# Legislative Update

October 2025





### **Draft OTT Accessibility Guidelines**

On 07 October 2025, the Union Ministry of Information and Broadcasting ("MIB") released the Draft Guidelines for Accessibility of Content on platforms of publishers of Online Curated Content (OTT Platforms) for Persons with Hearing and Visual Impairment ("Draft OTT Accessibility Guidelines") for public consultation (available <a href="https://example.com/hearing-new-months/">hearing and Visual Impairment</a> ("Draft OTT Accessibility Guidelines")

The Draft OTT Accessibility Guidelines establish standards for audio-visual content made available by publishers of online curated content ("Over-The-Top/OTT Platforms") and seek to ensure that such content is accessible to persons with hearing and visual impairment. The Draft OTT Accessibility Guidelines are open for public consultation and comments till 22 October 2025. They may be submitted to the MIB at digital-mediamib@gov.in in MS Word or PDF format.

The Draft OTT Accessibility Guidelines propose the adoption of key accessibility features including audio descriptions, Closed Captioning ("CC"), Open Captioning ("OC"), and sign language interpretation. They also set phased timelines for implementation across OTT Platforms.

Accessibility in India is primarily governed by the Rights of Persons with Disabilities Act, 2016 ("RPwD Act") and its rules. The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 ("IT Rules") require OTT Platforms to take reasonable efforts to improve accessibility of their content. Previously, the MIB had also issued an advisory to OTT Platforms to comply with various provisions of the RPwD Act and IT Rules."

# Salient features of the Draft OTT Accessibility Guidelines

#### **Applicability**

 The Draft OTT Accessibility Guidelines are applicable to all OTT Platforms. Its objective is to ensure that all online curated content published by OTT Platforms are accessible to persons with hearing and visual impairment.

### **Implementation Schedule**

- The Draft OTT Accessibility Guidelines are to be implemented by OTT Platforms in a phase-wised manner as provided below.
- Phase I: Within 6 (six) months of publication of the final guidelines, OTT Platforms must ensure that all new content carries at least 1 (one) accessibility feature for hearing impaired (CC/OC or ISL) and visually impaired viewers (audio descriptions). They must prominently display content descriptors indicating accessibility features at the time of release as well as for any promotional material. Lastly, they must ensure platform accessibility in the manner specified below.
- Phase II Progressive Implementation: OTT Platforms have been encouraged to provide at least 1 (one) accessibility feature for hearing impaired (CC/OC or ISL) and visually impaired viewers (audio descriptions) for their content within the following timelines.
  - 30% (thirty percent) of their total content library within 12 (twelve) months.
  - 60% (sixty percent) of their total content library within 18 (eighteen) months.
  - 100% (one hundred percent) of their total content library within 24 (twenty-four) months.

#### **Platform accessibility**

 OTT Platforms must ensure that their mobile applications, websites and software are designed and developed to be accessible to persons with disabilities by achieving compatibility with assistive technologies.

#### **Guidelines for CC and OC**

- Accuracy: Captions must match the spoken words in the dialogue. In addition, captions should convey background music and other sounds such as ringing a doorbell.
- Synchronization: Captions must match the text being spoken on screen and must be displayed at a readable speed for viewers.
- Completeness: Captions must run from the beginning to the end of the content to the fullest extent possible.
- Spelling and Grammar: Captions should have accurate spelling

## Legislative Update



- and grammar which is aligned with the content on screen, especially for non-verbal parts of a captioning text.
- *Position*: Captions must not block other important visual content or overlap one another or run off the edge of the screen.
- Case, italics and underlining: It is recommended that captions
  use mixed case text. Usage of all uppercase or all lowercase text
  must be refrained unless necessary for context. For signifying
  emphasis, italics must be opted for instead of underlining text.
- Colour: Captions should be legible with appropriate font colour in contrast to the background.

#### **Indian Sign Language Guidelines**

• To convey a clear message to persons with hearing impairments, Indian Sign Language ("ISL") interpretation must be provided by OTT Platforms through hands and facial expressions in an accurate and synchronised picturein-picture mode so as to convey a clear message to those with hearing impairment. The super-imposed image of the interpreter must generally appear in the bottom right-hand side of the screen.

#### **Guidelines for Audio Description**

 OTT Platforms should endeavour to make audio descriptions of their content available in a concise and comprehensible format without causing distractions.

### **Additional Requirements**

Status Report: OTT Platforms must submit a status report

- on accessibility compliance within their content libraries as on date of publication of the final guidelines. Additionally, quarterly reports will have to be submitted thereafter to indicate compliance with the implementation schedule mentioned above.
- Awareness: OTT Platforms must take effective steps to publicise
  and create awareness among the public about the accessibility
  of their content by highlighting accessible programmes on
  electronic and printed programme guides and by providing
  information in publications aimed at persons likely to benefit
  from accessible content.
- Expert collaboration: OTT Platforms have been encouraged to collaborate and work with the organizations working in the field of accessibility of content for persons with disability.

#### **Exemptions**

 Live and deferred live content; audio content such as music and podcasts; and short form content (audiovisual media content with a total duration of 10 minutes or less) have been exempt from the requirements introduced by the Draft OTT Accessibility Guidelines.

#### **Formation of Committee**

 The MIB will establish a committee to monitor the implementation of the Draft OTT Accessibility Guidelines and address pertinent grievances.

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