



**PROVISION OF ELECTRONIC PROGRAMME GUIDES ("EPGS") UNDER TELEVISION LICENSABLE
CONTENT SERVICE LICENCE NUMBER: TLCS000243BA**

STEPS TAKEN BY SKY UK LIMITED IN RELATION TO EPG ACCESSIBILITY

SECTION 1 – INTRODUCTION

- 1.1 This is Sky's response to Ofcom's request to provide an annual statement about the steps we have taken, and plan to take, to facilitate the use of our EPG by disabled people.
- 1.2 Paragraph 10 of Ofcom's Code of Practice on Electronic Programme Guides (the 'Code') states that *"EPG providers are required to produce an annual statement, by 30 November each year, of the steps they have taken and plan to take to facilitate the use of their EPGs by disabled people"*.
- 1.3 The Code states that Ofcom will assess the adequacy of these statements in the light of the particular circumstances of each EPG and that EPG providers are expected to consult with disability groups about the way they meet the obligations under the Code.
- 1.4 This statement sets out the steps taken by Sky to ensure accessibility of its EPG.
- 1.5 The Code also calls for EPG providers to use reasonable endeavours to secure so far as practicable the following features (or their equivalents) on EPGs accessed on new models of TV receiver beginning development after 27 July 2018 and subsequent models ("New TV Receivers"):
 - (a) text-to-speech (TTS);
 - (b) the ability to filter/highlight audio description and signing;
 - (c) text magnification;
 - (d) high contrast displays (together, the "Specified Features").
- 1.6 Sky currently has one model of Set-top-box (STB) which qualifies as a New TV Receiver and is therefore in scope of the requirements of the Code. This is the 1TB UHD model of our Sky Q STB. This sits alongside the previous model of Sky Q STB and our Sky+ STB, both of which pre-date the above requirements. Separately in 2021 Sky launched the Sky Glass streaming television, and in 2022 we launched Sky Stream which is an internet-connected box that can be plugged into other televisions to offer the Sky Glass interface. Sky Glass and Stream use the same software/operating system and therefore share all of the same features. For completeness, we will highlight the accessibility features available on Sky Glass/Stream where relevant in this report.
- 1.7 At Sky we take our responsibilities around accessibility very seriously. We have worked hard to continue to improve upon features that had already been implemented, to bring these features to other products and to add new features that further improve accessibility. We take an inclusive approach to design which means we strive to consider the needs of our diverse customer base before designing products. We work closely with user testing, community forums and closed forum networks and this enables us to meet the needs of our under-represented customers.
- 1.8 This year we have continued to refine and expand the features that we already present on our platform. We are pleased to confirm that we implemented the last of the required features this past year when the magnification feature for the TV Guide on Sky Q was rolled out to all customers at the end of July 2024. Furthermore, this feature is now being developed for Glass/Stream and is due to launch onto these platforms in 2025.
- 1.9 It is important for us to note that we are now working as a global company on technological infrastructure that must be suitable for a global market. This means that we have to view our software and hardware in the context of globally evolving legislation and ensure that it meets the standards of multiple territories. This has meant that 2024 saw considerable work taking place to improve the accessibility of our platform and services for aspects that are required for

the US market, and for the European Accessibility Act. Whilst this global approach brings complexity it does mean that all territories will then benefit from standards or functionality that is required elsewhere in the world. For example, the work being currently undertaken means that customers in the UK will benefit from a number of changes and enhancements in 2025. This includes work being to expand the magnification experience across the whole of the UI for Sky Glass and Sky Stream customers, Voice Guidance becoming available for apps, customisation of voice guidance speeds and enhancements to the voice and remote-control accessibility. Additionally, a significant programme of work on our VOD platform is now drawing to a close and this should see Audio Description becoming available across VOD from early 2025.

SECTION 2: CODE REQUIRED FEATURES

2.1 Text-to-Speech (TTS)

- TTS (or 'Voice Guidance') launched on all models of Sky Q box in the UK and Ireland in 2021. Due to them using a different EPG technology our Voice Guidance offering was re-worked for Glass/Stream and launched there in early 2023.
- This TTS functionality is not limited to just the linear EPG elements as required by the Code, but rather it stretches across much of our User-Interface (UI) such as our On Demand pages/content. We have also worked to increase coverage of TTS and therefore the offering has improved and will continue to do so i.e. as our UIs evolve so too does our Voice Guidance grow alongside.

2.2 Filtering/Highlighting

- Across all our EPGs (including Glass/Stream) we have the facility to highlight programmes with Subtitles, Sign Language, or Audio Description on the main TV guide listing. Viewers can use this highlighting capability to easily identify subtitled, signed and/or audio described content in the full TV Guide with a high-contrast highlight state.
- Across these EPGs we have the facility to enable a 'beep' to be heard if Audio Description is present when scrolling through from one channel to another in programme viewing. We also display AD, S, SL (Audio Description, Subtitling, Sign Language) text when a programme is selected on the TV Guide or when the 'i' button is pressed on the remote control.
- Access services flagging is now consistently applied for both linear and native VOD where it is supplied.
- Our EPG/UI offers excellent means by which people can find accessible content. On Sky Q there is a page, which is accessible via a voice prompt, which breaks down by genre the programmes with Audio Description that are available for the coming 7 days on live channels.
- Beyond this we have also worked to curate areas where suitable content is collated to enable easy searching/finding. Our On Demand catalogue includes an extensive collection from BSL Zone – which is fully searchable including by voice. This content collection has been available on Sky+, Sky Q, Glass, Stream, NOW and Sky Go for some time.
- We also believe that innovation on Sky Glass/Stream which provides aggregation of content from various apps in one place is incredibly useful for all customers. For example, that one search request will now show results from across multiple apps (i.e. so the viewer no longer needs to visit each app separately to search the individual catalogues) is especially those with accessibility needs that are helped by simplified/shortened journeys around the UI.
- Given the features we have now made available in this space, our approach to content curation and our voice control functionality on Sky Q/Glass/Stream (more on this below), we believe that our EPGs afford users excellent ability to find programmes with access services. We do not for example offer a full subtitling filter, because we do not believe this would be a useful function for our users. Given the huge amount of content that now carries subtitles (see also 3.3 below), this kind of filter would return thousands of results, especially as streaming apps become increasingly integrated into our search capabilities. We are confident that our offered functionality, alongside our curation and the use of 'show pages' where people can get full details on access services that are supported on a programme, ensure that users have excellent means of discovering accessible content as required by the Code.

2.3 Text Magnification

- A magnification feature for the TV Guide was rolled out to all Sky Q customers by the end of July 2024. Furthermore, this feature is now being developed for Glass/Stream and is due to launch onto these platforms in 2025.
- The image-led user interface and focus-based navigation of Sky Q and Sky Glass/Stream means these EPGs offer a high-end user interface rich in imagery, displaying TV content artwork or images. This helps customers navigate and find their content on screen.
- The Sky+ HD STB has an 'Increase Homepage Font Size' setting in the Accessibility menu. This complements the High Contrast and Bolder Font setting and ensures that the font on the rich Homepage we offer can be adapted further.

2.4 High Contrast Displays

- Across all of our EPGs we have the ability to enable a High Contrast setting (which we developed based on insight from the RNIB).

SECTION 3: ADDITIONAL WORK / SUPPLEMENTARY FEATURES

3.1 Work with the Makaton Charity

- We are committed to going beyond current requirements, including looking to serve customers with needs beyond those related to sight/hearing. This has seen us continue to work closely with the Makaton charity as we believe this is a content area that has been somewhat overlooked. The work we are doing here, is intended to bolster and not replace, work elsewhere (e.g. with regard to BSL). We are proud of our Sky Q/Glass/Stream Voice destination page which was made in collaboration with the Makaton Charity featuring content that is suitable for audiences with cognitive needs, especially younger audiences. You can get to the page by using the voice command 'Makaton', and it includes a range of content from across Sky Kids and our content partners, as well as dedicated YouTube channels from Makaton and Singing Hands, among others.
- We are working on the extension of flagging/highlighting functionality to serve a wider audience. This includes working with Irish broadcaster RTE to bring sign-language flags to ROI and Northern Ireland.

3.2 Customisation

We have continued to research and explore options for elements of customisation. We anticipate developments to be released in this area in 2025 which are tied into requirements around our global efforts.

3.3 Accessible Content

- As Sky is also a broadcaster with our own channels and content available via our EPGs/UIs, we are also keen to ensure that we exceed requirements and provide access services on as much of our content as possible.
- In 2024 we continued to exceed quotas in this area, with AD averaging 40% across all Sky channels and 26 Sky channels now delivering subtitles on 100% of programming.
- As part of our On Demand accessibility effort at Sky, subtitles are now available across UHD content and more widely on Sky Store titles.
- In honor of International Week of Deaf People we released the films Top Gun, Ferrari, and 10 Lives with BSL interpretation. Alongside this we also made BSL versions of two of the year's biggest films, Barbie and Oppenheimer available for viewers. And additionally, over the Christmas period we released Wonka and Lee with BSL as well as providing sign-interpreting for the King's Speech.
- We have also been undertaking the considerable task to have Audio Description available across our VOD service. We expect this to begin rolling out in early 2025.

3.4 Accessibility Website and AD Introductions

- We have continued to promote our accessibility services on our accessibility website (Sky Accessibility - ensuring that all our products and services are fully inclusive and easy for everyone to use | Sky Accessibility). This website highlights accessible features and support that are offered by Sky.

- We are also increasingly using this website as a place where those with accessible needs can discover and further explore our content. For years we have included a weekly TV highlights section. This year we have continued to provide 'Audio Description Introductions' for certain titles from across our channels. These introductions are scripted and voiced by our AD team. They allow customers to get an overview of a series voiced to them. We currently aim to update this on a monthly basis.

3.5 Voice Commands

- Sky's Voice control and search capability is supported across all Sky Q device models.
- All Sky Glass/Stream devices support Voice via the remote control and – on Sky Glass- hands-free control is also available, using a wake word ('Hello Sky').
- Customers can use the Voice control feature on Sky Q/Glass/Stream to easily activate subtitles, audio description, and Voice guidance. The Voice control feature also allows users to perform other useful actions like channel tuning and volume control, as well as complex searches of our content catalogues (e.g. based on title, actor, plot, keywords etc). Voice search also enables customers to use Voice to discover all audio-described content available on live TV in the coming week, segmented by genre.

3.6 Remote Controls

- In 2023 we rolled out changes to our remotes, which were improved through work with the RNIB and some of our visually impaired customers. Changes included increased font size, increased weight of icons, dishing of the voice key (i.e. improving the shape to allow for it to be easily distinguished), a tactile divider on the volume key and changing the volume icons from arrows to speaker symbol.
- We also introduced the Sky Q Virtual Remote which allows customers to control Sky Q boxes via a page in the Sky Go app. At present it is available on iOS and an Android version is in development and will launch in early 2025. The Sky Q Virtual Remote helps make Sky Q more accessible and is particularly useful for users with dexterity issues who are not easily able to use a traditional remote control. The Virtual Remote also features High Contrast and Large Button options for increased accessibility.

3.7 Connectivity

- Sky Glass customers can connect a supported Bluetooth headset. This is an inclusive feature that will enable customers with additional hearing needs to better experience audio on the platform.

3.8 Training & Customer Service

- Previously we trained over one hundred staff members on assistive technology to give our customer advisors more insight into how our blind and physically impaired customers use our products and services. These staff members now form a network to share best practice within their departments.
- We have created education modules for staff to learn about disability awareness, assistive technology and how to build this into one's role at Sky. These training courses are on Sky's internal learning platforms and are available to all staff and over 500 staff have now completed these training modules so far. We have recently given access to Italian & German colleagues in our effort to support the EAA.
- As part of our work with the Makaton Charity we have also been working with them to train our engineers so that they are better able to support customers who use Makaton.
- Whilst this is not directly relevant to Ofcom, it is perhaps worth noting that last year Sky Ireland launched a new free support service for visually impaired customers, powered by 'Be My Eyes' (Be My Eyes is a free app that connects blind and low-vision people with sighted volunteers and company representatives for visual assistance through a live video call). Visually impaired Sky customers can now access customer support via live video calls with Sky's Accessibility customer support team. For various reasons this app is not suitable for integration with our UK systems, however we are investigating what similar services we may be able to provide beyond ROI.