

# The Jodi Mattes Trust

Promoting equality of access to digital culture

## Response to the Delivering Digital Britain consultation

### About us

The Jodi Mattes Trust for accessible digital culture welcomes the opportunity of commenting on the interim report Delivering Digital Britain, a momentous undertaking.

**Our mission** is to promote the cultural equality of disabled people through the:

use of accessible digital media;

provision of accessible learning content;

involvement of disabled people in the process of creation, design and evaluation of digital media.

Every year we give the prestigious Jodi Awards for excellence in accessible cultural websites and digital media. Winners range from small organisations (such as the volunteer-run Pewsey Heritage Centre) to world-famous galleries (such as Tate Modern), through to networks of services (such as the public libraries in South Yorkshire and Humberside) ([www.jodiawards.org.uk](http://www.jodiawards.org.uk)).

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# 1. Summary and recommendations: building the national response to equality of access to digital culture

## 1.1 Summary

1.1.1 Digital media have enormous potential for enabling cultural participation of disabled people, reducing barriers and **granting disabled people their digital and cultural rights**. We will demonstrate in this response that this **can only happen through concerted national action**.

1.1.2 Fifteen years of the Disability Discrimination Act have failed to lead to cultural equality of disabled people in the field of culture. Specifically:

- **accessible online cultural and educational content** is so rare, that it can be explored in a few hours time. This is in stark contrast to opportunities granted to no-disabled users. It is in stark contrast to the hundreds of hours of monthly TV programmes with audio description and British Sign Language.
- a modern model for a **national digital library for print-impaired people**, to which public sector, publishers and disability organisations contribute fully has as yet to materialize.

1.1.3 Numerous national and international policy documents establish the cultural and digital rights of disabled people. They call for 'significant and lasting improvements' for disabled people, evaluations of current accessibility and co-ordinated action plans. Most of these policies are awaiting implementation.

## 1.2 Recommendations

1.2.1 The Jodi Mattes Trust calls specifically for a national research programme. This should:

- evaluate current levels of accessible digital culture in the arts, museums, libraries, archives and heritage sector, including barriers to participation
- map available skills and skills needs in related areas: digital technology; accessible technology, information and cultural content
- map digital technology developments and products that could benefit cultural and digital equality of disabled people

- make recommendations for collaborative and networked approaches to accessible cultural content creation
- make recommendations for sustainable growth and skills development.

1.2.2 The Jodi Mattes Trust endorses the recommendations for national cultural and digital programmes of bodies such as the Museums, Libraries and Archives Council, culture 24, the Collections Trust and the Chartered Institute of Library and Information Professionals. Disability equality should be integral to any such project.

1.2.3 Disability organisations should be consulted and involved in the process of Delivering Digital Britain.

The Jodi Mattes would be pleased to contribute to the developments recommended here.

## 2. General comments

- We are **concerned that disabled people are barely mentioned in the interim report**. Disabled people still face serious barriers to participation in digital society. Every new product and initiative has the potential of either reducing those barriers or of enhancing the digital divide. Webs 2.0 and 3.0 are not being built with accessibility in mind in the first instance - and digital training for technologists and web designers needs to be more thorough. The private and public sectors are not yet 'mainstreaming disability' enough, for us to be able to take their organisational commitment to disability equality for granted. Failure to mention disabled people would be a recipe for compounding disadvantage.
- The Jodi Mattes Trust believes that digital media have enormous potential for enabling cultural participation of disabled people, reducing barriers and **granting disabled people their digital and cultural rights**. We are intimately convinced that this **can only happen through concerted national action**. Our response explains how we come to this view. Our recommendations build on the strategic recommendations of cultural bodies and organisations such as the Museums, Libraries and Archives Council, culture 24, the Collections Trust and the Chartered Institute of Library and Information Professionals. We endorse their commitment to open access, inclusion and disability equality.

### **3. Disabled people face serious barriers to digital culture**

#### **2.1 Looking at good practice first**

The cultural sector is known for highly innovative and engaging digital initiatives for reducing barriers to society for disabled people.

##### **Case study 1: Tate imap (Jodi Award 2006)**

This site does what seems impossible to many people, by making modern art (and its key concepts) accessible to blind and partially sighted people. It is one of the few to describe online images for visually impaired people. The images are highly contrasted and made visible to partially-sighted people. It uses animation cleverly, in an accessible way to de- and re-construct images, making it possible for visually impaired people to see them better – and for everyone to understand Picasso and Matisse better. Outline black on white drawings can be copied into tactile drawings for blind people, using a 'tactile photocopier'. The site sets a standard for global best practice.

##### **Case study 2: Speaking Volumes, Yorkshire and Humberside Library Services (Jodi Awards 2006)**

This website was designed to allow readers to write content. Blind and partially sighted people site users chat about books and their favourite audio book readers. They include members from a number of reader development groups. Some for visually impaired people, some integrated. Books and reading materials are made available in accessible formats. It is an exemplary regional resource for reader development.

Cultural sector websites are somewhat more accessible than the average national website.<sup>1</sup>

Yet, in spite of these achievements, the digital and cultural rights of disabled people are far from implemented.

## 2.2 The extent of barriers

### 2.2.1. web accessibility

The MLA audit 'Accessibility of museum, library and archive websites'<sup>ii</sup> showed e.g. that:

- only 3% of sector websites met e-government accessibility standards (WCAG1 Level AA)
- the average sector webpage presents disabled users with 216 potential accessibility stumbling blocks
- disabled members of the User Panel could only successfully complete 75% of basic web site tasks, such as finding opening times and access information

### 2.2.2. accessible web content

Accessibility to content of the astounding wealth of online cultural collections and learning resources remains severely limited for some groups of disabled people.

Only a few handfuls of the thousands of arts, museum and heritage websites have presented collections in ways that are accessible to:

- blind and partially sighted people; e.g. through description of objects, optimum tone and colour contrast, outline drawings that can be printed off and transformed into tactile image, audio output
- deaf people; e.g. through British Sign Language (BSL) recognised by Parliament as an indigenous language
- people with learning difficulties; e.g. through easy read English, ample illustrations and use of symbol systems

It is our understanding that in the formal education sector accessible online curriculum resources for disabled pupils are extremely rare, adding to educational disadvantage.

**It is almost impossible for disabled users to search and find the few available accessible resources on the web and it will take only a few hours to explore these.**

In sharp contrast, there are several hundreds of hours of audio described TV programmes every month and regular BSL. Some two hundred cinemas provide optional sub-titles and audio description for every new release.

Enjoyment of the wealth of online cultural collections is thus denied several groups of disabled people. The gap of opportunity is startling and a civilised society cannot accept this. **There is barely any choice and thus no cultural freedom, because cultural freedom requires choice.**

**There is no connectivity between the few available resources.**

**There is no concerted action at national level to redress the imbalance,** yet fifteen year of the Disability Discrimination Act have not been enough to make even moderate progress from a user point of view.

**Case-study 3: The British Museum's BSL Schools Web Project (Jodi Award 2008).**

Young deaf people produced signed curriculum resources for young deaf people, working with Frank Barnes School and media company Remark run by deaf people. The participating children sit confidently sit at the heart of this resource. Deaf pupils remain starved of curriculum resources in BSL and this is one of the first examples of a museum contributing to building them. This project brings together an effective and creative mix of users, artists and designers with expertise in the area of BSL.

**Case-study 4: The National Archives Prisoner 4099 website Jodi Award 2007)**

Prisoner 4099 is an outstanding example of young users creating content which brings history to life online for everyone. Blind and partially sighted students from across the country, The National Archives and a number of national organizations worked to create an interesting and dynamic web presence about Victorian crime. A radio play produced by the students and based on the life of a 12 year-old boy, William Towers who was sent to prison for stealing, forms a significant part of the website. It covers the events as seen in the minds of modern teenagers and shows how they might feel and deal with a similar situation. As part of the project, archival documents have been transcribed into accessible formats.

### **2.2.3 Digital media in museums and arts and heritage venues**

Some stunning examples of good practice exist of accessible digital media offering accessible content for temporary exhibitions, permanent collections and virtual tours of collections or sites that are inaccessible.

### **Case-study 5: Bantock House, Wolverhampton Arts and Museum Service (Jodi Award 2007)**

Bantock House demonstrates exemplary commitment to developing a portfolio of services for deaf visitors and engaging with the deaf community. The museum has introduced a PDA guide with British Sign Language after exploring a range of technical options, available for deaf visitors anytime. Visitor information in BSL is available on the website. The videos for the PDA and the website have been filmed by a local company of deaf people who are all BSL users. Regular guided BSL tours have been introduced to widen access to the collections in a personalised way. A Deaf History exhibition has been held, which included the creation of perhaps the first archival local history materials in British Sign Language, with videos of deaf people signing their experience of living and working in Wolverhampton. A deaf person is employed part-time to promote the services to the deaf community.

### **Case-study 6: The National Trust (Jodi Award 2008)**

Twelve 'Virtual Tours' for all visitors have been installed and tested in National Trust venues. Significant emphasis has been given to consulting disabled people. The high quality visual displays with audio information are accessible to wheelchair users and have been designed for maximum ease of use by several groups of disabled people. Two of the tours have been fitted with British Sign Language – in regional dialect. The standardised layout of the interactive Virtual Tours provides a consistent and reliable experience for disabled people anywhere. The project has outstanding potential for national rollout, is very cost-effective and could be an inspiration for improvements of scale elsewhere.

**The common reality for disabled people visiting arts, museums and heritage venues is, however, to find no such resources available.**

The National Trust Virtual Tour shows the benefits of a national approach. It can bring sizeable cost-savings; creation, dissemination and use of new skills and huge benefits for the visitor experience.

## **2.2.5 Digital technology and library services for disabled people**

### **2.2.5.1 involving disabled people.**

Working with The Royal National Institute of Blind People has already responded to the interim report. We endorse the thrust of its response. We are concerned, however, that of two hundred respondents, RNIB is the only disability organisation to have responded. This is to us a symptom of the digital divide.

**There is a need for pro-active consultation with disability organisations to make sure that disabled people fully benefit from Delivering Digital Britain.**

### **2.2.5.2 digital Libraries for print-impaired people**

**A national digital library holds enormous potential for print-impaired people.** These include visually impaired people and people with dyslexia. It allows print-impaired people access to information in the format of their choice.

A range of obstacles exist:

- Copyright exemptions do not exist for people with dyslexia
- Lack of public funding to grant print-impaired people access to a larger slice of all publications. For example only 5% of all published materials are accessible to visually impaired people.<sup>iii</sup> In contrast, the Canadian government has invested some 20 million Canadian Dollars in the development of the national digital library for visually impaired people.

Great opportunities exist, for example publishers passing their digital files to trusted organisations such as RNIB for addition to the digital library.

**We express our support to every initiative aimed at creating a modern digital library of scale for print-impaired people.**

We wish to draw attention to the information and recommendations of the report 'International comparison of library services for visually impaired people', published by the International Federation of Library Associations and co-funded by the British Library and the Museums, Libraries and Archives Council.<sup>iv</sup>

### **Case-study 7: Revealweb (Jodi Awards 2005 Commendation)**

Revealweb was commended for excellence in widening access to information. The Revealweb library catalogue, a voluntary sector initiative that involved a number of library services for visually impaired people, brought together over 100,000 materials for the first time in accessible formats. It can be used by the public and library staff alike, and makes finding out about reading materials considerably easier for visually impaired people.

#### **2.2.5.3 Digital Britain benefiting deaf people**

Little research and discussion appears to have occurred about the potential of the digital age for making information and entertainment much more widely accessible to deaf people.

Yet, the BBC shows the way. Many resources with BSL are available on BBC online archives. The same cannot be said of any other media or cultural product and of any other category of information.

**Consultation with deaf people and organisations of deaf people is needed, to find out their needs and aspirations and how digital technology can be best deployed to meet these.**

#### **2.2.5.4 Digital Britain benefiting people with learning difficulties**

Very few websites have information tailored to be accessible for people with learning difficulties, in general and none we know of in the cultural sector.

It remains all too little known how much digital media can widen opportunities for communication and self-expression for people with learning difficulties. There is strong potential for a contribution from the arts, museums and heritage sectors.

**Consultation with people with learning difficulties and organisations of deaf people is needed, to find out their needs and aspirations and how digital technology can be best deployed to meet these.**

We recommend involvement of the Rix Centre, a research and & development organisation committed to realising the benefits of new media technology to transform the lives of people who have learning disabilities ([www.rixcentre.org](http://www.rixcentre.org)).

**Case-study 8: Outside in Pathways Outside In Pathways, London (Jodi Award 2008) in association with the Rix Centre.**

People with learning difficulties used digital cameras to film and edit their thoughts and reactions to visits to the Victoria and Albert Museum. The participants formed a highly culturally diverse group and this was reflected in the choice of objects explored during the workshops. "This was a successful example of a project that really used digital media as a vital catalyst, which can inspire other museums, libraries and archives to think about technology not just as a platform for dissemination, but as a the context for another kind of interaction and event," said Ross Parry, Chair of the Jodi judging panel. The project gave participants greater confidence in going out on their own.

## **4. International and national policies for the cultural and digital rights of disabled people**

### **4.1 Rights not charity**

The idea that deaf and disabled people have cultural rights is as yet to become an integral part of the philosophy, vision and practice of most cultural organisations.

The cultural rights of deaf and disabled people are implicitly enshrined in the Universal Declaration of Human Rights, article 27.1 (1948):

“Everyone has the right freely to enjoy the arts and the cultural life of the community....”<sup>v</sup>

The United Nations Declaration on the Rights of Disabled Persons, article 9, (1975) first to specifically enshrines the cultural rights of deaf and disabled people:

“A disabled person has the right .....to fully participate in social, recreational and cultural activities”<sup>vi</sup>

**David Lammy**, former Minister for Culture in 2006, wrote in an article to the times about digital media and culture:

“There are many challenges remaining and we must maintain a sense of urgency as we continue to improve the quality of life of people with disabilities through enabling their fundamental right to have access to cultural activity”<sup>vii</sup>

**The Jodi Mattes Trust would like this sense of urgency to percolate through the implementation of Digital Britain.**

### **4.2 International policies**

The UK is a signatory to international policies and plans, which make sense only with a commitment to a systematic national commitment to the cultural equality of disabled people:

- Council of Europe Recommendation R(92)6, passed in 1992, on the independent living of disabled people states that:

“Government institutions, leisure and cultural organisations should develop comprehensive access policies and action programmes designed to bring **significant and lasting improvements for all people with disabilities.**” <sup>viii</sup>

These policies and plans are not in place for cultural sector digital advances.

- Council of Europe ‘Action Plan to promote the rights and full participation of people with disabilities in society: improving the quality of life of people with disabilities in Europe’ (2006-2015).<sup>ix</sup> The Action Plan emphasises equal opportunities in culture. It states that:

“Member states should start with an evaluation of their existing disability policy programmes and identify in which areas progress has yet to be made .....and which specific actions will have to be carried out. Based on that evaluation member states should set up strategies to ensure that their own co-ordinated disability policy programmes, strategies and actions are progressively advanced .....

To our knowledge, this evaluation and action planning is as yet to take place. Again it calls for a concerted national approach to improvements towards an accessible digital culture.

### 4.3 UK legislation

The UK has legal instruments that strongly support the case for a concerted national approach to accessible digital culture, e.g.:

- The ‘anticipatory duty’ under the Disability Discrimination Act (1995) requires that service providers anticipate the requirements that disabled people may have as users and potential users of cultural services. The accompanying Code of Practice cites access audits, consultation with disabled people and action plans as examples of evidence for meeting this duty, which applies to government and government agencies. True, government is not a ‘service provider’ under the DDA, but it can be argued that it has a strategic responsibility to fully support service providers in meeting their legal duties in a pro-active way, e. g through a massive audit of currently accessibility of digital culture, new technological solutions and an integrated response. This would create the conditions for connectivity, skills developments, economies

- Public authorities have 'Specific Duties' within the 'Disability Equality Duty', including the **'duty to involve disabled people in a strategic and significant way'**. The implications of Digital Britain can powerfully affect the lives of disabled people and it makes perfect sense to involve disability organisations in its development.

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1. 'Accessibility of museum, library and archive websites, the MLA audit', MLA, 2005, www. 42% of museum, library and archive websites met Web Content Accessibility Guidelines Level 1 (WCAG1), as opposed to less than 30% for the national average (Disability Rights Commission Formal Investigation into web accessibility, 2004). Both surveys adopted the same methodology developed by Prof Petrie's team.
  2. As above
  3. google 'Right to Read campaign' ...
  4. Universal Declaration of Human Rights (article 2.1), United Nations (1948); [www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)
  5. United Nations Declaration on the Rights of Disabled Persons (1975); [www.unhcr.ch/html/menu3/b/72.htm](http://www.unhcr.ch/html/menu3/b/72.htm)
  6. David Lammy, Minister for Culture, 'Breaking barriers to the arts through technology', The Times (06.2007)
  7. Recommendation R(92)6 of the Committee of Ministers to Member States on a Coherent Policy for People with Disabilities (1992); [www.handicapincifre.it/allegati/RECOMMENDATION\\_R\(92\)6.htm](http://www.handicapincifre.it/allegati/RECOMMENDATION_R(92)6.htm) (section 8)
  8. Council of Europe Disability Action Plan 2006-2015 [www.coe.int/t/e/social\\_cohesion/soc%2Dsp/Rec\\_2006\\_5%20Disability%20Action%20Plan.pdf](http://www.coe.int/t/e/social_cohesion/soc%2Dsp/Rec_2006_5%20Disability%20Action%20Plan.pdf) (section 3.2, 'Participation in cultural life', p13)

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<sup>i</sup> 'Accessibility of museum, library and archive websites, the MLA audit', MLA, 2005, www. 42% of museum, library and archive websites met Web Content Accessibility Guidelines Level 1 (WCAG1), as opposed to less than 30% for the national average (Disability Rights Commission Formal Investigation into web accessibility, 2004). Both surveys adopted the same methodology developed by Prof Petrie's team.

<sup>ii</sup> A above

<sup>iii</sup> Right to Read campaign, ...

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<sup>v</sup> Universal Declaration of Human Rights (article 2.1), United Nations (1948);

[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

<sup>vi</sup> United Nations Declaration on the Rights of Disabled Persons (1975);

[www.unhchr.ch/html/menu3/b/72.htm](http://www.unhchr.ch/html/menu3/b/72.htm)

<sup>vii</sup> David Lammy, Minister for Culture, 'Breaking barriers to the arts through technology', The Times (06.2007)

<sup>viii</sup> Recommendation R(92)6 of the Committee of Ministers to Member States on a Coherent Policy for People with Disabilities (1992);

[www.handicapincifre.it/allegati/RECOMMENDATION\\_R\(92\)6.htm](http://www.handicapincifre.it/allegati/RECOMMENDATION_R(92)6.htm) (section 8)

<sup>ix</sup> Council of Europe Disability Action Plan 2006-2015

[www.coe.int/t/e/social\\_cohesion/soc%2Dsp/Rec\\_2006\\_5%20Disability%20Action%20Plan.pdf](http://www.coe.int/t/e/social_cohesion/soc%2Dsp/Rec_2006_5%20Disability%20Action%20Plan.pdf) (section 3.2, Participation in cultural life', p13)