



**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 this year Sky also launched the Sky Glass streaming television. For completeness, we will highlight the accessibility features available on Sky Glass where relevant in this report.
- 1.7 As our previous reports 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 innovating and investing to deliver accessibility functionality to customers. Consequently, our EPG areas contain much of what Ofcom expects to see in terms of accessible features.
- 1.8 As we stated in our 2020 report our priority this year was to implement TTS. We are very pleased that as of 28th April 2021 TTS was made available on all Sky Q variant boxes in the UK and Ireland. We also intend to be able to launch TTS on Sky Glass next year.
- 1.9 We are committed to making our technology and services such that people with accessibility needs can avail themselves of our products in the same way as customers with no additional needs. Whilst we will not list them in full, we would point Ofcom to Sky’s previous responses that detail many other features, products and apps that can be of assistance to those with

accessibility needs. Elements such as User-Interface ('UI')/EPG navigation features can make using our EPG more user-friendly for all and we have accessible remotes available free of charge. Our Sky Q remote has Voice capability which has many functions creating ease of use, such as being able to change channels and activating accessible services. The functionality is continually being improved allowing all users to conduct increasingly complicated and rich searches through their voice commands. We also have an accessibility section on sky.com which contains lots of support content for our access customers. 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. We also have used, and will continue to use, customers who have identified as having access needs in our research, development, and testing, as was the case with our TTS solution.

- 1.10 Whilst we have made excellent progress towards making our EPG environments increasingly accessible, we will obviously continue to build on these developments and successes. For 2022 onwards we will be continuing to explore potential solutions around magnification requirements. Alongside magnification we are also cognisant that the fundamental design and layout of a UI can be as important (or perhaps even more so) than magnification technology in allowing for an accessible experience. Longer term we want to look beyond features aimed at those with hearing and sight impairments and ensure we improve the EPG for those with other kinds of accessibility needs. We have begun to conduct research around ways to improve the experience for customers with cognitive needs, and we aim to take these insights forward into our work in 2022 and into the longer term.

SECTION 2: 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.
- At Sky we believe that TTS is the most valuable feature to customers who have accessibility needs. We have therefore been prioritising work towards this element.
- As noted above we were delighted that as of April TTS has been available on all Sky Q boxes in the UK and Ireland.
- Whilst full coverage across the entire UI is not possible at this stage, nonetheless we have strived to make TTS available on as much of the UI as possible. We are proud to say that the functionality is not limited to just the linear EPG elements (as required by the Code) and does stretch to many other parts of the 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.
- As the newly launched Sky Glass product uses a different EPG technology our TTS offering is having to be re-worked for this environment. As above, we do however recognise that given the importance of TTS we want to again prioritise extending this functionality to our new product. Analysis is underway and we hope that TTS will be launched on Sky Glass in the first half of 2022.

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 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). All UK PSBs have now either completed, or will complete in early 2022, their work to provide Sky with this data. Sky anticipates a phased roll-out of Sign Language (SL) icons in the EPG for Sky Q and Sky Glass over the first half of 2022, with highlighting capability deployed once the majority of signed content is being flagged.

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.
- Our Sky Q and Sky Glass 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.
- The image-led user interface and focus-based navigation of the Sky Q and Sky Glass 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. Our design teams have been working on this area and we hope to be testing a prototype with customers in the first half of next year.
- As mentioned in the introduction, the fundamental design and layout of a UI can be as important (or perhaps even more so) than magnification technology in allowing for an accessible experience. Based on customer research in this area we have already begun exploring ways to simplify our TV Guide menus and to increase the standard text size that we use. This new design is currently being used on Sky Glass.

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).

2.5 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, will continue to be extended through 2022.