



## 4.27. SI - Slovenia<sup>313</sup>

### 4.27.1. Key findings

- Slovenia requires the online contact point not only to be accessible to people with sensory impairments, but also to be easy to read.
- The procedure for complaints is provided in great detail, but the obligations on service providers are not.

### 4.27.2. Legal framework: primary and secondary legislation

National legislation	Summary of the measures
<b>Article 7 (1) AVMSD</b>	
Audiovisual Media Services Act (ZAvMS) – Consolidated 15 December 2021 – Articles 14a (1) and 14b (1) – ( <i>Zakon o avdiovizualnih medijskih storitvah</i> ) <sup>314</sup>	14a. Audiovisual media service providers must progressively and continuously improve access to their services with proportional measures, such as sign language, subtitling for the deaf and hard of hearing, spoken subtitles and audio description.  14b. The Republic of Slovenia must encourage providers to progressively provide access to their services to people with visual or hearing impairment.
<b>Article 7 (2) AVMSD</b>	
Article 14(a)2-4 ZAvMS	Audiovisual media service providers must submit action plans and report to the national regulatory media authority, national regulatory media authority, Agency for Communication Networks and Services of the Republic of Slovenia (AKOS) ( <i>Agencija za komunikacijska omrežja in storitve Republike Slovenije</i> ) <sup>315</sup> every three years, by the end of April of the calendar year following the previous three-year period. AKOS will report to the EU Commission on the progressive improvement of accessibility.
<b>Article 7 (3) AVMSD</b>	
Article 14(a)2 ZAvMS	Audiovisual media service providers must draft three-year action plans to improve access for people with disabilities and submit them to AKOS.

<sup>313</sup> The summary on Slovenia incorporates feedback received from Igor Žabjek, head of the monitoring department at the Agency for Communication Networks and Services of the Republic of Slovenia (AKOS), during the checking round with the national regulatory authorities.

<sup>314</sup> <http://pisrs.si/Pis.web/pregledPredpisa?id=ZAKO6225>

<sup>315</sup> <https://www.akos-rs.si/en/>



<b>Article 7 (4) AVMSD</b>	
Article 14(a)5 ZAvMS  General Act on the Protection of Vulnerable Groups – 10 May 2022 Article 2(2), (4), Article 3(2) and Article 4 – ( <i>Splošni akt o varstvu ranljivih skupin</i> ) <sup>316</sup>	<p>AKOS must set up an online point of contact that is easily accessible to people with disabilities (easy to read, and usable by persons with sensory disabilities). AKOS adopted a statutory act, the General Act on Protection of Vulnerable Groups,<sup>317</sup> that lays out the procedure for handling complaints regarding the accessibility of all audiovisual media services. AKOS enables the receipt of accessibility-related complaints by post, in person and by telephone as well as through the online contact point.</p> <p>2(2). Designates the AKOS online portal as the contact point. 2(4). A complaint is a verbal or written disagreement with the conduct of an audiovisual media service provider in relation to accessibility.</p> <p>3. Obliges AKOS to carry out the process for considering the complaint, based on the principle of protection of vulnerable social groups, as quickly as possible, without additional costs for the complainant, and to keep records.</p> <p>4. A viewer can file a complaint if the provider is not improving the accessibility of its services, or when emergency information is not conveyed in an accessible manner, or in other cases related to the accessibility of audiovisual media services. Complaints will be addressed in the order they are received. Confidentiality will be maintained.</p> <p>6. If AKOS determines that there is no basis for initiating inspection on the basis of the received complaint, AKOS shall handle the complaint in accordance with the provisions of this General Act. If the complainant does not provide enough information for the complaint to be dealt with, the complainant is invited to provide additional information. AKOS may request the provider to submit a statement or explanation and AKOS can carry out a review of the audiovisual media service if it determines that this is necessary in order to deal with the complaint. After receiving the provider's response and reviewing the recordings and data, AKOS provides an explanation to the complainant. AKOS may also prepare a public facing report if it considers the complaint to be of public relevance.</p>
<b>Article 7 (5) AVMSD</b>	
Article 14a(6) ZAvMS	<p>Emergency information made available to the public must be provided accessibly.</p> <p>Failure to provide emergency information in an accessible manner can be the basis of a complaint.</p>

<sup>316</sup> <https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2022-01-1638?sop=2022-01-1638>

<sup>317</sup> <https://www.uradni-list.si/1/objava.jsp?sop=2022-01-1638>



General Act on the Protection of Vulnerable Groups – 10 May 2022 Article 4(2)	
---	--

### 4.27.3. Overview of national rules

Types of accessibility measures	Brief overview of existing rules
Accessibility measures (hearing impairments)	No specific quotas, but subtitling is mentioned in the AVMS Act.
Accessibility measures (visual impairments)	No specific quotas, but audio description and spoken subtitles are mentioned in the AVMS Act.
Accessibility measures developed by self- or co-regulatory process	Action plans must be developed by all audiovisual media service providers, linear broadcasters and VOD providers, and submitted to AKOS.
Reporting to the NRA – frequency	Every three years audiovisual media service providers must report on the implementation of their action plans.
Designated point of contact for information and complaint	AKOS website is the online point of contact for information and complaints, but complaints can also be submitted via telephone, in person and through the post.

### 4.27.4. Law in practice: selected examples<sup>318</sup>

#### 4.27.4.1. Public service broadcaster

RTV Slovenia (RTVS), the public broadcaster, operates an online portal that provides quick access to information for persons with disabilities; it also offers news with audio description, spoken subtitles, sign language and subtitling as well as easy-to-understand news programming.<sup>319</sup> This portal also provides links to radio and television programmes offered by RTVS addressing topics relevant to, or about persons with disabilities as well as programming with accommodations, including the Listen to the Silence broadcasts which are produced in cooperation with the Association of Deaf and Hard of Hearing Associations of Slovenia, and are made in Slovenian sign language. RTVS established an Accessibility Department in 2018, which works closely with civil society groups, and is responsible for greater representation of disabled persons in RTVS content, the introduction and development of accessibility techniques and participation in international projects like the European Broadcasting Union Access Services Experts Group.<sup>320</sup>

<sup>318</sup> Examples as provided by the national expert.

<sup>319</sup> <https://www.rtvsllo.si/dostopno>

<sup>320</sup> <https://www.ebu.ch/groups/access-services-experts>



#### 4.27.4.2. Private service broadcaster

The private broadcaster PRO PLUS offers multiple channels, including the popular POP TV and KANAL A, as well as the most visited online news portal 24ur.com and popular Slovenian VOD platform VOYO. It has the capability of offering subtitling or audio description in collaboration with cable or Internet Protocol TV operators, but this is not always taken advantage of. In the past it tested automated speech-to-text technology but found it to be technologically inconsistent.<sup>321</sup>

#### 4.27.4.3. VOD

The Slovenian VOD service, VOYO, offers subtitles and dubbing into Slovenian.<sup>322</sup>

---

<sup>321</sup> <https://n1info.si/novice/slovenija/smo-v-informacijski-izolaciji-lacni-smo-vsebin-a-nam-niso-dostopne/>

<sup>322</sup> <https://voyo.si/>