A Roadmap for Accessible Entertainment in India:

Recommendations for access, literacy and language enhancement at population scale

August, 2025

Acknowledgements

INDIA'S GLOBAL OPPORTUNITY

India: First country to leverage Same Language Subtitles (SLS) for reading literacy

India's contribution to Sustainable Development Goal (SDG) 4: Quality Education

Mainstream accessible content for ALL:

- Hearing impaired
- Visually impaired
- Hearing and sighted too

KEY ACCESSIBILITY FEATURES FOR ALL CONTENT

SLS/C
Same Language Subtitles or Captions

Strong evidence: Improves media access, reading literacy and language learning.

AD
Audio Description

Enables access for the visually impaired by describing what is on the screen.

A tiger swims through calm water. Its black stripes on orange fur shimmer in the sun.

ISL
Indian Sign Language

The first language of most Deaf and Hard of Hearing (DHH) persons in India.

ISL
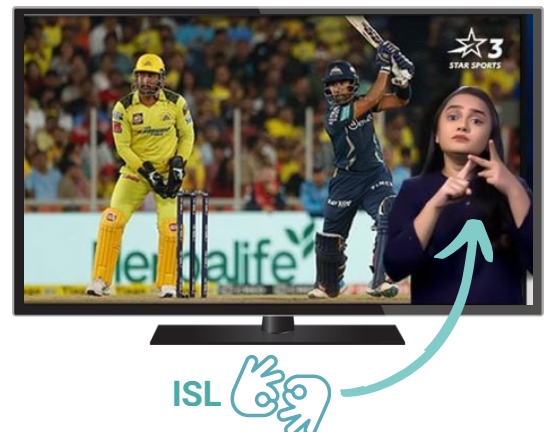
SPEED BUMPS TO SCALE IN INDIA

EMERGING STANDARDS

Film standards are clear
TV standards still forming
OTT standards unclear

INDUSTRY PERCEPTION

Perceived high cost
Tedious to implement

QUALITY IMPLEMENTATION

The promise of AI Tools yet to be fulfilled for Indian languages
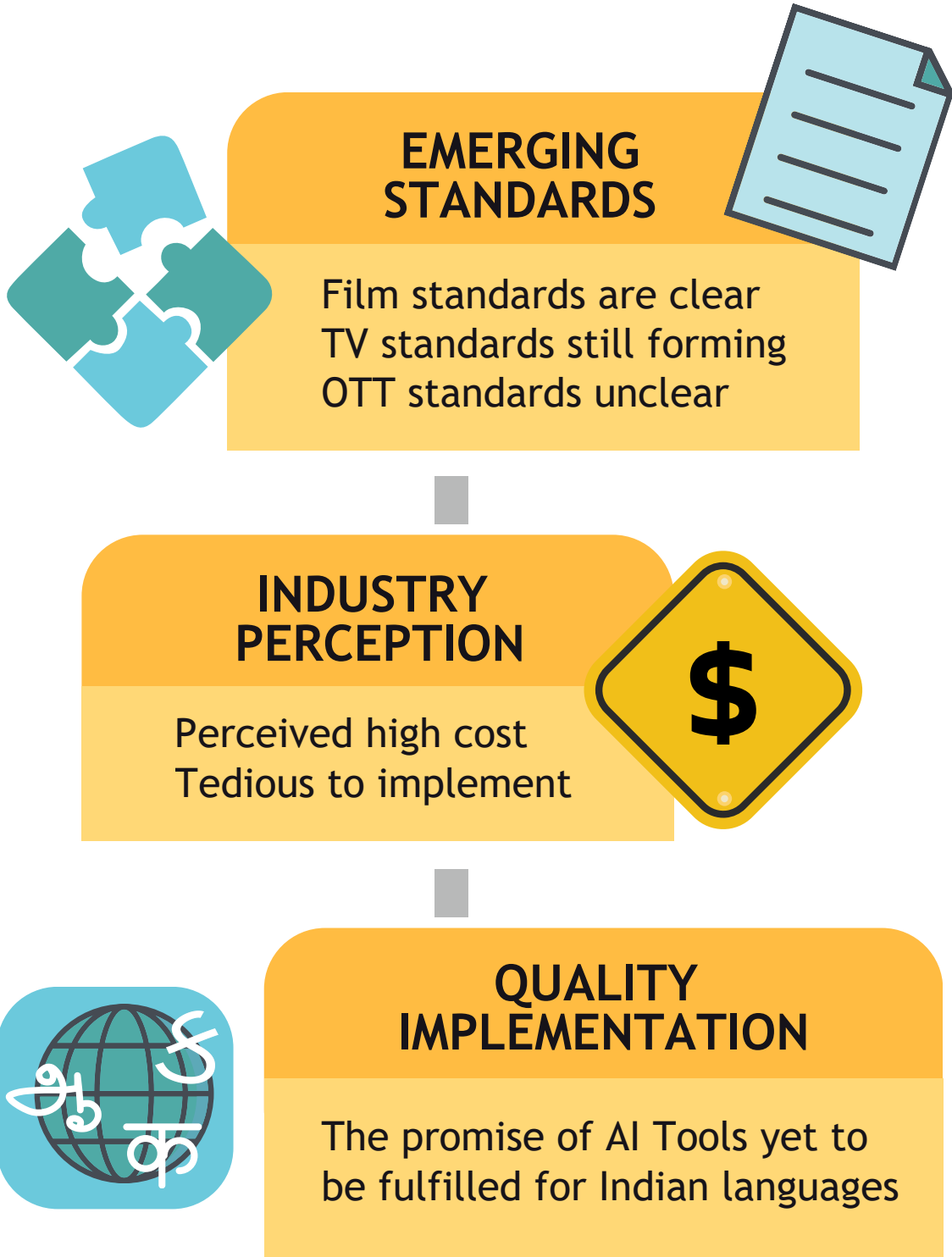
KEY RECOMMENDATIONS FOR ACCESSIBILITY

For Government Policy

All Content Born Accessible

Ensure quality implementation of Accessibility Standards for Films, 2024

Notify Accessibilty Standards for TV, 2019.

Mandate only accessible content on OTT platforms

For Industry

Business opportunity:
Leverage accessibility tools

Integrate accessibility into production pipelines

Maintain quality verbatim scripts of content from start to finish

Redefine video as A + V + T
T = Text of final script

Executive Summary

India is poised to redefine and expand the social purpose of inclusive media access. In the wake of the Supreme Court's landmark judgment (November 2024) on *Rajive Raturi v Union of India (2005)*, India has an unparalleled opportunity to champion a novel approach to leverage accessibility tools not only for Persons with Disabilities (PwDs) but also for mass literacy and language learning at population scale.

Several progressive content accessibility policies, framed over the last decade, precede this moment, starting with the Rights of Persons with Disabilities Act, 2016 which directly led to the Ministry of Information & Broadcasting's (MIB): i) Accessibility Standards for TV, 2019, ii) Guidelines on Accessibility Standards for Films, 2024, iii) Cinematograph (Certification) Rules, 2024, and iv) Advisory, 2025 to OTT platforms on accessibility. In parallel, over the last three decades, there has been growing evidence that media access benefits all viewers. This universal benefit position is reflected in The Telecom Regulatory Authority of India's (TRAI) recommendations to MIB on the National Broadcast Policy.

From a 'media access as universal public good' position, the recommendations below advocate for an 'all content born accessible' paradigm. That means, all audio-visual content - across film, television, and Over-The-Top (OTT)/streaming platforms - must integrate Same Language Captions (SLC), Audio Description (AD), and Indian Sign Language (ISL) from the outset of production, rather than as a costly and cumbersome afterthought.

By embracing the following recommendations, India can not only empower its PwD community but also harness accessibility tools like SLC to foster reading literacy among hundreds of millions of hearing individuals nationwide, improve their language ability, and further our cultural and educational missions at population scale. The Billion Readers (BIRD) Initiative at IIT-Delhi is committed to supporting policymakers in realizing this critical vision.[2]

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[2] The case for Same Language Captions (SLC) for reading literacy is built on strong scientific evidence. It makes the argument that SLC benefits ALL viewers and not just DHH persons. Impact and eye-tracking studies have found that SLC gives automatic reading practice to weak-reading viewers. The evidence from pilot studies of SLC implementation on TV in Indian languages demonstrates that regular SLC exposure results in steadily improving reading skills among children in and out of school, youth, and adults. A billion viewers in India watch 3-4 hours of TV every day, and will do so for life. Reading practice from SLC is incredibly cost-effective and scalable. The international acceptance of SLC is growing with global leaders like PM Narendra Modi, Bill Clinton, Boris Johnson and Gordon Brown remarking on its potential.

# Content and Media Accessibility: Current Landscape

🎥 Films

India recently introduced progressive steps toward film accessibility, notably through the MIB's 2024 Guidelines on Accessibility Standards for Films and the Cinematograph (Certification) Rules, 2024. These require the inclusion of accessibility features such as captions, audio descriptions, and sign language in theatrical releases in a phased manner. While efforts are ongoing to implement these standards, there are gaps - notably in ensuring the availability of captions in the 'same' language, or SLC, accessibility features in dubbed versions (just as in the original), and accessibility carried over to all distribution channels and devices.

📺 Television

The MIB's Accessibility Standards for TV, 2019 recommend that 50% of General Entertainment Content (GEC) be telecast accessibly, by 2025. Yet, these standards have not been officially notified yet, making them unenforceable. Consequently, actual implementation falls significantly short of the target. Currently, less than 5% of TV content is accessible, based on the data we have tracked across popular Indian TV networks (see Fig.1 below). See our tracker of accessibility features on popular TV networks here.

**Figure 1: Number of TV programmes with SLS by Network**
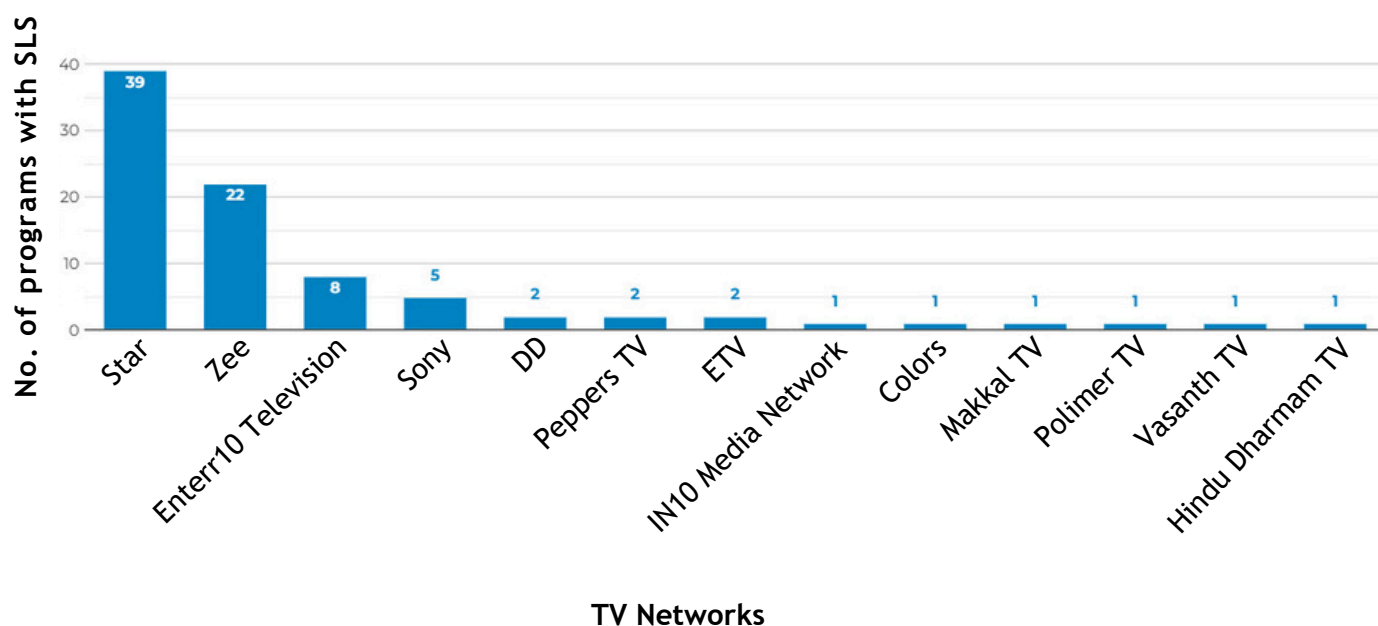
🖥️🌐 OTT Platforms

India's OTT sector is rapidly expanding with billions in revenue and a growing user base consuming multilingual content. However, 23 out of 26 leading OTT platforms do not have accessibility features for their content, based on the data we have tracked across popular OTT networks (Figures 2 and 3; see study). Under the 2021 IT (Intermediary Guidelines and Digital Media Ethics Code) Rules, OTT platforms must make "reasonable efforts" toward accessibility, but the Rules lack explicit technical standards or timelines. There is a need for comprehensive accessibility guidelines for OTTs to establish enforceable and uniform standards.

Figures 2 and 3: Percentage of content on leading OTTs with SLS and AD
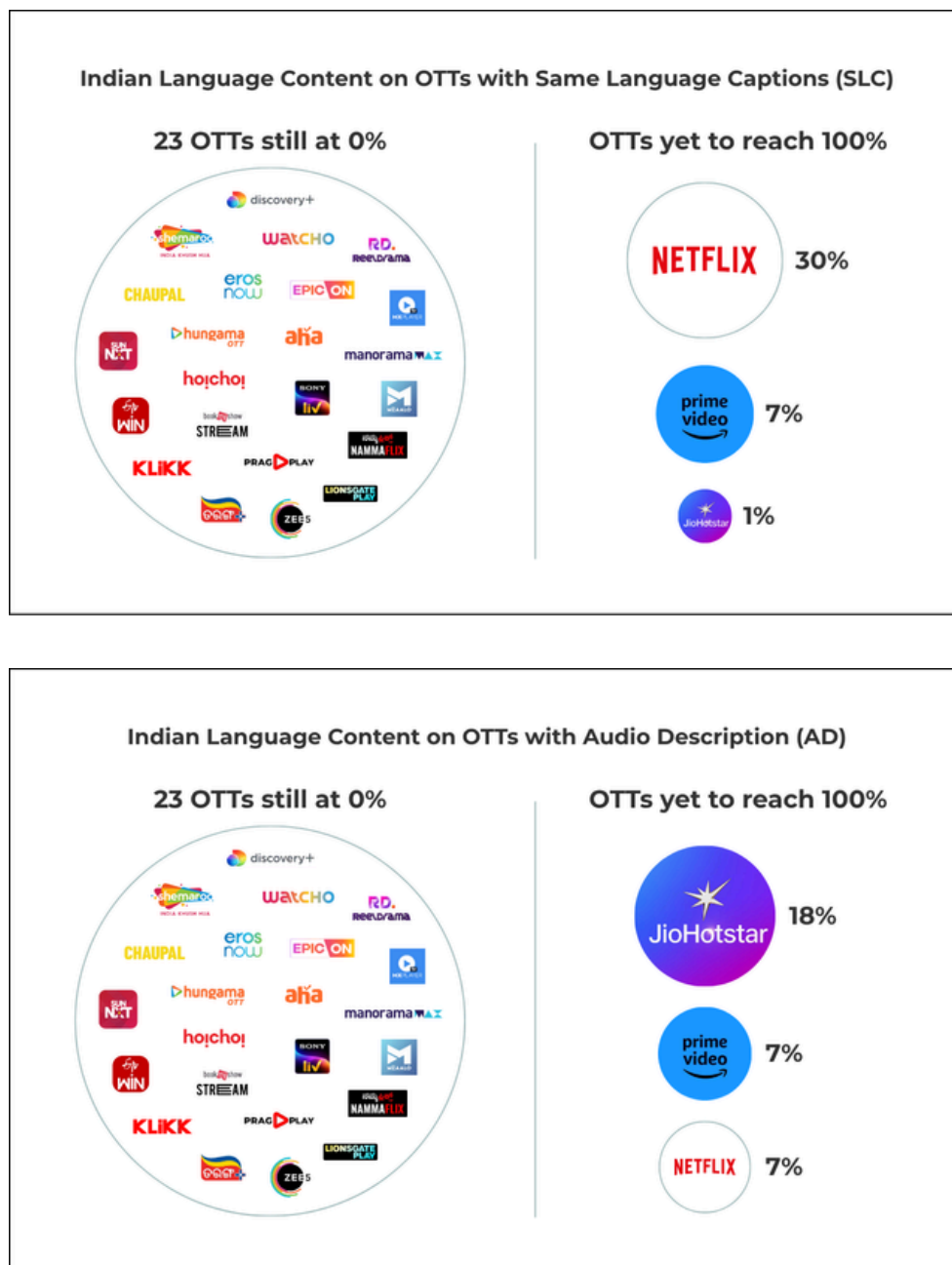
Key Principles

Born Accessible

Ensure that all new content across film, television, and OTT/streaming platforms are born accessible and existing content is made accessible through the integration of accessibility features like SLC, AD, and ISL.

Universal Design

Features like SLC stand to benefit ALL viewers and not just DHH persons. In addition to media access, SLC can help viewers boost their reading and language skills.

Harmonising Terminology

Nomenclature for accessibility features (e.g., "Same Language Captions" instead of "captions") should be precise and uniformly applied across all platforms and languages.

Global Literacy Leadership

India is the first nation that is leveraging SLC for reading literacy at population scale. India has innovated a powerful solution for SDG4.
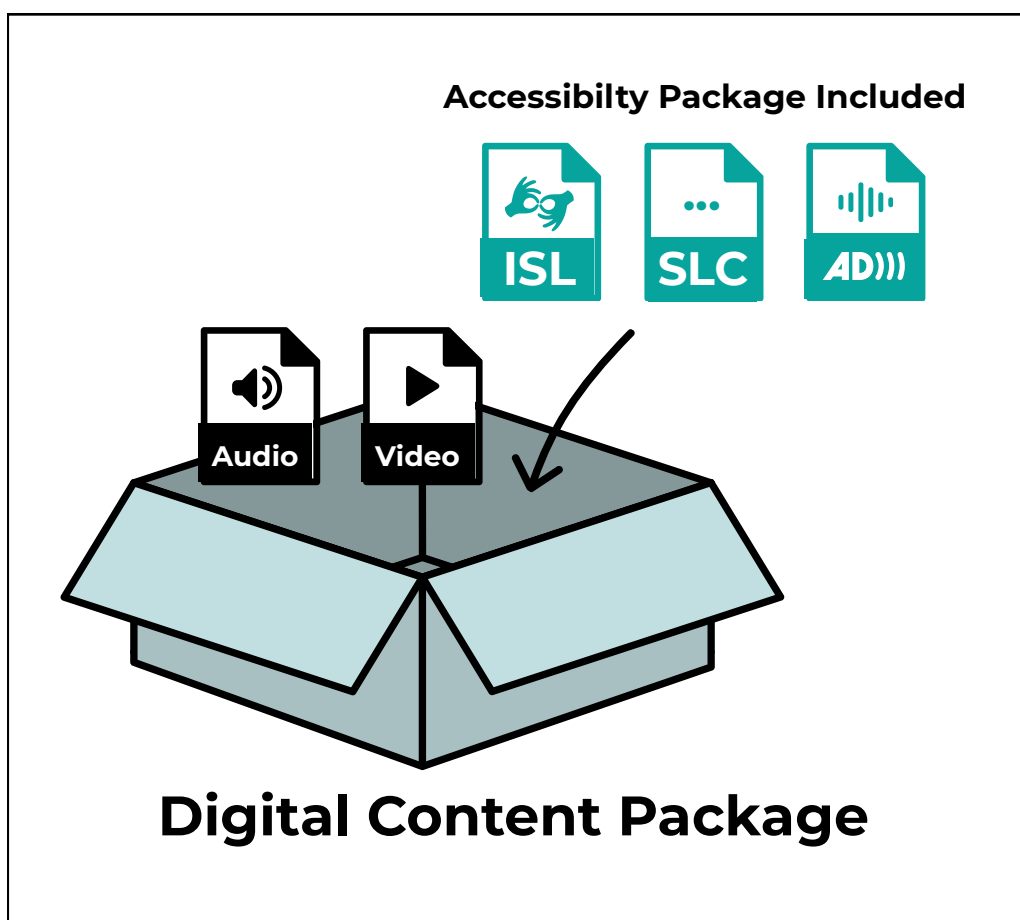
BIRD's Key Recommendations

Recommendation 1: All new content 'born' accessible

The Rajive Raturi Judgment establishes accessibility as a fundamental right, underscoring that all entertainment and educational content must be "born accessible." Features such as SLC, AD and ISL should be created at the time of production, not added later. Only then can licensing, distribution, and consumption of content across films, television, and OTT platforms become sustainably and universally accessible.

To achieve this, accessibility features should be embedded as integral components of every Digital Content Package (DCP) from the outset, rather than as costly retrofits later (Figure 4). Features like SLC and AD are low-cost when embedded at source. These features should be included as separate files within the DCP, enabling broadcasters and consumers to activate them as a choice. Content sourcing policies for all film distributors, television broadcasters and OTT platforms should require accessibility features, ensuring that new content remains accessible across all current and future distribution channels.

Figures 4: A Digital Content Package (DCP) that includes SLC + AD + ISL

Recommendation 2: Replace 'Captions' with 'Same Language Captions (SLC)'

Captions are defined as "a transcription or translation of dialogue, sound effects, relevant musical cues, and other audio information when sound is unavailable or not clearly audible," such as when the audio is muted or for viewers who are deaf or hard of hearing (DHH). However, the term 'captions' does not necessarily imply that the text matches the spoken language. Ideally, captions should be in a language viewers can understand - a challenge in India's multilingual context with 22 official languages and over 700 dialects.

The term 'captioning' originated in predominantly monolingual or majority-English-speaking countries like the US, UK, Canada, New Zealand, and Australia, where 'captions' and 'same language captions' (SLC) are effectively synonymous. In India, however, the diversity of languages requires a more precise term. 'Same Language Captions (SLC)' specifically denotes subtitles that reflect the dialogue and audio cues in the *same* language as the audio track. India should uniformly adopt the term 'Same Language Captions (SLC)' across all accessibility standards framed by the MIB for films, television, and OTT platforms. This will eliminate ambiguity caused by terms like CC, OC, captions, or subtitles and simplify implementation.

With 70–80% of Indians unable to functionally read English, mandating SLC for all Indian language content is essential for genuine accessibility and literacy advancement. English captions may remain optional for cross-language access, but SLC must serve as the baseline standard to avoid confusion. Figure 5 illustrates how the recent Telugu film Pushpa 2 was certified with English captions rather than SLC or Telugu captions.

Figures 5: CBFC's Certificate for Telugu film Pushpa 2 with English captions

Similarly, *Rekhachitram,* a Telugu movie available on Sony LIV with dubbed audio in Tamil, Malayalam, and Kannada, lacks SLC in all these languages (Figure 6).

Figures 6: Subtitles in English only and not in all dubbed Indian languages
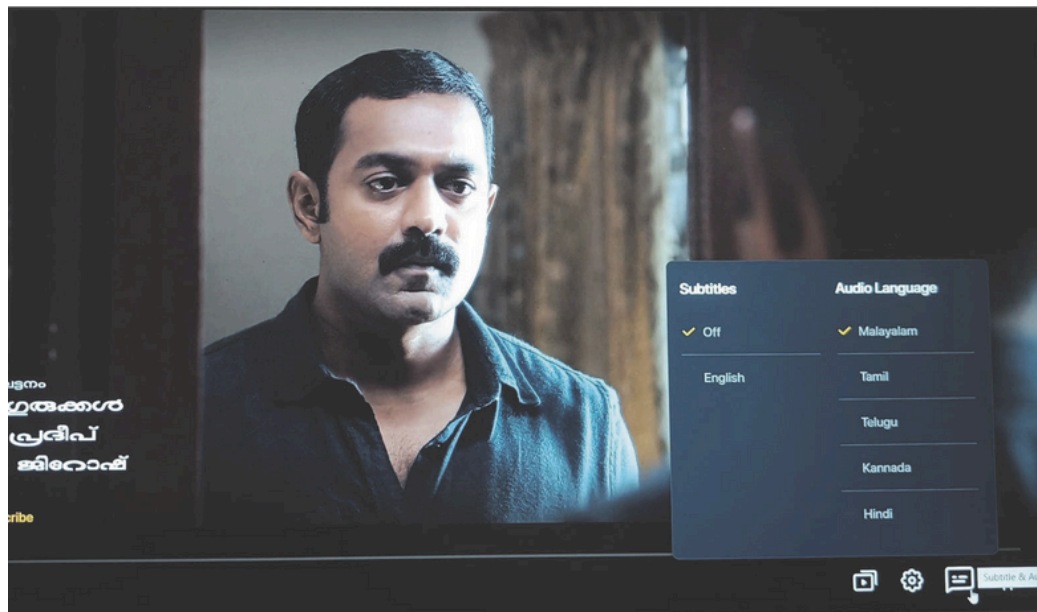
Rule 22(4)(d) of the Cinematograph (Certification) Rules, 2024 requires certification applications to include same language subtitles, same language audio description, or closed captions with other notified accessibility features. Despite this, many films are certified with only English subtitles, omitting the required same language accessibility features. Rule 22(4)(f) distinctly separates English subtitles from same language accessibility features. We recommend that the CBFC update the Ecinepramaan portal to mandate the same language accessibility features as prerequisites for certification, in line with the Rules.

Recommendation 3: All New Content on TV and OTT Accessible Now and All Existing Content Accessible Over Time

For TV:

a. All new TV content produced after a set date must be born accessible, including at least one feature for DHH persons and one for the visually impaired, and must be licensed and distributed as accessible.

b. All existing General Entertainment Content (GEC) produced before the set date must be made accessible within two years, with at least 50% accessible in the first year. Embedding accessibility features at production ensures consumers can easily activate them. Content sourcing policies should require accessibility as part of every DCP.

For OTT Platforms:

a. All new OTT content produced after a set date must be born accessible, including at least one feature for DHH persons (SLC and/or ISL) and one for the visually impaired (AD). All new content must be licensed, distributed, and hosted as accessible.

b. All existing GEC on OTT must be made accessible within one year of the set date, with at least 50% accessible within the first six months.

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Recommendation 4: Adherence to Bureau of Indian Standards (Accessibility Standards for ICT Products and Services)

MIB's Accessibility Standards for Films, TV and OTT platforms must include an obligation to comply with these standards. This will provide a clear and technical framework for the industry to comply with their obligations viz-a-viz media accessibility.

We propose amendments to the BIS 17802 to harmonise the standards with the forthcoming ICT Accessibility Rules. Currently, the definition of "Captions" in the BIS standards (Figure 7) mentions multiple terminologies such as captioning/subtitling/open and closed captions. The BIS standards, ICT Accessibility Rules (Figure 8a) and MIB's standards should be harmonious and adopt uniform and precise terminologies.

Figures 7: Definition of 'Captions' in the Bureau of Indian Standards (BIS)

3.1.7 *Caption* — Synchronized visual and/or text alternative for both speech and non-speech audio information needed to understand the media content (*source : WCAG 2.1*).

NOTES

1 This is also variously described using terms, such as "subtitles" or variants, such as "subtitles for the deaf and hard-of-hearing".

2 *Open Captioning* : The captioning whereby the user does not have to do anything in order to see captions for the hearing impaired' as these are an integral part of the picture and cannot be turned off [*source:* MoI&B Accessibility Standard]

3 *Closed Captioning* : The means by which both the audio dialogue and sound representations of audio-video content are made visible *via* onscreen text that is synchronized with the audio content on demand by the user [*source :* MoI&B Accessibility Standard].

4 *Sub-titling* : The captioning of dialogues whereby the user does not have to do anything in order to see such sub-titles for the hearing impaired, as these are an integral part of the picture and cannot be turned off [*source:* MoI&B Accessibility Standard].

Similarly, compliance requirements in the BIS standards should be *normative (mandatory)* and not *informative (good to have)* in nature, as currently mentioned in the BIS standards (Figure 8b).

Figures 8a: ICT Accessibility Rules ask for SLC or 'same' Indian language

IS 17802 (Part 2) : 2022

Table 1 (c) ICT with Video Capabilities
(Clause 6.6)

For Requirements, Refer to Respective Clauses of IS 17802 (Part 1)	Type of Assessment	Inspection, Test Procedure and Success Criteria
7.1 Caption processing technology		
7.1.1 Captioning playback	Inspection	Check that the ICT displays video with synchronized audio. 1. Check that there is a mechanism in the ICT to display the captions. 2. Check that the ICT has a mechanism to display the captions and sub-titling in supported languages. 3. .* Check that the captioning and sub-titling is in the same Indian language chosen by the user or in the language agreed to by all participants 4. .*Check that the captions follow MoI&B Accessibility standard as regards timing, colour, positioning and other parameters. NOTE — If a Braille device is connected, the ICT should provide an option to display captions on the Braille device.

Figures 8b: Informative and not normative

> * These procedures are applicable in respect of informative requirements only and, as such, are not part of normative requirements. These may be included based on user requirement in applicable cases.
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Recommendation 5: Content born or made accessible on the original platform should remain accessible on all platforms and distribution channels

In several instances, TV channels that have certain accessible features on their content when broadcasting on television, will distribute this content on third party platforms without the same accessibility features. Some instances below:

● **TV to YouTube:** Dangal TV, the 7th most popular channel in India, with a reach of 100

million viewers at Prime Time, displays SLC on selected programmes on television but not on the same content on YouTube (Figure 9). Young women (ages 16-21) prefer watching content on YouTube and miss out on accessibility features that exist but are not made available.

Figures 9: Same screen shot of a serial on Dangal on TV with SLC and on YouTube, without

● **Theatres to OTT platforms:** Another category is where producers of a piece of content create accessibility features, but platforms hosting the content do not offer them as choice. The BIRD Initiative created the SLC file for Loveyapa by working with Phantom Studios. The Hindi film, now streaming on JioHotstar, does not offer viewers the option of SLC.

A similar observation can be made for the Kamal Hassan starrer *Thug Life* in Tamil. We

know accessibility features exist since the Greta application has SLC and AD for all the languages the film has been dubbed in. But Netflix, where the film is now streaming, does not provide these features (Figure 10).

Figures 10: Screengrab of Tamil film Thug Life on Netflix with English captions but not SLC
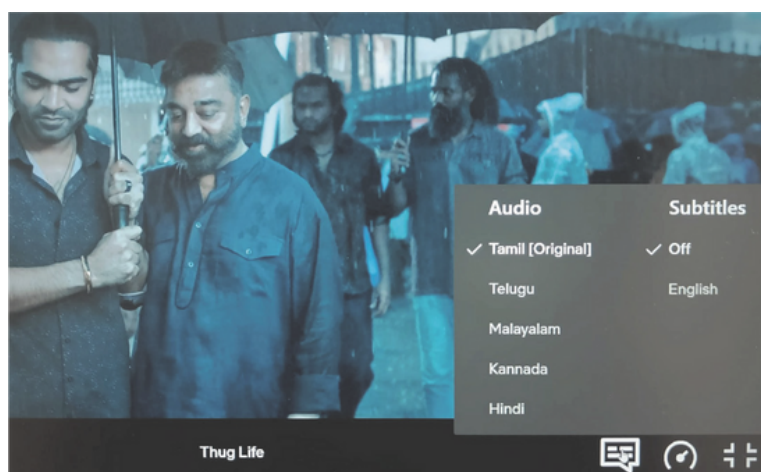
All accessible content on the original platform should travel with their set of accessibility features to other platforms. Owners and broadcasters should be required to upload accessible versions of their content to third party platforms like YouTube, Live TV apps, OTT aggregator platforms, etc. This obligation should apply to all types of content, including OTT originals, TV programmes and films - ensuring that accessible features are consistently available to viewers across all platforms.

Recommendation 6: Ensuring Access to Information for Audiences consuming inclusive content in Cinemas and Television

Both online and offline catalogues - including ticketing platforms like BookMyShow, TV guides, and set-top box electronic program guides - should be required to accurately display the availability and type of accessibility features (such as SLC, AD, or ISL) for all upcoming Film releases in Cinemas and broadcasts on TV. This will empower audiences to make informed choices and ensure that accessible content is discoverable and available to all.

The CBFC maintains a searchable Film Database on their website which serves as a central repository for details of Films it certifies (including certification date, synopsis, cast & crew details, audience rating, etc.). If the same database were to publish a list of accessibility features each movie has been certified with, it would empower audiences to identify available accessibility options for each film and help the MIB track compliance with ease.

The UK Cinema Association - a trade body that represents well over 90 per cent of UK cinema operators, including all of the major cinema circuits as well as smaller mainstream and more specialised cinema sites - launched Accessible Screenings UK, an online platform providing a comprehensive, searchable database of accessible cinema screenings.

Recommendation 7: Ensuring Fair Distribution of Inclusive Content in Cinemas and Television

Cinemas (as defined in the 2024 Guidelines on Accessibility Standards for Films) and Service Providers (as defined in the 2019 Accessibility Standards for TV) must ensure that content with accessibility features is evenly showcased: (i) in cinemas, across all screening times - not just morning or matinee shows - so that evening screenings are also accessible; and (ii) on television, across all broadcast time bands, including primetime, rather than limiting accessible content to off-peak slots.

Recommendation 8: Dubbed Versions Require Fresh Set of Accessibility Features

All dubbed versions of new content should also be fully accessible and compliant with the accessibility standards laid out for all new content. When any content's original language version is dubbed in other languages (either at the time of original release or at a later point in time by either the producer, the distributor, or any party downstream), each dubbed version should have its own set of accessibility features/files like SLC, AD, and/or ISL

For example, the Sunny Deol starrer in Hindi, *Jaat*, streaming on Netflix has been dubbed into Telugu, but does not include the accompanying accessibility features for Telugu (Figure 11).

Figures 11: Hindi movie Jaat on OTT with SLC but dubbed Telugu version not with SLC
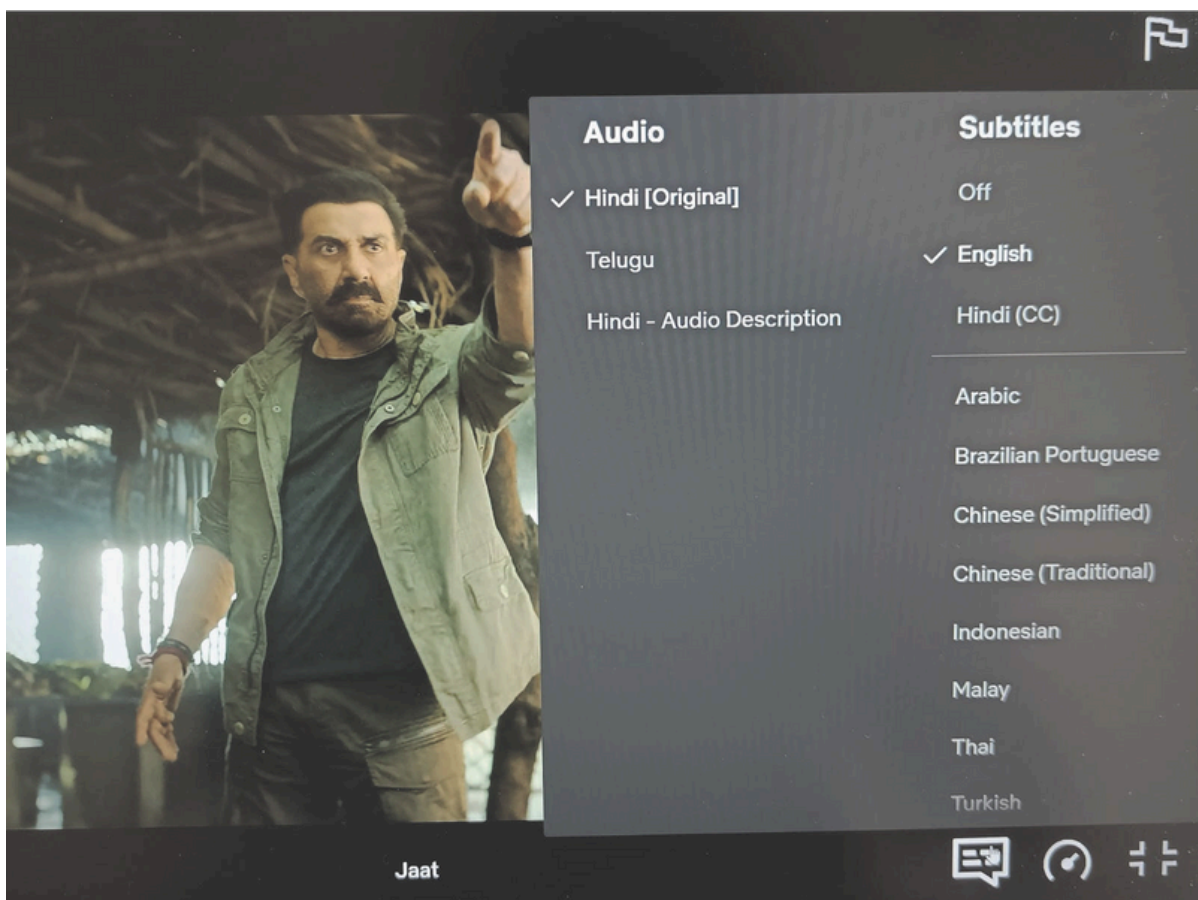
Recommendation 9: Accommodate Third Party Accessibility Feature Files When Missing

For all new and existing content (e.g, films, TV, OTT), if a civil society organisation or any entity creates and provides an accessibility feature file, and if that feature is not already included in the digital content package, then it must be accommodated in it. For example, if the content package of a film has SLC and AD but not ISL, and if an organisation has created an ISL video, then it must be added as part of the content package.

For instance, BIRD provided the SLC file for the Marathi movie Ata Thambaycha Naay! after the film had been released on Zee5. To its credit, Zee5 added it to the film on their platform (Figure 12).

Figures 12: BIRD's SLC file for Ata Thambaycha Naay! added retrospectively on Zee5

Recommendation 10: Accessibility Standards for Video-Based Educational Content

MIB's standards for video entertainment should also apply to educational video content. Channels with children's content should have "default on" SLC on their programming (which users can switch off if desired) to bolster media access for children who are deaf or hard of hearing and to improve reading literacy at scale.

Recommendation 11: Grievance Redressal

MIB could designate a section with the required number of grievance redressal officers to address complaints regarding the lack of, or quality issues in, accessibility features in films, television or OTT in a timely manner. There is a need for MIB to systematically record grievances (e.g., date/time when it was made) in a central database and ensure timely redressal.

Recommendation 12: Accessibility Compliance Reporting

To address the existing gaps and accelerate accessibility adoption in India, it is recommended that both television broadcasters and OTT platforms be mandated to file an annual compliance report detailing their level of platform and content accessibility. The benefits are multi-fold - increased accountability and transparency, eased progress tracking, valuable data for policymakers and the industry to strengthen implementation.

For Television Broadcasters

Broadcasters should be required to submit their annual accessibility self-certification reports through the existing Broadcast Seva portal, to the MIB. This leverages an established infrastructure familiar to broadcasters. The report should include content accessibility metrics like, percentage of GEC with accessibility features like SLC, AD and ISL.

For OTT Platforms

Given the absence of a dedicated reporting mechanism within the current 2021 Digital Media Ethics Code for accessibility, a new framework or an extension of existing reporting requirements is needed. OTT platforms should be mandated to publish their annual accessibility reports publicly on their platforms and submit a copy to the MIB. The report should include content accessibility metrics like the percentage of content with accessibility features.

Conclusion

India is not just catching up on media accessibility in the entertainment space. In many ways, India is leading the conversation on universalising the purpose of accessibility and inclusive design. This leadership comes not only from visionary policies but also from the scale and diversity of our population, making accessibility a universal design ethic that benefits all.

By embracing a 'born accessible' approach, mandating uniform standards, and fostering robust enforcement and innovation, India can define a new archetype of accessible media — one that empowers PwDs while simultaneously advancing literacy, language and cultural inclusion for hundreds of millions. This roadmap lays the foundation to transform accessibility from a regulatory obligation into a catalyst for social equity and national progress. The Ministry of Information & Broadcasting, along with all stakeholders, has an unprecedented opportunity to make India a global exemplar of accessible media, enriching lives and building an inclusive audio-visual ecosystem.

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