

Beyond Compliance: Inviting Audience Insights to Drive Participatory Accessibility in Film Media

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Abstract: Across Europe, expanding standards and legislation have mandated subtitling and other access services in audiovisual media, strengthening foundations for equal access. While compliance-based frameworks have increased availability and introduced minimum quality requirements in several EU countries, including Slovakia, Neves (2008) has long argued that legal standardisation—though valuable—often privileges technical provision over experiential depth. Measurable criteria alone cannot ensure meaningful engagement with film, where understanding emerges through layered aesthetic, narrative, and sonic elements (Perez 2025; Perez, Zahorák and Jurigová 2025). This paper advocates a shift from purely compliance-driven models toward implementation of participatory accessibility that foregrounds audience experience and collaboration. Focusing on Deaf audiences and subtitling, it draws on findings from a longitudinal study exploring Deaf viewers’ and professionals’ perspectives on subtitling preferences at film events, complemented by ongoing research into Slovak Deaf viewers’ preferences in TV broadcasting and VOD across two observed age groups. The findings indicate that compliance with existing standards does not always correspond to perceived accessibility or quality. Recurring issues include reductive or generic representations of sound in subtitles, inconsistent treatment of silence and music, and the application of subtitling strategies that either omit contextually relevant information or overdetermine interpretation.¹

Keywords: audiovisual translation, media accessibility, standardisation, audiences, participatory accessibility

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1. Introduction

The continuous evolution of digital technologies has extended the reach and influence of audiovisual media across global audiences. Massive amounts of video content are made available to viewers every day (Bolaños-García-Escribano and Díaz-Cintas 2019), while the proliferation of streaming platforms, mobile technologies and social media has transformed content production, distribution and consumption (Lopes da Costa et al. 2022). Such developments have generated growing demand for localised and accessible media experiences, intensifying the need for high-quality audiovisual translation and media accessibility services. In the European Union, this need was recently reinforced by the European Accessibility Act (EAA), adopted in 2019 and applicable from June 2025. The EAA mandates equal access for persons with disabilities across a broad range of services, including audiovisual media, through subtitling, subtitling for deaf and hard of hearing (SDH), and audio description. Indeed, it has significantly raised awareness of accessibility issues, with compliance becoming a key driver for integrating and enhancing media accessibility strategies across European regions (Friedel 2022). In the audiovisual media sector, it has enhanced access provision in TV broadcasting and streaming, increased awareness across content creators and supported gradual integration of accessibility considerations into production and distribution workflows.

Such developments have indeed generated a range of positive outcomes in the field of media accessibility. Following the EEA, there has been a notable increase in legal frameworks establishing media accessibility requirements at national level across EU member states, prompting content creators and distributors to prioritise inclusive practices. More audiovisual content is being made accessible, with an increasing focus on providing subtitling, audio description and accessible digital interfaces. Simultaneously, emerging technological advancements, such as automated subtitling tools, AI-driven audio description generation and adaptive media players have enhanced the potential for accessible media, enabling broader and more efficient dissemination of inclusive content (Lopes da Costa et al. 2022; Friedel 2022).

Despite these advances, media accessibility research continues to identify significant challenges. While expanding, legal frameworks still contain gaps and inconsistencies that leave certain accessibility needs unmet. Moreover, by their nature, these frameworks often focus on *what* needs to be done and, technically, *how* (Perez and Secară 2026), potentially leading to the false assumption that adherence to a set of basic rules automatically guarantees accessibility (Neves 2008)—whilst in reality, they address only part of the picture, overlooking the complexity of user experiences and the nuanced needs of diverse audiences. Often, the quality of accessible content is uneven (Greco and Jankowska 2019), with issues such as inaccurate subtitling, incomplete audio description or poorly adapted interfaces. Fragmented accessibility features, usability problems and limited awareness among providers fur-

ther undermine the effectiveness of these measures (Romero-Fresco 2019; Greco and Jankowska 2019). Even promising technological solutions are not universally available and frequently present limitations, including inaccuracies, reliability issues and potential biases in AI-driven tools (Koponen et al. 2020; Ferrara 2024).

These considerations suggest that, notwithstanding positive legislative developments, media accessibility cannot be reduced solely to compliance or the mechanical application of prescriptive guidelines and frameworks. Without a deeper understanding of user experiences, how can we determine which accessibility solutions are effective, for whom, and under what conditions? Do existing standards require contextual adaptation? And how can we assess whether access interventions not only meet formal requirements, but also successfully convey meaning and expressive nuance, resulting in genuinely valuable artistic experiences?

Addressing these questions requires reconceptualising accessibility as an inclusive, participatory process (Di Giovanni 2021). Authors of this paper believe that by embedding the perspectives of individuals (viewers and professionals) with sensory impairments throughout the creative and technical workflow, the industry can move towards accessibility that is not only legally compliant but also substantively meaningful, high-quality and genuinely audience-centred. To support this argument, we draw on findings from a longitudinal study examining Slovak Deaf viewers' and professionals' perspectives on subtitling preferences at film events, complemented by ongoing research into Slovak Deaf viewers' preferences in TV broadcasting and video on demand (VOD) across two age groups—young adults and 50+ viewers. These insights demonstrate how participatory approaches can guide the design and evaluation of accessible media, thereby enhancing expressive transfer and fostering richer, more equitable viewing experiences.

2. Media access concerns: two elephants in the room and what to do about them

As implied in the previous section, we believe that procedural and regulatory improvements in media accessibility, while valuable, have not addressed what we call the two persistent “elephants in the room”: uneven systemic structures and underlying ideological assumptions. Both can be seen embedded in traditional approaches, as defined by Greco (2018), still strongly present in general media accessibility practice. These approaches primarily focus on the procedural and formal aspects of what should be done *for* people with sensory disabilities, whilst almost by rule they are developed by teams of non-disabled professionals (Perez and Secară 2026). It is also important to point out that these practices are often rooted in an ableist, medicalised understanding of disability, reinforcing stereotypes and producing simplified, frequently inadequate solutions (Greco 2019; Romero-Fresco 2022). At the same time, inclusion of people

with sensory impairments within the film and media industries across the globe remains minimal, and non-existent in some regions (Pedersen and Aspevig 2014; Uzzo 2020; Perez 2023). Apart from very few—albeit valuable—initiatives, audiences with sensory impairments are largely left out from the “world of film”, remaining external observers who do not participate in the design, creation, production or distribution of either the original context or its access versions and solutions. Such a lack of inclusion reinforces a top-down approach to accessibility and sustains traditional post-production access models—applied at the end of the process, even though their deficiencies have been well-documented (Romero-Fresco 2018; Fryer and Cavallo 2022; Perez 2023). Consequently, research documents that insufficient efforts and persistent quality issues lead to feelings of discomfort and exclusion of audiences, instantly compromising individuals’ needs and fostering mistrust towards film media in general (Uzzo 2020; Perez 2023; Perez, Zahorák and Jurigová 2025).

Paradoxically then, while current media accessibility practices aim to achieve success by ensuring compliance and providing access, they still sometimes fall short of enabling audiences to engage fully with audiovisual content. Based on the outcomes of integrated, inclusive, participatory and collaborative approaches (Fryer and Cavallo 2022; Di Giovanni 2018, 2021; Di Giovanni, Fryer and Raffi 2023), we argue that media accessibility can be significantly enhanced by shifting towards participatory, audience-centred approaches that avoid bias, reject one-size-fits-all solutions, and acknowledge the intricate expressive and narrative dimensions of audiovisual media. We argue that addressing “the two elephants” thus requires not only legislative frameworks and technological interventions, but also a fundamental rethinking of whose perspectives are prioritised and how accessibility is conceptualised throughout the creative process.

Several positive developments in this direction have already been documented in practice, providing illustrative examples of how audience-centred approaches can be implemented (Romero-Fresco 2019; Fryer and Cavallo 2022; Di Giovanni 2022). While these cases cannot yet be presented as general practice—at least not in the region under our study—they offer important insights. They mark a gradual movement away from traditional post-production, post-hoc approaches that reinforce a binary distinction between audiences *who can* and *cannot access* content in its original form (Romero-Fresco 2018; Fryer and Cavallo 2022; Secară and Perez 2022; Perez 2023) and shift focus away from merely removing barriers to actively creating access with audiences, positioning them not only as consumers but also as co-creators of accessibility solutions (Romero-Fresco 2021).

Within this evolving landscape, two user-centred approaches in particular provide especially rich inspiration for our research. Firstly, there are participatory approaches (Di Giovanni 2018), which emphasise the engagement of end users in designing, evaluating and creating access services, enhancing both the quality of individual solutions and the overall experience of media accessibility for all stake-

holders. Secondly, there are collaborative approaches (Di Giovanni, Fryer and Raffi 2023), which frame accessibility design as a joint effort involving professionals of diverse abilities and expertise, while actively promoting social inclusion, empowerment and community engagement.

3. What audiences can teach us

To demonstrate the potential of participatory and collaborative approaches in enhancing audiovisual accessibility, this subchapter presents insights derived from two complementary research initiatives.

The first draws on a continuous longitudinal study with Deaf viewers and professionals, conducted under the auspices of the documentary film festival One World. Accessibility practices and their implementation at the festival were previously partially described in our earlier work (Perez 2023). In this article, we further develop and present findings continuously collected across the last six editions of the festival (2020–2025), using exploratory observation and participatory methods, as one of the authors of this study has actively participated as an invited accessibility expert and co-coordinator at the festival. The findings were gathered through access to the creative and organising team and via semi-structured interviews with Deaf access professionals and representatives of participating communities. This setting also enabled sustained observation of audience responses to accessible film practices in a real-world cultural context.

The second initiative consists of exploratory preference research conducted with Slovak Deaf viewers from two age groups, examining whether and how generational perspectives might shape expectations, interpretative strategies and accessibility needs in film and subtitling. The study focuses on young adults and viewers aged 50+, with an emphasis on subtitling strategies in Slovak TV broadcasting and VOD streaming. This selection was originally motivated by two factors. First, by discrepancies in TV broadcasting subtitling standards rooted in (Czecho-)Slovak tradition and legislation versus applied practices on major streaming platforms (Jurigová 2025). Second, the evolving viewing and subtitling preferences of younger audiences (Ofcom 2022, 2024²). At this stage, two sets of exploratory interviews were conducted: one with two representatives of the 50+ viewer group, whose preferences are shaped by the TV broadcasting subtitling tradition (Jurigová 2026), and one with two young adult viewers, whose preferences are aligned with the VOD international streaming subtitling style (Perez, Zahorák and Jurigová 2025). All four interviewees identify as linguistically and culturally Deaf, with hearing loss occurring from birth or pre-lingual life stages and consider Slovak Sign Language as their mother tongue.

² www.ofcom.org.uk

Findings from both research strands are presented in a complementary way, rather than as two separate cases, as we aim to showcase the potential of the implemented approaches collectively. They illustrate the capacity of participatory and co-creative models to enhance and refine access strategies by grounding them directly in the expressed perspectives, evaluations and needs of audiences. The results indicate how involving viewers in the design and evaluation of accessibility measures can make subtitling strategies more effective and responsive. At the same time, they invite a reconsideration—or at least a careful reflection—of certain principles embedded in existing guidelines and standards, encouraging a shift away from stereotypical assumptions about interpretation towards more flexible, audience-informed approaches to conveying film meaning, enhancing access strategies in film media.

3.1. Reconsidering subtitling standards

Between 2020 and 2025, a longitudinal evaluation was conducted on festival documentary subtitling, with the aim of critically reassessing inclusive practices for Deaf audiences. In this context, TV broadcasting standards frequently function as a benchmark, extending their influence beyond television and shaping subtitling conventions across other audiovisual environments in the country (Perez 2025). Yet as was already pointed out, also in the case of Slovakia, legal quality requirements remain confined to formal and technical compliance—a framework that does not necessarily address the experiential, cultural and affective dimensions of accessibility required in the film festival setting. Against this backdrop, the objective of the study was to examine whether compliance with existing guidelines and recommendations proves effective in practice and can genuinely support Deaf audiences in the festival viewing context.

The study combined participant observation at screenings with evaluation interviews and structured meetings with Deaf audiences at the documentary film festival One World Slovakia. These were complemented by semi-structured interviews with creative teams and subtitling professionals, including Deaf professionals involved in the accessibility team. This multi-layered approach enabled a dialogue between production assumptions and audience reception, creating space for viewers to articulate concrete experiences of inclusion and exclusion. Rather than treating feedback as anecdotal, responses were systematically analysed and discussed within the access production workflow. The main focus was on strategies providing access to overall artistic experience, beyond linguistic understanding, as the documentary films presented in festival contexts frequently construct meaning through complex sound design, subtle shifts in ambience, and carefully orchestrated uses of music and silence. These elements are not then decorative additions, but integral components of narrative structure and emotional framing (Barbosa and Dizon 2020; Cohen 2011). When subtitles reduce such features to minimal or generic labels (as could be done when

solely complying to existing legal frameworks), an essential layer of signification risks being lost. Ensuring that this dimension is thoughtfully mediated in inclusive subtitles is essential to enabling Deaf audiences to engage with the films on equal interpretative terms.

The findings of our study revealed several recurring issues. First, audiences criticised what they perceived as false assumptions about what information is necessary to be included in subtitles. Subtitles sometimes selectively labelled sounds while omitting elements crucial to narrative atmosphere. Viewers noted that subtitlers sometimes appeared to assume that music or silence were of limited relevance to the Deaf. Yet, as one participant remarked, “in cinemas, we can sense the presence and intensity of music and sound and would like to know what it expresses”. Second, respondents emphasised that, in their view, subtitles often failed to capture the interdependence between image and sound. The reduction of complex soundscapes to minimal labels such as “MUSIC” or “NOISE” was seen as insufficient, particularly when these elements carried expressive weight. Silence, for instance, was described as narratively significant but rarely contextualised. At the same time, some viewers identified an overuse of emotional or tonal cues, particularly in instances where meaning was already visually apparent. They argued that, in such cases, overly explicit labels risk pre-interpreting scenes, thereby constraining opportunities for independent meaning-making. For example, the inclusion of a label such as “SOBS SADLY” in a scene where a character is already visibly crying, or “ANGRILY” accompanying an utterance despite clear visual indicators of anger (such as facial expressions or aggressive gestures), may not only limit viewers’ capacity to interpret emotional nuance autonomously, but may also be perceived as distracting or even disruptive. Finally, audiences expressed a desire for richer contextual information when languages shifted or culturally specific references appeared.

After the collection of feedback and responses from Deaf audiences, the criticism of some of the applied subtitling practices was further discussed with Deaf experts involved in the festival accessibility team. These joint discussions revealed a clear link to strict compliance with the *minimum* quality requirements set out in the national Subtitling Decree (Ministry of Culture of the Slovak Republic 2023). In some cases, this regulatory framework potentially appeared to mislead subtitlers, who relied on formal adherence to the rules while omitting deeper analysis and interpretation of meaning. When the subtitles were assessed strictly against the Decree, all formal requirements were actually fulfilled, and the festival subtitles could easily have been classified as adequate and of good quality for TV broadcasting, to which the Decree primarily applies. For example, sounds not apparent from the visual layer were indicated in capital letters. In the case of background music lasting longer than 35 seconds, its continued duration was marked every 30 seconds, as required. Essential off-screen sounds were labelled, speaker identification was applied where necessary, and the requirements concerning font type, capitalisation, the use of brackets

and colour-coding were consistently observed. Yet despite this formal compliance, audience feedback pointed to instances of deficient access.

Analysing the problematic aspects, Deaf experts and access coordinators highlighted the limits of compliance-driven models that rely on generalised assumptions about what Deaf audiences “need”. They pointed out that such approaches often pre-empt interpretative agency by deciding in advance which sounds require description and which can be omitted. A recurring concern by both viewers and access professionals was the fragmentation of the audiovisual experience. They noted that subtitles sometimes treated sound as detachable information rather than as an integral component of meaning-making, thereby overlooking the dynamic relationships between image, sound and narrative structure. Criticism addressed the insufficient attention paid to the expressive load of silence and music. When silence functions dramaturgically, or when music carries tonal or narrative significance, reductive or absent description was perceived as diminishing interpretative depth. At the same time, audiences also problematised the opposite tendency: ambiguous sound descriptions that lack contextual clarity, as well as the overuse of emotional or tonal cues that predetermine reception (e.g. labelling music as “sad” or “tense”). Such strategies were described as limiting rather than enabling, because they at times prescribe interpretation rather than facilitate it.

In order to gain a broader perspective beyond the film festival context, the concerns raised were further explored through exploratory interviews on subtitling quality in TV broadcasting and VOD streaming. In this context, both young adults and viewers aged 50+ highlighted a range of persistent issues, several of which aligned with those identified in the film festival environment. These included conceptually flawed and vague labelling of music in TV broadcasting and overly schematic or inconsistent use of tonal cues in VOD streaming. Interviews also pointed to a problematic diminishing of multilingual dimensions, particularly in the case of foreign TV content, where subtitles (SDH) are produced from the dubbed version, resulting in the omission of information about the languages actually spoken. Collectively, these findings indicate that gaps in subtitling practices extend across viewing contexts, highlighting the need for more nuanced and audience-centred accessibility standards.

These examples demonstrate how systematic engagement with Deaf audiences can inform more nuanced subtitling strategies. In our case, solutions developed collaboratively with Deaf experts and audiences ensured greater effectiveness, addressing issues such as generic or minimal descriptions that can hinder comprehension, reduce narrative immersion and limit accessibility—especially in complex audiovisual content. The participatory approach reoriented accessibility towards the actual needs and interpretative agency of audiences, as highlighted across viewing contexts. Such approach has the potential to support more flexible, audience-informed frameworks adaptable to various media formats and narrative styles.

3.2. Making film events and film media accessible

Building on the stimuli raised in subtitle evaluation and preference interviews, our research enabled us to reconsider accessibility in more complex terms—both at the level of the film event as a whole and at the level of film as a medium.

In the context of film events—film festivals in particular—it is important to emphasise that such events provide a unique experience for attendees by combining pre-recorded content with live interaction and engagement. In doing so, they create an event-based form of spectatorship embedded within the overall programme (Burgess 2020; Diestro-Dópido 2021). Existing research, however, shows that accessibility services at film festivals across the globe are still commonly limited to linguistic access. At the same time, provision tends to focus on individual screenings, while specific communication needs related to live events and broader participation are often neglected (Pedersen and Aspevig 2014; Perez 2023). Designing and implementing accessibility beyond isolated provision for individual films, however, should be essential, as the aim is to create an inclusive experience for diverse audiences and to ensure access to the festival as a comprehensive cultural event.

During our five-year mapping of One World Slovakia, we identified several factors that prevented the festival from achieving broader accessibility. In the initial years, when the festival's accessibility measures did not adequately address diverse audiences (Perez 2023), our interviews revealed several shortcomings: inaccessible, exclusionary and poorly targeted advertising; significant communication barriers at the festival, with access limited, for example, for users of Slovak Sign Language; restricted access provision, as only a few selected films were screened with SDH; and previously mentioned quality issues in the access services provided. In response to these findings, the festival gradually shifted towards a more complex and integrated accessibility strategy. This shift resulted in a substantially expanded approach to event accessibility, including inclusive film screenings, sign language interpreting (albeit for selected parts of the programme), SDH, subtitles and interpreting, inclusive advertising and communication, traffic assistance, sound workshops and feedback meetings between audiences, filmmakers and access creators. People with diverse talents were brought into the spotlight as active contributors.

Since the 2021 and 2022 festival editions, this approach has been continuously developed, leading to an increased number of Deaf attendees at the festival as well as greater engagement. At the same time, Deaf experts have become an integral part of the festival's organising and creative teams. New positions were created, including access supervisors, sub-coordinators, SDH revisers and consultants, technology solution testers, and communication managers and consultants. This structural transformation has not only expanded access provision but has also generated new forms of professional learning and collaborative practice within the festival team. Working in closer dialogue with Deaf professionals and audience representatives has fostered on-

going knowledge exchange, reflexivity and the development of specialised expertise in inclusive event design. As a result, accessibility has evolved from a supplementary service into a shared creative and organisational practice, ultimately enriching the overall festival experience for all attendees.

The exploratory research evaluating applied subtitling strategies in TV broadcasting and VOD streaming also identified several deficiencies in how accessibility is understood in more complex terms. Most prominent is the issue of discontinuity and partial access—for example, in cases where accessibility is provided only for part of a programme, a single episode or one film within a series in TV broadcasting. This applies to both pre-recorded and live content: for instance, a sports match may be screened with subtitles, while the subsequent discussion with the teams is not. In the context of TV broadcasting, the selection of programmes provided with subtitles also appears problematic. These tend to consist mainly of older reruns, educational programmes or Slovak productions. The newest productions and films on TV are provided with SDH less frequently. Regarding VOD content, appreciation was expressed for the quantity and selection of programmes available. However, the subtitling strategies were perceived as plainer than those typically applied under Slovak standards by both young adult viewers and those aged 50+. Although initial, these findings already suggest a space for improvement across TV broadcasting and VOD streaming.

3.3. Discussion

The findings presented in this study provide qualitative evidence for the value of participatory, collaborative and audience-centred approaches in audiovisual accessibility in practice. By engaging Deaf audiences directly in the evaluation of subtitling practices and film media and event accessibility, our research helps map the gaps and limitations in compliance-driven models, showing that formal adherence to standards does not automatically guarantee meaningful or equitable access.

Indeed, it is important to note that these findings are based on qualitative methods, including exploratory interviews, participant observation and longitudinal evaluation at a single festival context. As such, they are not statistically generalisable to all Deaf audiences or viewing contexts. Sample sizes and the cultural-linguistic specificity of the Slovak context may limit the direct transferability of particular recommendations to other settings or countries. Nevertheless, the aim of this research was not to produce universally generalisable results, but rather to demonstrate the potential of participatory and collective approaches for generating actionable insights and guiding the evolution of accessibility practices.

Despite these limitations, the study underscores several key contributions. First, it showcases that audience engagement can directly inform practical revisions in subtitling workflows, producing solutions that are both more precise and responsive to interpretative needs. Second, it highlights how participatory models can reframe ac-

cessibility as a dynamic, co-creative process rather than a static checklist, fostering strategies that are sensitive to differences across age groups, media platforms and cultural contexts. Finally, it demonstrates that incorporating audience perspectives enhances not only technical and linguistic quality, but also the ethical and epistemic legitimacy of accessibility practices, reinforcing the principle that meaningful access requires attention to lived experiences and interpretative agency.

4. Conclusion

This paper has examined the potential of participatory, collaborative and audience-centred approaches to enhance media accessibility for Deaf audiences, with a particular focus on subtitling and film media and events practices. Drawing on qualitative insights from longitudinal evaluation at the One World Slovakia festival and complementary research on subtitle preferences in two age groups, the study demonstrates that involving audiences directly in the assessment and design of accessibility measures can reveal gaps and limitations in compliance-driven models, highlight context-specific needs and guide the development of more nuanced and effective solutions.

The findings underscore that while necessary, formal adherence to legal frameworks and guidelines is insufficient on its own. Generic, reductive or pre-emptive subtitling decisions often fail to preserve the expressive, narrative and emotional dimensions of audiovisual content, thereby limiting interpretative agency and audience engagement. By contrast, participatory evaluation enables accessibility strategies that are flexible, audience-informed and responsive to diverse viewing contexts, age groups and cultural-linguistic environments. Although the study is based on qualitative methods within a specific cultural and institutional setting, its value lies in illustrating the practical and conceptual potential of co-creative accessibility approaches. It demonstrates that Deaf audiences can actively contribute to refining subtitling practices and shaping inclusive media experiences, not only as recipients of access services but as co-creators of meaningful, equitable and high-quality audiovisual content. Importantly, such an approach generates new professional experiences and opportunities. It enhances mutual learning among creative teams, access professionals and audiences, opens up new horizons for collaboration, and supports the addressing of media access challenges. In this sense, participatory and collective accessibility becomes both a cultural practice and a means of socio-professional transformation.

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