

HEA

Higher Education Authority
An tÚdarás um Ard-Oideachas

Submission to the Copyright Review Committee

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Suggestions for improvements to the copyright Legislation on behalf of users with disabilities in particular students in education with print disabilities.

Executive summary

This submission is an outcome of a consultation meeting held in Trinity College Dublin on May 2012 that gathered and compiled information in order to make a submission to the Copyright Consultation Committee on the requirement of students with print disabilities to print materials in an alternative format.

We greatly appreciate the opportunity to respond to Question 56 (d), “*should all of the exceptions permitted by EUCD be incorporated into Irish Law, including : reproduction for people with disabilities*”. We wish to bring to the attention of the Copyright Review the experience and needs of students with print disabilities in accessing learning materials. The Higher Education Authority (HEA) anticipate that the numbers of students with disabilities will continue to grow in the coming years and so too will the demand from students with print disabilities for materials in alternative formats.

This raises many challenges for higher education institutions including the need to ensure equality of provision for disabled students, who, in order to learn, need access to alternative materials in 'real time'. Currently the provision of textbooks and materials in alternative formats is complex, expensive and inconsistent in format. Publishers do not provide intermediate files in an accessible version, therefore colleges have to initiate a complex, time-consuming and expensive process of reproducing a textbook through dismantling the textbook, scanning and editing it into an acceptable accessible format.

This change to copyright legislation is an opportunity to make a number of key recommendations to the Copyright Review Committee that would make a significant difference. The recommendations in this submission will ensure that students with print disabilities in mainstream education can realise their rights to an equal education. The HEA is satisfied with the proposed changes to section 104 of the Copyright Act, however we note that the act does not make any mention of the need to provide accessible intermediate versions of texts and materials. There is a need for fresh thinking on the part of publishers who need to understand the rationale for

providing accessible formats as a first step in ensuring the provision of accessible intermediate files to students with disabilities in real time.

Recommendations to the Copyright Review

- Establish the duty of the publisher to provide intermediate electronic versions of text in an accessible format in a timely manner
- Ensure that Intermediate Electronic Versions are structured in a format and to a minimum standard of accessibility that allows all information to be read. See <http://www.tcd.ie/CAPSL/TIC/accessible-info/pdf/>
- Ensure that educational institutions can procure intermediate electronic copies in real time from publishers on behalf of their students with print disabilities
 - Resources requested in electronic format should be supplied by the publisher in a format compatible with assistive technology
 - Ensure compliance with Equality and Disability legislation by ensuring documents are navigable by a wide range of assistive technologies
 - There is a need for publishers in Ireland to actively engage in the process of providing alternative formats and to understand the rationale for alternative formatting and the principles of accessible information
- Ongoing consultation with people with a disability is required to inform the legislative framework
- Publishers provide a directory of publisher contact details for use when requesting electronic formats modelled on the British and American resources (<http://www.publisherlookup.org/> and <http://www.publisherlookup.org.uk/>)

1. Introduction

This report has been created with contributions from key stakeholders (appendix 1) within the Irish higher education sector. This report has been compiled to identify areas for improvement in relation to access to alternative resources for students with disabilities and to suggest key recommendations in line with the objectives of the National Plan for Equity of Access to Higher Education 2008-2013 and obligations under the Disability Act 2005.

2. The need for fresh thinking and a new approach

The numbers of students with disabilities choosing to go to higher education has dramatically risen over the last decade from 990 to over 6,900¹. These students have expectations of gaining qualifications, building careers and being active citizens of Ireland. The number of new entrants continues to grow every year and in 2010 there were 2,386 new entrants registering a disability in higher education nationally.

However, in spite of the overall success of students with a disability in higher education there remain persistent and unacceptable pockets of under-representation. Only 17% of students with sensory disabilities go on into higher education as opposed to over 55% of total school leavers². **In other words students who are blind or who have visual impairments are four times less likely to progress on to higher education than other students.**

3. Participation rates of students with disabilities in higher education

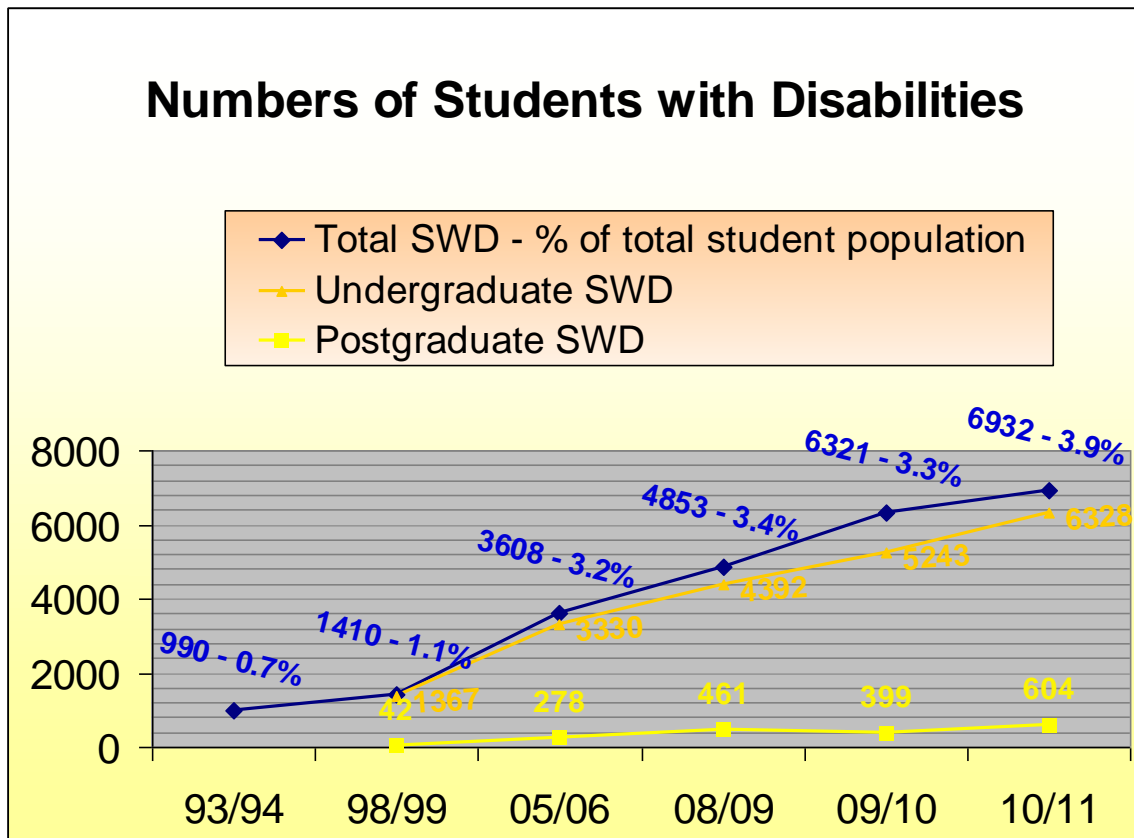
The ever growing numbers of students with disabilities in higher education leads to greater demand for the provision of resources in alternative formats. This is likely to continue to grow further in line with the Higher Education Authority National Plan for

¹ AHEAD Participation Rates 2010/2011

² National Office of Equity of Access, "National Plan for Equity of Access to Higher Education 2008-2013", 2008, (Dublin: Higher Education Authority)

Equity of Access 2008-2013 which seeks to double the number of students with sensory, physical and multiple disabilities in higher education.

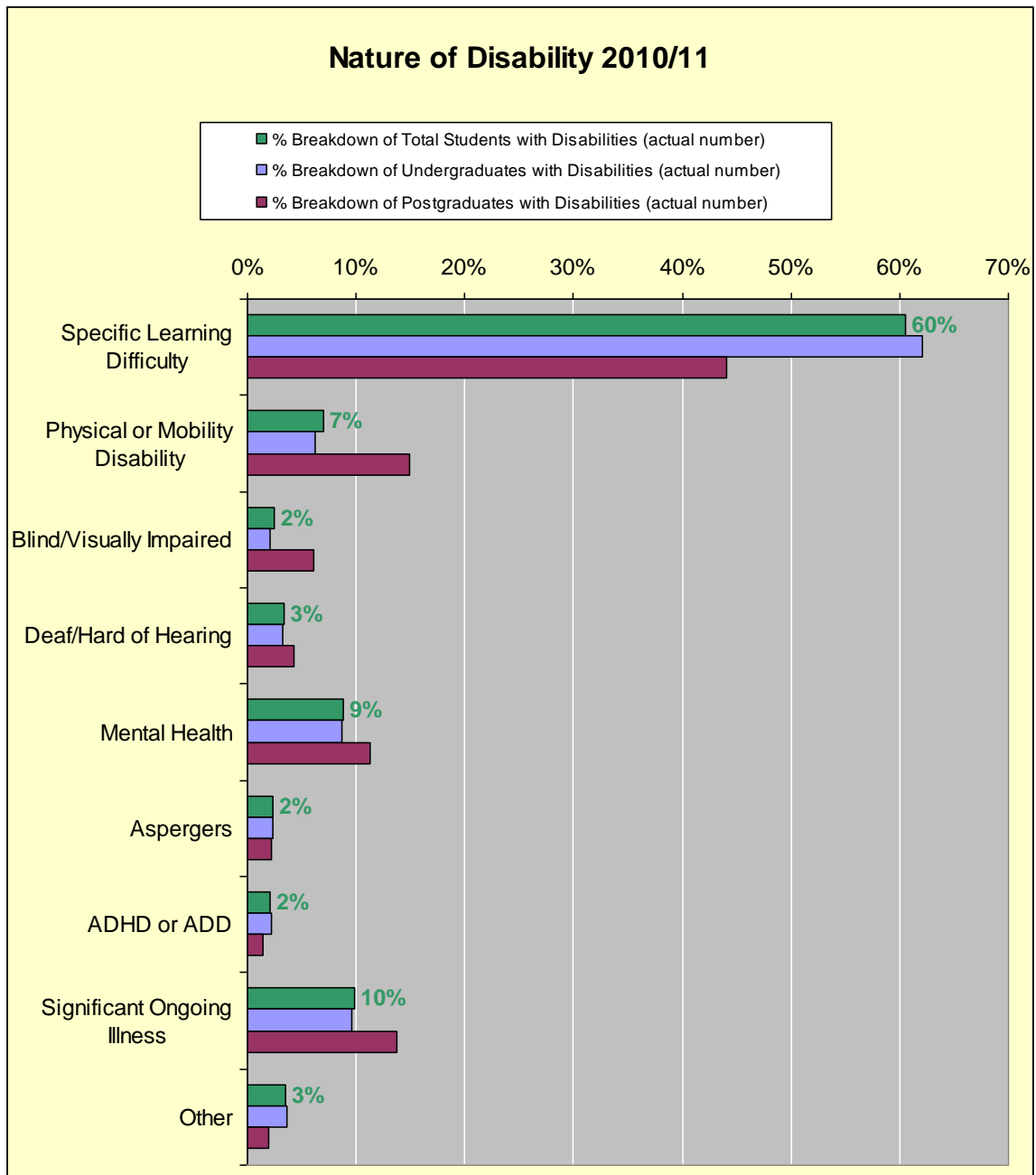
Figure 1: the increasing numbers of students with disabilities from AHEAD's first survey of the subject in 1993-94 right through to 2010-11



Type of disability:

The responding higher education institutions provided the disability profile of 6,328 undergraduates with disabilities and 604 postgraduates with disabilities. Of the 6,932 students represented in the disability profile, 4,192 (60%) have a specific learning difficulty, 172 (2%), are blind or visually impaired (see figure 2 below), which means that over 62% of students with disabilities in higher education have some degree of difficulty accessing text-based books and materials.

Figure 2: the disability profile of total, new entrant and final year students with with disabilities



Students with print disabilities have difficulty in reading and interpreting the written word as presented in a conventional way, such as hard-copy books and documents. Therefore they require an 'alternative format' or alternative mode of access to this material. This can be via intermediate electronic formats, DVD, audio access, large print, or touch such as braille.

4. Experience of students in accessing alternative resources

Students who have print disabilities have difficulty getting core textbooks in alternative formats in real time. Therefore they cannot study at the same pace as other students. According to recent research on technology and access to alternative resources

“Technology has an impact on what a student who is blind or visually impaired can and cannot learn and makes the difference between making learning possible or not”³

Parents groups like FEACH say there approximately 600 blind and visually children in education who need alternative to print materials, such as electronic books, recorded books, braille books, or DVDs but they are not getting them in real time and this affects their attainment in education⁴. These alternative texts and materials cannot be purchased in the same way as a textbook and must be created which takes an unacceptably long time. The result is that many children engaged in mainstream education and in state examinations do not get the key textbooks required in the required timeframe and are working at a severe disadvantage. Such a practice undermines the child’s capacity to develop independent learning skills and is discriminating.

In addition to students who are blind or visually impaired there are many other students with text difficulties, for example students with dyslexia and significant mobility impairments. According to the National Council for Special Education (NCSE) there are over 64,000 children in education who are affected by dyslexia or 6% of children in education, and by definition they experience a continuum of specific difficulties with reading and writing. While all children would arguably benefit from access to technology and texts in alternative formats for these children it is a

³ Seeing Ahead, A Study of the factors affecting Blind and Visually impaired Children going on to higher education, AHEAD Press, pg 46.

⁴ Seeing AHEAD, A Study of the Factors affecting Blind and Visually Impaired students going on to Higher Education, AHEAD Press, 2009

critical factor in their ability to engage with education and achieve equity of educational outcomes.

There are over 4,000 students with medically verified print disabilities (dyslexia and visual impairment) in HEI who require an 'alternative format' or alternative mode of access to this material. Like all students, those with a print disability need access to different types of printed material including:

- books e.g. core texts,
- journal Articles,
- specific lecture notes / hand-outs.

Their experience in accessing these texts can be ad-hoc and inconsistent depending on a range of factors such as the type and level of course, amount of reading materials, availability of existing alternative formats within the college or other college libraries, and the willingness of the publisher to make an accessible intermediate file available.

The opinion of the stakeholder group is unanimous regarding the lack of awareness on the part of some publishers regarding the materials in alternative formats. More often than not the materials requested in electronic format are often supplied in formats inaccessible to assistive technology (Quark). Texts must then be adapted to ensure they are properly usable with assistive technologies. In the UK, the Publishers Association (<http://www.publisherlookup.org.uk>) has started working to inform publishers as to the importance of documents having a semantic structure which can be used for navigation by a wide range of assistive technologies. In Ireland also, there is a need to raise awareness of the rationale for alternative formatting, and the principles of accessible information.

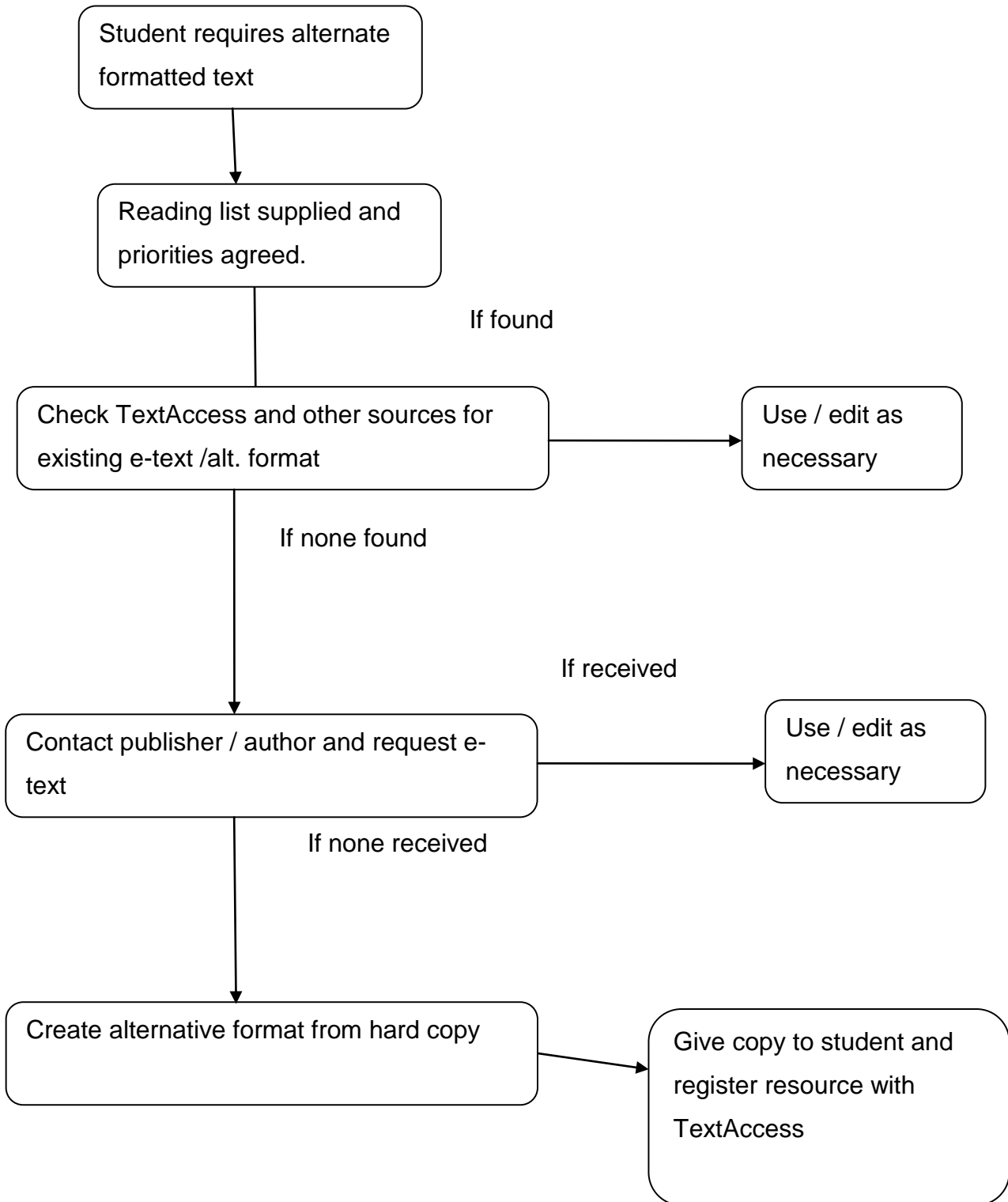
5. What is the current situation with alternative format provision?

Creating alternative formatted material is a convoluted, expensive, labour-intensive and administratively heavy (see chart 1 below). Up to €60,000 is allocated from the HEA Fund for Students with Disabilities in any given year for the creation of materials in alternative formats which, in the current climate, is an unnecessary duplication of scarce resources. Creating an alternate format textbook involves a process of contacting publishers to enquire about the availability of a textbook in an alternative accessible format (see Appendix 2). Where none is available it then involves creating an alternative formatted text through scanning and editing from printed texts. This procedure is out of step with advances in technology and worst of all it fails to deliver the texts/materials to the student in real time putting them at a significant disadvantage in comparison with other students. Furthermore this approach is not in compliance with current international and national legislation and a fresh approach is urgently required to ensure equal treatment of all students in higher education.

Alternative format materials can involve audio access, mostly using text-to-speech software. When providing materials in alternative format, the first step is always the acquisition / creation of an accessible electronic version of the resource, as electronic texts have the potential to be converted quickly and easily into the format required by the student. Electronic textbooks should be made available by the publisher in an intermediate file, which is one that can be easily converted into different types of Accessible Copy.

Below is an alternative format flow chart that illustrates the series of complex steps that currently must be taken within a college every time a student with a print disability requires a text/material in an alternative format. .

The steps involved in providing resources in alternative format: Chart 1



6. Technical developments

Over the past decade the use of electronic resources has become increasingly popular, aided by new technologies. The electronic format has replaced print as the most common method of journal use. For example, the Trinity College Dublin library currently has 6,915 e-journal titles beginning with the letter “I” alone. Lecture handouts and other resources are increasingly being made available to students online.

When providing materials in alternative format, the first step is always the acquisition /creation of an intermediate electronic version of the resource.

The Copyright and Related Acts 2000 allows some educational institutions to produce materials published in Ireland in accessible formats without express permission from the author or publisher as per section 104, “Provision of modified works” and section 205, “Making available to public copies of recordings of qualifying performances”. However, while allowing for this exception, the Copyright Act makes no reference to the availability of intermediate electronic versions of the resource. A vital step in ensuring that students with print disabilities can access textbooks in real time and on an equal basis to other students is the availability to institutions of intermediate electronic versions of the resource.

7. Intermediate Electronic Versions

Without access to intermediate electronic formats from publishers, accessible formats are produced through dismantling texts, scanning them page by page, converting them to word documents for editing, and rebinding the text. This takes time and resources, and these costs would be reduced substantially if publishers were to make digital copies available.

Publishers have an anticipatory duty to hold an intermediate electronic version of resources that can be supplied on request for the purpose of creating an accessible

resource for a person with a disability who is the owner or lawful user of a work in accordance with section 104 of the Copyright Act.

To be accessible, an intermediate electronic version must be structured in a format that allows all information to be read (e.g. removing columns; describing tables, graphs and pictures; cutting notes and footnotes and placing in the relevant point in the text; and inserting page numbers to allow for referencing etc.).

Intermediate File Accessibility Standards

An intermediate file should comply with a minimum accessibility standard as outlined by the WCAG (Web Consortium Accessibility Guidelines), as follows:

- structure (i.e. a table of contents);
 - formatting with styles;
 - the main body text set to an 'Int Normal' style so that it can all easily be changed to a different font or size;
 - tables created using table tools, not tabs or spaces;
 - text descriptions for images;
 - text transcripts of sound files;
 - a complete and correct copyright statement;
 - "meta-data' with the correct title, author, ISBN etc.

Intermediate electronic documents should follow an agreed standard to ensure accessibility. This standard should be future proofed as far as possible against future technological changes and be usable with standard processing systems (e.g. Windows and MAC OS).

For further information on creating accessible documents go to the Trinity Website:
<http://www.tce.ie/CAPSL/TIC/accessibility-info/pdf/>.

8. What is the situation internationally?

International developments

There has been much progress and stated commitment to the provision materials in alternative format on the international arena.

EU

On 15 November 2010 the European Commission adopted a new strategy to break down the barriers that prevent persons with disabilities from participating in society on an equal basis. The strategy outlines how the EU and national governments can empower people with disabilities so they can enjoy their rights. Actions include an accessibility initiative, which will consider how to use standardisation, public procurement or state aid rules to make all goods and services accessible to people with disabilities while fostering an EU market for assistive devices (European Commission 2010).

Furthermore, the EU Commission is currently preparing a proposal for a Directive implementing the principle of equal treatment outside employment, based on Article 13 of the Treaty. (See <http://ec.europa.eu/social/main.jsp?catId=529&langId=en>)

Bologna Communiqué 2011 for Higher Education on Social Cohesion states that

“higher education should play a strong role in fostering social cohesion, reducing inequalities and raising the level of knowledge, skills and competences in society. Policy should therefore aim to maximise the potential of individuals in terms of their personal development and their contribution to a sustainable and democratic knowledge-based society. [...] The population of higher education should reflect the diversity of our population. Therefore actions have to be taken to widen participation for persons with disabilities”⁵.

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http://www.ond.vlaanderen.be/hogeronderwijs/bologna/documents/MDC/London_Communique18May2007.pdf, page 5, 2.18

UK

In the UK, alternative format provision is informed by the Freedom of Information Act (2000), the Disability Discrimination Act (1995) and the Equality Act (2010). The Freedom of Information Act allows people to request information in any format they specify. The Disability Discrimination Act (and the Equality Act which replaces it), consider the provision of alternative formatting to be a reasonable accommodation, and they consider educational institutions to have an anticipatory duty to maximise accessibility for disabled people. This means that reasonable adjustments should not simply be reactive to known, current disabled students, but that they should anticipate the needs of disabled people who have not yet even thought about applying for a place on courses.

USA

The Americans with Disabilities Act (ADA) was passed in 1990 and became effective in January 1992. The ADA federal legislation opened up services to people with disabilities. The Act states that public and private organisations must provide appropriate auxiliary aids to ensure that communications with individuals with hearing, vision, or speech impairments are as effective as communications with others, unless an undue burden or fundamental alteration would result.

National developments

Legislation within Ireland has also ensured focus on this issue. The Equal Status Act 2000 specifically prohibits discrimination at an 'educational establishment' in Section 7, and under section 28 of the Disability Act 2005 (House of the Oireachtas 2000, 2005), individuals are entitled to receive information in alternative formats where possible, upon request.

Equal opportunities for people with disabilities.”

The HEA published the National Plan for Equity of Access 2008-2013 in July 2008.

Target 34 of this plan states:

The National Access Office will commission research on the provision of academic material in alternate format across the higher-education sector. Recommendations will be made and next steps outlined in the context of creating a model of good practice for the provision of alternative format.

In 2009, TCD revised and strengthened its Accessible Information Policy (Trinity College Dublin 2009), which includes commitments to:

- Openly advertise the availability of information in accessible formats to staff and members of the public. The College's agreed statement is 'Accessible formats are available upon request' and this should be prominently placed on all publications.
- Establish a procedure for requesting information in accessible formats.
- Advertise the availability of this service and ensure that all staff are trained in the receipt and operation of such requests.

9. Conclusion

It is clear from this report that providing alternative format is a complex process, but one that is vital to the inclusion of disabled students in education at all levels. Alternative format allows print-disabled students to participate fully and ensures they can learn, qualify and take up careers of their choice. It is imperative that all intermediate electronic versions of textbooks and other printed materials are made available to a minimum standard of accessibility. While all students benefit from access to electronic textbooks and other technology, for students who are blind or who have other print disabilities this access is vital as without it they will not be able to deal with the reading demands of an academic course and they may fail.

As new technologies are developed the process involved in the provision of alternative formats is becoming more cost-effective and less labour intensive. This report highlights actions that can further enhance the process and recommends that the higher education sector works with publishers and students towards this goal. Below are a set of recommendations for the copyright consultative review for consideration to improve access to alternative materials for print-disabled students in education.

Appendix 1

Stakeholder Advisory group

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Appendix 2 – The steps involved in providing resources in alternative format

Preliminary step

Higher education institutions should ensure that all students are aware of the disability service as early as possible to ensure that students who anticipate needing materials in alternative format connect with the service as early as possible.

Step 1: - The reading list

The first step in the provision of resources to students with print disabilities is the provision of reading lists by lecturers. To ensure a smooth process reading lists should be clear, concise, and received in a timely manner.

Timeliness

Reading lists are often provided to students and the library at the beginning of the teaching term, or even after teaching has begun. The TCD library recommends that all reading lists for the academic year should be received by the library before the end of July of the previous summer (see <http://www.tcd.ie/CAPSL/TIC/accessible-info/student-info/reading-lists.php>). While this is important to ensure resources are available for all students, it is particularly important when texts are required in alternative formats as the acquisition of alternative formats can be a lengthy process. Where readings lists are not provided prior to the commencement of term, there is a great likelihood of delays in resource provision that can negatively impact on the student's academic experience and ability to succeed.

Clear and concise

In order to provide alternative formats effectively, libraries need to know:

- what resources are key
- what sections of resources are key
- what is available electronically.

Handouts provided in class must also be highlighted in advance.

It is suggested that a pro-forma be supplied to lecturing staff where they include proper citations/references for **all** materials covered in their course, including

handouts, which are often disconnected from the reading list. They should also indicate whether the materials are available electronically and where they are available.

The pro-forma will do two things:

1. Allow educational support workers/library staff to search and retrieve more efficiently,
2. Should the material need to be converted into alternative format, it can be referenced/catalogued properly.

Raising staff awareness when preparing materials

The lecturer can help ensure the provision of accessible materials to students with print disabilities when preparing lecture handouts and choosing course material.

Where lecture notes and other resources are prepared in accordance with accessible information guidelines, the need for editing and formatting can be greatly reduced, or even eliminated. According to a legal opinion sought by TCD in January 2011, lecturers have a legal responsibility to ensure students with a print disability have the same access to handouts and teaching material as their peers:

“If notes are provided as a part of a particular module or subject then these should be made available in advance to students whose disability would prevent them from taking an accurate note during the lecture”

Lecturers should also be aware of electronic resources when compiling reading lists. Increasingly, material published after 2002 (particularly journal articles) is available electronically.

Further recommendations regarding reading lists are available from:

<http://www.tcd.ie/CAPSL/TIC/accessible-info/student-info/reading-lists.php>

Further information on accessible information is available from:

<http://www.tcd.ie/CAPSL/TIC/accessible-info/>

Student involvement when prioritising resources

Students need to be involved in deciding what material is to be sought and when it should be prepared. Problems such as miscommunication, missed deadlines and the

student's changing priorities can lead to frustration on all sides. Furthermore, students need to be involved in deciding what assistive technologies to use for most effective information provision, training needs, and when the support of a reader may be more appropriate than engaging in the alternative formatting process. Overall, it is essential that the student is at the centre of the decision making process regarding alternative formats.

Step 2– Check for existing electronic resources / alt. format

Once reading list priorities are agreed, the information is forwarded to the relevant Subject Librarian, who carries out full search of e-text databases and online resources. This includes Text Access. A comprehensive library search should be carried out by the Subject Librarian so that all e-text options are exhausted before alternative formatting is considered. The resources expended in doing this are far more economical than the expense of alternative format production.

Availability of eBooks

As e-reader technologies advance, the availability of eBooks grows. Libraries should be encouraged to seek electronic texts in addition to printed texts where possible. Under the Disability Act (2005) universities are obliged to ensure that goods and services supplied by external and internal suppliers are accessible to students with disabilities. Through the purchase and supply of electronic texts, universities would certainly live up to this obligation, fulfilling an anticipatory duty, and would move a long way toward an inclusive and universally accessible learning environment.

There are organisations that specialise in the supply of materials in alternative formats. In Ireland, the [National Council for the Blind in Ireland \(NCBI\) media centre](#) produces and distributes resources in electronic formats to those with registered visual impairments. It has a database of over 16,000 titles. Other resources include the American organisation [Recording for the Blind and Dyslexic](#), who will provide Irish citizens with cassette audio files, and Robobrace, which is an EU initiative that provides braille embossed or audio files within minutes of receiving electronic files from users via <mailto:britspeech@robobrace.org>

Text Access

Currently there is a national AHEAD initiative to catalogue resources prepared in alternative format called Text Access. Text Access provides a centralised database of accessible resources created by participating Irish colleges. Essentially if a book has been converted to an alternate format by any Irish college then no other Irish college should have to convert the same book if required by one of their students. While publishers are increasingly recognising their responsibility to make texts accessible, thus reducing the amount of accessible electronic resources created by Irish colleges, there is still demand for older texts which are available through Text Access.

Text Access began as a joint initiative between AHEAD and a Consortium of National and University Libraries (CONUL). It was developed over a two-year period in collaboration and consultation with CONUL, staff in libraries throughout the sector, similar projects in the UK, technology and copyright experts, and students with disabilities. It arose from the realisation that a great effort was being made by the Disability Services in Irish colleges to provide books in accessible formats for students with disabilities. The aim of Text Access was to reduce duplication and to share resources. There are currently 1,634 records on the database. Although it is still being added to the number of accessible books being created by colleges has reduced substantially as colleges have had more success in obtaining accessible formats directly from the publishers.

How Text Access Requests Work:

Ireland's higher education institutions are authorised under the Copyright and Related Rights Act, 2000 to make and supply a modified copy of a work to an individual with a physical or mental disability without infringing the copyright of that work. Subsequent sale, rental or loan of this modified copy to a member of the public is strictly forbidden by copyright law and could result in fines or imprisonment.

Students registered with the disability service of any college who have a print impairment can search the Text Access catalogue and request books. A member of disability service staff within the student's home institution then requests the book on

the student's behalf from the college where it was produced. A copy of the book is sent to the requesting college within 48 hours.

How Text Access is updated:

The HEA requires colleges who receive funding from the National Office for Equity of Access to Higher Education Fund for Students with Disabilities, to submit records of all accessible books created to the Text Access database. Text access only works if all universities regularly update information on resources held by them. While originally individual colleges uploaded their own records to the database, this proved problematic in that the records were often not created by librarians but people working in the disability service and were of varying quality. All records are now sent to the Text Access coordinator (currently UCD's Access Librarian) who uploads the records on behalf of each college.

Step 3 – Contact publisher to request e-text

Following an exhaustive search of current resources, the publisher is contacted and an electronic copy is requested.

A list of publisher contact details for British publishers is available from:

<http://www.publisherlookup.org.uk/>

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A list of publisher contact details for American publishers is available from:

<http://www.publisherlookup.org/>

There is no equivalent directory for Ireland.

As these accessible copies are bound by licensing agreements, colleges have to apply on behalf of each individual student who requires the accessible text.

Legal deposits

Trinity College Dublin has legal deposit privileges in both Britain and Ireland.

Furthermore, DCU, UL, UCD, NUIG, UCC and NIUM have legal deposit privileges in Ireland under the Copyright and Related Rights Act, 2000, which also notes the right of these institutions to receive an electronic copy of the resource.

Where a copy of a book requested under *subsection (1)* is delivered in a form other than an electronic form, the Board or other authorities referred to in *subsection (1)* may request, in addition to that copy, a copy in an electronic form readable by means of an electronic retrieval system and on such request being made a copy in electronic form shall be delivered by the publisher to the Board or authority concerned (House of the Oireachtas, 2000).

There seems to be a lack of awareness on the part of some publishers regarding the rationale for alternative formatting however and there can be delays in the receipt of electronic resources. Furthermore there is confusion regarding who within the institution should request electronic texts for readers with print disabilities. A nationally agreed process between higher education institutes and publishers would be welcomed.

It is important to recognise that the distribution of an electronic text is not the only step in alternative format provision. Resources requested in electronic format are often supplied in formats inaccessible to assistive technology (Quark). Texts must then be adapted to ensure they are properly usable with assistive technologies. In the UK, the Publishers Association (<http://www.publisherlookup.org.uk>) has started working to inform publishers as to the importance of documents having a semantic structure which can be used for navigation by a wide range of assistive technologies. In Ireland also, there is a need to raise awareness of the rationale for alternative formatting, and the principles of accessible information.

Step 4 – Alternative formatting

If it proves impossible to locate an existing electronic copy of the necessary text, or to obtain a copy from the publisher, an electronic copy is produced from an existing printed text. This is always the option of final resort as it is both time consuming and expensive.

The production of alternative formats involves obtaining a print text and removing the spine, scanning material and editing as necessary. Once the electronic text has been created it can be converted to the format necessary and sent on to the student.

In order to reduce the need for future formatting it is good practice to retain the new electronic resource for future use. As such, records should be added to any local archiving systems in the institution and information forwarded to Text Access at regular intervals.

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