

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 a statement about the steps Sky UK Limited has taken, plans approved over the last calendar year and any significant updates since then on EPG accessibility.
- 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 facilitate the use of its EPG by persons with disabilities, through:
 - (a) Our ongoing User Interface work;
 - (b) The provision of alternative remotes;
 - (c) The use of speaking companion apps;
 - (d) The promotion of awareness of our accessible offering;
 - (e) Seeking external advice and continued insight from accessibility customers.
- 1.5 The Code also calls for EPG providers to implement 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.
- 1.6 Sky does not currently make its EPG available on any New TV Receivers. However, over recent years Sky has made significant steps towards making its EPG more accessible and has already implemented many of the features listed above in paragraph 1.5, as well as numerous other elements that have made our EPG more accessible. This will be set out in more detail below but it is worth stressing that highlighting and high contrast are



available on both the Sky+ HD STB and the Sky Q STB, and whilst these boxes are not capable of running magnification, Sky+ offers the option for larger or bolder font. The main element that is still to be fully implemented is TTS. It should be noted that although TTS has not, as yet, been integrated into the EPG, companion apps are available for customers which provide a very similar experience (see Section 4).

1.7 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 and aiming to make improvements as quickly as possible. Consequently, our EPG areas already contain much of what Ofcom expects to see in terms of accessible features. This good progress over recent years means that inevitably the development that can be done will plateau. Therefore, much of this year's report consists of things that we have maintained from past years that make for an accessible EPG experience. We have however made some small improvements where possible.

SECTION 2: USER INTERFACE WORK

All Sky set top boxes (STBs)

- 2.1 The following facilities referred to in previous submissions have been maintained on all Sky set top boxes:
 - (a) the facility to highlight programmes with subtitles or audio description on the main TV guide listing;
 - (b) 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;
 - (c) the inclusion of 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;
 - (d) 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);
 - (e) the ability to enable a High Contrast setting (which we developed based on insight from the RNIB);
 - (f) the ability to select favourite channels making it easier to navigate between them for customers.

Sky+ HD STB

- 2.2 The following facilities referred to in previous submissions have been maintained 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 'Increase Homepage Font Size' setting in the Accessibility menu. This complements the High Contrast and Bolder Font setting that we had introduced previously and ensures that the font on the rich Homepage we offer can be adapted further;
 - (c) 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.
- Watch Next: the green button to watch next episode (where the episode is available in your Planner) is available in the Search and Scan banner shown during playback and also in the 'end of programme' message.
- 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

- 2.3 The following facilities referred to in previous submissions have been maintained on the Sky Q STB:
 - (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 box 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 box. 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 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.

SECTION 3: REMOTES

- 3.1 We offer a range of remote controls for our Sky+/HD and Sky Q customers.
- 3.2 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).

- 3.3 For Sky Q, 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 box. 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 set top box (note that this function is only available on main Sky Q boxes not multiroom boxes). 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 box.

SECTION 4: SPEAKING APPS

Sky+ App

- 4.1 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.
- 4.2 The app also allows customers to change channels on the set top box, and play content on the set top box, which is of particular use for blind customers using alternative navigation via TTS on the Sky+ App.

Sky Q App

- 4.3 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 box; download on-demand shows to their Sky Q box 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.
- 4.4 Sky has worked hard to ensure the Sky Q 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 Q App.

SECTION 5: PROMOTING AWARENESS OF ACCESSIBLITY SERVICES

5.1 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 Q products, as well as continued information about and access to our dedicated service team.

- 5.2 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.
- 5.3 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.
- 5.4 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 6: CONSULTANCY SERVICES, TRAINING AND ENGAGEMENT

- 6.1 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.
- 6.2 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.
- 6.3 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 and more visually impaired users test our products prior to launch.
- 6.4 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.
- 6.5 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.