



Coimisiún
na Meán

Access Rules

Compliance Report 2024

December 2025



Contents

1.0	Introduction	3
2.0	Scope	3
3.0	Methodology and Approach	4
4.0	Outcomes	6
4.1	Subtitling	6
4.2	Irish Sign Language (ISL)	9
4.3	Audio Description (AD)	10
4.4	Promotion of Access Services	11
4.5	Consultation with Users	12
4.6	Access Liaison Officer, Codes of Practice for Complaint Handling & Complaints	13
4.7	Engagement with Platform Providers	14
4.8	Arrangements for National Emergencies	14
5.0	Conclusions	15



1.0 Introduction

This is a report on the performance by television broadcasters in 2024 in complying with Coimisiún na Meán's Access Rules (2019).

The Access Rules ("Rules") set out obligations on television broadcasters to promote the understanding and enjoyment of programmes by persons who are deaf or hard of hearing and persons who are blind or vision impaired. The Rules provide percentage targets of programming for individual television services that must carry subtitling, Irish Sign Language (ISL) and audio description. There are also obligations on broadcasters in relation to promotion of access services, consultation with access service users and having a point of contact for access services.

Reliable and good quality access services make media content more accessible to greater numbers of people. Where people are facilitated in understanding and enjoying media content, they are included in cultural conversations and in public debate on important issues in society. Coimisiún na Meán's ("An Coimisiún") monitoring and reporting on regulated entities' performance against their obligations in the Access Rules supports greater inclusion in the media landscape.

This report covers the period January-December 2024. For this period, the Access Rules that were in force for 2019-2023 were extended to 2024, with the percentage targets for the different access services for 2023 applying for 2024. Revised Access Rules for 2025-2027 came into force in January 2025.

The television broadcasters and broadcasting services in scope for this report and their obligations under the Rules are explained in section 2. The methodology and approach used by An Coimisiún to assess compliance with the Rules is set out in section 3. The compliance outcomes are provided in section 4 and the conclusions are set out in section 5.

2.0 Scope

This report assesses the performance of the following television broadcast services in 2024 against the relevant requirements of the Access Rules.

Broadcaster type	Broadcasters	Television services	Number of services
Public service	RTÉ, TG4 and Oireachtas TV	RTÉ One, RTÉ Two, RTÉ One +1, RTÉ 2+1, RTÉjr, RTÉ News, TG4 and Oireachtas TV	8
Commercial	Virgin Media	Virgin Media One, Virgin Media Two and Virgin Media Three	3
Community	Cork Community TV and Dublin Community TV	CCTV and DCTV	2

The television services in the above table have percentage targets for access service provision in the Rules. The Rules provide for the possible inclusion of other television services during the effective period of the Rules. No additional services were included for 2024.



This report considers the performance of the relevant broadcasters in relation to the following obligations provided in the Rules:

- to meet specific targets and timeframes in respect of the provision of subtitling, audio description (“AD”) and Irish Sign Language (“ISL”) and adhere to guidance on quality standards for those access services;
- to promote access services on- and off-air;
- to consult, at least once annually, with groups representing a range of different access user groups; and
- to have an appointed Access Liaison Officer to respond to queries.

3.0 Methodology and Approach

An Coimisiún’s assessment of broadcaster performance is informed by the following:

- consultation with An Coimisiún’s User Consultative Panels,
- reports provided by the broadcasters to An Coimisiún indicating the levels of subtitling, AD and ISL achieved;
- compliance monitoring of access service provision on sample of broadcast recordings, and
- annual meetings with the broadcasters.

3.1 User Consultative Panels

An Coimisiún has established two User Consultative Panels (UCPs), which assist in assessing broadcaster performance in complying with the Rules by providing insight into the user experience of access services. The UCPs are comprised of access service users, members of Disabled Persons’ Organisations (DPOs) and members of disability representative/advocacy groups. One UCP is for people who use subtitling and/or ISL and the other UCP is for people who use audio description.

An Coimisiún meets with UCPs to hear views on broadcaster performance in delivering access services and An Coimisiún’s approach to regulation of the sector. Structured discussions set out critiques of broadcasters’ performance over the previous year in relation to the quantity and quality of provision, highlight points of praise and frustration, detail the outcomes of users’ engagements with broadcasters and any other matters arising.

An Coimisiún’s meetings with the two UCPs took place on 15 and 16 April 2024. In addition to learning about the experience of access service users, the meetings were used as an opportunity to explore how An Coimisiún can develop and improve its engagement with access service users in the context of its expanded range of functions. Directors of several teams within An Coimisiún (Codes & Rules, Compliance & Complaints, Media Development, Media Funding and Media Literacy and User Education) provided overviews of relevant functions and activity and there was a productive discussion on how to evolve engagement with the UCPs. An Coimisiún also met with users of access services in September 2024 to consult on the draft Access Rules for 2025-2027.

The UCPs provided feedback on a range of topics. The points relevant to compliance with the Access Rules may be summarised as:



- There is significant frustration with the lack of ‘real’ progress by broadcasters in producing accessible content;
- The quality of services provided can often be very poor;
- Monitoring does not identify sub-standard provision;
- Lack of response from broadcasters;
- Users want a step change in how the sector and regulator responds, with more active monitoring and a less onerous complaints process; and
- There is a desire for more action-orientated and consistent engagement with an Coimisiún.

3.2 Broadcasters’ Reporting

Broadcasters are required to provide an annual report to An Coimisiún indicating the level of subtitling, AD and ISL achieved for each television service they provide (section 9 of the Rules). Requests for returns were issued in January 2025 with a sample template for broadcasters to complete. Broadcasters are required to submit a list of all programmes broadcast during 2024 including genre, programme name, duration and the presence of access services. Broadcasters with ISL targets provided An Coimisiún with copies of full programmes with ISL. Broadcasters with AD targets (RTÉ One, 2 and Jr, Virgin Media 1) provided An Coimisiún with copies of programmes with AD. Broadcaster reports also included information on their promotion of access services, engagement with access service users and complaints handling.

3.3 Compliance Monitoring

An Coimisiún conducts compliance monitoring of a sample of broadcast output on Saorview for each television service in scope. The sample size is 3 days of content from each broadcasting service from which one day is selected for monitoring. All programming broadcast between 07.00 and 01.00 is checked for subtitling and ISL provision and the duration of the programme for which the access service is provided.

An Coimisiún applies a risk-based approach to monitoring of broadcaster’s access provision and targets its monitoring resources to the services most widely used or of greatest concern to users, as reported during UCP discussions. On this basis, the primary focus of monitoring is on subtitling provision by RTÉ, TG4, Virgin Media Television and Oireachtas TV services. An Coimisiún did not monitor subtitling on community television services due to their low viewership and the fact that most of their output consists of repeat programming. An Coimisiún did not conduct monitoring on the quality of AD as these services are generally reported by users to be of high quality.

When monitoring the quality of access services, monitors use the quality standards set out in the Access Rules, rate the accuracy, timing and format of subtitling and ISL on a scale of 1 (poor) to 5 (excellent). The quality score achieved is compared to the maximum score value and a percentage grade calculated. The number of hours of subtitled and signed programming is compared against the total broadcast duration. From this data, a percentage score is calculated and cross-checked with percentage achieved as reported by the broadcaster.

3.4 Meetings with Broadcasters

An Coimisiún holds annual meetings with broadcasters. The meetings review the broadcasters’ retrospective compliance with the Rules having regard to the results of the broadcasters’ and An



Coimisiún's monitoring and any feedback received from UCPs. These meetings were held remotely in July 2025.

4.0 Outcomes

4.1 Subtitling

The table below shows the target and actual subtitling provision in 2024 for all the services in scope. The 2024 target is the same as the 2023 target in the Rules. The 2024 actual figure is percentage achieved across the year based on the reports provided by the broadcaster and checked by sample monitoring by An Coimisiún.

Broadcaster	2024 Subtitling Target	2024 Subtitling Actual
RTÉ 1	92% (96% Peak Time)	94.42% (98%)
RTÉ 2	78% (88% Peak Time)	92.43% (98.16%)
TG4	59% (60% Peak Time)	64% (75%)
Oireachtas TV (cable/satellite)	18%	19.15% ¹
Oireachtas TV (Saorview)	18%	16.27%
Virgin Media One	56% (57% Peak Time)	63.39% (83.77% Peak Time)
Virgin Media Two & Virgin Media Three	55% of combined output	71.53%
RTÉ One +1	92% (96% Peak Time)	94.41% (98%)
RTÉ 2 +1	78% (88% Peak Time)	99.12% (98.16%)
RTÉ News Now	30%	See section 4.1.1 below.
RTÉjr	53%	65.93%
DCTV	13%	31%
CCTV	13%	28.5% ²

All broadcasters met or exceeded the targets set out in the Rules. Captioning is still used for a small number of older programmes, or ones that have been acquired from the UK, USA, etc. From 2024, captioning on new home-produced programmes will no longer be considered by Coimisiún na Meán as counting towards subtitling targets. Monitoring indicated general compliance with this requirement and An Coimisiún intends to request additional reporting to capture instances of captioning on new home-produced programming in 2025.

The performance of each broadcaster in relation to subtitling targets is described below.

¹ Further to a derogation granted to Oireachtas TV, achievement of subtitling targets can be calculated as a percentage of sitting days. When adjusted according to sitting days, Oireachtas TV achieved a total of 47.25% on cable/satellite and 36.9% on Saorview

² As provided under rule 6.4 of the Access Rules, where the length of the broadcast day is less than 18 hours, the subtitling requirement will be measured over the length of the broadcast day of the channel.



4.1.1 RTÉ

RTÉ's subtitling provision for RTÉ One and RTÉ Two, according to its own reporting, was 95.6% and 92.2% respectively. Both figures exceeded the targets of 92% and 78% respectively. Both channels exceeded the percentage target during peak time viewing (RTÉ One 99% vs 96% and RTÉ Two 99% vs 88%). RTÉ 1 +1 and RTÉ 2+1 carried more subtitling than was broadcast on RTÉ One and RTÉ 2 respectively. RTÉjr exceeded its subtitling target by 12.93% (65.93% vs 53%). An Coimisiún's monitoring of RTÉ output confirmed achievement of targets on RTÉ services with the exception of RTÉ 2. As targets and their achievement are considered over the full year, and the broadcaster's report indicated that it had met the target, it appears likely that the small deficit may have resulted from an unrepresentative sample size and will likely have been compensated for over the overall duration.

RTÉ is required to provide details on the level of subtitling carried on RTÉ News. However, RTÉ is unable to provide this detail as RTÉ News is a reactive channel and as such, does not have a set schedule from which to report. RTÉ News does not have its own subtitling infrastructure, which means there is no automatic logging of subtitled programmes on this channel. This channel rebroadcasts all news and current affairs programmes from RTÉ One. All of these programmes carry subtitles and the channel should therefore meet the targets. In agreement with An Coimisiún's predecessor organisation, the BAI, RTÉ has for several years submitted a manual report on subtitling on RTÉ News which is generated by a random check of programmes on RTÉ News Now, conducted by RTÉ. During 2024, a check of 20 randomly selected dates found that of 344 programmes broadcast, subtitling was carried through from RTÉ One and RTÉ Two to RTÉ News in 340 instances. An Coimisiún proposes to engage with the broadcaster to agree a more robust and reporting mechanism and a timeline for its implementation over the coming year.

RTÉ provided subtitles on a wide variety of programmes for multiple genres including;

Drama: *Fair City* and *Blackshore*;

Entertainment: *First Dates Ireland* and *The Tommy Tiernan Show*;

Factual: *Bailte* and *Ear to the Ground*

News and Current Affairs: all news broadcasts, *Nationwide*, *Prime Time* and all weather broadcasts;

Sport: *Sunday Game*, *Saturday GAA Live*

A large proportion of new subtitled programmes are aimed at a children's audience in accordance with the Access Rules. These programmes are carried on RTÉ Two and RTÉjr.

4.1.2 TG4

The broadcaster's level of subtitling in 2024 was 64% which is above the target of 59% in the Rules. TG4 also provided 75% subtitles for peak time programmes which is also above the target of 60%.

The broadcaster provided subtitles on a variety of home-produced programmes including traditional Irish music, drama, children's programming and light entertainment.

TG4 also provides subtitles on *SeinnteoirTG4* for a large percentage of programmes which were broadcast with subtitles.



4.1.3 Oireachtas TV

Oireachtas TV is carried on Saorview, cable and satellite platforms. Oireachtas TV broadcasts 24/7 on cable and satellite, and from 0900-0000 Monday to Thursday and 0900-1900 Friday to Sunday on Saorview.

The broadcaster reported that its subtitling provision in 2024 exceeded the target of 18% on cable and satellite platforms providing 19.5%. It did not meet the target of 18% on Saorview. The achieved figure was 16.27%. The broadcaster has explained the shortfall as resulting from a reduced number of broadcast hours.

When figures are adjusted in accordance with a derogation granted to Oireachtas TV whereby achievement of access targets can be calculated as a percentage of sitting days, Oireachtas TV subtitled 47.25% on cable/satellite and 36.9% on Saorview.

4.1.4 Virgin Media TV

Virgin Media One reported achieving 63.39% and 83.77% during peak time, exceeding the respective targets of 56% for the 18-hour day, and 57% for peak time. The result for Virgin Media Two and Three channels combined was 71.53%, exceeding the target of 55%.

The Virgin Media group of channels provided subtitles on a wide variety of programmes for multiple genres including;

Drama: *Coronation Street, Faithless, The Vanishing Triangle;*

Entertainment: *Gogglebox Ireland, Lucy Investigates and Second Chances;*

News and Current Affairs: *News at 5.30, The Tonight Show*

Sport: *Sports Stories*

Virgin Media also provides subtitles on Virgin Media On-Demand services for a large percentage of programmes which were broadcast with subtitles.

4.1.5 Dublin Community Television Society Limited (DCTV)

DCTV is a community television service broadcasting to Dublin City and County. The service is owned by a co-operative representative of the community it serves and is operated by volunteers on a non-profit basis. On the basis of its figures, its subtitling provision in 2024 was 31% which was well above the target value of 13%.

4.1.5 Cork Community Television Limited (CCTV)

CCTV is a community television service broadcasting to Cork City and County. The service is owned by a company limited by guarantee representative of the community it serves and is operated by volunteers on a non-profit basis. It produces its own programming in-house and also broadcasts programmes made by its members and independent producers. The broadcaster reported that it subtitled 25,088 minutes of programming which equates to 28.5%³ calculated over its 4 hour broadcast day. All of CCTV's subtitling is pre-recorded and subtitled programmes include a significant number of Sound & Vision funded programmes.



4.1.6 Summary of Subtitling Outcomes

Monitoring of output from RTÉ, Virgin Media Television, TG4 and Oireachtas TV confirmed the achievement of quantitative targets for all with the exception of RTÉ 2. As targets and their achievement are considered over the full year, and the broadcaster's report indicated that it had met the target, it appears likely that the small deficit may have resulted from an unrepresentative sample size and will likely have been compensated for over the overall duration.

Assessment of the quality of subtitles against the standards provided in the Rules was also conducted. In general, subtitles were of good quality. The majority of subtitling issues occurred with live programming in which monitors observed delays in provision, stalling and speeding up to catch up to the dialogue. Issues observed by monitors were raised with broadcasters during the annual meetings.

While it is commendable that all broadcasters reported that they met or exceeded their subtitling targets for 2024 and that monitoring of samples of content indicated high levels of subtitling quality across the broadcasters, it is also noteworthy that dissatisfaction with the quality of subtitling remains an ongoing source of frustration for users of access services. In addition to the observations of An Coimisiún's compliance monitors, specific subtitling issues identified by users were discussed during the annual meetings with broadcasters, in particular, communicating feedback from UCP members on the poor quality of (particularly live) subtitling. Broadcasters advised that there can be many causes of quality issues, some of which are outside of their control and are linked to the platforms and devices on which the end user is accessing the content. Of note, Virgin Media Television advised that a new live subtitling system had been implemented and improvements are expected in the quality of their subtitling output in 2025.

UCP panel members expressed a desire for more active monitoring of subtitled content to identify instances of lack of provision or poor quality provision. During 2025, the Compliance and Complaints team has been undertaking work to develop and implement a quality assessment framework for access services and is working on a participative research project focused on quality of subtitling and ISL provision.

4.2 Irish Sign Language (ISL)

The table below shows the target and actual ISL provision in 2024. The 2024 target is the same as the 2023 target in the Rules. The 2024 actual figure is percentage achieved across the year based on the reports provided by the broadcaster and checked by sample monitoring by An Coimisiún.

Broadcaster	2024 ISL Target	2024 Actual
RTÉ One RTÉ Two	5%	5.46%
RTÉjr	4%	6.45%
Oireachtas TV (cable/satellite)	6%	20.56%
Oireachtas TV (Saorview)	6%	20.56%
Virgin Media One	2%	3%

All broadcasters exceeded the targets set in the Rules. As in previous years, nearly 100% of programming with ISL is home produced.



The performance of each broadcaster in relation to ISL targets is described below.

4.2.1 RTÉ

The overall annual ISL percentage achieved on RTÉ One and Two exceeded the target (5.46% vs 5%), while RTÉjr also exceeded the target, providing 6.45% vs a target of 4%. RTÉ also noted that its ISL catalogue is available on RTÉ Player and that several programmes carried ISL on the RTÉ News App and other digital online platforms such as RTÉ Player while simulcasting on its broadcast channels. Example of these programmes include *The Late Late Toy Show*, *The State Funeral of Former Taoiseach John Bruton*, *Árd Fheiseanna Leaders' Speeches*, *The Stardust Commemoration* and *Primetime Leaders' Debate*.

4.2.2 Oireachtas TV

Oireachtas TV exceeded its target of 6%, providing ISL on 20.56% of their programming on cable/satellite and 20.35% on Saorview. When adjusted for sitting days, those figures rise to 51.09% and 44.18% respectively. In addition to ISL provision on proceedings for Leinster House, Oireachtas TV produce in-house studio programmes such as *Oireachtas TV Debates*, *Around the Houses* and special events such as Budget coverage with ISL.

4.2.3 Virgin Media One

Virgin Media One exceeded the ISL target of 2% in 2023, providing 3%. All ISL programming was home produced, including *Dublin After Dark* and *Anna Krieger: A Young Life Lost*.

4.2.4 Summary of ISL Outcomes

ISL monitoring observed the presence, general appearance and timing of ISL provision which was found to be consistent with targets and quality standards. More in-depth quality monitoring requires ISL expertise. The Compliance and Complaints team intends to secure external expertise to assist with monitoring during 2025.

While all broadcasters achieved their ISL targets for 2024, RTÉ, TG4 and Virgin Media Television, it was noted by broadcasters that they face challenges in securing the services of qualified ISL interpreters with the required frequency and regularity to meet targets in 2025 owing to the specialised nature of the service and the small pool of available interpreters.

Members of the subtitling and ISL UCP expressed a desire for increased ISL provision and dissatisfaction that, for projects funded under An Coimisiún's Sound and Vision Scheme, producers are required, for certain genres of programming, to include *either* ISL interpretation *or* audio description. Users would like to see both access services mandated. This feedback has been communicated to the relevant Coimisiún na Meán team.

4.3 Audio Description (AD)

The table below shows the target and actual AD provision in 2024. The 2024 target is the same as the 2023 target in the Rules. The 2024 actual figure is percentage achieved across the year based on the reports provided by the broadcaster and checked by sample monitoring by An Coimisiún.



Broadcaster	2024 AD Target	2024 Actual
RTÉ One	10%	12.05%
RTÉ Two		
RTÉjr	10%	16.17%
Virgin Media One	5%	7.46%

All broadcasters met or exceeded the targets set in the Rules. The performance of each broadcaster is described below.

4.3.1 RTÉ

RTÉ exceeded its targets for 2024 on RTÉ One and RTÉ Two (12.05% vs 10%). RTÉ has focused on dramas and home-produced programming for AD and examples from various genres include *Birdsong*, *Nova Jones*, *Obituary* and *Where the Wild Geese Go*. It also exceeded its target of 10% on RTE Jr, achieving 16.17%. The broadcaster noted that it has significantly invested in recruiting and training a panel of audio describers.

4.3.2 Virgin Media One

Virgin Media exceeded its target of 5% for audio described programmes, achieving 7.46%. The broadcaster noted that its audio described programming was made up of a mix of home produced and commissioned content including *Is Ireland Full? Downfall: The Trial of Conor McGregor*, *The Vanishing Triangle*, *Uprising* and *Faithless*.

4.3.2 Summary of Audio Description Outcomes

While compliance monitoring indicated a high standard of AD on RTÉ programming, monitors observed minor issues with pronunciation and audio levels on programmes submitted by Virgin Media Television. These comments were raised during the annual meeting with the broadcaster and the broadcaster undertook to investigate.

UCP members praised the quality of AD produced by RTÉ which uses human voices only, but voiced general concern about the use of synthetic voices in some audio described content on other services, stating a clear preference for natural voices.

RTÉ noted that resourcing AD provision in-house is time- and personnel-intensive and that automation may offer the opportunity to increase provision to a high quality standard in the future. It was noted that, due to improvements in technology, the difference between synthetic voices and human voices is becoming harder to detect. While it is not anticipated that the broadcaster will use such technology in AD generation in the short-term, it may be considered in future.

Members of the Audio Description UCP panel were positive about the impact of the Sound & Vision Scheme in increasing levels of audio described content available.

4.4 Promotion of Access Services

Broadcasters promote programmes with access services via a mix of standardised symbols, on-air promotions and through online, EPG, press listings and social media channels (section 5.3 of the Rules). DCTV noted the significant administrative burden in preparing accessibility information for its EPG provider.



Comments from UCP members the previous year indicated that promotion of accessible content was occasionally unsatisfactory, with accessible programming not being promoted as such, or programming advertised as accessible not having the access service available. Virgin Media Television noted that most complaints received from viewers were about this issue. At An Coimisiún's UCP meeting in May 2025, users did not report this to be a continuing concern.

4.5 Consultation with Users

Broadcasters are required to consult periodically and not less than once annual with groups representing a range of different access user groups to seek opinion on their viewing preferences, the broadcaster's performance against the Rules and other related matters (section 5.4 of the Rules).

RTÉ held several meetings with representative groups and individual users throughout the year, working with the Irish Deaf Society on ISL Awareness Week, with Schools in the Deaf and Blind Communities and hosting accessible tours at RTÉ. RTÉ met with users on 9 May 2024 bringing in new participants. RTÉ continued to consult with Deaf users in the early stages of production of *The Late Late Toy Show*.

Virgin Media Television indicated that engagement with user groups during 2024 was primarily by email. A proposed meeting in Q4 of 2024 was delayed due to operationalising increased access provision for live sport in early 2025. The broadcaster notes that it will engage with users to seek feedback on a new live subtitling system in 2025.

Although Oireachtas TV reached out to user groups to arrange a meeting, they did not receive any positive replies. In 2024, it did not receive any response from groups invited to engage for International Week of Deaf People. Oireachtas TV considered that users may be reluctant to engage because of the niche offering of the channel and the likelihood that many users only view its content on other news and current affairs programming channels and may address their feedback to those channels. Oireachtas TV noted a positive response from users in the context of a Working Group on ISL first convened by the broadcaster in 2019 and is hopeful that a similar response may accompany further work in this context. Notwithstanding the difficulty in formally engaging with access users, Oireachtas TV conducted a varied programme of outreach activities with the Deaf community including Culture Night events, ISL student activities and attendance at events at Deaf Village Ireland.

TG4 advised that its endeavours to consult with user groups in 2024 were unsuccessful because those groups do not consider there is sufficient benefit in meeting with TG4, as a single broadcaster, given the effort it involves in bringing access users to a meeting. Following consultation with Chime, TG4 provided ISL for its *Saol Eile* programme and engaged with users in its production. The broadcaster regularly sends relevant information to access users via its social media channels.

Although CCTV and DCTV did not formally meet with user groups in 2024, they have been in contact with local groups. DCTV proposed to collaborate with user groups on Sound & Vision funded projects and is considering convening a panel of viewers with access needs. CCTV met with the Harmony Deaf Choir in 2024 regarding ISL and propose to meet the Cork Deaf Association in 2025 with a view to expanding its user consultation base.



Several broadcasters advised of challenges experienced in getting engagement from access services user groups and some proposed that An Coimisiún could coordinate a single consultation event for broadcasters and access service user groups. Representative groups attending our UCP meetings also noted difficulty in meeting ad hoc requests from broadcasters for feedback. An Coimisiún followed up on this feedback and recommended that representative groups proactively establish a structured schedule of engagements with broadcasters based on their capacity and resources.

4.6 Access Liaison Officer, Codes of Practice for Complaint Handling & Complaints

As required in Rule 5.5, broadcasters must provide contact details of an individual who will deal with complaints about Access Services. All broadcasters provide the name of an individual, or a specific email address, in relation to such complaints.

All broadcasters have a Code of Practice for Complaint Handling in place, published on their respective websites. An Coimisiún engaged with broadcasters during the annual meetings to request that Codes of Practice for Complaint Handling are appropriately updated.

RTÉ did not receive any complaints about access services in 2024. Queries and feedback are responded to by the RTÉ Access team.

Virgin Media Television provided details of the 14 complaints regarding access services they received in 2024. The majority related to incorrect listings for accessible programmes. Investigation of these complaints indicates errors of the part of the broadcaster and the user. Three complaints were received about the failure or synching of subtitles. The majority of complaints received by Virgin Media Television are received by email.

TG4 did not receive any formal complaints about access services in 2024 but received a mixture of queries and questions about accessibility, primarily through social media. There were 13 complaints about the absence of subtitles on *Crá* due to a technical fault and 5 general complaints about the absence of subtitles on live sport were received and responded to and, where appropriate, steps were taken to resolve the issues.

Oireachtas TV, DCV and CCTV did not receive any access service complaints in 2024.

In 2024, An Coimisiún reminded broadcasters and the UCPs of changes to complaint handling arising from the commencement of the Online Safety and Media Regulation Act 2022 on 15 March 2023. Stakeholders were advised that a complaint about a failure to comply with the Access Rules could now be made under the statutory complaints provided at section 48 of the Broadcasting Act 2009. Previously, there was no statutory basis for such complaints. This change means a broadcaster must process a complaint about the Access Rules under its Code of Practice for Complaint Handling, which provides a point of contact, its complaint handling procedures and a timeframe for responding. Where a complainant is not satisfied with the broadcaster's response or does not receive one within the specified timeframe, the complaint may be referred to An Coimisiún to handle in accordance with its statutory process. No such complaints were received by An Coimisiún in 2024.

While broadcasters report receiving low numbers of complaints and An Coimisiún has not received any, it should not be inferred that users are satisfied with broadcasters' provision. UCP members continue



to express frustration with access provision generally and with responses from broadcasters when complaints about access services are made. It appears that users do not see any point in complaining to broadcasters when issues arise. Users have also noted that the statutory complaints process is unduly onerous and is, in itself, fundamentally inaccessible as it is provided in section 48 of the Act that complaints must be made in writing. The Compliance and Complaints team has engaged with individual users to explain the complaints process and will continue to work with users to support their awareness and ability to exercise their statutory right to make a complaint that there has been a breach of the Access Rules.

4.7 Engagement with Platform Providers

Broadcasters are required to take steps to monitor content at the point of transmission to ensure that quality standards are being met and are further required to engage with platform providers to resolve issues arising in the delivery of access services to audiences using different television platforms.

RTÉ senior management from the Operational Division schedule quarterly meetings with platform providers. TG4 reported that they have established a new department and procedure for continuous monitoring of its content on external platforms.

Virgin Media Television and Oireachtas TV engage with platform providers on a case-by-case basis, and did not have cause to do so during 2024. Both broadcasters outlined their procedures for ensuring access services are correctly broadcast.

DCTV and CCTV are carried solely by Virgin Media and engage regularly. DCTV outlined its procedures for escalating access service carriage issues and its aim to upgrade its servers.

4.8 Arrangements for National Emergencies

Broadcasters are required to ensure that access service users are kept informed about national emergencies and to ensure that with key information provided by subtitling and, where practicable, by ISL. ISL interpretation provided in such announcements should be clearly visible and understandable.

RTÉ's practice is to include an in-shot ISL interpreter at Government press conferences dealing with issues of national emergency, but such media events are not within the broadcaster's control. In addition to the provision of live subtitles for all news and weather bulletins and news specials, in the case of unfolding emergencies, such as major weather events, up-to-date information is provided on a rolling basis on the RTÉ website. A daily ISL news bulletin also carries information on emergency events.

Oireachtas TV noted that, while it does not have a news provision function, its in-house interpreters can provide ISL for emergency broadcasts. Oireachtas TV also noted that ISL for Government announcements should be provided by the Government. TG4 has the capacity to add subtitles to important on-air information and to include ISL interpretation provided on Government announcements. The broadcaster noted that ISL interpretation in such circumstances is generally not provided for Irish language announcements.

Virgin Media Television noted that all its news and current affairs programming is subtitled as standard and ISL interpreting is carried where it is provided with Government announcements.



DCTV does not have the capability to transmit emergency messages but expressed interest in further exploration. CCTV noted that it can only transmit emergency information via embedded subtitles.

5.0 Conclusions

The quantity and range of access service provision on television services was maintained in 2024 in line with the Rules in force. All subtitling, AD and ISL targets were met or exceeded by all broadcasters. While monitoring indicates a high level of compliance, access services users continue to express dissatisfaction with service provision, particularly the quality of subtitling on live programming. The disconnect between compliance monitoring results and the user experience points to a need to improve the assessment methodology in monitoring. Engagement with broadcasters also suggests that a more targeted approach to identify where quality issues may be occurring across the access service delivery chain would improve outcomes for users and would link with An Coimisiún's new regulatory responsibilities under the European Accessibility Act.

To address this disconnect, An Coimisiún undertook desk research and consulted extensively with academics, user groups and DPROs, in 2024, to scope a project to improve the monitoring of the quality of subtitling and ISL. This scoping work identified the following issues to be addressed:

- The scoring matrix for quality assessment does not provide sufficiently in-depth analysis on various quality measures;
- The frequency and sample size of content monitored may not be sufficient to identify the nature and extent of quality issues arising;
- Technical limitations of the recording equipment do not allow for simultaneous recordings and comparative assessment of access services provided across multiple platforms; and
- Limited team capacity and an ISL skills gap are barriers to progress.

An Coimisiún plans to address the above issues incrementally over 2025 and 2026 to improve the monitoring of access service quality. Measures to be taken include:

- Developing and piloting an updated scoring methodology for quality of subtitling and ISL and commission research on user views of quality standards to test and improve it;
- Increasing the sample size for monitoring;
- Exploring improved technical solutions for recording broadcaster output; and
- Increasing monitoring capacity through staff training and flexible deployment, and obtaining ISL expertise to support monitoring.

Outside of the access services themselves, broadcasters' consultation with user groups was uneven across the sector in 2024, largely due to the limited resources and capacity of access service users, DPROs and representative groups to engage individually with broadcasters. A coordination role for an Coimisiún in supporting engagement with users for smaller broadcasters may be considered, but as a first step it has been suggested that broadcasters may come together to develop a structured engagement proposal for circulation to user groups.

UCPs remain a key mechanism for An Coimisiún to ensure that the lived experience of access users is factored into compliance monitoring so that it addresses users' needs and priorities. An Coimisiún's



engagement with access service users has been broadened in terms of frequency and an expanded range of matters. In response to issues raised during UCP meetings in April of 2024, An Coimisiún developed a proposal for engagement with access service users which was circulated to UCP members in August 2024. An Coimisiún also met with UCP members in September 2024 as part of the targeted public consultation process for the revision of the Access Rules. Subsequently, An Coimisiún began a procurement process in Q4 of 2024 to secure an external supplier to coordinate UCP meetings and to advise on future engagement structures. An Coimisiún is confident this more structured approach will continue to improve engagement and deliver more impactful outcomes for users.

