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From media accessibility policies to its providers: a case study on state-owned television in Portugal

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ABSTRACT

This study uses a multi-method approach to examine Media Accessibility services in Portugal, including legislation review, a questionnaire and in-depth interviews with professionals from the state-owned free-to-air channel. Four main findings emerged. First, although the minimum legal requirements for MA are generally met, provisions remain inconsistent across genres and modes, limiting access despite occasional signs of readiness for higher standards. Second, the lack of institutionalised feedback channels and dissemination strategies constrains professionals' understanding of users' needs and reduces the visibility of accessible content. Third, MA professionals face limited recognition, rely on informal collaboration in the absence of dynamic guidelines, and are hindered by technological shortcomings, all of which reinforce broader issues of professionalisation. Fourth, the data suggest a complex interplay between internal and external perceptions of MA professionals' roles and the broader societal understanding of MA services. To address these issues, we propose recommendations targeting communication, training, and collaboration.

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Introduction

The movement to include people with disabilities in all walks of life has consolidated the human right to access. It has also led to the development of Accessibility Studies as a distinct area of research and Media Accessibility (MA) as a subfield of Audiovisual Translation focused on access to media products for users who are not able to access them in their original form (Greco 2018, 206). The "accessibility revolution" (Greco 2018, 207) followed a societal effort for inclusion driven by governmental directives addressing the needs of vulnerable communities. In media contexts, the USA and the UK have been industry pioneers since the early 1980s, but several European countries have been steadily engaging with MA practices and developing their own guidelines. Initially centred on subtitling for the Deaf and Hard-of-Hearing (SDH) and audio description

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(AD), the industry of Audiovisual Translation (AVT) has expanded to incorporate various other accessibility practices, including sign language interpreting, audio narration, and audio subtitling, addressing diverse viewer needs. This study sits within MA and focuses on the contexts, practices, and agents of MA in Portugal.

According to the latest census data, in Portugal, about 10.9% of people over the age of five live with some form of impairment (INE 2021, 3). Given the increasing reliance on audiovisual content for entertainment, education, and information dissemination, this is an area of significant social impact and an important tool for promoting greater social inclusion, also because these numbers may fall short of the real number of people living with impairment(s) and other people not qualified as disabled may need/enjoy accessible content.

The first steps in MA in Portugal can be traced back to the 1990s (see Neves 2012). In 1997, RTP started teletext subtitling broadcasts, followed by the introduction of the first SDH programme two years later. The first experiment with AD took place in 2003 (Neves 2013). In the early 2000s, concerted efforts were made to regulate MA, resulting in a new protocol signed by the three leading broadcasters[1] (Presidência do Conselho de Ministros, Gabinete do Ministro da Presidência 2022). This protocol sets a minimum number of hours per week for content broadcast with sign language interpreting and SDH, but, since then, television-accessible services in Portugal have become a legal requirement, as will be discussed later in this article.

By focusing on the contexts of production and the professionals involved in creating accessible content, this article reports on data collected as part of a larger project, "Accessibility in Portugal: Practices in Public and Private Broadcasting Channels", examining MA services in Portugal.[2] Employing a multi-layered research design, the study analyses and discusses sector-specific laws and other guidelines, as well as reports from the ERC-Entidade Reguladora para a Comunicação Social (Portuguese Regulatory Authority for the Media) to assess the implementation of national accessibility laws and resolutions.[3] Building on this foundation, the study combines a questionnaire with in-depth semi-structured interviews to explore the discourses of MA professionals regarding MA at the free-to-air, state-owned channel, RTP. To contextualise the study, the article begins by reviewing related research. Next, it describes the research design and data analysis, while the last sections present and discuss the findings. The article concludes with a set of recommendations to address the issues identified.

Related studies

Research on legislation and provision of MA services in Europe has mainly taken place in the twenty-first century, concentrating not only on the examination of laws and available accessible content but also on the expectations and needs of actors and users: Remael 2007; Reviers 2016 on Europe; García-Prieto 2020; García-Prieto, Aguaded, and García-Rojas 2022 on Spain; Rovira-Esteva and Tor-Carroggio 2019; Tor-Carroggio and Rovira-Esteva 2019; 2020 on Catalonia; García-Prieto and Ponte 2020 on Portugal; Jankowska and Walczak 2019 on Poland; García-Prieto and Aguaded 2021 on the UK; Houwer, Remael, and Vandekerckhove 2008; Vandekerckhove, De Houwer, and Remael 2022 on Flanders.

Most studies review the initial stages of accessible content in the aforementioned countries while also addressing ethical, financial, quality, or technical challenges. Some studies offer quantitative analyses of accessible content (García-Prieto 2020; García-Prieto, Aguaded, and García-Rojas 2022; Tor-Carroggio and Rovira-Esteva 2020). Concerning legislation, all countries examined in the literature have enacted laws regarding accessible content.

Legal requirements vary, ranging from quotas, such as the requirement for 10% of broadcasting with AD in the UK (Reviers 2016), to a minimum weekly requirement, such as ten hours of AD and sign language interpreting on Spanish state-owned channels (Tor-Carroggio and Rovira-Esteva 2020). In other regions, like Flanders, no specific minimum requirement was initially set, but recent legislative updates in 2023 now align with the requirements outlined in the European Accessibility Act (Reviers 2016).

Regarding accessible content provision, a common conclusion from analyses of various broadcasters is their failure to meet legislative requirements (García-Prieto and Aguaded 2021; Jankowska and Walczak 2019; Rovira-Esteva and Tor-Carroggio 2019; Tor-Carroggio and Rovira-Esteva 2019). As for mode, the main accessible service mentioned in the literature is SDH (García-Prieto and Aguaded 2021; Rovira-Esteva and Tor-Carroggio 2019), while the most frequent audio-described programmes are entertainment-related (García-Prieto 2020). Notably, state-owned channels generally provide more accessible content, as they are subject to direct funding or stricter regulations (García-Prieto, Aguaded, and García-Rojas 2022; Reviers 2016).

As for users, researchers have looked at satisfaction levels regarding the quantity and quality of accessible content in audiovisual media (e.g. García-Prieto and Aguaded 2021; Rovira-Esteva and Tor-Carroggio 2019). Specific topics include opinions on professional, amateur and automatic accessible products (Rovira-Esteva and Tor-Carroggio 2019; Tor-Carroggio and Rovira-Esteva 2019), customisable subtitles (García-Prieto 2020; García-Prieto, Aguaded, and García-Rojas 2022), consumption habits (Rovira-Esteva and Tor-Carroggio 2019), and needs for different types of programmes, at different hours (García-Prieto 2020). Regarding actors, Tor-Carroggio and Rovira-Esteva (2019) interviewed the directors of accessibility at several Catalan channels, and Robert, Schrijver, and Diels (2019) surveyed practitioners, trainers, broadcasters, and service providers. These studies provide insight into topics such as the demand for accessible content, remuneration, quality control, and training needed.

A recurring theme in literature is how audiovisual media can serve as a tool for social inclusion. Similarly, proposals for improvement emphasise the need for increased investment in accessible content (Rovira-Esteva and Tor-Carroggio 2019), stricter regulations, a digital switch-over that would enable more content, and enhanced training (Jankowska and Walczak 2019; Reviers 2016).

Research design

This study adopts a multi-layered research design to examine MA service provision in Portugal. To contextualise MA service provision, we first analyse and discuss sector-specific laws and other guidelines, as well as reports from the ERC to evaluate the implementation of national accessibility laws and resolutions, including the number of accessible programming hours. This offers a broader understanding of service delivery.

Building on this foundation, we conducted a case study of the Accessibility Unit of the state-owned channel, RTP, using a questionnaire and in-depth semi-structured interviews to explore the practices and perspectives of MA professionals within this setting.

In the following sections, we briefly outline the materials and research design. Additional data related to this publication are available at the ZENODO data repository at the following link: https://doi.org/10.5281/zenodo.19429238 (Valdez et al. 2026).

Contextual analysis

To place the case study of RTP's Accessibility Unit within the wider Portuguese media landscape, we conducted a contextual analysis of national and sector-specific accessibility laws, guidelines, and regulatory reports. Following Reviers (2016), this approach enabled us to examine both formal requirements and practical implementation across Portuguese television and streaming services.

Materials

We first reviewed international and European instruments relevant to accessibility, including the UN Convention on the Rights of Persons with Disabilities (United Nations 2006) and the EU Audiovisual Media Services Directive (European Parliament 2018), as well as the European Accessibility Act (European Parliament 2019). These instruments provided an overarching legal framework for national policies. At the national level, Portugal's Television Law (Lei da Televisão, no. 27, 2007, revised 2021), including Article 43-A, specifies accessibility requirements for television and audiovisual services.

To assess the extent to which national accessibility requirements have been put into practice, we examined publicly available ERC reports and resolutions (e.g. ERC/2021/317). Data were extracted systematically from ERC reports for the years 2021, 2022, and the pluriannual plan 2022–2025, including the actual hours of accessible programming broadcast per channel, mode, and genre. The gathered information was organised into comparative tables to contrast regulatory requirements with the reported programming hours, highlighting gaps and variations across channels, modes of accessibility, and genres. This contextual analysis provided a basis for understanding the practices, perspectives, and internal guidelines of MA professionals, connecting the national legal framework and reported programming data to organisational-level implementation.

Case study

Questionnaire design and data analysis

RTP's Accessibility Unit was invited to complete an online questionnaire designed in Qualtrics. The questionnaire was collaboratively developed by the authors, pilot-tested with professional audiovisual translators outside the target population, and adjusted based on their feedback, following best practices for online surveys (Saldanha and O'Brien 2013). Since the target population comprised all nine professionals at the Unit, no sampling was applied; all were contacted, and six responded. The questionnaire consisted of seven sections with closed (single and multiple choice) and open-ended questions (see Figure 1).

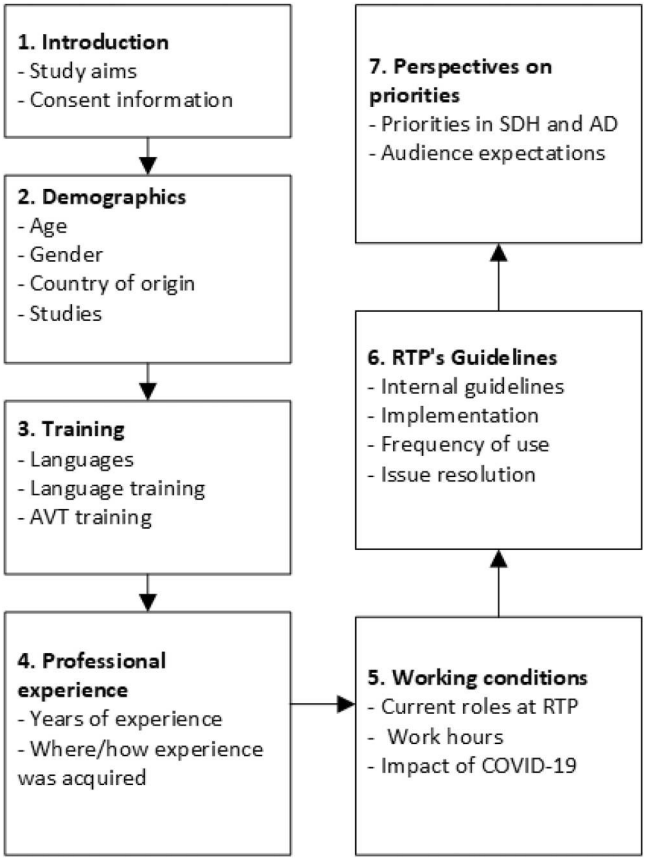


Figure 1. Questionnaire design.

The questionnaire included both open- and closed-ended questions focusing on AD and SDH, generating unstructured and structured data. LGP (Portuguese Sign Language) was not included in the study, as it is not offered by RTP's Accessibility Unit and therefore fell outside the scope of the present research. Descriptive statistical analysis was used to summarise and describe the structured data. Qualitative data from the open-ended questions was analysed to identify prevalent themes. These findings informed the design of the follow-up interviews.

Interview design and analysis

Four semi-structured interviews were conducted with all available staff from RTP's Accessibility Unit, including the unit manager, one AD specialist, and two SDH professionals. An interview schedule of open-ended questions, developed collaboratively by the research team and informed by the questionnaire, allowed flexibility to address interviewees' varied experiences. Each interview was conducted by two researchers, paired by expertise. Interviews lasted between one and two hours and twenty minutes (total: six hours and five minutes of recorded material), with three held in person and one online. An overview of the data is provided in Table 1.

Table 1. Overview of interview data.

MA Professionals involved in	
Management	1
SDH	2
AD	1
Total	4

Interviews were recorded, transcribed, and then imported into the qualitative data analysis software ATLAS.ti. Using an inductive approach, we adopted a thematic analytical strategy for coding and analysing the transcribed interviews (Saldaña 2016). All quoted excerpts were translated into English by the authors; translations aimed to remain as close as possible to the original meaning.

Contextual analysis

Legislation

Accessibility gained international recognition through the UN Convention on the Rights of Persons with Disabilities (United Nations 2006), adopted in 2006 and later signed by Portugal in 2007. This convention emphasises the promotion, protection, and guarantee of fundamental rights and freedoms for people with disabilities, covering issues such as communication, language, discrimination, reasonable accommodation, and universal design.

More recently, the EU made strides towards enhancing accessibility through its Audiovisual Media Services Directive, updated in 2018. This directive "creates a media framework for Europe's digital decade" to address specific issues, including accessibility requirements in Articles 22–24 (European Parliament 2018). Later, the European Accessibility Act of 2019 set requirements for accessible products such as websites, applications, and mobile services.

To understand the Portuguese legislative context, it is essential to distinguish among three distinct levels: national or local laws, sector-specific laws, and other guidelines (following Reviers 2016). Concerning guidelines, Neves introduced SDH (Neves 2007) and AD guidelines (Neves 2011). They are research-based and have influenced the internal guidelines of Portuguese broadcasters, including RTP. More recently, in 2018, the ERC issued the document "Guia de Boas-Práticas. Legendagem para Surdos em programas gravados" ("Good Practice Guidelines for SDH", ERC 2018).

Regarding national and sector-driven laws, Portugal's Television Law (Assembleia da República 2007) has undergone several revisions, the most recent in 2021. In Chapter IV, Section II, Article 43-A, the law stipulates that television and audiovisual service providers must broaden the range of services accessible to people with disabilities.

To enforce compliance with this law, ERC has issued resolutions for both state-owned and private broadcasters. In 2021, it published ERC/2021/317, introducing a new pluriannual plan that sets out minimum accessibility requirements for television and streaming services for 2022–2023 and 2024-2025. Developed in consultation with the Instituto Nacional para a Reabilitação (National Institute for Rehabilitation) and broadcasters, this plan specifies the number of accessible content hours required, including SDH, LGP

(Portuguese Sign Language) interpreting, and AD. It also outlines assessment and monitoring procedures, with broadcasters expected to provide the necessary information for public annual reports published by ERC.

The latest pluriannual plan (ERC, JAN2022-DEC2025) specifies that providers must allocate suitable technical and human resources and sets minimum requirements regarding the weekly amount of accessible content. It requires that at least 60% of the content must be accessible between 8 am and midnight. Accessibility requirements vary based on the TV channel type (state-owned or private), region (mainland Portugal or the autonomous regions of Azores and Madeira), and media type (TV, Cable TV, or Streaming services). In Table 2, we summarise the weekly (for SDH) and quarterly (for AD) requirements from January 2022 to December 2023 (ERC 2021, 11–17).

Table 3 gathers the requirements from January 2024 to December 2025 (ERC 2021, 11–17).

For the period spanning January 2024 to December 2025, the ERC resolution makes additional recommendations. These include increased efforts to adopt new technologies for improved accessible services, audio narration for graphical content, collaboration among providers to establish best practices for LGP (Portuguese Sign Language), a steady increase in AD, knowledge sharing, and joint initiatives between service providers and state organisations responsible for institutional advertising to offer SDH, AD, and LGP (Portuguese Sign Language) (ERC 2021, 21–22).

From the above tables, we see that the 2022–2025 plan mandates a weekly five-hour increase for state-owned channels and a weekly two-hour increase for private channels concerning SDH, live programmes with intralingual subtitling (i.e. automatic subtitling), and sign language interpreting. There has been no increase in the requirements for audio-described programmes across both state-owned and private channels. Similarly, for the Autonomous Regions and Cable TV, there is no increase in requirements for any accessibility practices.

In addition to national oversight, Portugal, along with other EU Member States, is subject to European-level evaluations concerning accessible content provision. The European Regulators Group for Audiovisual Media Services recently issued a report assessing accessibility obligations across Member States (ERGA 2021). The report indicates that, in Portugal, these obligations have been partially implemented and that quality standards have been

Table 2. Requirements in state-owned and private channels (from January 2022 to December 2023).

	Free-to-air state-owned channels				Free-to-air private channels	Subscription private channels
	Nationally broadcast			Regionally broadcast		
	RTP1	RTP2	RTP3	RTP Azores/ RTP Madeira	SIC/TVI	Cable TV
Programmes with SDH (weekly)	25h	25h	2h (or↓)	2h (or↓)	20h	2h (or↓)
Live programmes with live subtitling (weekly)	25h	15h	4h	4h	NA	6h
Programmes with LGP interpreting (weekly)	17h	14h	10h	10h	10h	10h
Programmes with AD (quarterly)	20h	6h	NA	NA	5h	NA

Table 3. Requirements in state-owned and private channels (from January 2024 to December 2025).

	Free-to-air state-owned channels					
	Nationally broadcast			Regionally broadcast	Free-to-air private channels	Subscription private channels
	RTP1	RTP2	RTP3	RTP Azores/ RTP Madeira	SIC/TVI	Cable TV
Programmes with SDH (weekly)	30h	30h	2h (or↓)	2h (or↓)	22h	2h (or↓)
Live programmes with live subtitling (weekly)	30h	14h	4h	4h	NA	6h
Programmes with LGP interpreting (weekly)	20h	20h	10h	10h	12h	10h
Programmes with AD (quarterly)	20h	6h	NA	NA	5h	NA

developed (ERGA 2021, 6). However, unlike most Member States (20), where obligations extend to all broadcasters and streaming services, in Portugal, these requirements are limited to specific providers, such as state-owned, private, and some satellite broadcasters.

From planning to practice

Given that providers in other countries have rarely met national requirements for accessible content (see section "Related studies"), it seemed relevant to assess the extent to which these laws and resolutions have been implemented and the number of accessible programming hours in practice. At the time of writing, the latest available data pertained to the fourth quarter of 2022 (Nobre 2023).

Hours of accessible programming

Table 4 summarises data on accessible programming hours broadcast in 2021 (Ruivo 2022, 7–19). Although the figures for SDH and LGP (Portuguese Sign Language) only pertain to the twelve weeks analysed by the ERC, the hours for AD reflect the annual total, as shown in the report.

Table 4. Hours of broadcast accessible programming in 2021 compared to the required minimum hours as stipulated by ERC (in parentheses)[a].

	Free-to-air state-owned channels					
	Nationally broadcast			Regionally broadcast	Free-to-air private channels	Subscription private channels
	RTP1	RTP2	RTP3	RTP Azores/ RTP Madeira	SIC/TVI	Cable TV
SDH (12 weeks)	212 h (240 h)	592 h (240 h)	NA (0 h)	NA (0 h)	231.5 h (216 h)	NA (0 h)
LGP (12 weeks)	576.5 h (144 h)	194.5 h (144 h)	195.5 h (72 h)	203.5 h (72 h)	256 h (96 h)	74.5 h (36 h)
AD (per year)	88 h (70 h)	22 h (20 h)	NA (0 h)	NA (0 h)	38.5 h (12 h)	NA (0 h)

[a]The table distinguishes between minimum requirements and actual provision: numbers in brackets denote the minimum hours mandated, while numbers outside brackets reflect the hours of accessible programming effectively broadcast.

There is no reference to live subtitling, audio narration, or audio subtitling in the 2021 report. The minimum requirements for SDH, LGP (Portuguese Sign Language), and AD were mostly met or exceeded across all channels. Based on quantitative data alone, it might seem that the MA services are well-established and meet the needs of the target communities. However, a closer look at the number of hours included in the minimum requirements suggests a different perspective. For example, having only 20 h per year as the minimum requirement can hardly be seen as enough. On a more positive note, since the minimum requirements have been exceeded in many cases, it indicates that MA providers may be ready to handle more demanding standards.

Table 5 summarises the data on accessible programming for 2022 (Nobre 2023, 7–11). As with Table 4, the hours listed here for subtitling and LGP (Portuguese Sign Language) refer solely to the three-week analysis by the ERC, while the hours for AD represent the total for the last trimester, as outlined in the report.

The ERC Report for 2022 examined a three-week sample, detailing actual broadcast hours and schedules (8am to 12am and 12am to 8am). According to this report (Nobre 2023, 7–11), both state-owned channels, RTP1 and RTP2, exceeded the minimum requirements for SDH, live subtitling, LGP (Portuguese Sign Language), and AD. The exception was live subtitling on RTP2. In contrast, RTP Madeira and RTP Azores did not meet the minimum requirements for SDH, although they complied with LGP (Portuguese Sign Language). Private channels, SIC and TVI, fully adhered to accessibility requirements across all modes. However, for LGP (Portuguese Sign Language), only the minimum requirement was met. Conversely, CMTV, Portugal, SIC Notícias, and Porto Canal did not broadcast any hours for SDH, live subtitling, or AD. Nevertheless, most of these channels offered at least the minimum of 6 h per week for LGP (Portuguese Sign Language).

Audiovisual genres and time of broadcast

The 2021 Report summarises the AV genres by mode of accessibility and channel (Ruivo 2022, 21–24). Table 6 presents these data.

Table 5. Hours of accessible programming in 2022 compared to the required minimum hours as stipulated by ERC (in parentheses)[a].

	Free-to-air state-owned channels					
	Nationally broadcast			Regionally broadcast	Free-to-air private channels	Subscription private channels
	RTP1	RTP2	RTP3	RTP Azores/ RTP Madeira	SIC/TVI	Cable TV
SDH (3 weeks)	86.5 h (75 h)	123 h (75 h)	1 h (6 h)	NA (6 h)	65 h (60 h)	43.5 h (6 h)
Live subtitling (3 weeks)	112 h (75 h)	24.5 h (45 h)	NA (0 h)	NA (0 h)	NA (0 h)	NA (0 h)
LGP (3 weeks)	180 h (51 h)	68 h (45 h)	96 h (30 h)	89 h (30 h)	89 h (30 h)	NA (18 h)
AD (trimester)	40 h (60 h)	7.5 h (18 h)	NA (0 h)	NA (0 h)	18 h (15 h)	NA (0 h)

[a]The table distinguishes between minimum requirements and actual provision: numbers in brackets denote the minimum hours mandated, while numbers outside brackets reflect the hours of accessible programming effectively broadcast.

Table 6. Audiovisual genres according to mode of accessibility and channel.

	RTP1			RTP2			SIC			TVI		
Genres	SDH	LGP	AD	SDH	LGP	AD	SDH	LGP	AD	SDH	LGP	AD
Cultural magazines	6.1	0.4		29.9	54.6					0.9		
Documentaries	25.9			47.9		29.6	1.3		30.8	2.8		
Fiction	60.7			21.1								
Fiction/films			17.8			70.4	11		69.2			
Fiction/series			82.2				7.7			8.8		
Fiction/soap operas							80			87.5		
Information programs	7.3	60.4		2.3	13.3			14			43.9	
Recreational programs		36.1						86			53.6	
Religious programs		3.5			32.1						2.5	

The ERC pluriannual plan does not specify which AV genres should be the focus of MA services and only suggests that providers aim for a variety of genres. This is achieved to some extent but in a limited way, as no provider offers more than four genres. The specific genres chosen vary between providers, with each prioritising different ones. This results in fictional genres being offered more regularly and across various accessibility modes, while programmes focused on information are not provided with AD. Such inconsistency highlights that only a very limited number of genres are available in more than one accessibility mode. This raises questions about the reasoning behind genre selection and the decision to prioritise one over another, as well as the distinction made between deaf and blind communities regarding which genres they might want or need to access, which does not appear to be based on a needs assessment.

Case study

Questionnaire

This section presents the questionnaire findings, providing insight into the profiles of MA professionals responsible for accessible content and the reference materials, such as internal guidelines, that inform their practice.

Profile

Based on responses from six out of nine MA professionals working at RTP's Accessibility Unit, Table 7 shows the respondents' demographic information.

The six MA professionals, three women and three men, are experienced translators who worked at RTP in various roles for durations ranging from 2–20 years, with some initially starting their careers at RTP in SDH and later transitioning to AD. They have very rarely combined both roles simultaneously, a practice that seems to be uncommon in AVT and MA (see, for instance, Robert, Schrijver, and Diels 2020). Three team members work on SDH, two on AD, and one is exclusively responsible for managing the MA services. No professionals are involved in audio narration, live subtitling, or audio subtitling. Most of the team works between 35–40 h per week, except for the team leader, who logs the most hours due to his team management responsibilities.

Although primarily focused on producing SDH and AD in Portuguese for content in the same language, the respondents have both language- and translation-specific

Table 7. Respondents' demographic information.

	Gender		
Female	3	Male	3
Age (in years)			
25–34 years	3	35–44 years	3

training. All of them received training in English, while four also received training in Spanish, four in Portuguese, and two in French. Furthermore, all respondents have formal academic backgrounds in translation: one holds a bachelor's degree, three completed postgraduate specialisation programmes, and two earned master's degrees.

Regarding AVT, all respondents had academic training at the theoretical or introductory level except for two. The training of those who had received academic training in specific AVT modes varied and extended beyond their areas of work: interlingual subtitling (mentioned by 4 respondents), intralingual subtitling (2), audio description (2), and audio subtitling (2) (see Figure 2).

Only one of the respondents had completed additional courses in AVT as part of their lifelong learning at a translation company to enhance their competences. In other words, most respondents had not received any lifelong or continuing professional development training, including at RTP.

Internal guidelines

To better understand the role of internal reference materials in MA professionals' practice, respondents were asked whether written internal guidelines exist for accessibility services (e.g. a best-practice manual). The majority (five out of six) confirmed that such norms and guidelines are indeed in place at RTP.

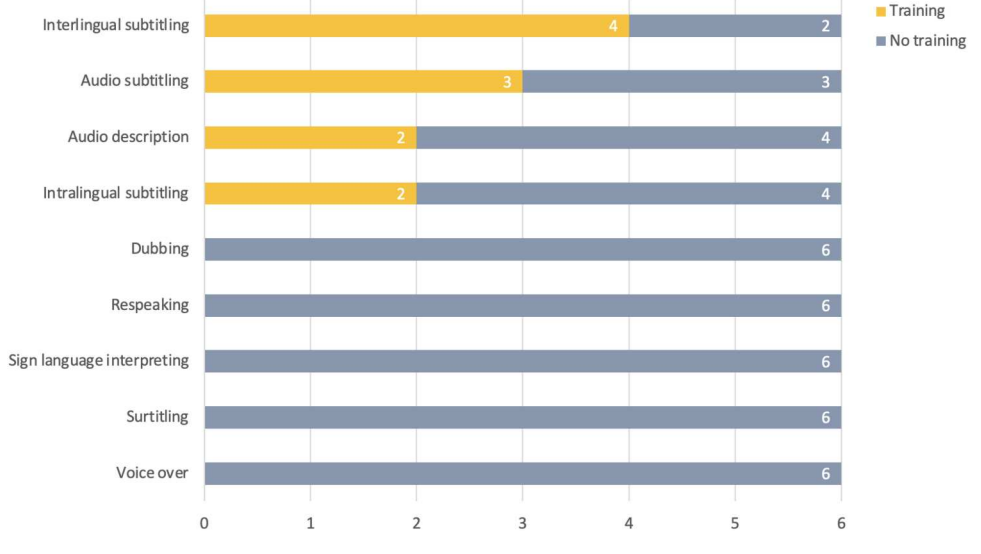


Figure 2. Respondents' areas of training in AVT.

Regarding updates, respondents viewed SDH guidelines as static, although some proposed revisions on a semesterly or yearly basis. For AD, responses ranged from "never updated" to updates every five years. Respondents' accounts of when the guidelines were first introduced were also inconsistent, spanning from 2013 to 2018, with one noting reliance on Ofcom before formal documentation. When facing uncertainties, respondents reported mainly consulting colleagues and managers, and occasionally members of the target communities.

Interviews

To present the interview findings, we focus on the most salient themes identified during the analysis. Each theme is introduced with a table showing the distribution of subthemes, followed by a discussion of how these inform our understanding of MA practices.

Perspectives regarding the target audience

When asked to consider the target audience of the RTP's MA services, interviewees mainly focused on three key aspects: (1) the lack of a communication channel between the target audience and MA professionals; (2) the limited visibility and recognition of the role of MA professionals; and (3) insufficient public awareness about MA services. Although these points are presented separately, we see them as interconnected and mutually reinforcing (Table 8).

A recurring theme in the interviews was the lack of access to feedback from the target audience. Interviewees expressed a shortage of formal and institutionalised channels for direct engagement with target communities or relevant associations, such as organisations representing the Deaf community.

For instance, one audiodescriber, illustrating the challenge of accessing direct feedback from the target audience, remarked on this issue, stating: "the little feedback we receive comes from [name of consultant], who is blind and has connections within the blind community. For instance, there was a time she said, 'Don't use the verb *proclinar*' [to bend forward]. They don't like it. She told me, 'I don't like it'".

Throughout the interviews, they expressed appreciation for their direct and internal collaboration with the consultants, whom they described as key team members and without whom they would have no contact or knowledge of the needs of the target communities.[4] The consultants not only revise the AD scripts but also provide ongoing feedback to the audio-describers, contributing informally and indirectly to their training. For SDH, no feedback is available.

Table 8. Perspectives regarding the target audience.

Subthemes	Absolute frequency	Relative frequency
Lack of a communication channel between target audience and MA providers	34	45%
Limited visibility and recognition of the role of the MA providers	21	28%
Insufficient public awareness about MA services	20	27%
	75	100%

This issue goes beyond the lack of formalised feedback channels and includes the need to promote and share information about programmes offering MA services and their broadcast schedules. A professional from the SDH team highlighted the need for improved communication channels for promoting MA services before programmes are aired, underscoring the need for proactive communication strategies:

> I believe it's essential to establish a communication channel or some means to announce programmes that will be captioned and provided with Teletext before they are aired. If there were a way to communicate that certain programmes will have captioning, I think that would be beneficial.

In addition, interviewees raised concerns about communication with the target audience, emphasising a systematic lack of visibility and information on the MA services they offer. This lack of awareness manifests in two dimensions: internally within RTP regarding the provision and implications of MA services, and externally among target communities and general audiences.

In terms of the internal dimension, reflecting on the limited visibility of MA services within RTP, one of the audio-describers discussed the invisibility of her work and its effect on her professional profile and standing, stating:

> I'll be honest, if you leave this office and ask people in that office just in front what audio description is, they wouldn't know. There are very few people here [in this building] who know what we do. We don't even have a specific career path [job title] because being a multimedia platform technician doesn't accurately describe what I do. We're grouped with the real multimedia platform technicians, but I'm not one. I'm an audio-describer, you see, but nobody here knows what that is. (…) Very few people here know what we do, so I think that says it all.

For this audio-describer, her job title as a multimedia platform technician, coupled with the lack of awareness among colleagues from other departments about the audio-describer role, highlights the visibility challenges faced by MA professionals. This was echoed by other interviewees working on SDH.

For them, the internal invisibility of their work leads them to reflect on the scarcity of available information for both the general public and target communities alike, which in turn leads to external invisibility. Commenting on the absence of external communication with audiences about their work, one of the interviewees said:

> When people ask me, "What do you do?" and I answer, "I do the Teletext subtitling", they answer "Teletext, does that still exist?" Or if they ask "What is your profession?" and I say "I am an audio-describer", they react with "What is that?" People simply do not know and the fault lies not with them. It simply doesn't get out.

Another professional in the same vein emphasised the need for increased visibility of MA services by remarking:

> Nobody knows what the 888 is for either. I know it's not the target audience['s fault], and presumably, the target audience is better informed in that regard, I suppose. But just in terms of information, I think it would open many eyes right away. (…) For example, sometimes, when something is more visible, people give it more importance because before they didn't even see it as a useful or essential service, it was taken for granted.

This speaks to a potential link between the visibility of MA services and the general perception of how "useful or essential" their work is. That is, the lack of visibility the MA services enjoy leads the MA professional to assume that others do not value their work, which, in turn, discourages efforts to bring more visibility to the MA services.

These perspectives are, in our interpretation, connected and intertwined with interviewees' perspectives regarding the professional profile of MA professionals.

Perspectives regarding the professional profile of MA professionals

When asked to reflect on the professional profile of MA professionals, interviewees focused on two main subthemes: (1) their professional identity, and (2) the training and competences required for their roles (Table 9).

On the subject of professional identity, interviewees expressed the view that, regardless of the specific MA service they provide (AD or SDH), most do not describe themselves as "translators". One interviewee shared this perspective, stating, "I never describe myself as a translator because I'm not translating anything; I'm translating from one medium to another, from one audience to another, but conventional translation, as what we were taught, no. So, I describe myself as a subtitler". This interviewee highlights the distinction between the perception of their role as MA professionals within the Unit and the conventional understanding of translators' tasks, emphasising a traditional interlingual perspective as foundational to their interpretation of translation. This perspective appears to be shaped by their training ("but conventional translation, as we were taught, no"). Additionally, their job titles seem to reinforce this perspective, as indicated by another interviewee: "In terms of career, I am a multimedia platform technician involved in adapted content".

In terms of specific training for their role, two interviewees reported that the ideal would be to have training or expertise in languages and translation, albeit not specifically in audiovisual translation. This stems from the assumption that there is limited availability of higher education courses in audiovisual translation ("unfortunately, it's not something that is very developed in Portugal"), which goes against research on the topic (Ramos Pinto 2012; Valdez et al. 2023). Thus, it is expressed that they cannot expect prospective team members to have such qualifications. None of the interviewees referred to competences in SDH or AD, or a degree in AVT, MA, or related fields such as Deaf studies and Disability studies.

Two others offered an alternative viewpoint. According to them, prospective colleagues do not necessarily need degrees in languages or translation; instead, they could come from diverse fields as long as they have a strong command of the Portuguese language and a genuine interest in the profession. One of the interviewees also highlighted additional skills they considered essential, including being "open to technology" to help learn the necessary tools. There is no expectation that prospective colleagues

Table 9. Perspectives regarding the professional profile of MA professionals.

Subthemes	Absolute frequency	Relative frequency
Professional identity of MA providers	5	12%
Training and competences of MA providers	37	88%
	42	100%

should already have expertise in using subtitling and audio description software from the start. Furthermore, another interviewee emphasised the importance of interpersonal skills, such as a willingness to collaborate within teams, a strong sense of responsibility for their work, and a readiness to accept revisions and constructive criticism.

Perspectives regarding work processes

When asked to reflect on work processes, interviewees focused on three main topics: (1) collaborative problem-solving, (2) guidelines as reference tools rather than evolving frameworks for practice, and (3) lack of automation as a disruption to workflows and service delivery (Table 10).

When discussing work processes, interviewees emphasised the centrality of collaborative problem-solving. Rather than relying primarily on reference materials such as internal guidelines, staff turn to colleagues or supervisors whenever uncertainties arise during their work, a view already expressed in the questionnaire (see section "Questionnaire"). As one professional explained, "these [internal guidelines] are recommendations … whenever there's a doubt, we share it with colleagues, we ask a colleague nearby or ask me: 'hey, this situation came up, how should I do this? Does it make sense if I do it like this?'" Such accounts underline that collaboration and shared judgment underpin everyday workflows.

Internal guidelines, however, continue to play a dual role. On the one hand, they offer a valuable point of reference and provide newcomers with an initial orientation. On the other hand, they are perceived as limited in scope: static documents that rarely adapt to evolving practices. Originally based on Ofcom, these guidelines are used in an introductory phase to train new staff, but are not routinely updated or used daily. Several interviewees noted that the subtitling guidelines have remained unchanged for years, while others stressed difficulties in accessing or updating them. Their static nature, paradoxically, reinforces reliance on peer exchanges and informal networks.

Despite these limitations, guidelines still shape practices, particularly in training contexts where they outline a common baseline. Yet their application is never straightforward. Professionals often negotiate or deviate from the guidelines, for example, extending subtitle duration in documentaries or adapting reading times in children's programming to ensure readability. As one remarked, "sometimes the situation calls for something different, and then doubts arise". In this sense, guidelines are less prescriptive rules than flexible tools, functioning more as a point of departure than a source of definitive answers. Responsibility for adapting them ultimately lies with practitioners themselves.

Work processes also extend beyond SDH and AD into what staff describe as "extracurricular functions" – additional technical duties that keep broadcasts running on a daily basis. These include "scheduling broadcasts, setting alarms for subtitles, updating

Table 10. Perspectives regarding work processes.

Units of meaning	Absolute frequency	Relative frequency
Collaborative problem-solving	45	43%
Guidelines as reference tools rather than evolving frameworks for practice	42	40%
Lack of automation as a disruption to workflows and service delivery	17	16%
	104	100%

weather, lotteries, and weekend or holiday news". In practice, "setting alarms for subtitles" refers to monitoring when shows with SDH subtitles go live and manually launching the subtitles at the time of the start of the show, since no automated system exists.

The absence of automation has multiple consequences. First, it obliges staff to work in shifts, a practice some described as upsetting or uncomfortable ("the night shift really throws me off"). Second, it disrupts normal workflows by forcing professionals to pause SDH and AD tasks in order to launch subtitles manually ("for example, children's programmes go on air every ten minutes. So every ten minutes, we have to stop working to push a button to launch the subtitles"). Finally, it limits audience access to content, as some programmes remain inaccessible not because subtitles are unavailable but because they cannot be broadcast automatically.

As one interviewee explained:

> There are some programs for which we sometimes have subtitles prepared, but are not being broadcast with subtitles, either because we are not physically at the office or because otherwise we would not even be able to work on our other tasks, because otherwise we would be just sitting there pressing a button to launch subtitles.

Interviewees attributed these problems to underinvestment in the Accessibility Unit, particularly in automation technologies, but also in translation technologies such as subtitling software or live subtitling. These operational constraints highlight the broader technological limitations of the current system and underscore how much of the responsibility for smooth broadcast operations rests on the shoulders of MA professionals themselves. In addition, the allocation of these non-translation duties, including updating weather news, points to a broader issue discussed earlier: the limited recognition of MA professionals' expertise. While their "extracurricular functions" are essential to maintaining the reliability of broadcast operations, they fall outside their specialised role and risk reinforcing the perception that MA is a support activity rather than a distinct professional field.

Summary and overall discussion

To synthesise our findings, this section combines the results of the contextual analysis with insights from the questionnaire and interviews.

The review of the legislation and regulations governing accessibility services indicates that while minimum requirements are, for the most part, fulfilled, the broader goal of achieving 100% accessibility is far from realised. Encouragingly, minimum thresholds have frequently been surpassed, which may signal that MA providers are prepared for more ambitious standards. Yet, closer examination reveals inconsistencies in the genres prioritised, the modes of accessibility provided, and the disproportionate attention granted to some genres over others. Consequently, certain target communities are differentiated without evidence-based justification, a tendency consistent with patterns identified in other national contexts.

Our findings from the questionnaire and interviews show a lack of formal and institutionalised channels for direct engagement with target communities and relevant associations among MA professionals at RTP's Accessibility Unit. While these professionals recognise the importance of such feedback, they mainly depend on personal networks

for guidance, underscoring the need for more structured communication and collaboration avenues. Without these, their work will continue to be based on assumptions about users' communicative needs rather than an actual understanding of the needs of the target communities.

This communication issue extends beyond the absence of institutionalised feedback channels and includes a broader problem of limited visibility and information dissemination regarding MA services. Effective communication and collaboration with user associations and target communities are essential not only for understanding the needs of MA users but also for promoting and disseminating programmes featuring MA services and their broadcast schedules.

This observation aligns with the findings of the ACCESS Unit study (FCT/DSI/Unidade ACESSO 2016), which revealed that a significant proportion of respondents with sight loss were unaware that shows featuring AD were broadcast by RTP. This suggests that the insufficient promotion of audio-described programmes negatively impacts their visibility and reception among the intended audience.

The data from our interviews with RTP's MA professionals also suggests a complex interaction between internal and external perceptions of their roles and the wider societal understanding of MA services. The interviewees pointed to a lack of awareness and recognition of their roles and responsibilities as MA professionals, which seems to lead them to work under a cloud of invisibility. Internal invisibility occurs when they observe that colleagues in other departments are unaware of the nature of their work or when they are assigned job titles such as "multimedia platform technician". Besides failing to accurately reflect the scope and importance of their contributions to creating accessible content, job titles such as these also suggest a misunderstanding of their role with broader implications. External invisibility is evident when they see that the general public and society at large also appear to have limited knowledge and understanding of the role of MA services.

The interviews also reveal that work processes in the Unit are shaped less by formal structures than by informal collaboration and technological constraints. Problem-solving is largely collective, with colleagues and supervisors serving as the main source of guidance in practice. Written guidelines remain in place but are perceived as outdated and limited, functioning more as a starting point than a living framework. This tension between collaboration and static rules underscores the adaptive skills of staff, who routinely negotiate and modify procedures to ensure readability and audience access. The lack of automation, however, imposes structural obstacles that collaboration alone cannot remove: staff must monitor broadcasts manually, work irregular shifts, and balance SDH and AD with unrelated technical duties. These conditions not only affect efficiency and audience access but also highlight the misalignment between staff expertise and the recognition their work receives within the broadcaster.

Perhaps because of this lack of internal and external recognition of their roles, MA professionals do not share a sense of belonging to a recognised profession and professional group and thus do not recognise the need for a specific set of qualifications or training. Our interviews revealed a belief among RTP's MA professionals that the skills required for MA are broad and can be acquired through various means rather than through specialised training or qualifications in AVT or related fields. This issue is not specific to RTP's professionals or MA accessibility but one identified more

widely in the translation industry (Sela-Sheffy 2022) and speaks to a greater lack of professionalisation and all that it entails.

Conclusion and recommendations

This article presents findings from a case study conducted at the Portuguese state-owned channel (RTP) as part of a larger research project investigating MA in Portugal. The study employed a combination of a questionnaire and in-depth semi-structured interviews to explore professionals' perspectives and discourses on MA practices within the Accessibility Unit. To consider the data collected in context, the article offers a review of the legislation and regulations that govern and mediate accessibility services and discusses their implementation.

Four main findings stand out from our analysis. First, while minimum legal requirements for MA are generally met, the goal of full accessibility remains distant. Accessibility provision is inconsistent across genres and modes, privileging some groups of users over others without evidence-based justification. Although providers occasionally exceed the minimum requirements, suggesting readiness for higher standards, the lack of coherence undermines equitable access.

Second, the absence of institutionalised feedback channels with target communities means that MA professionals largely rely on personal networks rather than user-informed practices. This gap limits the understanding of users' real needs. Moreover, poor dissemination of information about accessible programmes further reduces their visibility and reach, leaving many potential users unaware of existing provisions.

Third, the data suggest a complex interplay between internal and external perceptions of the roles of MA professionals and the broader societal understanding of MA services. MA professionals express a lack of recognition both internally and externally, reflected in their job titles, and an absence of professional identity or specialised training pathways. Work processes are heavily shaped by informal collaboration, while technological shortcomings – particularly the lack of automation – force staff into manual workflows. These challenges hinder efficiency, limit audience access, and contribute to the broader issue of professionalisation in the MA field.

To address these identified issues, we propose three interconnected recommendations centred on communication, training, and collaboration. First, reception-oriented research has the potential to offer evidence-based insights into users' expectations and preferences. Since RTP's Accessibility Unit does not have the resources to provide SDH and AD for all programmes, it would be important to better understand which types of programmes are most watched and which ones the target communities wish to watch so that the programmes selected for SDH and AD align with the audience's preferences.

In addition, the evidence obtained through reception-oriented research would be relevant to equip MA professionals with the insights needed to update their guidelines and practices. This would mitigate the risk of overreliance on potentially biased perspectives offered by consultants accessible through personal networks. Such evidence can also guide professional training to ensure MA professionals stay responsive to the evolving needs of their audiences. Lastly, collaboration among universities, user associations, and MA professionals could help raise awareness of MA services and promote a culture of inclusivity and accessibility within the broader media landscape.

Promoting visibility and understanding of MA services requires a multifaceted approach that encompasses training, communication, and collaboration. As Orero, Pereira, and Utray (2007; also mentioned by Tor-Carroggio and Rovira-Esteva 2020) identified, the development of MA is influenced by five key factors: regulation, communication, training, production, and signalling. Although in its infancy, the data already collected in this study seem to show how these aspects are interconnected. The existing regulation results more from external pressure than internal action; no support is given to professionals to ensure its implementation, and the assessment of its implementation is based solely on quantitative parameters (that is, hours broadcast). This has encouraged a lack of communication between professionals and users, which in turn contributes to the invisibility of the MA services, professionals and products (through unclear signalling/icons). It also contributed to a lack of professionalisation associated with deficient training, lack of specialised qualifications, and norms of conduct.

Improving the context of MA in Portugal will require action on various fronts. While we recognise the limitations of our study, particularly the sample size of interviewees and the focus on a single group of MA professionals, we hope that the findings discussed offer valuable insights for future research and improvement of MA services in Portugal.

Notes

1. These three broadcasters refer to the state-owned free-to-air channel RTP (Rádio e Televisão de Portugal), which comprises various regional, international or thematic subchannels, as well as two private channels, i.e., SIC and TVI. Added to these, on satellite TV, the Portuguese can freely access other national channels, namely Porto Canal, CNN, SIC Notícias, among others.
2. See https://ulices.letras.ulisboa.pt/projects/accessibility-in-portugal/.
3. The Entidade Reguladora para a Comunicação Social (ERC) is an independent public body that oversees and regulates the media sector in Portugal, covering all organisations that produce or disseminate media content under Portuguese jurisdiction. It was established by Law no. 53/2005 of 8 November. Its central role is to monitor and regulate media activity in areas such as the press, radio, television and online media (www.erc.pt).
4. The two consultants described by the interviewees are part of the unit's staff, but were among the professionals who were not available to participate in the questionnaire or interviews.

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