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# EPG Accessibility Report 2022/23

Progress report and future approach to accessibility

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[EPG Accessibility Report 2022/23](#) – Welsh Overview

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# 1. Overview

- 1.1 Disabled audiences, especially those with hearing and sight impairments, are often confronted with particular difficulties using TV programme guides (known as electronic programme guides or 'EPGs') to find and view programmes.
- 1.2 The EPG Code sets out Ofcom's expectation that EPGs should be accessible to all audiences, including those with disabilities. Each year Ofcom publishes a report on progress made by EPG providers in making their EPGs more accessible.

## EPG Report: What we found in brief

Most EPG providers have improved or extended the availability of accessibility features set out in the EPG Code since our last EPG Accessibility Report.<sup>1</sup>

### Sky and Virgin Media

Sky and Virgin Media have introduced new accessibility features since our last report. Sky now offers **three of the four accessibility features set out in the EPG Code; Virgin Media offer all four**. Sky and Virgin Media have also extended, or have plans to extend, the availability of accessibility features across their full range of television products (including devices not captured by the EPG Code).

### Everyone TV (Freeview and Freesat)

Everyone TV has extended the availability of accessibility features on Freeview and taken efforts to make audiences aware of the accessibility services available on Freeview Play devices. **All four accessibility features are available on Freeview EPGs via its Accessible TV Guide (ATVG).**

The accessibility features available on Freesat continues to lag behind Freeview. **One accessibility feature is available on certain Freesat devices; an additional accessibility feature is available partially on all Freesat supporting TVs and Freesat devices.** We note the challenges Everyone TV has faced and expect to see further progress by next year's submission.

### YouView

YouView devices remain unchanged since our last report. **Two accessibility features are available on YouView devices.** We understand that YouView is not available via any new TV receivers that began development since the EPG Code was revised in 2018 but we expect YouView to consider the accessibility requirements in any future product developments or updates.

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<sup>1</sup> See section 2 for an overview of Ofcom's powers in relation to assessing progress made by EPG providers, and the accessibility features EPG providers are required to offer.

### Next steps: Future of EPG accessibility

We recognise that audiences are increasingly consuming content in diverse ways. Whilst still a primary means of discovering and accessing television programmes, EPGs increasingly form one part of user interfaces which integrate content from a variety of sources and via various delivery methods.

In the second section of this year's EPG report, we review how audience behaviour is changing in light of new television services and highlight the continued importance of accessible service design to continue to support disabled audiences in a more fragmented media landscape.

Alongside this report, we have published a [consultation on updating our Accessibility Best Practice guidelines](#). The consultation proposes changes to the guidelines, including by expanding them to include advice for providers of video-on-demand (VoD) services. We will also be carrying out research among disabled audiences to further inform our final decisions on the guidance.

## 2. Background

### What is an EPG?

'EPG' stands for Electronic Programme Guide, sometimes referred to as a 'TV guide'. It's an on-screen menu that tells users what TV programmes are available on their television. EPGs allow users to navigate through different programmes and channels to help find specific programmes to watch, provide a means of selecting or accessing those programmes, and allow users to see what programmes will be available in advance. An EPG can normally be found by pressing a button, such as 'Guide', on the remote control of a TV or set-top box.

- 2.1 EPGs are a primary way audiences find and view television programming. Disabled audiences, especially those with hearing and sight impairments, are often confronted with particular difficulties in using EPGs to access television programmes, which may not have been designed with consideration of accessibility issues in mind.
- 2.2 EPG providers are required to produce an annual statement of the steps they have taken and plan to take to facilitate the use of their EPGs by disabled people. Each year Ofcom publishes a report setting out the progress made by providers in making their EPGs more accessible to use (see section 3).
- 2.3 We recognise that audiences also access television programmes through means other than EPGs, and that EPGs are often just part of the user experience. In section 4 of this report, 'Future of EPG Accessibility', we consider how other aspects of television services are used by disabled audiences.

### Ofcom's powers in relation to EPGs

- 2.4 The EPG Code<sup>2</sup> sets out the practices to be followed by providers to secure that people with disabilities can use EPGs in the same way that people without disabilities use them.
- 2.5 Under amendments made to the code in 2018,<sup>3</sup> EPG providers are required to use 'reasonable endeavours', so far as practicable, to include facilities for users to do all or as many as possible of the following:

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<sup>2</sup> [Code of practice on electronic programme guides \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/epg/epg_code_of_practice_on_electronic_programme_guides/)

<sup>3</sup> [Statement: EPG Accessibility \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/epg/epg_accessibility_statement/)

### Required accessibility features

- **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. 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.

2.7 The requirements apply to EPGs on all new models of TV receivers that began development after 27 July 2018, and all subsequent models.

## 3. Report on EPG Accessibility

### Accessibility features by provider

- 3.1 As in previous years, EPG providers have continued to make progress in the development and implementation of accessibility features. In this section, we consider progress and briefly set out the availability of accessibility features by provider. A full overview of accessibility features available on each EPG can be found in the EPG provider’s submissions published on Ofcom’s website.<sup>4</sup>
- 3.2 Some television manufacturers may offer accessibility features that exist in addition to those offered by EPG providers. We have not considered these features in this report and comment only on those set out by providers in their submissions.

#### Freeview (Everyone TV)<sup>5</sup>

| Accessibility Feature | Text to speech (TTS)   | Highlighting/ filtering  | Magnification  | High contrast displays   |
|-----------------------|--|--|--|--|
| Availability          | Feature Available  | Feature Available  | Feature Available  | Feature Available  |
| Summary               | Available on 66% of Freeview Play devices via the full ATVG. | Available on 98% of Freeview Play devices via the full or modified ATVG. | Available on 98% of Freeview Play devices via the full or modified ATVG. | Available on 98% of Freeview Play devices via the full or modified ATVG. |

- 3.3 All four accessibility features are available on Freeview EPGs via its Accessible TV Guide (ATVG). The ATVG was launched in 2018 to Freeview Play devices and exists as a separate guide to the standard EPG, accessible via navigating to channel 555 on internet connected devices.<sup>6</sup> A ‘modified ATVG’ exists without TTS provision, for older devices which are unable to support TTS.
- 3.4 We are pleased to see that since our last report, Everyone TV has prioritised improving the reach of its ATVG and constituent features to more devices. As of November 2022, the full or modified ATVG was available on 98% of Freeview Play devices, an increase of 7% compared to 2021. Of the 98%, the full version of the ATVG was available on 66% of devices, an increase of 9% compared to 2021.

<sup>4</sup> <https://www.ofcom.org.uk/research-and-data/multi-sector-research/accessibility-research/electronic-programme-guide-epg-accessibility-report-2023>

<sup>5</sup> A full overview of accessibility features is set out in [Digital UK’s accessibility submission](#). Everyone TV’s submission was provided before it rebranded from Digital UK to Everyone TV in early 2023.

<sup>6</sup> New TV receivers must support the full ATVG as a pre-requisite for Freeview Play accreditation.

3.5 We recognise that TTS is the most technically complex accessibility feature to provide and that it may be beyond the control of Everyone TV to reach the residual Freeview Play devices unable to receive the full ATVG. We understand that new devices must support the full ATVG as a pre-requisite for Freeview Play accreditation and therefore expect that uptake will continue to increase as households replace older devices. We also welcome Everyone TV’s continued efforts in providing information on the availability of accessibility features across Freeview Play devices.

### Freesat (Everyone TV) <sup>7</sup>

| Accessibility Feature | Text to speech (TTS)                      | Highlighting/ filtering   | Magnification                             | High contrast displays                   |
|-----------------------|---|---|---|--|
| Availability          | Feature Not Available                     | Feature Partially Available   | Feature Not Available                     | Feature Available on Certain Devices     |
| Summary               | Not available on Freesat’s set-top boxes. | Symbols denote availability of access services by programme in the EPG. | Not available on Freesat’s set-top boxes. | Available on Freesat’s 4K set-top boxes. |

3.6 Freesat was acquired by Everyone TV in 2022, who has become the licence holder for Freesat’s EPGs. Freesat offers its own set-top boxes, and licenses device manufacturers to use Freesat’s EPG. Freesat’s submission refers to provision of accessibility features on its 4K set-top boxes and Freesat-supporting televisions.

3.7 Freesat’s 4K set-top boxes and Freesat supporting televisions indicate programmes listed on the EPG that offer access services (i.e. subtitles, audio description or sign language) by denoting [S,AD,SL] symbols. Freesat 4K set-top boxes also include a high contrast ratio display available across the user interface.

3.8 We consider that this equates to delivery of one accessibility feature on certain Freesat devices (high contrast display on Freesat’s 4K set top box) and partial delivery of the highlighting/ filtering feature on Freesat supporting TVs and Freesat’s 4K set-top box.

3.9 Everyone TV has said that they intend to roll out further features to Freesat’s G3 set-top box in 2023 including magnification, filtering of accessible content, and high contrast user interfaces (three of the four required accessibility features). We note that Everyone TV is also considering adopting a similar approach to its ATVG on Freeview in the longer term.

3.10 Everyone TV recognises that Freesat lags behind Freeview in terms of the availability of accessibility features. We share this view but welcome Everyone TV’s plans to prioritise

<sup>7</sup> A full overview of accessibility features is set out in [Digital UK’s accessibility submission](#). Everyone TV’s submission was provided before it rebranded from Digital UK to Everyone TV in early 2023.

developing accessibility features on Freesat’s devices. We expect progress to be made by next year’s report.

## Sky <sup>8</sup>

| Accessibility Feature | Text to speech (TTS)                                | Highlighting/ filtering  | Magnification  | High contrast displays                      |
|-----------------------|---|--|--|---|
| Availability          | Feature Available                                   | Feature Available  | Feature Not Available  | Feature Available                           |
| Summary               | TTS available on Sky Q (throughout user interface). | Highlighting of programmes that support subtitling, audio description and sign language available across all of Sky’s EPG. | Magnification not available, but a rich ‘image led user interface’ present across all user interfaces on Sky products. | Full availability across all of Sky’s EPGs. |

- 3.11 Voice guidance (TTS equivalent) is available on all Sky Q boxes across the full user-interface (not restricted to the EPG), programmes which support subtitles, and audio description can be highlighted on the EPG, and upcoming audio-described programming can be found in a designated area of the user interface. Programmes that are signed can now also be highlighted in the EPG. Sky Q set-top boxes support high contrast displays throughout.
- 3.12 We consider this equates to availability of three accessibility features on the Sky Q variant set-top box models, which are in scope of the EPG Code. Magnification is not available, but Sky have progressed work on developing solutions for this.<sup>9</sup>
- 3.13 Sky has also introduced equivalent highlighting/ filtering and high contrast display features across its Sky Glass and Sky Stream products and intends to launch voice guidance on these devices in 2023. These devices are not currently in scope of the EPG Code and we welcome Sky’s intention to roll out accessibility features on an equivalent basis to Sky Q across its product portfolio.

<sup>8</sup> A full overview of accessibility features on Sky EPGs and devices is set out in [Sky’s accessibility submission](#).

<sup>9</sup> Homepage font size can be increased on Sky + HD set top boxes.

## YouView <sup>10</sup>

| Feature      | Text to speech (TTS)                    | Highlighting/ filtering   | Magnification                               | High contrast displays                      |
|--------------|---|---|---|---|
| Availability | Feature Not Available                   | Feature Not Available   | Feature Available                           | Feature Available                           |
| Summary      | Not available on YouView set-top boxes. | No mechanism to highlight or list programmes from linear channels which have audio description or are signed. | Available across all YouView set-top boxes. | Available across all YouView set-top boxes. |

- 3.14 Magnification and high contrast displays are available across YouView’s set-top boxes throughout the user interface. YouView does not currently provide a mechanism to highlight or list programmes from linear channels which have audio description or are signed but we note that on-demand programmes that have audio description or are signed are listed in a designated area of the user interface.
- 3.15 We consider that this equates to delivery of two accessibility features (magnification and high contrast displays). As set out in last year’s report, we do not consider the Alexa integration available on some YouView devices to be a full substitute for TTS.
- 3.16 YouView is not available via any new TV receivers that began development since the EPG Code was revised in 2018 and therefore fall in scope of the accessibility requirements. However, we would expect YouView to consider the accessibility requirements in any future product developments, including software updates where implementation of the features is feasible.

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<sup>10</sup> A full overview of accessibility features on YouView’s EPGs is set out in [YouView’s accessibility submission](#).

## Virgin Media <sup>11</sup>

| Feature      | Text to speech (TTS)                                       | Highlighting/ filtering                                   | Magnification                                    | High contrast displays                          |
|--------------|--|---|--|---|
| Availability | Feature Available  | Feature Available   | Feature Available                                | Feature Available                               |
| Summary      | Voice guidance for the TV guide and channel bar available. | Availability of access services is shown within TV guide. | Enlarged TV guide available on Virgin TV 360 box | Available across Virgin Media TV set-top boxes. |

- 3.20 An enlarged TV guide is available on the Virgin TV 360 box and high contrast displays are available across the user interface on the Virgin TV 360 box, V6 box and TiVo box. Voiceover guidance (TTS equivalent) is available on the EPG, and some voice control functionality is available in other aspects of the user interface on the Virgin TV 360 box. In addition, availability of subtitles, sign language, and audio description for a programme is shown alongside the show description within the guide.
- 3.21 We consider this equates to delivery of all accessibility features and demonstrates delivery of Virgin Media’s plans to roll out ‘text to speech’ functionality across its product portfolio, as set out in last year’s submission.
- 3.22 Virgin Media has also introduced equivalent accessibility features on its Stream device. This device is not currently in scope of the EPG code and therefore we welcome Virgin Media’s approach to rolling out accessibility features on an equivalent basis.

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<sup>11</sup> A full overview of accessibility features on Virgin Media’s EPGs is set out in [Virgin Media’s accessibility submission](#) and Virgin Media’s [website](#).

## 4. Future of EPG Accessibility

- 4.1 In this section of the report, we review the changing ways audiences, including those with disabilities, are discovering and consuming television programmes and consider the implications for audiences that rely on accessibility features.
- 4.2 We have drawn on information taken from our published research on audience and consumer behaviour. We also surveyed a small selection of members of the Royal National Institute of Blind People (RNIB)<sup>12</sup> to better understand the experiences of audiences with sight loss when watching TV. We refer to insights that were shared with us, where relevant.

### EPGs remain an important tool to discover, navigate and access television programmes

- 4.3 EPGs are the main way audiences discover, navigate and access live television, which remains the most common form of TV consumption. Watching live TV, typically accessed via an EPG, accounted for 45% of the average total daily time spent watching video content in 2021.<sup>13</sup>
- 4.4 Household take-up of traditional TV services also remains high, of which EPGs tend to be a central component of user interfaces and the viewing experience. Freeview is the most prevalent TV service, used by 32% of UK households to watch programmes, shows or films, followed by Sky (30%), Virgin Media (10%), and BT (6%).<sup>14</sup>
- 4.5 Consumption of live TV and take-up of traditional TV services is greater still amongst older and disabled audiences, who may rely more on access services. Freeview is used more in older households and those where one or more members have an impacting condition: 39% of households in which members experience sight loss use Freeview, and 41% for those aged 65 and older, compared to 32% of all households.<sup>15</sup>
- 4.6 EPGs therefore remain central to audiences' television viewing experiences as a primary means to discover, navigate and access live TV programming. This is especially the case for older audiences and those that may have impacting conditions that make greater use of accessibility features. It remains critical for EPG providers to offer accessibility features to ensure older and disabled audiences continue to be able to discover, navigate and access TV programmes in the same way as those without.

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<sup>12</sup> RNIB members were invited to respond to an anonymous survey asking about their experiences of watching television in May 2023. 14 responses were received. Responses have been anonymised and are included for descriptive purposes.

<sup>13</sup> Media Nations 2022. Ofcom estimates of total video viewing. Modelled from BARB, Comscore and TouchPoints.

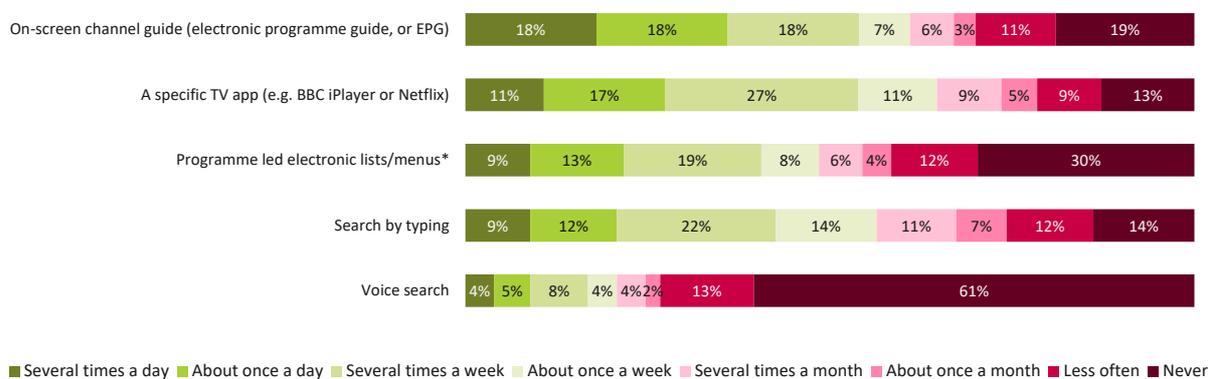
<sup>14</sup> Ofcom Tech Tracker 2023. Base: All Respondents: Which – if any – of these TV services are used in your household to watch programmes, shows or films?

<sup>15</sup> Ofcom Tech Tracker 2023. Base: All Respondents: Which – if any – of these TV services are used in your household to watch programmes, shows or films? Filtered by impacting condition.

## Audiences are increasingly relying on other services and technology to access content

4.7 Figure 1 shows the range of methods audiences use to discover content when looking for something to watch on TV. While the largest share of audiences makes use of EPGs most frequently (18% of respondents several times a day), around two thirds (66%) used a specific TV app to find something to watch weekly. Just under half (49%) reported to rely on programme led electronic lists and menus<sup>16</sup>, weekly.<sup>17</sup>

**Figure 1: Methods of content discovery when looking for something to watch on TV, by frequency of use<sup>18</sup>**



4.8 The increase in uptake of smart TVs and connected devices has facilitated audiences accessing content from a range of sources, including outside of the EPG. For example, 54% of households use the internet to watch TV via an internet connected device in 2023, with 13% using TV apps or services on their smart TVs and 27% using streaming services via a set-top box.<sup>19</sup>

## Accessibility is important beyond the EPG

4.9 Accessibility features may not extend beyond the EPG on TV services, which can make it difficult for audiences reliant on such features to discover and access content from apps or other parts of their TV user interface. We also understand accessibility features can be inconsistent across user interfaces, with certain features available for some services but not others.

<sup>16</sup> \*Lists/menus of individual programmes shown on e.g. smart TV home screen or Amazon Fire TV home screen

<sup>17</sup> Ofcom VoD Survey 2023. Online adults/teens aged 13+. Question: When you're looking for something new to watch on TV, how often do you use/look at the following? Fieldwork conducted 22-27 February 2023.

<sup>18</sup> Ofcom VoD Survey 2023. Online adults/teens aged 13+. Question: When you're looking for something new to watch on TV, how often do you use/look at the following? Fieldwork conducted 22-27 February 2023.

<sup>19</sup> Ofcom Tech Tracker 2023. Base: Audiences who watch TV on a TV set. Do you or does anyone in your household use the internet to watch content on your TV set using any of these methods?

- 4.10 In the section below, we set out responses received from respondents to our survey of RNIB members which asked how easy it is to find and select on-demand television programmes via services such as streaming apps, compared to using an EPG.<sup>20</sup>
- 4.11 The comments were provided by a small number of RNIB members on a voluntary basis. They should not be considered representative of the experience of all audiences with sight impairments when watching television. Nonetheless, the comments indicate a range of experiences of audiences with sight impairments when discovering and accessing television programmes on other parts of the TV interface than the EPG.

### RNIB Survey Responses

#### **Some respondents highlighted inconsistencies in the availability and application of accessibility features across the TV user interface and between different VoD services:**

*'[It is] Harder [than using an EPG] because I use them less often and so am less familiar with the interfaces and they are inconsistent. Also often requires typing via a small on-screen keyboard.'*

*'It depends as each [app] is set up differently. I've used the [Channel] 5 catch up service and that was very easy to use. iPlayer used to be easier but that's changed again. Constant change is a pain as you just get really comfortable using a service and they change it.'*

*'Streaming services are typically easier BUT every one is very different. I'd love one app that could search all of the streaming services and will also highlight if AD is available and give me the option to subscribe if I'm not already.'*

#### **Other respondents preferred to navigate programmes via VoD services on mobile devices (e.g. smart phones):**

*'It is quite easy for me to find catch-up programmes via the various phone apps with a speaking screen reader and also programmes broadcast on Freeview via the on-screen TV guide, but I never watch catch-up services via Sky or Freeview as these apps have no speech and many of the programmes do not have audio description.'*

*'[It] depends on the device, [it's] easy enough on my phone.'*

#### **Some respondents found it easier to navigate on-demand content than programmes via the EPG:**

*'It's the same maybe on demand slightly easier'*

*'It is pretty easy to find programmes via these platforms. the search option is pretty good. the big contrast is between Netflix where AD starts auto compared with Iplayer where I don't think it does.'*

*'I think it is easier [than using an EPG].'*

- 4.12 Some EPG providers have been more ambitious in extending accessibility features beyond the EPG where they have control of the broader user interface. As set out in the previous section, Sky offers voice guidance functionality on its Sky Q set top box across the full user

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<sup>20</sup> RNIB Survey question: In your experience, how easy is it to find and select 'catch-up' or 'on-demand' television programmes, such as those accessed via streaming services such as BBC iPlayer or Netflix? Is it easier or more difficult than selecting programmes via the EPG?

interface (not just the EPG). Virgin Media's voice control functionality also extends beyond the EPG to other aspects of the user interface on its TV 360 box and 'Stream' device.

- 4.13 While the legal requirements don't currently cover these other ways of accessing content, there are a number of developments which may change this. In 2022, Government set out its intention to "close the loophole that allows unregulated internet-delivered services to appear on TV sets in the UK by designating additional regulated electronic programme guides."<sup>21</sup> This would mean more TV guides would fall under the current EPG requirements. More recently, the [Draft Media Bill](#)<sup>22</sup> (March 2023) includes a new requirement on providers of internet connected television selection services (such as smart TV manufacturers) to ensure their services incorporate features that enable people with disabilities (in particular in relation to sight or hearing) to use the service, and that they are informed and can make use of any assistance provided by VoD players included in the service.<sup>23</sup> This would place a new regulatory requirement on TV selection service providers to consider accessibility beyond the EPG.
- 4.14 In the meantime, we urge EPG providers to continue focusing on accessibility in relation to EPGs and television services more broadly as technological innovation continues to provide new opportunities for accessing content and audience behaviour changes.
- 4.15 Alongside this report, we have published a consultation on updating our Accessibility Best Practice guidelines. The consultation proposes changes to the guidelines, expanding them to include advice for providers of video-on-demand services (such as those referenced in the comments above) and account for different ways of watching programmes (e.g. via mobile or web-based platforms). We are also carrying out research among disabled audiences to further inform our final decisions on the guidance. We hope that the results of this research and revised guidelines will be of use to EPG providers and others in their efforts to create a smooth journey to content for everyone.

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<sup>21</sup> Department for Culture, Media and Sport (DCMS), 2022. [Up next - the government's vision for the broadcasting sector](#).

<sup>22</sup> The Bill intends to reform regulation of public service broadcasting in the UK, and also includes provisions requiring the accessibility of certain video-on-demand services

<sup>23</sup> Draft Media Bill, Clause 326AL(4). The draft Bill refers to 'television selection services' which are services provided using the internet which allow users to make a selection between various 'internet programme services' (such as on-demand apps on a smart TV interface) and access those services or their programmes.