

# PUBLIC SERVICE MEDIA AND ACCESS SERVICES

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**Abstract:** Public service media (PSM) play a significant role in national media markets ensuring accessibility to program content and services for people with disabilities. They are trying to implement and increase the amount of content available to people with sensory impairments (sight and hearing), as well as people with mental (intellectual and cognitive) challenges, thus acting in accordance with their legal responsibilities. The aim of this research is to analyse the current situation and the possibilities for further development by the careful consideration of the problems faced by public service media trying to ensure accessibility. Both theoretical methods (analysis, deduction and comparative method) and empirical methods (case study and content analysis) will be used in the paper. The conclusion is that public service media must adapt their contents in accordance with European accessibility standards, which are implemented through the national regulatory framework. While some European service media providers have strict obligations and quotas related to the types of services and the amount of content, public media in Serbia, Slovenia and Croatia, for example, they are legally bound to try to increase the amount of accessible programming based on financial and technical possibilities. Although national laws usually do not differentiate between media service providers (public and commercial), public service media fulfil their obligations to the greatest extent ensuring accessibility by making subtitles, audio-description, sign language and news in easy-to-understand (simple) language.

**Keywords:** *public service media, access services, subtitling, audio-description, plain language.*

**Field:** Social sciences

## 1. INTRODUCTION

In this research, persons with disabilities are considered to be all those, in line with the Convention of United Nations on the Rights of People with Disabilities (UN CRPD), reached on 13th December 2006, “who have long-term physical, mental, intellectual or sensory damages that in interaction with different obstacles can harm their full and efficient participation in society on equal basis with others“. (United Nations, 2006) While available services assume alternative formats to provide equal access and participation in the media for all viewers and listeners of audio-visual content, for the blind and visually impaired there are audio-description and sound subtitles, for the deaf and hard of hearing there are sign language and subtitles. „For the purpose of establishing successful communication of a television-mediated message, which is performed at two levels – logical-intellectual and emotional-affective – it is necessary to compensate the part of the information that cannot be received by persons with disabilities due to their problems with vision or hearing.“ (Ćitić, 2021) For the persons with mental disabilities the accessible contents are the ones adapted through the so-called simple, easy-to-understand language. It is these alternative formats whose presence and production we analyse in this paper concerning the national media services of Serbia, Slovenia and Croatia.

The special significance in modern democratic society is attributed to public media services whose primary task is to respond to all the programme demands of viewer and listener audience in the accomplishment of public interest. This significance has been recognised by the European Broadcasting Union (EBU), the leading world alliance of PMSs, which currently has 113 members in 56 countries, and as reported in the annual report, “has the vision to tend to make public services the most creative, reliable and engaged media today and in the future“. (EBU, 2025) Through versatile directions of activities, EBU has an important role in connecting public media services, exchange of knowledge, ideas and experiences, in this case via a specialised annual conference in the field of TV programe availability for the persons with disabilities (EBU Access Services Community Meeting). Speaking at the conference held in Radio-Television of Serbia in 2023, in which 57 availability service experts participated, the coordinator of EBU group Paul Harrison stated that “all European public media houses are obliged to have accessible services. There will always be challenges, the things are now definitely better than they were ten years ago, and we are still making progress. New technologies are there, constantly being developed, and we only need to take care of having some benefit from their advancement“. (Marinković, 2023) Practice has proven that in the process automatisation of adapting programme contents to the deaf and hard of hearing through subtitles, the advantage is given to the public media services using dominant world languages (English, German, French etc.), while a lot of difficulties in the implementation of the so-called

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Speech-To-Test (STT) softwares are present in the public media services using “minor languages”, to which our regional languages also belong. That is the aggravating factor for enabling the larger quantity of programme contents available to the deaf and hard of hearing persons.

As public media organisations, public media services are obliged in their diverse programme selection to respond to the audience demands for informative, educational and entertainment contents. For example, as given in the Law concerning the work of the providers of the public media service in Serbia, as “independent, autonomous legal subject financed by public and other sources”, it is their duty to “provide the realisation of public interest through versatile, balanced, high-quality programmes regarding informing, education, culture and entertainment in order to accomplish public interest, i.e. to satisfy the needs of all parts of the society.” (Paragraf, 2025) Through this Law, as well as through the Law on Public Informing, the media providers in the sphere of accomplishing public interest are obliged to consider the language and speech standards of the deaf and hard of hearing along with endeavouring to accommodate the programme contents to the blind and visually impaired persons. Similar stipulations are an integral aspect of the other media laws regulating the work of public media services in the countries where they exist. Legal regulations that deal with the media functioning in Croatia oblige the media service providers through the Law on Electronic Media that they “have the obligation constantly and gradually to use proportional measures to make their services more accessible to the children with developmental disabilities and persons with disabilities.” (Zakon HR, 2023) For example, the Law on Audio-Visual Media Services in Slovenia, in the article on the protection of the persons with disabilities, mentions the obligation for “the providers of audio-visual media services to gradually and continually enhance the accessibility of their services to the persons with disabilities through proportional measures, such as translation to sign language, subtitles for the deaf and hard of hearing, speech subtitles and audio-description. (ZavMS-B, 2021) According to this law, every third year media service providers are obliged to submit their report on the completed activities to the Agency for Communication Networks and Services of the Republic of Slovenia. The European Law on Accessibility in Slovenia was adopted in January 2023. This Law implements the EU Directive 2019/882 - The European Accessibility Act (EAA), reached in 2019. The Law has been in force since 28th June 2025 in the European Union, and refers to all media providers having their services available in the territory of the EU. By this, media service providers are obliged to make the availability of their digital editions and audio-visual contents. “The services that provide access to audio-visual media services can include web pages, online applications, applications for digital receivers, applications that can be downloaded, services on mobile devices, including mobile applications and connected players, as well as the services of related television.” (EUR-Lex, 2019: 4) Furthermore, the accessibility of audio-visual media services is regulated by the Directive 2010/13/EU of the European Parliament and Council, with the exception of electronic programme guides (EPG), which are regulated by the last Directive. This obligation is supposed to allow the unimpeded access to linear programme contents on digital video streaming platforms for following both live and delayed TV programmes.

In the analysis of the obligatory European recommendation regarding the accessibility of other services and products, which aid the practicality of everyday life of the persons with disabilities, still “it is expected that the most obvious influence of this law will be in the media sector, considering the requirements for accessibility apply for the services providing access to audio-visual media services.” (Rudec&Margetić, 2025)

## 2. MATERIALS AND METHODS

In the research concerning the accessibility of public media programme contents, the combined methodological approach was used. The research focused on Slovenia and Croatia, the two EU member countries in the region, which are active members of EBU Access Services Community group. The research included the information regarding the activities of the national public media service of Serbia (RTS), which is also the member of the EBU group and realises the activities of accessible contents placement.

Apart from theoretical frame, the work was based on media practice, so in the research both theoretical and empirical methods were used. Theoretical methods, such as the analysis of the regulatory frame, media service providers' obligations and the very implementation of different alternative service forms. Besides, the given theoretical methods were implemented for quantitative observation of the accessible services used in public media services as a response to fulfilling the legal obligation to comply with the needs of the persons with disabilities in the reduction of barriers in accessibility of audio-visual media contents.

Through qualitative methodology, for the research is based on the understanding of the significance,

practice and accessibility of public media services, we used the case study and contents analysis. For this research, we conducted two semi-structured interviews via e-mail (Interviews with examinees were conducted via e-mail on 10th November 2025). They were given the same questions. The first interview, within the case study of RTV Slovenia, was carried out with Mateja Vodeb, the director of the Department for Accessibility at RTV Slovenia. The project of contents accessibility in the Slovenian public media service was selected for the analysis as an example of good practice in the implementation of different services and the quantity of contents available to the persons with disabilities. The second interview was conducted with Suzana Ivančić, the director of Department for Programme Adaptation for the Persons with Sensory Disabilities at Croatian Radio-Television (HRT). The purpose of the conducted interviews was the analysis of the implementation of programme adaptation policies, i.e. getting the insight of the perception and practice of accessible programmes of these public media services. Within the case study, the research demanded a special analysis of the programme scheme of the RTV Slovenia First Programme in the week from 6th to 12th November 2025, as well as the subcategory Dostopno on the portal of the Slovenian public media service.

### 3. RESULTS

As stated, the aim of this research was through observing the challenges faced by public media services, to analyse the existing state and the possibilities for further development. When asked in the interview with the directors of departments for accessible programmes of RTV Slovenia and HRT, when these public media services started to introduce accessible services and in which order, Mateja Vodeb answered that the first programme in sign language called Poslušajmo Tišinu has been broadcast for 45 years at the Slovenian national television, and the programme for children Priče iz Školjke, has been broadcast for 40 years, while the main news programmes have been translated since 2009. "We have broadcast subtitles for the deaf and hard of hearing for almost 30 years, and two years ago we upgraded them with subtitles by the live usage of speech recognition for the Slovenian language." Vodeb reported that in 2012 the first movies with audio-description were broadcast. Those were the beginnings. Meanwhile, public media services developed through the introduction of new TV channels and digital platforms, which indicated the need for a systemic approach to this assignment of national relevance. Therefore according to her words, RTV Slovenia since 2016 systemically has been working on accessibility. The introduction of audio subtitles has largely increased the participation of accessible programmes. In the interview conducted for the needs of the research, Vodeb claimed that today RTV Slovenia offers four services available both as linear and non-linear: in live programme, delayed and on demand. Those are sign language, audio subtitles, audio-descriptions and subtitles for the deaf and hard of hearing. Also, as she pointed out, one of the novelties initiated in 2020 at the beginning of the corona virus pandemic, are the news and other articles in the simple language, which are daily published on the site [rtvslo.si](https://rtvslo.si) in the subcategory Dostopno.

The first out of the mentioned four services was the adaptation of the programmes in the Slovenian sign language. "The majority of programmes in sign language are broadcast simultaneously on TV Maribor, live with the interpreter and subtitles. The other programmes, in particular educational and for children, are recorded in advance and broadcast separately", said during the interview the director of the Department for Adapted Programmes of the Slovenian public media service.

According to her, the second service deals with subtitles. RTV Slovenia prepares them in three ways. The first deals with the subtitles prepared ahead for the programmes that have no live broadcast, but are pre prepared for broadcasting: "employees and external collaborators add subtitles to the programmes with the help of speech recognition and manually edit them into the suitable language and equip with time codes (TC). Such subtitles are of high quality. Over a thousand programmes are thus equipped every month. Some programmes with more persons who speak are subtitled with different colours for every speaker so that they could be recognised more easily." She also stated that live subtitles are a special way of preparation. They are mainly prepared for daily informative programmes, and for other live broadcast programme contents. The employees in the Department for Subtitles manually insert those in advance prepared, revised and linguistically edited subtitles in live programmes and, if necessary, combine them with the automatic speech recogniser. The subtitles are mostly of high quality. The third way of programme equipping is represented by automatic subtitles. They are created with the help of speech recogniser and with automatic live language editing. Automatic titles are used in the programmes and live broadcasts, just like in some pre prepared produced programmes. As Vodeb deems, these subtitles are of lower quality than those linguistically revised, but still up to a great degree they fulfil the usage standards in RTV Slovenia programmes. Subtitled programmes are available on web portals and applications of RTV 365

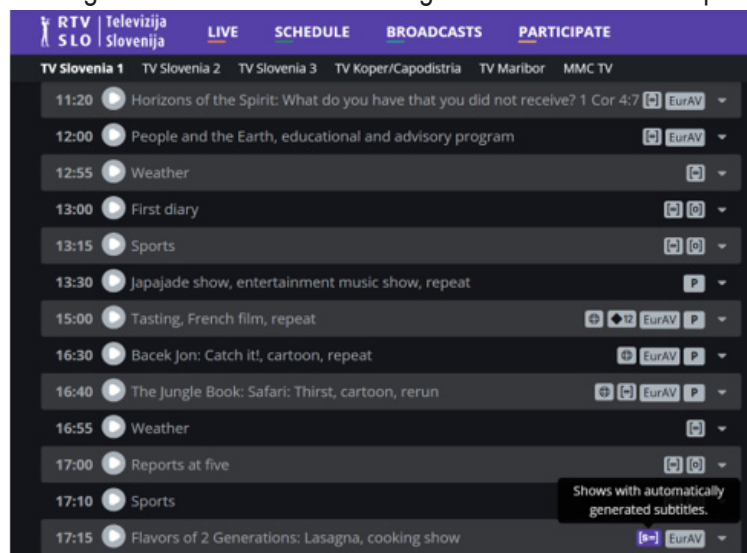
streaming platform for cell phones and smart TV sets.

The third way of adapting programme contents are audio-descriptions for the blind and hard of hearing. RTV Slovenia provides audio-descriptions for diverse documentaries and series, feature movies and programmes for children, along with live programmes during the broadcasting.

The fourth kind of adapting TV programmes concerns sound subtitles. "We also regularly provide audio subtitles for foreign and domestic contents in the programme. Audio subtitles are available everywhere where subtitles are available, except for feature movies and series", said Vodeb. During the interview, she explained how they technically enabled the placement of audio descriptions and audio subtitles. "We emit audio descriptions and audio subtitles on the second audio channel, where broadcast mix is used. They are available via all operators, inside antennas and via web page, as well as in the archives of the RTV365 application."

In the analysed programme scheme in which programme contents were particularly marked with special signs adapted for the persons with disabilities (Figure 1), for the week from 6th to 12th November 2025 all accessible services were present. The subtitles for the deaf and hard of hearing were dominantly present, as well as audio-descriptions for the blind and visually impaired (Figure 2). Special heed should be paid in the programme scheme to the contents made accessible through automatically generated subtitles, by which, regardless of the smaller number of programmes, in terms of the time covered significant programme time schedule since they were present during the morning show *Dobro Jutro*, which lasts from 7AM to 9AM, and just like some other programmes that are informative, entertainment, for children and of other programme kinds.

Figure 1: Programme scheme with markings for RTV Slovenia adapted programmes



Source: RTV Slovenia Internet portal.

During the week of analysing accessible programme scheme, there was a significant quantity of contents that mainly had subtitles and sound subtitles. This service for the blind and hard of hearing was available for 121 programmes, while during the observed week, three contents had audio-descriptions. The featured series of domestic production *Takšno je Življenje* had the audio-description of scenes between audio-dialogues on TV Slovenia for 20 hours. The lack of contents in the Slovenian sign language in the programme scheme was compensated by the extremely high presence of the programmes with subtitles.

Figure 2: Presence of accessible programmes on TV Slovenia 1 in the week from 6th to 12th November 2025

Accessible service	6.11.2025.	7.11.2025.	8.11.2025.	9.11.2025.	10.11.2025.	11.11.2025.	12.11.2025.
Subtitles [=]	32	31	41	33	26	33	31
Automatically generated subtitles [s=]	7	5	6	7	8	6	6
Audio subtitles [o]	18	18	15	10	19	21	20
Audio descriptions [...]	0	1	1	1	0	0	0
Sign language [<]	1	0	1	0	0	1	0

Source: Author's research

Aside from these services available through linear and non-linear following programme contents, the public media service of Slovenia adapts the news and other formats to the people with cognitive disabilities. As Mateja Vodeb stated in the interview, "daily we prepare about 3 pieces of news in the simple language, sometimes even fewer - for instance during weekends. Additionally, we adjust pre-election and pre-referendum debates and the news in emergency or situations of crisis to the technique of easy reading. We select and adjust the most important contents from the central portal. Our target audience is rather diverse – persons with intellectual disabilities, immigrants, less educated, people with reading difficulties, poorer concentration and the elderly." The simple news on RTV Slovenia portal is available on page Dostopno in the category Enostavno (<https://www.rtvlo.si/enostavno>). They are separated into four categories: Slovenia, World, Sport and Fun. Besides, the information in simple language is available in the categories Prominent Slovenians, Let's Get to Know Slovenia, Useful Information, Important Days and Elections. While the director for accessible programmes of RTV Slovenia Mateja Vodeb in the interview said that the gravest challenges are of financial nature, as well as the slow development of speech and language technologies for the small languages, Suzana Ivančić, the colleague from the Croatian Radio-Television (HRT), emphasised that in their case the greatest challenges are the lack of technical and human capacities for the realisation of a larger quantity of programme content adapted to the persons with disabilities. Asked when HRT began to introduce accessible services and in what order, she replied that the subtitles for the deaf and hard of hearing have been available since 2007, and audio-description since 2015. "Five persons are doing the subtitles for the deaf and hard of hearing, a dozen of external collaborators work as the translators of the Croatian sign language, dramatists, directors and actors for the adjustments via audio-description for the deaf and hard of hearing."

The public media service of Croatia offers to the users of their programme contents accessible programmes in sign language, subtitles and sound descriptions. The adapted contents are available as linear, through live programme broadcast, as well as non-linear, through delayed following programme contents and on demand. Suzana Ivančić noted that the subtitles for the deaf and hard of hearing are available via TV programme, on HRTi video streaming platform, along with the web platform, where the contents translated into the Croatian sign language are also available, while the contents for the blind and visually impaired with audio-description, apart from the web portal and HRTi, are available in the programme scheme of the third TV channel HRT3. She stated that the annual production of the accessible contents for diverse target groups in 2024 was: "subtitles – 17 865 programmes, or 358 961 minutes, audio-description – 150 programmes, 6 283 minutes a year and sign language – 1 365 programmes, 49 543 minutes." She particularly accentuated that the subtitles are automatised, all apart from the live subtitles (Dnevnik and Vesti) and that it has substantially influenced the programme accessibility. Besides, which is crucially relevant, they prepare the subtitles with sound descriptions. "Descriptive subtitles are made for all drama and documentary programmes, movies and series for children, as well as for the other programmes in which it is important to describe the sounds for the sake of better plot comprehension. Furthermore, with descriptive subtitles we have made these series accessible: Kotlina, Novine, Crno-Bijeli Svet, and the movies and series for children broadcast on HTV3. All the contents are available on HRTi OTT platform, too.

The examination of accessible services encompassed the programme contents accessible to the persons with disabilities within the RTS programmes, where since 2005 the news programmes are regularly broadcast at 4PM in the Serbian sign language, and in emergency situations all news editions and specialised programmes as well. Following the years of broadcasting in sign language on RTS, the central informative programme Dnevnik 2, since 2022 is broadcast on RTS3 channel in the format more acceptable for the deaf and hard of hearing (the interpreter for the sign language occupies a larger screen space). The tradition of domestic subtitled TV series accessibility by opting for the number 888 on Teletext was established in 2015, whilst since June 2017 Dnevnik 2 is also available with subtitles. "The editorial board of RTS School Programme has been producing the programmes for the deaf and hard of hearing. Hence, the following series were created: Gestovni Bukvar (30 instalments – as many instalments as the number of alphabet letters) and Znakopis (30 instalments – a foreign language course, the sign language is the mother tongue for the majority of persons unable to hear). RTS also produced the first domestic subtitled TV series Mansarda, in which the main character Vera uses sign language, and the programme New Year Mansarda was its sequel." (RTS, 2015) The movie programme adaptation through audio description on RTS began in 2012 in cooperation with the Homer Society, and it went on with the adaptation of domestic feature series in cooperation with the Savez Slepih Srbije in 2019 (series Koreni, Nečista krv, Jutro Će Promeniti Sve, Vera, Nobelovac etc.). In 2025, RTS formed its own team for creating scripts for sound descriptions, as well as for producing descriptive subtitles, which would enable the deaf and hard of hearing to receive information on the sounds via subtitles. Since 2024, once a week RTS3 channel broadcasts series with sound descriptions, and all contents are available on digital video streaming platform RTS Planeta on subpage Pristupačno within which there are also the categories: Znakovni Jezik (SZJ), Audio-Deskripcija (AD) Opisni Titl (CC), Mesto za Nas and Inkluzivni Vodič. (<https://rtsplaneta.rs/Pristupačno>) On this page at every moment 200 titles are available for the persons with disabilities, among which there are all sorts of programmes.

#### 4. DISCUSSION

"Nobody doubts the important role that media accessibility plays, not only in audio-visual translating (AVT), but also in translation studies. Accessibility still is an open concept because its final aim, social integration and removal of dependence barriers, must always be reexamined in relation to the changeable circumstances of our environment and, above all, because the way this is perceived is constantly changing." (Richart-Marset&Calamita, 2020: 9) The results received in the conducted research confirm the hypothesis that public media services tend to respond to the needs of the persons with disabilities and maximally use the available resources aiming to allow the removal of barriers and the greater accessibility to the programme contents. They are not only based on traditional linear broadcasting of accessible programme contents, but they try to make them available for subsequent consumption on their digital platforms in line with the European regulations. "Directive on Audio-Visual Media Services" (AVMSD) states: "The right of the persons with disabilities and elderly to participate and be integrated in the social and cultural life of the Union is unbreakably connected with providing accessible audio-visual media services." In 2019, the EU adopted the Law on Accessibility, with the aim to improve the functioning of inside market for accessible products and services by removing the obstacles formed by different rules in member countries." (Papanikolau, 2022) The practice of Slovenian, Croatian and Serbian public media services has showed that they recognise the public interest of target groups for being informed, educated and entertained. The conducted analysis can be a useful reference point in further following legal obligations in attempting to reduce programme barriers.

#### 5. CONCLUSION

The basic conclusion is that public media services have special responsibility in fulfilling the legal regulations regarding the development, implementation and increase in the presence of accessible programmes. The case study analysing the example of good practice of RTV Slovenia, as well as of the analyses of RTS and HRT services indicate that solid strategy and sensing the needs of a target group can bring enviable results that reflect the positive user reaction, which poses a further motivation for testing and implementing new technologies as useful tools in achieving the final goal – removal of barriers.

## REFERENCES

- Čitić, T. T. (2021). Accessibility of TV programmes to persons with disabilities. *Sociološki pregled*, 55(3), 1110–1137. <https://doi.org/10.5937/socpreg55-32277>
- EUR – Lex. (2019). Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services. Retrieved from <https://eur-lex.europa.eu/legal-content/HR/TXT/PDF/?uri=CELEX:32019L0882>
- Marinković, A. (2023). Eksperti Evropske radiodifuzne unije i RTS-a o tome šta veštačka inteligencija donosi televiziji. Retrieved from <https://www.rts.rs/lat/vesti/drustvo/5215058/eksperati-evropske-radiodifuzne-unije-i-rts-a-o-tome-sta-vestacka-inteligencija-donosi-televiziji-.html>
- Papanikolau, A. (2022). Media Access Services: What is so important about them? Retrieved from <https://multilingual.com/issues/november-2022/media-access-services-what-is-so-important-about-them/>
- Richart-Marset, M., & Calamita, F. (2020). The great challenge of translation and audiovisual accessibility in the media. *MonTI*, 12, 7–28. <https://doi.org/10.6035/MonTI.2020.12.01>
- RTS. (2015). Titlovane serije. Retrieved from <https://www.rts.rs/lat/vesti/drustvo/2088374/titlovane-serije.html>
- Rudec, R.K. & Margetić, S. (28th June 2025). Act on Accessibility Requirements for Products and Services. Retrieved from <https://www.wahl.hr/insight/act-on-accessibility-requirements-for-products-and-services>
- United Nations. (2006). Convention on the Rights of Persons with Disabilities (CRPD). Retrieved from <https://social.desa.un.org/issues/disability/crpd/convention-on-the-rights-of-persons-with-disabilities-crpd>
- ZAVMS-B. (2021, December 21th). Zakon o spremembah in dopolnitvah Zakona o avdiovizualnih medijskih storitvah. Retrieved from <https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2021-01-4156?sop=2021-01-4156>
- Zakon HR. (2023). Zakon o elektroničkim medijima. Retrieved from <https://www.zakon.hr/z/196/zakon-o-elektronickim-medijima>
- Paragraf. (2025). Zakon o javnim medijskim servisima. Retrieved from [https://www.paragraf.rs/propisi/zakon\\_o\\_javnim\\_medijskim\\_servisima.html](https://www.paragraf.rs/propisi/zakon_o_javnim_medijskim_servisima.html)

