

SECTION 14 IMPLEMENTING THE NETWORK

Objective 14: To forecast implications of systems of production for staffing needs, including where staff reductions, increases and specialisation may be required.

Outcome:

Summary

- 1) To signal the need for a step change in use of alternative accessible formats a conference should be held at which an announcement is made of a Scottish Accessible Learning Resources Network.
- 2) Awareness-raising should focus on the potential for both schools and authorities to improve access to the curriculum through learning resources in alternative formats; to clarify copyright law and copyright exemption with regard to the adaptation of materials; and to put forward plans for the Network.
- 3) A phased roll-out should take place with the Network performing both an operational role with authorities and schools as well as a more strategic role with key partners.

Implementing a Scottish Accessible Learning Resources Network

Introduction

In Section 13 we showed that Model A, based on a Scottish Accessible Learning Resources Network, is best placed to meet the criteria for a service that can provide accessible learning materials, ensuring:

- Inclusion and equity;
- Provision of a range of Alternative Formats;
- Support to local authorities to fulfil legal duties;
- Copyright extension;
- Feasibility and efficiency;
- Scalability.

In this final section we describe in a little more detail what would be expected of Model A and a Scottish Accessible Learning Resources Network. Some of the steps involved in delivering accessible curriculum materials will be relatively straightforward to introduce. Others will be more complex to deliver on, either because they:

- depend on specialist skills that are not yet widely available, or
- require structures that have yet to be put in place, or
- require an integrated approach that crosses traditional subject and curriculum boundaries, or
- depend on all three of the above to be addressed.

A number of actions need to be taken and processes established to ensure successful implementation. In this final section we first outline these actions and processes. We then consider how this may be done in a phased, managed way that can make best use of limited resources.

Establish Scottish Accessible Learning Resources Network team

The need for a network and coordinating function

We recommend that a new service is set up to help provide a coordinating function. New impetus is needed to raise awareness, improve on the unevenness of staff skills, develop tools and resources and promote equity with print disabled pupils. Unless specific attention is given to this emerging area change will not happen.

One measure of the need for a new impetus and coordination is that in the four years since copyright exemption was extended, only one group of pupils has benefited – pupils receiving services from teachers of visually impaired pupils – even though ‘the visually impaired’ was defined under copyright exemption legislation to include more pupils than those with a visual impairment.

A second measure of the need to signal a clear commitment to change is that staff at all levels who are aware of accessible books – and there are few – equate accessible formats with sight impairment. Nor is this a problem confined to Scotland; globally, accessible formats are generally considered only as applicable to visually impaired people.

Role of the Scottish Accessible Learning Resources Network

In this section we outline the roles such a network would perform in relation to schools and education authorities and what additional specific tasks it should undertake.

Proposed Aim:

The aim of the new Scottish Accessible Learning Resources Network should be to assist education authorities to fulfil their duties to meet pupils' support needs by providing print materials in accessible formats.

Proposed Objectives:

In order to address this aim, the Network should:

1. Undertake an operational role to support local authorities to carry out their duties under relevant legislation.
2. Perform a strategic role by developing materials and staff development resources and liaise with central government, local authorities and other key agencies.

1. Operational role

At several points we have reported on the need to raise awareness of the potential for improvements to be made in giving pupils wider access to the curriculum. Awareness-raising is necessary at all levels of staffing – from senior officers to classroom assistants. Action is therefore needed across several areas of service delivery so that change may be effected.

Raising awareness in schools and local authorities is essential but it will not be sufficient, therefore, following an outline of what actions need to be taken to raise awareness we discuss other steps that will help ensure that the resources needed are in place to respond to heightened awareness: raising awareness without the tools in place to do something about it is a wasteful exercise.

Raise awareness

Once set up the first actions of the Scottish Accessible Learning Resources Network should be to raise awareness amongst schools, local authorities and others. Throughout the Books for All project, we were aware of a huge gap in awareness that will need to be bridged in order that pupils can benefit from receiving materials in accessible formats. While pockets of good practice exist in Scotland, the lack of awareness and understanding exists at all levels of staff including:

- Accessibility officers both within education and corporate services within the local authority, who are involved in developing strategies to improve access to the physical environment, the curriculum and information and communication;
- Head teachers, class teachers, support for learning staff and classroom assistants;
- IT and other support services.

Each of these groups will benefit from increasing their knowledge and acquiring new skills in the area of print accessibility.

Custom and practice dictates not only how services address questions of alternative formats, but also in knowing what questions to ask. We are convinced that progress cannot take place unless significant effort is put into raising awareness.

Awareness raising should address the lack of understanding about accessible formats that exists at all levels and what is currently possible under existing legislation. Effort will be needed in order simply to get to the point where there is wider understanding of the gaps in practice that exist in this area, and what actions can be taken to address these gaps. Two key operational targets for awareness raising are schools and local authorities.

Awareness raising: schools

Awareness raising with schools should focus on:

- Opportunities afforded by devolved budgets to source materials in alternative formats.
- What steps they could take to respond to the anticipatory duties of Disabilities Strategies legislation to improve pupils' access to the curriculum e.g. when completing school development plans.
- How staff might more readily make available in accessible forms those materials and resources they themselves have produced.
- What systems need to be in place to promote sharing of such materials within the school.
- Arrangements for obtaining out-of-copyright materials.
- Understanding among school senior management of obligations under existing legislation on copyright exemption and of the duty to promote equality for disabled pupils.
- Staff skills needed to respond to requests for appropriate alternative formats.
- How to set up efficient procedures for producing, storing and distributing materials.
- Arrangements for record keeping on accessible copies made and of pupils receiving them.
- Arrangements for liaising with local authority staff in order to acquire materials in more specialised formats.

Awareness raising: education authorities

As the "responsible body" under disability discrimination legislation, and having duties under the Education (Scotland) Act 1980, the Education (Additional Support for Learning) (Scotland) Act 2004 and Disability Strategies legislation, the priority for education authorities should be to add value to the proposed actions

described above for implementation at school level. As the corporate public body, local authorities have complementary duties to their education authorities through, for example, their disability equality duties to promote equity.

For developments at school and classroom level to take place, implementation will need to be driven by education authorities who will also have a continuing role to play in adding value to arrangements that will take place within schools.

Education authorities can improve arrangements in schools by taking action to:

- Raise awareness with schools, support for learning staff, peripatetic service providers and other relevant agents of change.
- In consultation with relevant agencies, both internal to the authority and external, identify in-service training needs to be devised and undertaken by schools.
- Make available, either singly or in association with other authorities or national or voluntary bodies, resources and network arrangements that support schools to produce accessible materials.
- Put in place an appropriate infrastructure to ensure that production and delivery of materials in alternative formats can be implemented and maintained in a cost effective manner.
- As part of that infrastructure, put in place or liaise with others to ensure that accessible formats are available to pupils that currently are exempt from copyright.
- Seek to negotiate licensing arrangements to create accessible versions for pupils who are **not** currently exempt from copyright.
- Ensure that managed computer networks in schools can support provision of alternative formats to be made available to individual pupils.¹⁰⁸
- Set up either through the authority intranet, or by other means, an appropriate facility for storing and accessing materials in intermediate electronic format (e.g. structured / tagged MS Word (DOC)/HTML/PDF); and mechanisms for distributing to schools while ensuring secure arrangements for digital rights and that these are managed within the law.

At the time of writing the most likely education authority agents of change who are in a position to promote and introduce such changes are Quality Improvement Officers, working in close collaboration with senior management responsible for pupils with additional support needs.

Awareness raising: conference to launch Scottish accessible learning resource network

There is a concern that, unless a clear commitment is made to introduce change and specific identifiable actions are taken that signal to authorities and schools that change is needed in this area, the status quo will remain. If so, availability of accessible materials will continue to be restricted to the few pupils who are assumed, wrongly, to be the only ones who can benefit from copyright exemption. We therefore recommend holding a conference to which selected local authority representatives and other agencies are invited, to launch the Scottish Accessible Learning Resources Network.

¹⁰⁸ The local authority now has a general and specific duty to ensure the promotion of equity with disabled people. This includes, for example, setting out terms in contractual arrangements with suppliers of managed network services.

Adding value: producing accessible materials

The Scottish Accessible Learning Resources Network should work with education authorities on all of the above so that they can:

- Identify and make available in accessible formats those materials that are out of copyright.
- Apply Best Value criteria to extend arrangements for making materials available in accessible formats to those pupils for whom copyright exemption exists but for whom no arrangements are in place.
- Support local authorities to take steps to extend provision for pupils who “have difficulty reading information provided in standard written form” but who are not covered by the 2002 copyright act, through for example Disability Equality legislation.
- Identify what formats are required by individual pupils and set up work flows that can meet these requirements.
- Have available the appropriate tools for schools and / or authorities to produce materials in accessible formats, and staff skills to use them in the two different settings.
- Coordinate production of accessible resources.
- Put in place mechanisms for staff to a) check for availability of existing accessible versions and b) share accessible copies with other schools within the local authority, and beyond.
- Develop procedures for staff to obtain materials in specialised formats, and if necessary, implement services and tools at authority level.

2. Strategic role

Above we have discussed in outline form how the Scottish Accessible Learning Resources Network would support schools and education authorities to make materials available in accessible formats. In addition to that operational role a number of steps should be taken in parallel to help lay the foundations of a coherent integrated approach to delivering learning materials in accessible formats. We use the term ‘strategic role’ for reference but see the operational and strategic functions as intertwined: both need to be in place.

The Scottish Accessible Learning Resources Network should in liaison with others:

- Devise and produce a ‘toolkit’ on accessible formats.
- Establish competences needed to produce materials in the alternative formats required and at the quality required.
- Devise a training program and produce exemplar materials both printed and web based.
- Submit training-program for accreditation and validation by SQA under SCQF.
- Offer technical skills training to authority and school personnel.
- Establish mechanisms for identifying in advance new curriculum materials required in accessible formats.
- Develop mechanisms for sharing resources.
- With relevant agencies, examine opportunities to extend copyright exemption.

- Liaise with providers of materials in alternative formats, including local authorities; voluntary organisations; Scottish Executive; national funded agencies; and publishers' associations.
- Liaise with local authorities on capacity building options to facilitate the wider groups of pupils who can benefit from increased availability of alternative formats.
- Liaise with Convention of Scottish Local Authorities (COSLA) and CLA on licensing arrangements.
- Liaise with relevant Scottish Executive departments and relevant government agencies on improving access to print for the wider group of people who have some form of print disability.

Implementing Model A: a phased approach

While some of the actions required to implement Model A described above are relatively straightforward, putting in place a coherent framework of effective service delivery will represent a complex undertaking involving collaborative partnership arrangements. We propose therefore that development is undertaken in phases. This will allow both broad developments to take place across authorities as well as more in-depth work through partnership arrangements with a smaller number of authorities.

Phase 1

Establish Scottish Accessible Learning Resources Network

- Based on the above operational and strategic functions agree remit of network with Scottish Executive and other potential partners.
- Establish Project Working Group plus Steering Committee or Advisory Group.
- Agree team members and work plan.
- Hold first meeting, agree content of conference and launch.

Scottish Accessible Learning Resources Network Conference

Hold a conference inviting selected local authority representatives and other agencies to attend to raise awareness of:

- Scottish Accessible Learning Resources Network.
- Duties under Disabilities Strategies and other legislation and how alternative formats can help to meet the literacy support needs of pupils with ASN.
- What is possible within existing copyright exemption legislation.
- Which pupils are exempt under existing legislation; what this means for the pupils and for services they provide.
- Action planning requirements.
- Revealweb and duties.
- Partnership arrangements with local authorities.

Outcome of conference:

- Foundation for awareness raising.
- Brief guide to accessible formats.

- Clarity amongst delegates on who to contact for additional information and for specialist guidance.
- Up to three pilot authorities identified.

Begin to establish arrangements for exempt pupils for whom materials are not available

- Discuss with partner authorities what provision can be made for making available electronic intermediate source material.

Begin to explore extension of copyright exemption

- Meet with Scottish Executive to discuss approach to Westminster through the Office for Disability Issues regarding extending copyright exemption to print disabled people.
- Attend meetings with publishers, publishers associations and the Copyright Licensing Agency to explore possible licensing schemes for providing accessible learning resources for print-disabled pupils who are not copyright exempt.

Design draft structure of file repository for learning resources

- Establish criteria for design of file repository.
- Design outline structure for file repository system identifying inputs, processes and outputs.
- Consult on outline structure with CLA, SEED, LTS, CALL, local authorities, COSLA and relevant bodies such as RNIB, RNID, Dyslexia Scotland, Capability Scotland.

Accessible Learning Resources Toolkit

- Begin development of Accessible Learning Resources 'toolkit' incorporating guidance and staff development resources.
- Consult with authorities on requirements.

Phase 2

Establish Accessible Learning Resources Networks in three local authorities

- Collaborate with each partner pilot authority on mechanisms for: identifying pupils who would benefit from alternative formats; how information on required formats will be managed; what formats are required; existing resources generating materials; potential for (and restrictions on) sharing.
- Identify broad range of end users, ensuring inclusiveness and equity.
- Identify sample staff who will produce materials.
- Begin to identify staff competences required.
- Structure materials.
- Produce intermediate source files.
- Explore dissemination channels.

Awareness raising: schools and authorities

- Agree with the three pilot authorities appropriate awareness raising mechanisms for each authority, reflecting priority themes set out above for awareness raising in schools and in authorities.
- Explore arrangements to heighten understanding among school senior management of obligations under existing legislation on copyright exemption and of the duty to promote equality for disabled pupils.
- Identify staff skills needed to respond to requests for appropriate alternative formats.
- Agree efficient procedures for producing, storing and distributing materials.
- Introduce arrangements for record keeping on accessible copies made and of pupils receiving them.
- Agree arrangements for liaising with local authority staff in order to acquire materials in more specialised formats.
- Agree content for awareness raising, how it will be delivered to schools and other agents in each authority. (What needs to be said, who says it, when it is done and what is in place to respond to follow up questions.)

Liaison with CLA

- Continue to explore extension of copyright exemption
- Establish CLA licence to enable accessible materials to be made for print-disabled pupils who are not copyright-exempt.

Accessible Learning Resources Toolkit

- Complete Accessible Learning Resources Toolkit.
- Establish criteria for evaluation of toolkit.
- Pilot delivery in the three local authorities.
- Evaluate use of toolkit.

Pilot file repository system

- Complete file repository system structure.
- Establish procedures and mechanisms for sharing materials between local authorities.
- Each local authority network pilots collating, creating and providing access to bank of accessible resources.

Continue strategic role

- Offer technical skills training to authority and school personnel.
- Establish staff competences to produce materials in alternative formats.
- Devise a training program and produce exemplar materials both printed and web based.
- Submit training-program for accreditation and validation by SQA under SCQF.
- Establish mechanisms for identifying in advance new curriculum materials required in accessible formats.
- Develop mechanisms for sharing resources.
- With relevant agencies, examine opportunities to extend copyright exemption.

- Liaise with providers of materials in alternative formats, including local authorities; voluntary organisations; Scottish Executive; national funded agencies; and publishers' associations.

Phase 3

Scaling up

- Continue roll-out of Accessible Learning Resources Networks in three local authorities.
- Continue process of cataloguing and sharing materials between local authorities.

Awareness raising

- Continue raising awareness with schools, support for learning staff, peripatetic service providers and other relevant agents of change.
- In consultation with relevant agencies, both internal to the authority and external, identify in-service training needs to be devised and undertaken by schools.
- Devise a training program.
- Submit training-program for accreditation and validation by SQA under SCQF.
- Agree network arrangements to support schools to produce accessible materials.
- Ensure that managed computer networks in schools can support provision of alternative formats to be made available to individual pupils.¹⁰⁹
- Set up either through the authority intranet, or by other means, an appropriate facility for storing and accessing materials in intermediate electronic format (e.g. structured / tagged MS Word (DOC)/HTML/PDF); and mechanisms for distributing to schools while ensuring secure arrangements for digital rights and that these are managed within the law.

Evaluation of pilot

- Conduct evaluation of impact of Accessible Learning Resources Networks on learning and teaching, for possible wider implementation.
- Begin discussion with other Scottish local authorities, identifying best fit with one or more of the three pilot authorities.

Phase 4

- Continue process of cataloguing and sharing materials between local authorities.
- Establish mechanisms to identify in advance new curriculum materials required in accessible formats.
- Continue roll out of network.

¹⁰⁹ The local authority now has a general and specific duty to ensure the promotion of equity with disabled people. This includes for example setting out terms in contractual arrangements with suppliers of managed network services.

- Liaise with local authorities on capacity building options to facilitate the wider groups of pupils who can benefit from increased availability of alternative formats.
- Liaise with Convention of Scottish Local Authorities (COSLA) and CLA on licensing arrangements.
- Liaise with relevant Scottish Executive departments and relevant government agencies on improving access to print for the wider group of people who have some form of print disability.

Concluding comments

Scottish education could become an international leader in enabling the availability of accessible formats to all pupils with a print disability. The policy framework that has developed in Scotland over the last 8 years has introduced new opportunities for these developments to take place.

Without a sustained effort to make it happen changes to practice will remain isolated and fragmented, where progress will occur in a piecemeal fashion. We have presented in outline form what steps would be needed to increase the availability of accessible learning materials in accessible formats.

We suggest that the Scottish Executive give further consideration to the phased outline of work presented in section 14.