

BT response to Ofcom consultation: Prominence and accessibility on connected TV platforms- Draft code of practice and draft guidance on the agreement objectives

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BT Group

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1 Executive Summary

BT Group delivers connected TV services (marketed as EE TV) to consumers via the YouView platform. Ofcom has recommended to the Secretary of State that YouView on EE TV (Sagecom ITE)¹ be designated as a Regulated Television Selection Service (RTSS under the Media Act 2024).

Ofcom is correct to acknowledge the evolving landscape for TV consumers in its implementation of the Media Act 2024. We agree with Ofcom on the continued importance of ensuring audiences (i) can readily find public service content whatever platform they choose to use, and; (ii) that public service content is accessible, where appropriate.

Ofcom's proposals are important in establishing a baseline for the prominence of public service content and for delivering an accessible customer experience. We note that a flexible and future proof framework is crucial, not only to adapt to changes in the commercial landscape, but also to allow room for innovation. Further clarity on how this will work in practice is particularly important to:

- ensure the framework delivers its objectives in practice, and
- maintains alignment particularly as platform design, discovery mechanisms and user behaviours evolve.

We also emphasise the importance of considering how the proposals operate together across the end-to-end user experience (i.e. encompassing Designated Internet Programme Services – DIPS, and 'non-regulated' aspects such as hardware).

Going forward, we urge Ofcom to take a genuinely consumer-centric approach that reflects how audiences actually navigate, discover, and engage with content on connected TV platforms. As user journeys become increasingly content-led and dynamic, the effectiveness of prominence and accessibility obligations should be judged by reference to real-world user experience and outcomes, rather than by reliance on fixed interface structures or positional metrics in isolation. Maintaining coherent, usable and flexible discovery journeys — while preserving user choice and supporting innovation — will be critical if the framework is to deliver meaningful and sustainable benefits for audiences as connected TV services continue to evolve.

¹ Ofcom (2025) [Statement: Designation of Television Selection Services](#)

2 Prominence

Question 1

Do you agree with our approach to considering appropriate prominence and our analytical framework?

We agree with the use of an approach that analyses the functionality of existing user interfaces and note that several aspects of the proposals align with practices that are already evident in the sector. The analytical framework as outlined rightfully prioritises this context and proposals are then assessed on effectiveness. More broadly, we recognise the enduring value of public service broadcaster content and its importance in delivering a range of trusted, high-quality programming to audiences across the UK.

We note, however, that the pace at which connected TV platforms innovate should be a central consideration in designing a sustainable regime and urge Ofcom to establish a process for regular review. As Ofcom notes, user preferences and choices can materially shape how audiences interact with connected TV platforms. It is therefore important that users retain the ability to customise their viewing experience and engage with content in ways that best reflect their individual needs and expectations.

Question 2

Do you agree with our proposals on app menus, and our assessment of their associated impacts?

BT agrees that app menus represent a key route to content for the majority of users and recognises the important role they play in supporting the discoverability of PSB content.

We note that the proposed approach to visibility focuses on ensuring that designated PSB player apps are available and clearly visible with minimal navigation required, which we recognise as central to achieving appropriate prominence for DIPS apps. We also welcome the consistent treatment proposed between DIPS apps and other IPS apps, which we consider important in preserving consumer choice and maintaining a coherent and positive user experience.

The proposed Code also sets out an indicative order in which designated apps should appear within app menus, reflecting their ordering under the EPG Code and associated positioning expectations. We appreciate that these proposals apply only where an app menu exists, and do not in themselves create an obligation to introduce or retain a particular menu structure.

It is important to note, however, that this approach does not necessarily secure visibility in practice, which should remain the overriding objective, as ordering and positioning alone do not automatically deliver appropriate prominence.

In practice, app menus can become de-centred within the broader user experience, for example where navigation is driven through personalised views, content-led entry points or alternative discovery journeys. As a result, and notwithstanding Ofcom's stated intention to focus on outcomes rather than fixed design requirements, the emphasis placed on app ordering and

positionality risks operating in a more prescriptive manner than intended, with potential implications for platform flexibility over time.

We consider it important that the final framework continues to allow platforms sufficient flexibility in how prominence outcomes are delivered in practice. App menus vary across platforms and over time, and increasingly incorporate elements of user personalisation, such as recently used apps or user-defined ordering which this proposal has acknowledged. In applying its framework, Ofcom will therefore need to ensure that expectations around app menu placement remain effective as platform interfaces continue to evolve, and that designated internet programme services are not inadvertently displaced to less visible parts of the user interface. This risk is likely to be mitigated where Ofcom's focus remains on functionality and visibility outcomes, rather than fixed design or positional requirements.

We also note that the app menu proposals sit alongside a broader set of UI-related expectations across primary content areas, search and accessibility. While we recognise the individual merits of these measures, it is important for Ofcom to remain mindful of their cumulative impact on UI design and operational complexity, particularly where platforms seek to maintain a streamlined and coherent user experience.

Question 3

Do you agree with our proposals on primary content areas, and our assessment of their associated impacts?

BT largely agrees with Ofcom's identification of areas beyond the core app menu that contribute to content visibility. In considering prominence within primary content areas, we welcome Ofcom's recognition of the range of UI features through which content is surfaced. We note, however, that this is likely to introduce additional complexity when assessing prominence in practice, particularly given the absence of clear indicators for how different features should be weighted or prioritised. While Ofcom highlights the multiple interacting elements that can contribute to visibility, it remains unclear how these are to be assessed within dynamic user interfaces, where content presentation is shaped by a combination of algorithmic logic, editorial decisions and user behaviour. Given these complexities, we urge Ofcom to remain flexible in any enforcement of the RTSS regime/new code obligations.

The proposals seek to provide flexibility by referring to the 'most prevalent and visible' content rows, without prescribing specific locations or UI formats. While the proposals avoid mandating the introduction of promotional areas or disaggregated content rows, Ofcom also notes that most platforms already use such features, albeit in widely differing ways. This requires these proposals to be applicable across all of these platforms and creates a challenge in determining how appropriate prominence should be evaluated consistently across platforms with different interface designs, update cycles and user journeys, including where services are accessed across multiple device types.

Ofcom states that, taken in the round, programmes from PSBs currently tend to receive less prominence on average than non-PSB programmes across content areas. Further explanation of the specific indicators or analytical inputs underpinning this conclusion would assist in understanding how adherence to the proposals is expected to be measured. The 'TSS review'

subsection of Annex 4 indicates that Ofcom counted ‘the number of immediately visible app tiles on app menus and content tiles in disaggregated content areas’. It would be helpful to understand whether this can be treated as an indicator of prominence.

Some highly prominent user-driven content areas, such as ‘continue watching’ or other personalised rows, fall outside the scope of the proposals. We therefore have concerns about how the prominence of PSB content should be assessed in practice where such areas displace content rows that might otherwise contribute to visibility in line with the suggested approach for primary content areas. Clarification would be helpful on whether user-driven content areas which are ‘immediately visible’, but are neither editorially nor algorithmically curated, and which may appear above editorial or algorithmically curated content rows, are nonetheless considered to form part of the ‘primary content areas’ expected to contribute towards delivering appropriate prominence.

Question 4

Do you agree with our proposals on search, and our assessment of their associated impacts?

BT supports the view that where users actively search for content, public service content should be easy to locate and clearly presented. Ensuring that PSB content is surfaced prominently where it represents the most relevant response to a user query is a proportionate way of ensuring discoverability. We also welcome Ofcom’s recognition of differences in how search functions are implemented across platforms, including text-based and voice-based search.

BT considers that further clarity would be helpful on how expectations around ‘similar degrees’ of prominence in search results are intended to operate in practice. Where PSB and non-PSB content are assessed as similarly relevant to a given search query, the proposals state that they should be given similar prominence when considering the number of programmes in the search, their position, manner of presentation and ‘any other factors’. Search functions, by their nature, present a finite set of content to users. It is therefore important to understand what is intended by prominence in this context, including whether it relates primarily to result ranking, visual emphasis, or a combination of both. Clarification on how this should be interpreted would support consistent application of the Code.

We also note that the proposals on search interact closely with the accessibility objectives set out elsewhere in the Code. Search is a particularly important tool for users with accessibility needs, including those who rely on voice input, screen readers or other assistive technologies. Ensuring that PSB content is clearly identifiable within search results, and that information about accessibility features is surfaced at the point of discovery, can support both prominence and accessibility objectives.

We emphasise the importance of regulatory flexibility given the pace of change in the TV ecosystem, to ensure that new requirements do not constrain innovation in emerging methods of surfacing and searching for content. For example, we have recently introduced AI-driven search functionality on EE TV, which we would not have anticipated even five years ago.

The effective operation of the search proposals will also depend on DIPS providers supplying high-quality metadata. Accurate and comprehensive metadata supports reliable relevance assessment, appropriate attribution, and the effective surfacing of PSB content within search

results. We therefore welcome Ofcom's recognition of the role metadata plays in this context and consider it important that the final framework reflects the shared contribution of platforms and DIPS providers in supporting effective, search-based discoverability

Question 5

Do you agree with our proposals on listed channels, and our assessment of their associated impacts?

BT welcomes Ofcom's proposals on listed channels and supports the alignment of these requirements with the existing EPG framework. We agree with Ofcom's decision to exclude regulated EPGs from the scope of these proposals and agree that the presentation of listed channels on connected TV platforms should provide continuity for audiences. We also agree with Ofcom's assessment that this approach is likely to deliver audience benefits by ensuring that public service channels remain easy to find as viewing increasingly shifts to connected TV environments.

Question 6

Do you agree with our proposals on attribution, and our assessment of their associated impacts?

Clear attribution of public service content to the relevant PSB player plays an important role in supporting informed viewing choices, particularly within increasingly aggregated online TV environments. Effective attribution is also closely linked to the availability of accurate and detailed metadata, which underpins platforms' ability to surface, label and present content appropriately across user journeys. We therefore agree with Ofcom's proposal to seek parity of treatment between PSB and non-PSB content without mandating specific visual treatments and consider that this approach is likely to deliver audience benefits while remaining proportionate and practical for platforms to implement.

3 Accessibility

Question 7

Do you agree with our proposal on alternatives to visual information, and our assessment of its associated impacts? Please provide your reasoning, and if possible, any supporting evidence.

BT supports the objective of enabling users to navigate and understand connected TV services without reliance on visual cues and aligns with Ofcom in emphasising the importance of effective non-visual access. Non-visual access represents an important foundational requirement for accessibility, particularly for users with visual impairments. BT broadly agrees that such measures align with established accessibility best practice and would have a positive impact where implemented effectively.

However, we note that the practical impact of these measures is constrained where equivalent non-visual functionality is not supported within third-party applications. Users may experience a loss of non-visual navigation or feedback once they move from the platform interface into an app. BT therefore agrees with the proposal and Ofcom's assessment of its associated impacts, while emphasising the importance of considering end-to-end user journeys across both platform and app environments.

Question 8

Do you agree with our proposal on text and image enlargement, and our assessment of its associated impacts?

BT supports Ofcom's proposal on text and image enlargement and considers it an important and proportionate accessibility measure. We agree with Ofcom's assessment that the proposal reinforces positive accessibility outcomes with limited associated impacts.

Question 9

Do you agree with our proposal on distinguishable text and images, and our assessment of its associated impacts?

BT supports alignment with recognised accessibility standards and agrees with Ofcom's proposal to ensure that text and images are distinguishable, including through appropriate contrast levels. We agree that this requirement is both feasible and consistent with existing design approaches. BT therefore agrees with Ofcom's assessment that the proposal appropriately reinforces positive accessibility outcomes, with limited associated impacts, especially where it remains aligned to established standards.

Question 10

Do you agree with our proposal on information on accessibility features, and our assessment of its associated impacts?

BT agrees with Ofcom's proposal that users should be clearly informed about the accessibility features available on a service and considers clear signposting to be essential to enabling effective use by consumers.

Question 11

Do you agree with our proposal on labelling of accessible content, and our assessment of its associated impacts?

BT strongly agrees that clearly labelling accessible content within the user interface, and making this information visible prior to content selection, supports informed viewing choices. However, there remain opportunities to strengthen the effectiveness of labelling in practice. BT welcomes the flexibility within Ofcom's proposals to build on this baseline and to support innovation in how accessibility information is presented to users.

Greater consistency in how accessibility information is surfaced across different stages of the user journey would further help ensure that disabled users can utilise services for the same purposes as non-disabled people. BT also notes that accessibility information may become less visible or less consistently presented once users transition from the platform interface into third-party applications, which can reduce the overall effectiveness of labelling for users who rely on access services.

Question 12

Do you agree with our proposal on enabling use of the available accessibility features, and our assessment of its associated impacts?

BT agrees with Ofcom's proposal to ensure that platforms can enable the use of assistance for disabled people, including access services such as subtitles, audio description and signing.

Question 13

Do you have any views or evidence on the effectiveness or impact of any other actions in relation to making use of the RTSS and finding/making use of accessible programming?

BT considers that Ofcom's proposals provide a strong foundation for improving accessibility on connected TV platforms and should continue to evolve as services and user behaviours develop.

There are several areas where further development could materially improve outcomes for audiences. These include greater consideration of how accessibility settings and controls persist across platform-to-app journeys, reducing friction for users as they move between services. There is also scope to build further on the discovery of accessible content, including exploring mechanisms that allow users to prioritise or filter content based on accessibility needs.

Clearer expectations around accessibility during first-time set-up and sign-in processes could also help address potential barriers identified in Ofcom's research and improve accessibility from the outset of the user journey. More broadly, BT considers there would be value in Ofcom continuing to develop a longer-term strategic vision for how accessibility standards on connected TV platforms are expected to evolve, helping to ensure accessibility remains embedded as services become more personalised and technologically sophisticated.

BT encourages Ofcom to consider these areas as part of the ongoing development of the framework, to ensure the regime remains effective, proportionate and future-proof.

4 Guidance on Agreement Objectives

Question 14

Do you agree with our proposed draft Guidance, and our assessment of its associated impacts?

BT agrees with Ofcom's proposed draft Guidance and considers that it provides a proportional framework which supports compliance with the statutory agreement objective. Greater clarity on how compliance can be demonstrated would help provide regulatory certainty, especially as commercial models continue to evolve.

5 Combined impact assessment and implementation

Question 15

Do you agree with the assessment of the combined impact of our proposals when considered as a package?

Taken together, the proposals form a coherent regime that seeks to improve the visibility, accessibility and discoverability of public service content across connected TV platforms, while allowing flexibility in how those outcomes are delivered in practice.

BT consider it important to remain mindful of the aggregate impact of the proposals in practice. Overlapping expectations across multiple UI surfaces could increase implementation complexity, particularly in dynamic and personalised environments. Ensuring continued clarity around how prominence and accessibility outcomes are assessed across the package, and avoiding overly prescriptive interpretations when measures interact, will be important to maintaining flexibility and deliverability over time.

Question 16

Do you agree that 12 months is a reasonable period for all providers to bring themselves into compliance?

Ofcom's proposed 12-month period for providers to bring themselves into compliance appears broadly reasonable in principle. However, its effectiveness will depend on the timing and final form of the Code and Guidance. In practice, implementation may not always correspond neatly to a single-year compliance period. Continued flexibility in managing the transition, including scope for phasing where appropriate, would therefore support proportionate and sustainable delivery.



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