
EPG Accessibility

Annual report on improvements to the accessibility of
Electronic Programme Guides

EPG Accessibility report – [Welsh Overview](#)

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1. Overview

People with visual impairments watch as much TV as others but are confronted with particular difficulties when using TV programme guides (known as electronic programme guides or ‘EPGs’) to find and view programmes.

[The EPG Code](#) sets out Ofcom’s expectation that EPGs should feature magnification, high contrast displays, filtering or highlighting of accessible programmes, and ‘text to speech’ functionality so that they can be used by disabled people.

The report in brief

This is our fourth annual report since amendments to the EPG Code in 2018. We have previously acknowledged that it takes time to implement the changes required. However, we now expect EPG providers either to have implemented the required features or to have clear plans in place to do so, where practicable.

We are grateful to RNIB for establishing a focus group this year which allowed us to engage with users of these features and better understand how they are working for consumers in practice, across a range of devices used to access the EPG (e.g. connected TVs or set-top boxes).

Summary of progress

- All providers now offer high contrast displays. Highlighting of accessible content is widely available but remains to be applied by YouView and STV.
- Only Digital UK provides filtering for broadcast content, a feature which is highly valued by users with sight impairment seeking audio-described programmes.
- There has been some progress on implementing text to speech (‘TTS’) functionality, otherwise known as ‘speaking EPGs’. Sky now provides TTS across all Sky Q boxes, and Digital UK offers an innovative solution using a separate EPG accessed via Channel 555 on nearly all Freeview Play devices. Other providers use the separate functionality of mobile operating systems, some smart TVs (Freesat) or integration with digital assistants such as Amazon Alexa (YouView), which do not yet offer functionality equivalent to TTS.

EPG providers should:

- include more detailed evidence in their reporting on how they have made ‘reasonable endeavours’ to put into operation, the required accessibility features
- focus on implementing filtering and TTS functionality
- engage with user groups

Ofcom will:

- continue to ask EPG providers voluntarily to provide information about additional measures they have taken to improve ease of access across their user interface
- instigate roundtable discussion to promote collaboration and best practice sharing both between EPG providers and between them and their manufacturing partners.

2. Background

Visually impaired people

- 2.1 There are over two million people who experience sight loss in the UK today and this is expected to increase dramatically because of an ageing UK population. Sight loss is also strongly linked to certain conditions such as diabetes and obesity - the rates of which are both going up. The number of people with sight loss is estimated to rise to 2.7 million by 2030. By 2050, the current figure will double to over four million.¹
- 2.2 Television is also seen to help people to cope with social isolation, to which older people are particularly prone. The Covid-19 outbreak and subsequent lockdown periods have once again highlighted the importance that TV can play in people's lives and especially the need for it to be accessible to all.
- 2.3 Many programmes can be understood and enjoyed without perfect vision. Some television programmes (e.g. news, documentaries) rely heavily on speech, and others are accompanied by audio description. Most people with visual impairments will have watched television regularly before their sight was impaired and will not want to give up a familiar and enjoyable activity.

Electronic Programme Guides (EPGs)

Ofcom's powers in relation to EPGs

- 2.4 The EPG Code sets out the practices to be followed by EPG providers to secure that people with visual impairments can use EPGs in the same way that people without such disabilities use them (see Annex 1). In June 2018 following [consultation](#), we made [amendments to the Code](#) (originally drawn up under subsection [310\(3\) of Communications Act 2003](#)).²
- 2.5 These amendments required EPG providers to use 'reasonable endeavours', so far as practicable, to include facilities for users to do all or as many as possible of the following:

¹ RNIB, 2015. [Key information and statistics](#).

² EPGs contain the listing and promotion of television programmes, as well as features that enable the user to access programmes. Access to programmes listed and promoted within the EPG is dependent on the data transmitted as a broadcast signal.

The Four Key Accessibility Features³

- **Text to speech ('TTS')**: the facility to “render text needed for EPG navigation and the provision of information on channels and programmes included in the EPG as speech”. TTS is a key accessibility feature for those with more serious sight impairment.
- **Highlighting or filtering**: the facility to “highlight or list separately programmes with audio description, and with signing”.
- **Magnification**: the facility to “adjust the display of EPG information so that it can be magnified, or the text enlarged”.
- **High-contrast displays**: the facility to “select a ‘high-contrast’ display”. A television's contrast ratio refers to the difference in light between the brightest whites and the darkest blacks that a display can produce.

- 2.6 Providers can use ‘equally effective’ measures to provide these features within their EPGs. This is to enable providers to use innovative methods and provide flexibility for developments to take place within the market based on developing consumer preferences. We made clear in our [2018 statement](#) that in determining what measures are ‘equally effective’ we would look at factors including whether they provide the same functionality and do not involve significant additional complexity or cost to consumers. Those affected by sight loss are more likely to be financially vulnerable, with 39% of visually impaired people of working age saying they have difficulty in making ends meet.⁴
- 2.7 EPG providers are required to produce an annual statement of the steps they have taken to implement these features and the steps they plan to take to better facilitate the use of their EPGs by disabled people. Ofcom produces annual reports on the providers’ progress and compliance. Our reports also serve as guides to consumers on where they can find accessible EPGs.⁵
- 2.8 EPGs are licensed by Ofcom as television services and their providers must comply with [the EPG Code](#). The EPG providers for the relevant period to November 2021 were: BT, Digital UK for Freeview, Freesat, Sky, STV, Virgin Media and YouView. STV no longer provides a regulated EPG, and unless that position changes we will not report on them in future.

Market Context

- 2.9 EPGs remain the most popular way of finding out what is on live TV. The most recent data show that this is broadly similar across age groups, with 44% of adults aged 16-34 reporting to use EPGs compared to 45% of all adults.⁶ Digital UK estimates there to be 175,000

³ Paragraph 19, [EPG Code](#).

⁴ RNIB, 2015. [‘My Voice’ report](#).

⁵ Ofcom has a duty to regularly examine the sections of the [EPG Code](#) relating to prominence and requirements to support fair and effective competition, and set out our [decision](#) to retain competition rules on EPG providers. Accessibility will always be considered throughout these changes and any further work Ofcom undertakes in this area.

⁶ BARB/Additional Panel Classifications (APCs), 2020. Participants of the survey answered the question “how do you find out about what is on TV?” and could select more than one response.

monthly users of their Accessible TV Guide on its Freeview service, which allows audiences to filter programmes with subtitles, audio description or sign language and use TTS navigation.⁷ Features which increase accessibility are increasingly being used by all audiences, not just people who are hearing or visually impaired.⁸

- 2.10 EPG licensees have varying levels of control over the elements needed to deliver accessibility features depending on their involvement in the design, development and distribution of TV receivers. Providers that have a direct relationship with end-users of their EPGs, such as Sky and Virgin Media, typically enjoy a large degree of control over the features of set-top boxes produced for them by contract manufacturers, including those related to accessibility. Those with an indirect relationship with end-users, such as Digital UK who licences the use of its EPG to other device manufacturers, enjoy less control over the ultimate delivery of EPG accessibility features.⁹
- 2.11 We also recognise that EPG providers face other factors which may affect the delivery of accessibility features. For example, strategic partnerships, can present opportunities to share development costs and device technology but also risk complicating processes for agreeing changes to product specifications, including in relation to the provision of accessibility features.

⁷ [Digital UK submission](#).

⁸ [Ofcom's technology tracker](#) found that 60% of Pay TV consumers make use of voice controls through digital assistants and device voice command functions. [Research by Stagertext](#) found that 80% of 18–24-year-olds use subtitles some or all of the time while watching TV, despite only 10% of the same group having a hearing impairment.

⁹ Television and set-top box manufacturers can carry Digital UK's EPGs while varying other components of design, so long as they meet a core set of product specifications. In 2021, this specification was updated to include carriage of Freeview's ATVG, which includes all accessibility features listed in the EPG Code.

3. Annual report on EPG Accessibility

- 3.1 This report covers the third full year of reporting. In keeping with last year, our focus is on the providers and the individual progress that has been made. Providers' non-confidential submissions are published in full alongside this report and can be [found here](#). A summary of the features available at the time of reporting can be found in Annex 2.

Key Findings

More EPGs are accessible but some still lag behind in filtering accessible content and 'text to speech' functionality

- 3.2 We understand that implementing the new Code requirements takes time, however, providers have now had a reasonable length of time to implement the four key accessibility features or equally effective measures.
- 3.3 We are pleased to see that every provider has now implemented high contrast displays on their EPGs. We are also encouraged by the progress of some providers and the innovative approaches taken, for example Digital UK's Accessible TV Guide (ATVG) is now available on nearly all Freeview Devices. However, there is still work to be done as many EPG providers do not offer all the required accessibility features or equally effective alternatives, or only offer them on a subset of their devices.
- 3.4 Only two providers (Digital UK and Sky) currently offer TTS, while only Digital UK offer both filtering and highlighting capabilities. Some providers, such as Virgin Media, have clear plans in place to introduce remaining features to existing devices, in this instance a clear timeline for the introduction of TTS. However, others have not offered timelines for the implementation of remaining features, including YouView's delivery of TTS. We are disappointed that more EPG providers are not outlining clear plans to implement TTS, and while we encourage innovative solutions, digital assistants do not currently offer functionality equivalent to TTS and our RNIB focus group participants said that further development would be needed for it to be comparable.
- 3.5 While highlighting is available on most regulated EPGs (the exceptions being YouView and STV), filtering is only available on Digital UK's EPGs. We would like to underline the importance of filtering, namely the aggregation of accessible content in one place. Highlighting on the other hand simply refers to the signposting of accessible content, for example clearly displaying the 'AD' 'SUB' and 'SL' initials on the EPG. While the Code requires highlighting 'or' filtering to be implemented, the ability to clearly identify and find content with audio description continues to be raised as a key issue by access service users, and we hope providers will make reasonable endeavours to provide both these features.

With new methods of delivery, there are fewer obstacles to providing the required accessibility features

- 3.6 Given that changes to the EPG Code were made nearly four years ago, we would expect considerable progress to have been made by this stage, or detailed accounts of the cumulative impact of providers' reasonable endeavours to improve accessibility of their EPGs.
- 3.7 EPG providers are required to report on the accessibility features provided in new models of TV receivers that began development after July 2018, and any subsequent models. If a device was in development prior to July 2018, but updated versions of the model have since been launched, we would expect providers to act within the spirit of the Code by endeavouring to implement these accessibility features – unless there are good reasons for being unable to do so. This particularly applies where providers have a dominant product in their offering that is regularly updated, as opposed to releasing new devices.
- 3.8 Stumbling blocks faced by EPG providers may include the technical difficulty of providing such features; relatively few people using the specific model in question; or where the costs are unduly burdensome. If the latter is relevant, it would be helpful for Ofcom to gain an understanding of the estimated costs. And where the inclusion of accessibility features forms part of a broader series of updates, it is worth considering whether these costs can be absorbed as part of the wider development work. We also acknowledge that where an EPG provider is reliant on equipment from device manufacturers, they may have less control over the production process. In such a scenario, we expect the EPG provider to use any influence they have over these third parties to implement accessibility features.
- 3.9 Technological development of TV receivers by EPG licensees and device manufacturers continues to improve, which has the potential to enhance the functionality of existing accessibility features. The continued transition to delivery of features via an internet connection ('IP delivery') has reduced the cost and hastened the roll out of features such as TTS navigation, which EPG providers have previously cited as technologically complex and costly to deliver. We also recognise that IP delivery of features allows EPG licensees to push out improvements by software updates without requiring consumers to upgrade their device, which typically incurs an additional cost. We hope this will reduce the obstacles faced by EPG licensees in providing accessibility features and allow consumers to benefit from more regular and less costly updates in the future.
- 3.10 The transition to IP delivery has also facilitated the roll out of complimentary accessibility features to those specified within the EPG Code. For instance, the development of voice search engines and integrated digital assistants allows users to search video content from various services using their voice and execute basic navigational commands.¹⁰ While not required under the EPG Code or considered a substitute for TTS navigation, we welcome such innovations where they may enhance the accessibility of EPGs further.

¹⁰ We recognise that features seeking to provide accessible means of navigating EPGs (such as integrated voice assistants) tend to rely on the provision of data by third parties which often falls outside the control of EPG providers.

- 3.11 While we recognise that not all households are connected to the internet, only 0.4% of UK properties are unable to receive a decent broadband connection (at least 10Mbit/s download speed), and therefore do not consider IP delivery of accessibility features to be prohibitive.¹¹

More needs to be done to make people aware of where EPGs are accessible and where they are not

- 3.12 Paragraph 24 of the [EPG Code](#) states that EPG providers should offer information for people with disabilities on how to use the EPG and the access services accompanying the programmes.¹² This provision highlights the importance of providing easily accessible information as to what features are available on devices and the endeavours Ofcom expects EPG providers to undertake to meet this requirement. This year we also asked for information on additional measures on a voluntary basis taken by the providers to improve ease of access more generally for those with visual impairments beyond the four key accessibility features. Below we outline the extent to which the regulated EPG providers publicise this information, and other additional measures taken.

Royal National Institute of Blind People Focus Group

- 3.13 Earlier this year, we engaged with the Royal National Institute of Blind People (“RNIB”) on the current status of EPG accessibility. It organised a focus group in early March to provide insights into the key concerns of blind and partially sighted people when using and navigating EPG’s. The focus group included 6 people with visual impairments including participants with some vision and participants with little or no vision. This was not a representative group but provided important understanding of the value of various EPG features to the people who need and use them in practice.
- 3.14 The key themes raised by the focus group around EPG accessibility are summarised below:
- a) TTS navigation highly valued, but participants expressed frustration that it often did not extend to all parts of the TV platform, such as third-party applications.
 - b) Voice command and search functionality was also highly valued. Participants praised Sky Q’s voice command feature in particular; one participant commented that it facilitated independent navigation of the TV without reliance on the support of a partner. However, participants expressed a frustration that voice command functionality across all platforms often did not extend to all features needed for navigation.

¹¹ Ofcom, [Connected Nations 2021](#). ‘Decent’ broadband entails a service of at least 10Mbit/s download speed, and 1Mbit/s upload speed from either fixed or fixed-wireless networks.

¹² This information should be on an easily accessible part of their EPGs or alternatively in other accessible ways (e.g. on websites). EPG providers are required to work with broadcasters, platform providers and disability groups to publicise the information and facilities available on EPGs to assist disabled people.

- c) Listed information on EPGs about access services is not always accurate or reliable, in the experience of the participants, leading to a continued reliance on websites over EPGs to find out information about upcoming TV schedules and content with access services.

Progress report on EPG providers

DigitalUK

Main features

- 3.15 This year, Digital UK has continued to roll out its Accessible TV Guide (ATVG), a separate EPG accessed through channel 555, which is now available on 94% of connected Freeview Play devices already in the market. The ATVG offers all four accessibility features using an innovative solution to get around some of the challenges presented by hardware-based solutions. Digital UK provides a live list of device models that carry its ATVG on its [website](#).
- 3.16 We are pleased to see Digital UK is continuing to explore the final 6% of compatible devices, but we acknowledge that these remaining devices largely consist of devices produced before July 2018. In January 2021 the ATVG was added to the Freeview Play conformance process¹³ meaning new device models may be rejected if they are unable to support the ATVG.
- 3.17 Digital UK has informed Ofcom that approximately one 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. Digital UK has explained it will continue to work with manufacturing partners to try and resolve this issue.
- 3.18 The full ATVG provides TTS and the ability to filter and highlight accessible content. The AVTG allows the user to select its accessibility preferences upon first use, and these choices will be saved and used to select what is shown on the guide from that point forward.
- 3.19 The ATVG displays text content double 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). 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. The ATVG also has a display with a minimum of 7:1 contrast ratio, with some areas providing higher contrast than this.

¹³ The Freeview Play conformance process is the device test manufacturers must take before new device models can receive the Freeview Play trademark.

Additional areas

- 3.20 Digital UK provides additional measures to improve EPG accessibility, for example the Freeview mobile app TV Guide can become a talking initial EPG if the user switches on iOS Voice Over or Android TalkBack.
- 3.21 Digital UK provides an online EPG on its website¹⁴ which has accessible view capabilities and highlights accessible programming available via a user's TV. It also provides support services across multiple avenues depending on user preference or need, including a telephone advice line, webchat on the website, and FAQs/how-to videos for self-help. Its 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.
- 3.22 Last year, Digital UK reported that it has worked closely with accessibility groups and ensured the feedback was taken on board at each stage of development of the new accessible TV guide. The Accessible TV Guide won Gold at this year's Connected TV Awards for 'Advancing the User Experience'.¹⁵ This year it has confirmed the response from users and advocacy groups has been positive, with AbilityNet¹⁶, Henshaws¹⁷ and Hearing Link¹⁸ promoting and reviewing the product.

Ofcom response

- 3.23 Digital UK has made excellent progress this year in launching its ATVG on the vast majority of compatible devices and is actively pursuing roll-out on the few remaining devices. It is important that visually impaired consumers have access to information about what accessibility features are available for them, therefore we are pleased that a live list of device models compatible with the ATVG is available on its [website](#).
- 3.24 There are legacy Freeview-only devices that are not capable of carrying the ATVG. This is significant for users of these devices, but we understand that these devices were predominantly produced prior to July 2018, before the current EPG Code requirements were introduced.
- 3.25 As explained in our [previous report](#) in greater detail, Digital UK engaged thoroughly with user-groups and charities to inform decisions for the ATVG and additionally has sought feedback on its key accessible features following the launch.

¹⁴ [Freeview TV Guide](#)

¹⁵ Videonet, 2020. [Videonet Connected TV Awards](#).

¹⁶ AbilityNet is a company and charity to support people of any age, living with any disability or impairment to use technology to achieve their goals at home, at work and in education.

¹⁷ Henshaws is a charity that helps people living with sight loss and a range of other disabilities, providing support, advice and training, enabling people and their families to build skills.

¹⁸ Hearing Link is a UK-wide charitable organisation for adults with hearing loss, their family and friends.



Main features

- 3.26 TTS is not available on Freesat's set-top boxes; however it is available as a function on some compatible smart TVs through which the Freesat EPGs are available. Similarly, Freesat has no magnification features of its own, but is compatible with the zoom functionality on some smart TVs. It does not currently have filtering capabilities, but does offer highlighting for subtitles, audio description and sign language.
- 3.27 Last year, Freesat introduced high-contrast displays on its new generation of 4K set-top boxes, with a display contrast ratio of at least 7:1, and a dedicated high-contrast user interface (UI) with a contrast ratio of at least 18:1. Some Freesat-enabled smart TV's also have high-contrast displays.¹⁹ Freesat also provides an audio beep feature that indicates when audio description is available for the highlighted or selected programme on the EPG.
- 3.28 Freesat has recently merged with Digital UK, having been acquired from its shareholders (BBC and ITV) earlier this year.

Additional areas

- 3.29 Freesat has additional measures in place to improve EPG accessibility, for example providing dedicated subtitle and audio description remote control buttons.
- 3.30 Freesat did not report any engagement with charities in the development of its EPGs.

Ofcom response

- 3.31 While we are encouraged to see that all four accessibility features are available in some locations, we are disappointed not to be able to report on timelines for the full implementation of the features across all Freesat-enabled TVs or across Freesat set-top boxes and that no real improvement has been made since last year.
- 3.32 We understand that the integration of Digital UK and Freesat may initially have adversely affected the timeframes for implementing the features. We hope in time it will bring the current and future accessibility features offered on Freeview to Freesat.
- 3.33 We recommend that Freesat engage with charities and consumer groups in the future to gain insight into the benefits of improving the availability of accessible EPG features universally across its devices. We will continue to engage with Freesat over this issue.

¹⁹ For the Freesat 4K range of set-top boxes, the high-contrast feature displays all of the UI in high-contrast (black/white). For the relevant smart TVs, the TV manufacturers determine where and how this is implemented.



Main features

- 3.34 Sky completed development of its TTS solution and has made this feature available on all Sky Q variant set-top box models in the UK and Ireland. While TTS is not available across the entire UI at this stage, Sky have confirmed that the functionality covers both the linear and on demand EPG elements and the function can be activated via voice commands.
- 3.35 While Sky doesn't yet offer filtering of accessible content, all Sky EPGs have the facility to highlight programmes with subtitles and audio description and have the ability to enable a 'beep' to be heard if AD is present when scrolling. Sky anticipates a phased roll-out of Sign Language (SL) icons in the EPG for Sky Q over the first half of 2022, having notified broadcasters of the capability in a new EPG specification to supply Sign Language metadata element, which all PSB's have now either completed, or will complete in early 2022.
- 3.36 Although Sky does not offer magnification across all its set-top box models, the font can be made larger or bolder on the Sky+ HD set-top boxes. Sky has stated that it is exploring ways to simplify its TV Guide menus and to increase the standard text size used, and that the design team has been testing a prototype with customers in the first half of next year.
- 3.37 All Sky's set-top boxes provide the 7:1 high-contrast ratio requirement as a minimum, which Sky developed based on insight from RNIB. Sky has met this requirement every year since our first report.

Additional areas

- 3.38 Sky has taken additional steps to improve EPG accessibility, including providing accessible remotes to customers free of charge. Older models of Sky Q and the new Sky Q 1TB UHD boxes offer a high-end user interface with artwork and imagery.
- 3.39 Sky Q enables users to exercise various functions through voice commands, such as navigating the user interface and performing content searches. Sky continually improves this feature to allow users to conduct increasingly complicated and rich searches through voice commands.
- 3.40 Sky Glass, Sky's in-house developed smart TV platform which launched in October 2021 intends to carry accessibility features on an equivalent basis to Sky Q. At present, highlighting of accessible content, text magnification and high contrast display options are available on Sky Glass, in addition to voice search functionality. Sky also plans to roll out TTS on its Glass platform in the first half of 2022.

Ofcom response

- 3.41 We are pleased to see that Sky has successfully rolled out TTS, and it is particularly encouraging to see that the TTS functionality is not limited to the linear/broadcast

elements of the EPG (the Code requirement) but also other aspects such as on-demand content. The value of TTS is emphasised by charities and user-groups, including the RNIB who praised Sky's voice guidance and command functionality in our recent focus group.

- 3.42 We are pleased to see concrete timelines and proposals for the introduction of magnification of accessible content across all of its devices in the future, however we would like to be made aware of timelines for introducing filtering of accessible content.



Main features

- 3.43 Virgin Media has now successfully introduced both magnification and high contrast displays on its TiVo and Horizon platforms. The Horizon platform, available through the TV 360 box, is also capable of highlighting audio-described and subtitled content but does not yet have the ability to filter this content into aggregated areas.
- 3.44 Virgin Media says it is continuing to work on the development of TTS functionality, with the aim to deliver this during the first half of 2022, and that it intends to engage with Ofcom as it finalises the development and testing of this functionality.

Additional areas

- 3.45 The Horizon platform offers voice command functionality, allowing users to exercise basic commands using their voice, including activation of access services such as subtitles (where available) and navigation of content.
- 3.46 Virgin Media has not reported any recent engagement with user-groups or charities, but in 2018, the DAC reviewed Virgin Media's plans for the new Horizon platform, and Virgin Media has confirmed that it plans to work with them throughout the continued development of the platform.

Ofcom response

- 3.47 Virgin Media has made some progress this year in successfully introducing two of the four features and highlighting capabilities. It is encouraging that Virgin Media has provided clear timelines on when it aims to deliver TTS capabilities across the platforms and voice command functionality is also likely to improve accessibility of user interface navigation. However, it is disappointing that filtering is not yet available, and that Virgin Media has not provided Ofcom with specific timelines for its plans to implement this feature.
- 3.48 Virgin Media has not reported any specific recent engagement with user-groups or charities, but it has stated it intends to continue to work closely with DAC to gain their

support now that the product has launched and carry out further testing to ensure that the platform remains accessible.



3.49 YouView is a joint partnership of broadband providers and broadcasters that includes BT and TalkTalk, who market TV services that utilise YouView's EPG. BT and YouView have historically held separate EPG licences and provided separate submissions for this year's report. However, we understand that YouView provides the EPGs made available via Sony smart TVs and devices including BT and TalkTalk TV set top boxes²⁰, which are considered in this section. BT's submission confirms the information provided by YouView in relation to the accessibility of the relevant BT set top box services. This section looks at whether YouView has made reasonable endeavours to implement the required accessibility features.

Main features

- 3.50 YouView does not currently provide TTS capability on its set-top boxes. It offers filtering and highlighting of some subtitled and audio described on-demand content in a separate UI (which does not form part of the regulated EPG) on newer set-top boxes but does not yet provide it for broadcast content on the EPG. YouView repeated last year's statement that it will aim to make efforts to incorporate this feature on future set-top boxes.
- 3.51 YouView offers magnification within its set-top boxes through a zoom function and provides the 7:1 contrast ratio requirement as a minimum across all generations of YouView set-top boxes.

Additional areas

- 3.52 YouView offers an integration with existing separate Amazon Alexa devices on newer set-top boxes that allow the use of the digital assistant to search on the box using speech.
- 3.53 YouView highlighted the work it has done in the past with user-groups and charities but did not comment on any recent developments or collaboration. In 2016 YouView presented its high contrast displays and magnification capabilities to RNIB, the DTG Accessibility Group and they were tested by the DAC.

Ofcom response

- 3.54 YouView provides two of the four key accessibility features 'built-in' across its set-top boxes. While YouView has confirmed that it will make reasonable endeavours to make filtering and highlighting of linear content and TTS available, we are disappointed it is not

²⁰ Where the EPG uses the YouView platform.

more transparent and publicly forthcoming on the detail of how and when it will meet the requirements. We need YouView to provide us with sufficient evidence in order to assess the extent of their endeavours.

- 3.55 Our engagement with RNIB leads us to believe that while digital assistants can be a valuable tool, their value can be limited if their functionality does not extend to all parts of the UI and third-party services. Further development to provide greater information and features through these assistants should be considered.



Main features

- 3.56 While STV was a regulated EPG provider for the relevant period of this report (to November 2021) STV is no longer a regulated EPG.
- 3.57 STV's TV Guide can be accessed in various locations by its audience on the STV Player; it can be accessed through [stv.tv](https://www.stv.tv) or through the STV Player apps for Android and iOS. Voiceover support for the TV Guide is available on its [browser](#) and through the STV Player mobile apps.
- 3.58 Filtering and highlighting of accessible content are not currently available on the TV Guide. This year magnification has been made available in all locations STV provides the 7:1 contrast ratio requirement as a minimum on its browser.²¹

Additional areas

- 3.59 STV provides dedicated SUB and AD buttons on its remote control and an easy on/off toggle function.
- 3.60 STV did not report any engagement with user-groups or charities in the development of its EPGs. STV did say that the presentation of information on the STV player is still being user-researched and improved upon.

Ofcom response

- 3.61 While STV no longer provides a regulated EPG, it made a promising start to meeting Ofcom's accessibility requirements and we hope it continues to develop to exemplify good practice.

²¹ For more information on STV's TV Guide and its Channels page, please see [STV's response](#).

Next steps

For EPG providers

- 3.62 In our previous report, we encouraged providers to give more detailed evidence that they have made ‘reasonable endeavours’ to implement the four accessibility features. This must include timelines for feature delivery and the effectiveness of alternative measures, in addition to limiting their confidential aspects to the minimum necessary to protect commercial sensitivities. We need to restate these expectations this year and will highlight them in our information requests to the providers in the future.
- 3.63 We also need to restate the importance for the EPG providers to make faster progress on implementing TTS. TTS is only provided by two EPG licensees (Digital UK and Sky) and the use of digital assistants has been offered by other providers as an alternative. We understand from engagement with RNIB and others that such assistants can be valuable accessibility tools, but that their functionality is often limited, particularly when limited to voice search, and further improvements for their use by people with visual impairments are needed. For them to be an appropriate alternative to TTS, providers should consider how digital assistants can be used to supply information to audiences comparable to that which would be provided by a speaking EPG.
- 3.64 At a time when audience habits and technology are rapidly changing, it is of utmost importance that EPG providers engage with user-groups, charities and trade bodies that represent people with disabilities or impairments. This is particularly important when considering alternate or additional steps that can supplement the four key accessibility features.
- 3.65 Our recent engagement with RNIB highlighted the importance of consistency in the features of TV receivers and how they interact with other devices in the user's experience, or other elements in the UI such as third-party apps. We encourage EPG providers to carefully consider the full user journey for someone with sight loss and how their products fit into a wider experience. In particular, we would like to see EPG providers consider how accessibility features might be extended to third party applications which sit alongside their regulated EPGs. Ofcom’s accessibility requirements represent a baseline to ensure that television services can be enjoyed by all audiences. However, it is the experience of these audiences that should be the primary motivator and focal point when developing accessibility features.

For Ofcom

- 3.66 This year we have highlighted the importance of providing easily accessible information as to what features are available on devices and the endeavours Ofcom expects EPG providers to undertake to meet this requirement. We will continue to ask on a voluntary basis for information on additional measures taken by the providers to improve ease of access more generally for those with visual impairments and hope to see more endeavours

from providers to publicise easily accessible information for their existing and potential users.

- 3.67 In assessing EPG provider performance this year, it has once again been evident that true accessibility requires efforts both from regulated EPG providers and from other parties such as device manufacturers. We also see benefit in EPG providers coming together to share solutions and best practice in this area.
- 3.68 Over the next year Ofcom intends to drive further progress through promoting collaboration and best practice sharing both between EPG providers and between them and their manufacturing partners. We will instigate roundtable discussions and more generally strongly encourage EPG providers to engage with each other to optimise benefits for their visually impaired customers.

A1. Relevant EPG Code provisions

A1.1 The EPG Code sets out the following in relation to assistance to people with hearing and/or visual disabilities:

- a) general principles with which EPG providers must comply. Amongst these is a required practice to make such adjustments to their EPGs as are practicable to secure that they can be used by people with disabilities affecting their sight or hearing for all the same purposes as they are used by other people (paragraph 17(a));
- b) an expectation that the needs of people with disabilities affecting their sight or hearing should be an integral part of planning for the future development of EPGs. To this end, Ofcom expects EPG providers to consult disability groups about the way they meet their obligations under the code, and to work with disability groups, broadcasters and set-top box manufacturers on ways of improving usability (paragraph 18);
- c) that EPG providers should use 'reasonable endeavours so far as practicable' to secure accessibility features or 'equally effective measures' including text to speech, highlighting or listing, display adjustments for magnification or text enlargement and high-contrast displays (paragraph 19);
- d) an expectation that EPG providers work with manufacturers of TV receivers to make the accessibility features listed in paragraph 19 available in new models and any subsequent models, unless the associated estimated costs show that the adoption of any specific accessibility feature would be unduly burdensome (paragraph 20);
- e) a practice for EPG providers to produce annual statements of the steps they have taken and plan to take to facilitate the use of their EPGs by disabled people, specifying which steps they have taken to comply with paragraph 19 (paragraph 21);
- f) a reminder of the obligations EPG providers have under the Equality Act 2010 to make reasonable adjustments in the provision of facilities and the delivery of services so as to make these accessible to disabled people (paragraph 22);
- g) a practice for EPG providers to ensure that programme information denotes whether access services are provided, using standard acronyms: S (subtitling), SL (sign language) and AD (audio description) (paragraph 23);
- h) a practice for EPG providers to provide information for people with disabilities about assistance in relation to programmes (e.g. how to use the EPG) (paragraph 24); and
- i) a practice for EPG providers to work with broadcasters, platform providers and disability groups to publicise the information and facilities available on EPGs to assist disabled people (paragraph 25).

A2. Summary of available features

KEY
+ Full feature available across all relevant devices
< Available on some devices or through alternative solutions
* Not available on any device or through alternative solutions

EPG Provider	Text to Speech	Filtering	Highlighting	Magnification	High contrast displays
DigitalUK (Freeview)	Yes + ATVG available on 94% of all devices	Yes + For linear content ATVG available on 94% of all devices	Yes + ATVG available on 94% of all devices	Yes + ATVG available on 94% of all devices	Yes + ATVG available on 94% of all devices
Freesat	Yes < Available through some smart TVs	No * Currently unavailable	Yes < Available through some smart TVs	Yes < Available through some smart TVs	Yes < Available on Freesat 4K boxes and some smart TVs
Sky	Yes + TTS available on majority of UI on Sky Q box models	No * Currently unavailable	Yes < For subtitles and AD, SL will be available in 2022	Yes < Available on Sky+ and Sky+ HD set-top boxes	Yes +
Virgin Media	No* Aims to deliver this in the first half of 2022.	No * Currently unavailable	Yes + Available on Horizon and TiVo boxes	Yes + Available on Horizon and TiVo boxes	Yes + Available on Horizon and TiVo boxes
YouView (inc. BT and TalkTalk)	No * Amazon digital assistant available on newer devices	No * Is available for on-demand content.	No * Currently unavailable	Yes +	Yes +
STV	Yes < Voiceover support in some locations	No * Currently unavailable	No * Currently unavailable	Yes +	Yes +