
EPG Accessibility

Annual report on improvements for people with visual impairments

A [Welsh Overview](#) is available

STATEMENT:

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1. Overview

People with visual impairments watch as much TV as other people but are confronted with particular difficulties when using TV programme guides (otherwise known as electronic programme guides or EPGs) to choose what they watch. As a result, their viewing choices can be unnecessarily restricted, and they could miss out on finding and viewing programmes.

The EPG code (drawn up under the Communications Act 2003¹) sets out the practices to be followed by EPG providers concerning the features and information needed to enable EPGs to be used by people with disabilities.

In June 2018 following consultation, we made amendments to the EPG Code to secure that people with visual impairments are able to use EPGs in the same way that people without such disabilities use them (see section A1). This is our second annual report following the changes but the first encompassing a full year reporting period.

¹ 310(3) of Communications Act 2003

The report in brief

We know that it takes time to implement all the changes required following the amendments we made to the Code in 2018 to secure that people with impairments are able to use EPGs in the same way that people without such disabilities use them. We understand that providers are continuing to work on implementing the required accessibility features and it is clear that a number of providers are carefully considering accessibility within their planning. In particular:

- Some providers prioritising the inclusion of accessibility features in their product development and actively seeking input from user-groups in the design stage.
- Some providers making efforts to highlight the importance of these features to their manufacturing partners.
- Digital UK innovating with plans for an application-based TV guide designed specifically for accessible users
- Providers giving specific timelines for implementation and detailed plans for features, which we are able to acknowledge in our reporting.

We welcome these positive steps and have received positive feedback from Royal National Institute of Blind People (RNIB) on working with providers in many areas of development and the ongoing engagement of some providers. We will continue to seek the views of representative groups in future annual reports.

We do, however, have some concerns that some providers are falling behind in terms of their inclusion of accessibility features and the lack of progress in some areas. In particular:

- Some providers have reported little or no engagement with user-groups and representatives in discussions around the features, or alternative methods. We encourage all providers to work with these groups in order to ensure the features they implement will benefit the users they are designed for.
- Some have also kept their timelines and detailed plans for implementation confidential. We understand that some information may be commercially sensitive, but we encourage providers to make information regarding their plans and developments available wherever possible, as this is of value to consumers, especially those who have visual impairments.

2. Background

People with visual impairments

- 2.1 There are over two million people who experience sight loss in the UK today and this is expected to increase dramatically in the future. As people get older, they are increasingly likely to experience sight loss, and the UK population is ageing. In addition, sight loss is strongly linked with certain medical conditions such as diabetes and lifestyle factors including 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.²
- 2.2 Those affected by sight loss are more likely to be elderly, or financially vulnerable³. As well as a rise in number due to an ageing population, 39% of visually impaired people of working age say they have difficulty in making ends meet⁴.
- 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.
- 2.4 Television is also seen to help people to cope with social isolation, to which older people are particularly prone. Whilst outside the reporting period for this report, the Covid-19 outbreak and subsequent lockdown has once again highlighted the importance that television can play in people's lives and especially the need for it to be accessible to all.

Electronic Programme Guides ('EPGs')

- 2.5 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.
- 2.6 EPGs are licensed by Ofcom as television services and their providers must comply with the EPG Code (see below). The current EPG providers are: Sky, Virgin, YouView, Freesat, Digital UK for Freeview, and BT (who provide both the BT and EE EPGs).
- 2.7 The EPG Code sets out the practices that EPG providers should follow in relation to assistance for people with hearing and/or visual disabilities, as well as practices to be followed in relation to the prominence of public service channels and the securing of fair and effective competition.

² [RNIB – Key information and statistics](#)

³ [‘My Voice’ report](#) RNIB, 2015

⁴ [‘My Voice’ report](#) RNIB, 2015

- 2.8 As well as reporting annually on EPG accessibility, Ofcom is currently looking at the sections of the EPG Code relating to [prominence](#). This includes amendments to ensure the main five PSB channels remain easy to find at a time when viewers increasingly watch TV online. We are also reviewing the requirements to support fair and effective competition, with plans to consult on proposals in Summer 2020 and publish our final decision before 1 December 2020. Accessibility of the EPG will always be considered throughout these changes and any further work Ofcom undertakes in this area.⁵
- 2.9 In June 2018, following a consultation, we amended the EPG Code so that visually impaired⁶ people can benefit from additional accessibility features. Our amendments meant that in future, they should be able to use EPGs in the same way that people without such disabilities use them.
- 2.10 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:
- a) render text needed for EPG navigation and the provision of information on channels and programmes included in the EPG as speech ('text-to-speech' functionality or 'TTS');
 - b) highlight or list separately programmes with audio description, and with signing ('filtering or highlighting' functionality);
 - c) adjust the display of EPG information so that it can be magnified, or the text enlarged ('magnification' functionality); and
 - d) switch between the default and 'high contrast' displays ('high contrast displays' as referenced in section A1 of this report).
- 2.11 Providers are able to use 'equally effective' measures to provide these features within their EPGs. This was to enable providers to use innovative methods and provide flexibility for developments to take place within the market based on developing consumer preferences.

⁵ The [Digital Economy Act 2017 requires Ofcom to review the EPG Code](#)

⁶ In this document, we use the term 'visually impaired' to refer both to those with partial sight loss, and those who are completely blind.

3. Annual report on EPG accessibility

Summary

3.1 Paragraph 10 of the EPG Code reads in full:

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, specifying which steps they have taken to comply with paragraph 8 above (see section A1). If an EPG provider has been unable to secure all or any of the objectives set out in paragraph 8 on the grounds of practicability, this annual statement should outline the alternative steps they have taken to increase the accessibility of their EPGs. Ofcom will assess the adequacy of these statements in the light of the particular circumstances of each EPG.

3.2 This is our second annual report since we amended the EPG Code in 2018 but the first that encompasses a full reporting year. In our first report, we expected providers to inform us, and therefore consumers of their future plans due to the short time period since the requirement was put in place. We hoped this would mean providers would be able to offer more information on practical steps they have taken this year.

3.3 We recognise that providers face different circumstances and challenges when they are trying to ensure the inclusion of accessibility features, especially those providers that operate in a horizontal market⁷ and do not have direct control over the manufacturing process and distribution of the set-top boxes their EPG is provided on. However, we do consider it vital that such providers use their relationship with manufacturers to make their products as accessible as possible.

3.4 Below we provide a summary of providers' reports focusing on the features highlighted within the EPG Code. Providers' non-confidential submissions are published in full alongside this report. A summary of features currently available can be found in Annex 2.

⁷ By "horizontal" market here we mean that the providers do not have control over the complete supply chain i.e. in this case the manufacture of set top box and connected television equipment. The manufacturers of this equipment produce products for the global market so there are challenges with influencing the specifications at design level. This is contrasted with a "vertical" market where the EPG provider exercise greater control over each element of the distribution chain, for example the manufacture of set top boxes.

Text to speech (“TTS”)

Paragraph 8 (a) of the EPG Code defines this as the facility to “render text needed for EPG navigation and the provision of information on channels and programmes included in the EPG as speech”.

- 3.5 TTS is a key accessibility feature for those with more serious sight impairment. Full TTS capability is currently not provided in any of the EPG providers’ set-top boxes.
- 3.6 Virgin Media have confirmed they aim to deliver the features specified in the EPG Code in their next generation ‘*Horizon*’ platform by the second half of 2021.
- 3.7 Sky confirmed plans to include this feature by the end of 2020 in their latest Sky Q box and also plan to roll it out on older Sky Q set-top boxes. They are also planning to make this feature available on other devices (e.g. iOS and Android) so it is not just limited to those watching Sky via their set-top boxes.
- 3.8 Digital UK is launching an accessible TV guide by the end of June this year which will include TTS functionality along with the other three features Ofcom recommend (see section 2.10).
- 3.9 BT, EE, Sky, Freesat, YouView and Digital UK already use forms of voice control technology that work alongside their set-top boxes, such as digital voice assistants (e.g. Amazon Alexa), or remotes with voice control capabilities. Some providers are pursuing these technologies in their future plans.

Ofcom response

- 3.10 TTS remains the most expensive feature to implement for providers, but we are continually informed by representative groups and charities that it has the biggest impact on their viewing experience.
- 3.11 It is important that visually impaired consumers have access to information about what accessibility features are available for them. Therefore, we welcome the timeframes that Digital UK, Sky and Virgin Media have given us, as this means we can include the most up-to-date and accurate information in our report.
- 3.12 We are particularly encouraged by the efforts that Digital UK has made in developing an application-based TV guide designed specifically for accessible users. We consider this an important example of how ‘alternative measures’ can be taken in consultation with users to innovate in the provision of accessible EPGs.
- 3.13 Some other providers are pursuing alternative measures to TTS via voice control technology. If these features are going to be deemed equally effective to TTS, then it is important that these are thoroughly user-tested. Providers also need to consider the impact these alternative technologies might have for more financially vulnerable consumers as many may not be able to afford the additional devices. The usability of

alternative measures may also differ for those who have more difficulty using new technology and should be considered in the testing stage.

Highlighting and filtering

Paragraph 8 (b) of the EPG Code defines this as the facility to “highlight or list separately programmes with audio description, and with signing”.

- 3.14 Virgin Media and Sky both currently provide this feature on their set-top boxes. Sky currently offer this feature for audio-described content; however, they have stated that providing the same for signed content is a priority for them and they hope to make this available on their new set-top boxes by the end of 2020.
- 3.15 BT and YouView offer this feature for some on-demand content (which does not form part of the standard EPG) but do not yet provide it for broadcast content on the EPG. YouView have stated that they aim to make efforts to incorporate this feature on future set-top boxes.
- 3.16 EE, Digital UK and Freesat do not currently offer this on their set-top-boxes, however it is available as a function on some compatible Smart TVs through which the Digital UK and Freesat EPGs are available (e.g. Samsung Smart TVs).
- 3.17 Digital UK stated their plans to incorporate this feature on their new accessible TV guide, it will allow the user to select their 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.

Ofcom response

- 3.18 Whilst it seems that more providers are making efforts to provide this feature in the near future, EE and BT are falling behind in this area. We understand that it takes time to develop these features and sometimes there are barriers to making them available due to not having control over the manufacturing of set-top boxes. However, as many other providers have managed to include this feature, we would expect them to make this a priority in the near future and include potential timescales in future reports.

Magnification

Paragraph 8 (c) of the EPG Code defines this as the facility to “adjust the display of EPG information so that it can magnified, or the text enlarged”.

- 3.19 Magnification is a feature which is widely offered by the providers. BT, YouView and Virgin Media all offer this capability within their set-top boxes through providing a zoom function.
- 3.20 Although Sky does not offer a zoom function, they do allow the font to be made larger or bolder on their Sky+ set-top boxes. Sky have stated that they are looking into how they can implement a magnification feature on their EPGs. Last year, they undertook a workshop

with the RNIB and other interested parties to help their research into providing this feature.

- 3.21 Whilst Digital UK and Freesat have no magnification features of their own, they are compatible with the zoom functionality on specific Smart TVs.
- 3.22 Some providers have plans to develop this feature. Digital UK's new TV guide will be able to display text twice as large as the default text size.

Ofcom response

- 3.23 We welcome the fact that many providers include this feature within their EPGs and the commitment of others to develop it in their models moving forward. We encourage discussions with the RNIB and other user groups to best understand how to continue to make this feature available for viewers.

High-contrast displays

Paragraph 8 (d) of the EPG Code defines this as the facility to "select a 'high contrast' display".

- 3.24 This is the most commonly offered feature among the providers, with YouView, Virgin, Sky, BT and EE providing the 7:1 contrast ratio requirement⁸ as a minimum on their set-top boxes. YouView provide a high-contrast ratio of 15:1.
- 3.25 Freesat also launched this feature at the beginning of 2020 in their new set-top boxes, with their EPG having a standard ratio of at least 7:1.
- 3.26 Digital UK also confirmed this feature is also available on Freeview as the default setting on some TVs. Digital UK plan to implement a display with a minimum of 7:1 contrast ratio in their new accessible TV guide.

Ofcom response

- 3.27 We are pleased that this feature is now implemented on most providers EPGs and are encouraged to see that Freesat have recently launched this feature. It is also very positive that the majority of providers have included contrast ratios that exceed the minimum required.

Additional Areas

Engagement with consumer groups and charities

- 3.28 Many providers highlighted that they have worked with consumer groups and charities (including the RNIB) during the product development stages.

⁸ The EPG Code defines a 'high-contrast' display as one with a contrast ration of no less than 7:1

- 3.29 Digital UK reported that they had worked closely with accessibility groups and ensured their input and feedback was taken on board at each stage of development of their new accessible TV guide. They have worked with the Digital Accessibility Centre⁹ during the design phase, and AbilityNet¹⁰ will be involved in testing their product. They have also held meetings with the RNIB and others to update them on their work.
- 3.30 Sky brought together their technology and design teams and the RNIB in order to discuss how magnification could be best implemented on their EPG. They are also currently reviewing the results of a research project into the experience of visually impaired users of their Sky Q and Sky+ products.
- 3.31 The DAC reviewed Virgin Media's plans for their new Horizon platform, and Virgin Media have confirmed that they plan to work with them throughout the continued development of the platform.
- 3.32 Freesat said they had worked with the RNIB to develop their high-contrast display they recently launched on their set-top boxes.
- 3.33 YouView highlighted their work they have done in the past with user-groups and charities but did not comment on any recent developments or collaboration.
- 3.34 BT and EE did not report on any involvement with user-groups or charities in the development of their EPGs.
- 3.35 We have asked the RNIB to provide a short update on their experience working with providers in the area of developing accessibility features.

⁹ Digital Accessibility Centre (DAC) is a non-profit social enterprise and one of the leading providers of web accessibility services

¹⁰ 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

RNIB feedback on working with providers

“Blind and partially sighted people have continually told us that television is important to them. The Electronic Program Guide sits at the heart of any TV viewing experience which is why RNIB prioritises the accessibility of the EPG over any other aspect of a TV interface.

We have been seeing great commitment and real measurable progress from TV manufacturers in making EPGs accessible through speech, high contrast and magnification. These accessibility benefits have then been carried over onto other parts of the interfaces and for some manufacturers they have become a standard feature of their smart television ranges.

On Freeview¹¹ blind and partially sighted people have genuine choice and any HbbTV¹² compliant TVs will be able to deliver additional accessibility through the new EPG channel on 555. It’s important for other platforms to match this level of accessibility and we’ve been encouraged by the recognition and commitment we’ve seen in this area.”

Ofcom response

- 3.36 We are encouraged that many providers continue to conduct user-testing throughout the product development of features on their EPGs.
- 3.37 The EPG Code allows providers to use ‘equally effective’ measures to offer the features set out in the Code, this gives providers the flexibility to be able to use new innovative methods to improve accessibility on their EPGs. We would re-iterate how valuable user-testing and engagement with representative groups is when developing any new features.
- 3.38 We are encouraged by the view of the RNIB and the fact they recognise the commitment made by providers in this area. We would re-iterate the importance they place on all platforms to provide the desired level of accessibility. We will continue to seek the input of the RNIB and other representative groups when we report on the progress made by EPGs in future years.

Market Context

- 3.39 Digital UK, Freesat and YouView highlighted that they operate within a ‘horizontal’ market. This means they do not have direct control over the manufacturing and distribution of the set-top boxes that their EPGs are made for; therefore, progress is made through the providers cooperating and engaging with the manufacturers.
- 3.40 In the last year, Digital UK have prioritised the four features in their *Freeview Play Product Overview* document, which is shared with their partners who produce the set-top-boxes. It sets out the requirements for their device models. However, the set-top boxes are made

¹¹ Provided by Digital UK

¹² HbbTV (Hybrid Broadcast Broadband TV) means you can get both standard broadcast free-to-air television and IPTV services (television provided by an internet connection) all in one set-top box.

by manufacturers who are not required to follow these product specifications as they are produced for the global market.

- 3.41 Last year, Digital UK stated that they were working with the DTG to recommend Ofcom's accessibility requirements into the D-Book¹³. They have stated that the DTG considers accessibility requirements to not be relevant to the purpose of D-Book, as it is focused on interoperability between devices and broadcasters. Digital UK are working with the DTG Accessibility Working Group to make the features more prominent in the manufacturing of devices, and still aim for the features to be included in the D-Book.

Ofcom response

- 3.42 We understand the challenges that face some providers when implementing these features into their EPGs; the horizontal market which they operate in does not always allow for the providers to make changes as easily as they would like to, as set-top-boxes are produced for a global market. We are encouraged to see providers continuing to work with the manufacturers to encourage these features to become more standard within the design of their EPGs.
- 3.43 There are also significant costs for manufacturers in relation to implementing some of the features such as TTS and magnification. We encourage providers to work with their manufacturers in order to negotiate costs and develop affordable ways of implementing these features, as we expect there to be great benefit to the consumer of having accessibility features. TTS in particular will have a clear and positive impact for those who have severe visual impairments.

Ofcom overall response and next steps

- 3.44 We understand that implementing the new Code requirements takes time given the product development cycles of EPG providers and equipment manufacturers which can vary and last several years. This is the first report published after a full reporting period, with 18 months having passed since the amendments to the EPG Code in June 2018.
- 3.45 We are encouraged by the fact that many providers, since our last report, have built on their plans for implementation of these features. It is good to hear that providers such as Digital UK are embedding accessibility of their EPGs at the centre of design and involving user-testing at many stages of development. This is an approach we would like to see other providers adopt in future.
- 3.46 Last year, the majority of providers told us of their ideas and research into the four features we recommended in our statement. This year most providers have focused on reporting their detailed plans for implementation of these features, and the RNIB have also reported to us that the efforts they have seen from providers recently have been

¹³ The D-Book is the UK technical specification, published by the Digital TV Group (DTG) for digital television receivers – it sets the interoperability requirements that enables manufactures to develop products compatible with the UK environment.

promising. Next year we would expect these plans to have been put into practice, so that these accessibility features are available on the providers' EPGs.

3.47 Following the publication of this report, we will continue to engage with the EPG providers about the developments they are making in this area.

3.48 We will be encouraging providers to consider the following points in relation to future reporting:

- i) Timeframes given for development should be as specific as possible. We are encouraged by the specific timeframes that Digital UK, Freesat and Sky have given us for implementation of some of the features and would encourage others to follow suit.
- ii) Confidential elements of responses should be kept to the minimum necessary to protect commercial sensitivities, bearing in mind the value to consumers of receiving clear information on plans to develop accessibility features.
- iii) If EPG providers aim to introduce 'equally effective' features to those specified in the Code, they should provide evidence from user testing/consultation, to support the efficacy of these feature.

3.49 We are also encouraged by the engagement we have had with the RNIB in this area. This is a positive step and we will look to obtain further input from other user-representative groups for future reports.

A1. Relevant EPG Code provisions

A1.1 The EPG Code¹⁴ 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 6(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 7);
- 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 8);
- d) an expectation that EPG providers work with manufacturers of TV receivers to make the accessibility features listed in paragraph 8 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 9)
- 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 8 (paragraph 10);
- 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 11);
- 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 12);
- 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 13); 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 14).

¹⁴ [The EPG Code, Ofcom](#)

A2. Summary of features provided

EPG Provider	Accessibility Feature			
	Text to Speech	Filtering/Highlighting	Magnification	High contrast displays
EE	✗	✗	✗	✓
BT	✗	✗	✓	✓
Digital UK	✓ On smart TVs only	✓ On some smart TVs only.	✓ On some smart TVs only	✓
Freesat	✓ On smart TVs only	✓ On Samsung smart TVs only	✓ On Samsung smart TVs only	✓
Sky	✗ but available through second screen device/app	✓ Available for audio-described content on Sky+ HD, Sky Q, and Sky Q 1TB UHD STBs	✓ Have a bolder and larger font option on only Sky+ and Sky+ HD STBs	✓
Virgin Media	✗ but available through second screen device/app	✓	✓	✓
YouView	✗ but available through second screen device/app	✓ Audio-described and signed programmes listed separately on newer boxes from retail and TalkTalk	✓	✓