Deliverable 10:

Overview of the relevant laws in the area of media accessibility in 2024

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1   Introduction

This short report was compiled on the basis of a survey that was distributed among the national representatives of the AccessibleEU project. Unfortunately, very few responded and therefore this report only covers 6 of the 27 EU countries.

2   Austria

The equality of all people and the consequences of this principle are widely and extensively enshrined in conventions, national laws and action plans as well as in regulations. Legal foundations and guidelines oblige states and institutions to take action against discrimination and in favour of accessibility.

2.1   Code of honour

The Code of Honour for the Austrian Press is based on equal treatment of all persons and prohibits discrimination. Point 7.2 of the chapter "Protection against generalised denigration and discrimination" reads: "Any discrimination based on age, disability, gender, ethnic, national, religious, sexual, ideological or other grounds is prohibited."

The Code of Honour for the Austrian Press was drawn up by the Austrian Press Council.

2.2   Accessibility

The legal regulations in regard to Accessiblity in ICT are

Web Accessibility Act (WZG) (Federal Law Gazette I No. 59/2019) igF promulgated on 22 July 2019, as a national law implementing Directive (EU) 2016/2012 on the accessibility of the websites and mobile applications of public sector bodies

UN Convention on the Rights of Persons with Disabilities, Federal Law Gazette III No. 155 of 23 October 2008, in particular Article 3 lit. c.: "The principles of this Convention are: ... c) full and effective participation and inclusion in society", UN Convention documents on monitoringausschuss.at

Federal Constitutional Law (B-VG) Article 7 and Article 8

Article 7: "No one may be disadvantaged because of their disability. The Republic (federal government, provinces and municipalities) is committed to ensuring equal treatment of disabled and non-disabled people in all areas of daily life".

Article 8: "Austrian Sign Language is recognised as an independent language."

Federal Disability Equality Act (BGStG), Federal Law Gazette I No. 82/2005 in the current version (as amended), in particular Section 6 (5): "Buildings and other facilities, means of transport, technical commodities, information processing systems and other designed areas of life are Accessible if they are accessible and usable for people with disabilities in the generally customary manner, without particular difficulty and in principle without outside help."

Disability Employment Act (BEinstG), Federal Law Gazette I No. 22/1970 as amended, in particular §§ 6ff

Signature and Trust Services Act - SVG, Federal Law Gazette I No. 50/2016 as amended

Zustellgesetz, BGBl. No. 200/1982 igdF, in particular Section 3 or § 29 para. 7 (Note: The Zustellgesetz regulates the electronic delivery of RSa/RSb letters from public authorities to private individuals/companies, but not the reverse).

General Administrative Procedure Act, Federal Law Gazette No. 51/1991 igdF

Marrakesh Treaty, which regulates access to copyright-protected publications and documents for people with visual impairments and thus forms the basis for access to many educational programmes. In Austria, this is enshrined in the Copyright Act (§42d).

General comment No. 2 (2014) of Committee on the Rights of Persons with Disabilities on Article 9: Accessibility of UN CRPD

Public Procurement Directive: Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC

Public Procurement Directive for water, energy, transport, and postal services: Directive 2014/25/EU of the European Parliament and of the Council of 26 February 2014 on procurement by entities operating in the water, energy, transport and postal services sectors and repealing Directive 2004/17/EC Text with EEA relevance

European Electronic Communications Code: Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast)Text with EEA relevance

European Audiovisual Media Services Directive (AVMSD): Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November

2018 amending Directive 2010/13/EU on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services (Audiovisual Media Services Directive) in view of changing market realities

The European Accessibility Act2 (EAA), is an EU law that will set new EU-wide minimum accessibility requirements for a range of products and services.3 It seeks to strengthen the right of persons with disabilities to access goods and services available in the EU internal market. The Act is a Directive, which means it sets binding accessibility goals but leaves to the Member States of the European Union (Member States) to decide how they want to reach them. It was adopted in 2019 with several shortcomings, including the failure to adequately address the accessibility of transport and the built environment. The Directive only sets out the absolute minimum requirements that must be met without further detailing how to comply with these requirements. Member States may adopt national laws that are more ambitious than the EU text, but never softer or contradicting.

2.3   Sports reporting

Guidelines and recommendations for appropriate coverage of athletes at the Paralympics have been drawn up and published by the International Paralympic Committee.

http://www.paralympic.org/

The IPC Guidelines Reporting on Persons with a Disability provide useful tips for the behaviour of journalists, for example as reporters or for interviews, as well as for texting, i.e. wording in the form of appropriate words and phrases.

http://www.iwrf.com/resources/iwrf_docs/IWRF_Reporting_on_Persons_with_a_Disability.pdf

The 2017 Federal Sports Promotion Act focuses on inclusion. One of the eight general objectives of sports funding is the "greatest possible inclusion of people with disabilities", for which funding is provided for measures and projects. This funding must also pay particular attention to "the integration and inclusion of socially disadvantaged groups (people with physical, mental and/or sensory disabilities)".

https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20009941

3   Germany

Ordinance on the creation of barrier-free information technology in accordance with the Disability Equality Act (Barrier-free Information Technology Ordinance - BITV 2.0)

The Barrier-free Information Technology Ordinance aims to enable and guarantee the comprehensive and fundamentally unrestricted barrier-free design of modern information and communication technology. Information and services provided electronically by public authorities, as well as electronically supported administrative processes with and within the

administration, including procedures for electronic file management and electronic processing, must be accessible and usable for people with disabilities.

https://www.gesetze-im-internet.de/bitv_2_0/BJNR184300011.html

Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies (Text with EEA relevance)

The move towards a digital society offers users new ways of accessing information and services. Information and service providers, such as public authorities, are increasingly using the Internet to obtain, create and provide a wide range of information and services online that are of fundamental importance to the general public.

For the purposes of this Directive, the concept of "accessibility" includes principles and techniques to be observed when designing, creating, maintaining and updating websites and mobile applications in order to make them more accessible to users, in particular people with disabilities.

https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32016L2102

3.1   Laws:

https://www.bundesfachstelle-barrierefreiheit.de/SharedDocs/Rechtssammlung/MStV.html

https://www.die-medienanstalten.de/service/rechtsgrundlagen/gesetze

3.2   Research and study programmes

Master Barrier-free Communication (University of Hildesheim)

The degree programme focuses on translation/interpreting in easy-to-read language. The programme also provides in-depth insights into relevant fields of research and practice in accessible communication: - AAC and assistive technologies - Communicative inclusion of people with hearing impairments - German Sign Language (DGS) - Communicative inclusion

https://www.uni-hildesheim.de/leichtesprache/ma-barrierefreie-kommunikation/

Assistance media

The project examines the past and present of media-related barriers within digital cultures and how they are overcome by software and hardware assistants. General assistance systems (from simple help programmes to complex voice assistants such as Apple's Siri) are examined as well as special support technologies.

https://www.leuphana.de/institute/icam/forschungsprojekte/abgeschlossene-projekte/medien-der-assistenz.html

Dis-/abilities - non-/disability and media in the context of digitalisation

The development of technical aids and their use by people with disabilities is an important field for German-language media studies, but one that has so far only been dealt with sporadically. It offers the opportunity to analyse the relationship between differently abled bodies, sensory experiences and technologies and, in doing so, to explore concepts such as assistance, media participation, etc.

https://dis-abilities-and-digital-media.org/index.php/de/

Accessibility of digital educational media: Development of a matrix for testing the accessibility of digital educational media

Bachelor's thesis at the Stuttgart Media University in 2021. The aim of the thesis is to develop a matrix for testing the accessibility of digital educational media. The underlying research question is: "Which accessibility criteria are relevant for digital educational media?"

https://www.oerbw.de/edu-sharing/components/render/9e9a295f-dfdc-4429-9a56-2f3d35e89458?query=Barrierefreiheit&parameters=%7B%22ccm:university%22:%5B%5D,%22keywords_all%22:%5B%5D,%22ccm:educationallearningresourcetype%22:%5B%5D,%22ccm:taxonid%22:%5B%5D,%22ccm:lifecyclecontributer_author%22:%5B%5D%7D&repositoryFilter=&mds=mds&mds

3.3   Advice and assistance in implementing technical accessibility

- **Accessibility portal of the service consolidation of the federal government** [↗]

The Accessibility Portal of the Federal Service Consolidation is provided by the Federal Ministry of the Interior and Homeland Security. The portal provides a wealth of information and practical tips on the topic of digital accessibility and its implementation. Users can find out what digital accessibility means and which legal provisions apply to its implementation.

- **Communicate barrier-free!** [↗]

People with disabilities often need assistive technologies to use computers and the Internet. This is where the STIFTUNG barrierefrei kommunizieren! foundation comes in. The foundation supports those affected, relatives and multipliers from politics and business in order to break down fears of contact and barriers.

Participation 4.0: Digital accessibility - added value for everyone [↗]

The aim of the Participation 4.0 project is to raise awareness of digital accessibility among companies and public administrations so that people with disabilities can participate fully in public and working life. The website provides information on legal requirements, raises awareness of accessibility and the associated added value, and provides

- **Accessible information and communication - BIK-for all** ↗

The "BIK for All" project was funded by the Federal Ministry of Labour and Social Affairs from 2015 to 2018 to raise awareness of accessible websites and promote compliance with the relevant standards. Numerous awareness-raising initiatives were carried out together with partners. The project also includes many implementation aids and a WCAG test [...]

Expertise in information and communication (Federal Accessibility Agency) ↗

Specific tips for implementing accessibility in the area of information and communication are presented. In particular, it deals with sign language, easy language, communication in the area of health, accessible print media and communication with and about people with disabilities.

Expertise in information and communication (Federal Accessibility Agency):More info

- **Practical aids for information technology (Federal Accessibility Centre)** ↗

The website provides an overview of the legal basis for accessible web design as well as further tips on the topics of web conferences, editing, apps, PDF, online videos and testing digital accessibility.

Practical aids for information technology (Federal Accessibility Agency):More info

- **Accessibility: training, project support and advice** ↗

The website offers comprehensive information on the subject of accessibility and also goes into detail about the various forms of restrictions and technical solutions as well as the history of technology and current technical developments.

Accessibility: Training, project support and counselling:More info

- **Computer, smartphone and internet - DBSV** ↗

The German Association for the Blind and Visually Impaired (DBSV) aims to support the blind and visually impaired in their social and professional integration. Among other things, it deals with the topic of 'barrier-free web design'. The DBSV wants to dispel reservations and at the same time help to find the right ways for blind and visually impaired people to participate in [...].

Computer, smartphone and internet - DBSV:More info

- **TU Dresden: Downloads and materials for the accessible design of documents, presentations, video conferences - digital teaching** ↗

As part of a project, the Disability and Study Services working group at TU Dresden has compiled materials and instructions on how to make university teaching accessible. In addition to information on standard software such as Adobe, Microsoft Word and Excel, it also refers to video conferencing tools that can be used by people with disabilities. The instructions are available in German and English [...]

TU Dresden: Downloads and materials for the accessible design of documents, presentations, video conferences - digital teaching:More info

- **Guidelines for designing accessible continuing education programmes / "Digital accessibility" course** ↗

Adapting training courses for blind and visually impaired people to make them accessible requires a certain amount of effort, but this is by no means as great as it may initially seem. The website offers instructions, checklists and online courses on the subject. All courses are available free of charge, but some require a user account. The course "Digital [...]

Guidelines for designing accessible continuing education programmes / "Digital accessibility" course:More info

- **Recommendation on gender-appropriate, digitally accessible language** ↗

The Federal Monitoring Centre for Accessibility in Information Technology (BFIT-Bund) has drawn up a recommendation on the use of gender-appropriate language in the context of digital accessibility. The recommendation is based on a nationwide, representative study. The findings from the study are used to make significant statements on the use of a preferred [...]

Recommendation on gender-appropriate, digitally accessible language :More info

- **Accessibility guidelines from the German Publishers and Booksellers Association** ↗

The German Publishers and Booksellers Association has set up a task force and published a total of 3 guidelines and recorded webinars on the subject of accessibility - accessible pdfs, epub, accessible websites. The background to this is that the European Accessibility Act now also obliges private providers to provide digital accessibility by June 2025.

Accessibility guidelines from the German Publishers and Booksellers Association:More infomailto:dbs@dipf.de?subject=Defekter%20Link&body=auf%20der%20Seite%204781,%20%0A%0Ahttp%3A%2F%2Fwww.bildungsserver.de%2Fbarrierefreie-kommunikation-und-zugang-zu-digitalen-medien-4781-de.html%3Fseite%3D4781%0A%0AOnlineressource%2063187.%0ALeitf%C3%A4den%20zu%

- **Checklist including online events** ↗

The checklist contains tips and advice on how to organise online events in such a way that they are accessible to people with different impairments. The information can be filtered according to the type of impairment of the participant group and the planning phase of the event.

Checklist including online events:More info

- **Five tips for an accessible video** ↗

The authors explain briefly and concisely what needs to be considered when videos are to be made accessible for blind and visually impaired people, for example image descriptions.

Five tips for an accessible video:More info

- **Accessible web design** ↗

Accessible web design - sometimes also called accessibility - is the art of programming websites so that everyone can read them. When designing websites, it is often not taken into account that many people have physical limitations. Certain programming techniques then create 'barriers' to their access to the Internet. This can be a lack of text to describe graphics.

Accessible web design:More info

- **Accessible PDFs: Check, correct and optimise PDFs** ↗

This handout is a guide to creating accessible PDF documents.

Accessible PDFs: Checking, correcting and optimising PDFs:More info

- **Digital accessibility checklist: pdf documents** ↗

Barriers in pdf documents, especially for visually impaired and blind users, are listed step by step and their elimination explained. It is always better to edit the original Word document before conversion in order to minimise barriers.

Digital accessibility checklist: pdf documents:More info

Source: https://www.bildungsserver.de/barrierefreie-kommunikation-und-zugang-zu-digitalen-medien-4781-de.html

4 Cyprus

4.1 Laws

However, please don't imagine that Cyprus implements a great level of accessibility in Media... There is some captioning is some cases, and a short sign language news broadcast. However we have just voted the [the Accessibility of Products and Services Law of 2024 (57(I)2024)](#) and hopefully media providers and other services will soon have to comply to these regulations.

4.2 Left:

- [The Radio and Television Organisations Laws of 1998](#) (N.7(I)/1998), amendments 2010 and 2021 (N.197(I)/2021), (as well as the [Cyprus Radio Foundation (amendment) Law (N.196(I)2021)](#)), harmonized with the EN 2018/1808 provides for the obligation of media providers to implement accessibility requirements, including audio transcription, captioning and sign language.

- [The Regulation of Electronic Communications and Postal Services Law of 2004 (N.112(I)/2004)](#) included references to the accessibility of these services for persons with disabilities, which in 2022 have been replaced with references to universal access, including accessibility for people with disabilities. Disability relevant provisions are now specified in the [Defining the Scope of the Universal Electronic Communications Service, Regulatory Decision of 2022, E.E. Par.III(1), No. 5726, p. 1906, 22/7/2022 (ΚΔΠ 297/2022)](#)

5 Bulgaria

Short information about the state of Art in Bulgaria (from Press Release of the Council of Electronic Media - Press release - https://www.cem.bg/displaynewsbg/858 - 09 December 2022, WORK MEETING AT SEM ON ACCESSIBILITY OF MEDIA SERVICES FOR PEOPLE WITH SIGHT AND HEARING IMPAIRMENT)

The providers of media services with a national scope and terrestrial digital radio broadcasting of television programs with a polythematic or informational program profile and an average daily audience share of more than 20 percent and BNT television programs must provide in at least one of their broadcasts news in the range 19:00 - 23:00: 30 h translation into Bulgarian sign language.
 The public BNT and BNR also have obligations according to the Law on People with Disabilities, which explicitly prescribes an obligation for the Bulgarian National Television, the Bulgarian National Radio and the Bulgarian Telegraph Agency to provide information accessible to people with disabilities. The media must include in their programmes

programmes and information related to people with disabilities (Article 64, paragraph 1 and paragraph 2 of the USSR).

The official of the CEM, who is assigned to provide information on issues related to accessibility - Dilyana Kirkovska, presented the report on the implementation of Art. 8a of the Radio and Television Act regarding the implementation of accessibility measures by media service providers in the period September 2021-December 2022. The monitoring is in accordance with the European legal framework (Directive (EU) 2018/1808 of the European Parliament and of the Council of 14 November 2018, United Nations Convention on the Rights of Persons with Disabilities), as well as with Bulgarian legislation (Law on Persons with Disabilities, Law on Bulgarian Sign Language, Law on Radio and Television).

here are some links and info for the situation in Bulgaria related to you request:

5.1   Relevant Laws:

5.1.1 Radio and television act

https://www.cem.bg/files/1719515910_radio_and_television_act.pdf - in art. 6, para. 3 of the ZRT provides for specific obligations for the Bulgarian National Radio and the Bulgarian National Television - in their capacity as national public providers of radio services and audiovisual media services, to respect the rights of people with sensory disabilities. They have the obligations to provide media services for all citizens of the Republic of Bulgaria, to include broadcasts that inform, educate and entertain - in this aspect, no exceptions or discrimination are allowed; to provide citizens with an opportunity to familiarise themselves with the official position of the state on important issues of public life; to provide for distribution political, economic, cultural, scientific, educational and other socially significant information - thus the right of all groups in society to receive information, regardless of whether they are the majority or minority, is guaranteed.

BNR and BNT have the obligation to assist in the development and popularisation of Bulgarian culture and the Bulgarian language, as well as the culture and language of citizens in accordance with their ethnic affiliation; to ensure through their media services access to the national and European cultural heritage; to promote mutual understanding and tolerance in relations between people.
 BNT and BNR are obliged to apply the new information technologies.

5.1.2 Electronic communications act

 - https://www.cem.bg/infoen/83 - In Art. 7 - "Measures for end-users with disabilities", in Art. 23a - "Ensuring equality of access and choice for end-users with disabilities" and other specific provisions are provided specifically to ensure access for people with disabilities.

Providing opportunities for people with disabilities, incl. elderly people and persons with specific social needs, to derive maximum benefit from the choice, price and quality of electronic messages, is laid down as one of the main goals of the Law on Electronic Communications - Article 4, Paragraph 1, Item 1 of the Law on Electronic Communications . Specific provisions regarding the protection of persons with disabilities are provided for in Chapter Eleven - "Universal Service". According to Art. 182, para. 2 of the ZES, the universal service includes: connection to a fixed network and fixed telephone services; provision of public telephone sets; access to public telephone services, including emergency services, telephone directory and reference services for persons with disabilities similar to those enjoyed by other end-users. In Chapter Fourteen "Protection of the interests of end users" it is stipulated in the general conditions of the contract with end users that the special measures for people with disabilities should also be specified /art. 227, paragraph 1, item 6 of the Law on Economic and Social Affairs/.

5.2 Links

. Internal Acts of Councels of Electronic media - https://www.cem.bg/infoen/55

Law on Persons with Disabilities - https://portal.cor.europa.eu/divisionpowers/Pages/Bulgaria-Social.aspx

Law on the Bulgarian Sign Language, - https://pap.deaf.bg/en/national-legislation/

5.3 Other analyses

Public Service Broadcasting Resists - The search for independence in Brazil and Eastern Europe - http://www.fmd.bg/?page_id=21

The book - https://fmd.bg/wp-content/uploads/2020/04/Octavio_Pieranti_PSB_Resists_book.pdf

Information habits and needs of hearing impaired people - Results of a survey of "We Hear You" and "Media Democracy" Foundation (in Bulgarian) - http://www.fmd.bg/wp-content/uploads/2019/08/survey-info-habits-hearing-disabilities-bg.pdf

Monitoring Media Pluralism in Europe: Application of the Media Pluralism Monitor 2017 in the European Union, FYROM, Serbia & Turkey. Country Report: Bulgaria - Country Report - https://cmpf.eui.eu/wp-content/uploads/2018/11/Bulgaria_MPM2017_country-report.pdf

Rights of people with disabilities - https://www.ombudsman.bg/en/p/rights-of-people-with-disabilities-22

CONTRIBUTION BY THE GOVERNMENT OF BULGARIA TO THE QUESTIONNAIRE ON THE APPLICATION OF ARTICLE 8 OF THE UNITED NATIONS CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES UNDER HRC RESOLUTION

37/22 -
https://www.ohchr.org/sites/default/files/Documents/Issues/Disability/Article8/Bulgaria.docx

6 Slovenia

6.1 Competencies of the Agency under the Audiovisual Media Services Act

Current Legislation on the Accessibility of Audiovisual Media Services to Persons with Disabilities

Currently, the accessibility of audiovisual media services (AVMS) for persons with disabilities is governed by the Act on Amendments to the Audiovisual Media Services Act (Official Gazette of the Republic of Slovenia, No. 204/21; hereinafter: ZAvMS-B), which transposed Directive (EU) 2018/1808 into Slovenian legislation in December 2021. According to Article 14.a of the ZAvMS, providers of audiovisual media services must progressively and continuously improve the accessibility of their services for persons with disabilities through proportionate measures such as sign language interpretation, subtitles for the deaf and hard of hearing, spoken subtitles, and audio descriptions (first paragraph of Article 14.a of the ZAvMS). Specifically, the ZAvMS stipulates that public communications and emergency information during natural disasters broadcast through audiovisual media services must be provided in a manner, form, or language adapted to persons with disabilities (sixth paragraph of Article 14.a of the ZAvMS).

6.1.1 Complaints Handling by the Agency

The fifth paragraph of Article 14.a of the ZAvMS empowers the agency to receive and handle complaints regarding the accessibility of audiovisual media services to persons with disabilities. In 2023, the agency received three complaints related to television programme accessibility:

1. alleged non-functioning subtitles in Slovenian-spoken content.

2. Slovenian content not equipped with Slovenian subtitles.

3. background music during spoken segments that was disturbing to the complainant.

In each case, the agency, following the General Act on the Protection of Vulnerable Groups (Official Gazette of the Republic of Slovenia, No. 70/22), informed the television programme issuers and requested explanations. While the agency has the authority to conduct inspections to ensure compliance with the ZAvMS, no inspection procedures were initiated as no circumstances warranted such actions.

6.2 Three-Year Improvement Plans for Accessibility of Audiovisual Media Services

In accordance with the second paragraph of Article 14.a of the ZAvMS, audiovisual media service providers are required to prepare an accessibility improvement plan for persons with disabilities for each three-year period and submit it to the agency. By the end of April following each three-year period, providers must report to the agency on the implementation of the measures outlined in their accessibility improvement plans (third paragraph of Article 14.a of the ZAvMS). The first plans for the period 2022-2024 were to be submitted to the agency by the end of 2022, as stipulated in the first paragraph of Article 42 of the ZAvMS-B. The agency published and provided forms for these plans at the end of 2022.

6.3 Cooperation with Disability Organisations

The agency held a virtual meeting with all audiovisual media service providers and representatives of disability organisations in the Republic of Slovenia. The meeting aimed to familiarise stakeholders with the content of the accessibility planning forms and to discuss the expectations and needs of persons with disabilities regarding accessibility. The meeting included real-time captioning and interpretation into Slovenian sign language to ensure accessibility for persons with disabilities.

6.4 Accessibility Information Portal for Persons with Disabilities

In 2022, the agency established an accessibility information portal on its website, providing information and a platform for receiving complaints related to accessibility, including audiovisual media services. The portal explains the required accessibility measures and outlines the legal obligations of service providers. In 2023, the agency enhanced the portal to make it more accessible, especially for blind, visually impaired, deaf, and hard-of-hearing individuals, by preparing 20 video-audio content pieces in Slovenian language with spoken content, subtitles, and sign language interpretation.

6.5 Competencies under the Accessibility of Products and Services for Persons with Disabilities Act

The Accessibility of Products and Services for Persons with Disabilities Act (Official Gazette of the Republic of Slovenia, No. 14/23; hereinafter: ZDPSI) transposed Directive (EU) 2019/882 into Slovenian law on 24 January 2023. The ZDPSI establishes a general framework for the accessibility of certain products and services and gives the agency new competencies, including monitoring the implementation of additional accessibility

requirements for electronic communication services, services providing access to audiovisual media services, e-books, and related software.

Article 10 of the ZDPSI stipulates that providers of audiovisual media services must ensure

1. perceptible, usable, understandable, and reliable electronic program guides with information on the availability of accessibility features.

2. full provision of accessibility components such as subtitles, audio description, spoken subtitles, and sign language interpretation in appropriate quality, allowing precise display and synchronisation with audio and video, as well as user control over display and usage.

The agency's oversight procedures under this Act will commence when the ZDPSI comes into effect on 28 June 2025, as specified in Article 46 of the Act.

7   Portugal

7.1   Laws

 ERC https://www.erc.pt/pt/em-foco/acessibilidade-das-emissoes-televisivas-

On Portuguese legislation for TV channels, the article 34, number 3, specifies that the Portuguese Regulatory for the Media (ERC) shall specify all the technical criteria for accessibility on media, including how it is delivered to customers and how much of the content needs to be accessible.

Law (in Portuguese): https://files.dre.pt/1s/2007/07/14500/0484704865.pdf

The main topics on this are:

News content shall be broadcasted with Portuguese Sign Language interpretation, with specifications for the minimum amount of time and periodicity

Other TV shows shall be broadcasted with Portuguese Sign Language interpretation, with specifications for the minimum amount of time per day

Other content that might not be broadcasted in Portuguese have to have captions for everyone (in Portugal we don't do voice over, we use captions for all content that is not originally in Portuguese)

Here is a link to the document in English where they specify all the rules: https://www.erc.pt/documentos/legislacaosite/English/accessibilityforpersonswithspecialn eeds_deliberacaoerc_2016_260_uk.pdf

While this document is from 2016, there are some changes in the recent years, mainly on improving the quality of Portuguese Sign Language interpretation (visually) and improving the compliance of the regulation. TV channels have improved the amount of programmes broadcasted with Sign Language, the technical specifications and the variety of programmes.

During COVID, the health authority have had a sign language interpreter on all public communications and an agreement was made to include that professional on the images recorded by the TV channels and then broadcasted to everyone. This agreement included the position of the interpreter and how camera operators should frame the interpreter on the image, so everyone could have access to the information delivered by the authority.