work closely with accessibility consultants from the RNIB to make sure we build on our knowledge and experience of accessible design and service at Sky. We have collaborated with consultants on website and App accessibility, as well as ongoing user interface design.

- 5.2 We have made this training available at our different UK locations: Osterley, Leeds and Dunfermline in Scotland to provide support to our product designers and service teams.
- 5.3 We have also increased our pool of Customer Testers and invited deaf customers to join in via Action on Hearing Loss, to help us prepare for the launch of subtitles on demand. More visually impaired users also test our products prior to launch.
- 5.4 We have carried out an extensive research project with the RNIB and our Products and Insight teams, testing the experience of visually impaired and blind users of Sky Q and Sky+ products. We are currently reviewing the detailed feedback.
- 5.5 And of course, we ensure that the feedback we receive from our accessibility customers is passed on to Sky product owners so that they can take this feedback into account when developing existing and new products and services.