[PT] Linear television channels comply with accessibility measures; video-on-demand operators lack an ambitious attitude

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The Portuguese audiovisual linear services fulfilled their obligations in 2023 regarding accessibility measures for audiences with special needs. A recent report by the Portuguese Regulatory Authority for the Media (ERC) assessed the level of compliance with the multi-annual plan that entered into force in January 2022 and found that some objectives had even been exceeded. A less favourable scenario exists with regard to on-demand audiovisual services, as no significant development was documented in 2023 regarding the previous year.

Following the implementation of the Audiovisual Media Services Directive (AVMSD) in 2020, the media regulatory entity approved a multi-annual plan with which operators have to comply, establishing minimum requirements to be met, namely a given number of broadcast hours with different instruments of inclusiveness. There are different measures for different service providers, and the public broadcaster has more rules to comply with. Also, video-on-demand (VOD) providers have other obligations. The plan is in effect until December 2025 and is divided into two periods to allow services to gradually adopt the new measures, following the indication of the AVMSD that television broadcasters and VOD services must make their audiovisual services continuously and progressively more accessible to persons with special needs.

The main accessibility measures concerning linear broadcasters (commercial and public service television) are adapted subtitling, a Portuguese sign language interpreter to address hearing-impaired audiences, and audio description for members of the public with visual impairment. The measures do not cover, however, a very significant part of the programming in terms of hours. VOD services rely more on functionalities related to the use of a computer as a viewing system, with subtitling, audio description, and keyboard shortcuts being the most common functionalities. The information on accessibility measures is displayed on the website of each VOD service, but there is no information regarding the proportion of the catalogue in which these functionalities are available.

Although there are some minor issues yet to be addressed to ultimately achieve all the objectives, namely in subtitling live shows, the report of the regulatory authority stresses that most obligations for linear television were, in fact,

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exceeded. This was the case for subtitling, the presence of a Portuguese sign language interpreter, and audio description.

The report states that VOD operators have been less active in implementing accessibility measures, and due to the lack of developments in this field, the regulatory entity has called on these content providers to adopt more ambitious plans to incorporate accessibility into their catalogues.

Accessibility of television programme services and on-demand audiovisual services in 2023

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