



# SIGN LANGUAGE ON OTT : EVERYBODY'S INCLUSVITY

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While we say that we enjoy ‘watching’ cricket, we often don’t realise, watching a cricket match is an entire sensory experience, the roar of the crowd, the commentator’s excitement as the ball races to the boundary, the collective gasp before a crucial delivery etc [1]. But for millions of people with hearing or visual disabilities, this experience has often been incomplete. Recently, while watching a match during the ICC Men's T20 World Cup, I noticed something different, an option for commentary accessibility designed for viewers with hearing disabilities. It was a small feature on the screen, easy to overlook for many, but for those who need it, it represents something far more meaningful, ‘inclusion’.

Accessibility in media is not merely a technological upgrade, it’s a recognition of the fundamental right to participate in shared ‘cultural’ experiences. Streaming platforms and broadcasters are increasingly becoming the gateways through which audiences engage with content, be it stories, sports, and public conversations etc. When these platforms publish content, they should ensure that its accessibility extends to people with special needs and they aren’t left out.

Recognizing this need, the Ministry of Information and Broadcasting recently introduced accessibility guidelines for OTT platforms, to make digital entertainment more inclusive for persons with hearing and visual impairments. They are called “Guidelines for Accessibility of Content on platforms of Publishers of Online Curated Content (OTT Platforms) for Persons with Hearing and Visual Impairment”[2].

[1] The article reflects the general work of the authors and the views expressed are personal. No reader should act on any statement contained herein without seeking detailed professional advice

[2] [https://mib.gov.in/sites/default/files/2026-02/finalized-accessibility-guidelines-for-ott-platforms\\_0.pdf](https://mib.gov.in/sites/default/files/2026-02/finalized-accessibility-guidelines-for-ott-platforms_0.pdf)

## Accessibility Guidelines for OTT Platforms:

To make online content inclusive, accessibility standards can be broadly understood in terms of support for ‘persons with visual impairments’ and ‘persons with hearing (audio) impairments.’

### 1. Guidelines for ‘Persons with Visual Impairment’

a. **Audio Description (AD):** Platforms should provide ‘audio descriptions’ for audio-visual content wherever possible. These descriptions should:

- i. Clearly explain important visual elements (actions, expressions, settings)
- ii. Be concise and easy to understand
- iii. Fit naturally within pauses in dialogue
- iv. Enhance the viewing experience without causing distraction
- v. The narration quality must be clear, accurate, and well-paced.

b. **Accessible User Interface:** OTT platforms (websites, mobile apps, smart TVs, etc.) should:

- i. Be compatible with assistive technologies such as screen readers
- ii. Ensure easy navigation for users with special needs
- iii. Follow accessible design practices across all devices.



## 2. Guidelines for ‘Persons with Hearing (Audio) Impairments’

- a. Closed and Open Captioning: Captions should be provided to ensure that all audio elements are accessible to users.

Guideline	What It Means In Practice
<b>Accurate:</b>	Match dialogue and include non-speech sounds such as background music and other sounds (e.g. ‘doorbell rings’ or ‘music intensifies’) to convey mood and context
<b>Synchronized:</b>	Appear in sync with speech and sounds, at a readable speed
<b>Complete:</b>	Cover the entire duration of the content
<b>Spelling &amp; Grammar:</b>	Use correct spelling and reflect natural speech, ensure clarity in non-verbal cues
<b>Positioning:</b>	Avoid blocking important visuals, overlapping, or going off-screen
<b>Style (Case &amp; Emphasis):</b>	Use standard sentence case, avoid excessive ALL CAPS; prefer italics for emphasis
<b>Color:</b>	Use clear, high-contrast colors for easy readability

**b. Indian Sign Language (ISL) Interpretation: Where provided, ISL interpretation should:**

- i. Be displayed in picture-in-picture mode
- ii. Be accurate and synchronized with the content
- iii. Clearly convey meaning using both hand gestures and facial expressions
- iv. Be positioned so that it is visible without obstructing key visual content
- v. Show the image of the interpreter superimposed upon the original film on the screen.

**Exemptions:**

The guidelines aim to make OTT content more accessible, but they also acknowledge that not everything can realistically be adapted. For instance, adding captions or audio descriptions in real time is technically challenging, especially for live or near-live content, so such content is exempt. Audio-only formats like music and podcasts are also excluded since they don't involve visual elements. Similarly, short-form content, such as ads and quick clips is exempt due to its brief nature. However, this applies only to standalone pieces and longer content split into smaller segments/episodes does not qualify for this exemption.

**Redressal of Complaints:**

While these are guidelines, they also provide for mechanism for implementation and compliance. For redressal of grievances against the publishers:

Level	Who Handles It	What Happens	Timeline
Level I	Publisher (OTT platform)	User submits complaint via email/mail and Publisher acknowledges complaint	Within 24 hours
		Publisher reviews and decides on the complaint	Within 15 days
		If No Response from Publisher OR User Dissatisfaction, the complaint escalates to Level II	After 15 days / dissatisfaction of response
Level II	Self-Regulating Body (industry body of publisher)	User can appeal OR complaint auto-escalates	Appeal within 15 days
		The body reviews and issues guidance/advisory to publisher	Decision within 15 days
		If user is still dissatisfied, the complaint escalates to Level III	After decision
Level III	Monitoring Committee set up by Central Government	Final appeal to the Monitoring Committee set up under the Guidelines	Appeal within 15 days



## **Implementation:**

**For Newly Published Content:** The final guidelines adopt a noticeably phased and flexible approach to implementation. They provide OTT platforms with a 36-month transition period, after which all newly published content must carry at least one accessibility feature each for persons with hearing and visual impairments, such as captions, Indian Sign Language interpretation, or audio descriptions.

In addition to content-level compliance, platforms are also required to integrate these features across their user interfaces and clearly display accessibility indicators at the time of release, including in promotional material.

**For Existing Content:** For existing content libraries, however, the approach is more gradual, encouraging platforms to add accessibility features on a best-effort basis rather than mandating strict targets. This is complemented by procedural requirements such as the submission of an Accessibility Conformance Report after the initial 36-month period, followed by quarterly updates, along with proactive steps to improve discoverability and public awareness of accessible content.

**Concerns Over Implementation:** This relatively relaxed timeline marks a clear departure from the earlier draft guidelines[3], which had proposed a far more compressed and target-driven implementation schedule. Stakeholders, particularly OTT platforms and industry bodies, had raised concerns about the feasibility of such tight deadlines, pointing to the operational and financial challenges of retrofitting large content libraries and producing high-quality accessibility features at scale. There was a demand for more realistic timelines from platforms, especially given the technical complexity involved in integrating accessibility across platforms[4].

[3]<https://mib.gov.in/sites/default/files/2025-10/draft-guidelines-2.pdf>

[4]<https://www.storyboard18.com/ott-news/mib-extends-deadline-for-stakeholder-comments-on-ott-accessibility-guidelines-to-nov-7-82959.htm>



While the final framework appears to reflect these concerns, shifting from rigid compliance milestones to a more phased and flexible model, the Guidelines seem to have been challenged by in Delhi High Court[5] on the contention that the implementation schedule being dilutive and violative of disability rights law.

**Conclusion:**

As digital media continues to reshape how audiences consume content, accessibility can no longer be treated as an optional add-on. Instead, it must be seen as an essential element of responsible and inclusive communication, one that allows every viewer to feel that they truly belong in the audience.

While the Guidelines are currently challenged w.r.t. the implementation, by encouraging features such as closed captions, audio descriptions, and sign language interpretation, these guidelines represent an important step toward ensuring that entertainment and information are available to everyone, regardless of how they see or hear the world.

[5] <https://brandequity.economicstimes.indiatimes.com/news/media/mibs-ott-accessibility-norms-challenged-in-delhi-hc-over-alleged-disability-law-breach/129646693>

For any feedback or response on this article, the authors can be reached on [ayushi.kalelkar@ynzgroup.co.in](mailto:ayushi.kalelkar@ynzgroup.co.in) and [radnyee.joshi@ynzgroup.co.in](mailto:radnyee.joshi@ynzgroup.co.in)

**Author: Ayushi Kalelkar**

Ayushi is experienced in corporate legal and heads the investment and deal advisory at YNZ Legal. She is also a member of Bar Council of Maharashtra & Goa. By qualification she is Master in Commerce and Bachelor of Law from Mumbai University.



**Co-author: Radnyee Joshi**

Radnyee is a Law Trainee at YNZ Legal. She has completed LLB from D.Y. Patil College of Law. She has done her Bachelor of Arts from Mumbai University.