



# Enhancing co-creation with people with disabilities: technologies and approaches

## MuselT Recommendations Booklet

This recommendation booklet, addressed to both professionals and policymakers, presents practical guidance and strategic insights for fostering inclusive cultural experiences for people with disabilities. Drawing on MuselT's co-creation projects and interdisciplinary research, it combines actionable recommendations for professionals with evidence-based policy briefs aimed at informing European Union cultural policy.

For professionals, the booklet provides **do's and don'ts** tailored to four key stakeholder groups—technological developers, museums and cultural institutions, performing arts professionals, and Social Sciences and Humanities researchers—translating complex project learnings into clear, adaptable guidance for designing, researching, and delivering accessible cultural experiences.

For policymakers, it offers three concise policy briefs that highlight gaps in current European Union frameworks, propose strategic areas for development, and advocate a systemic, rights-based approach to cultural accessibility. Together, these recommendations support collaboration across sectors, promote Universal Design and co-creation, and aim to ensure that culture is inclusive, participatory, and designed with people, not just for them.

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# Recommendations for professionals

## Introduction

MusElT has developed a set of targeted professional recommendations grounded in its co-creation experiences with people with disabilities.

This section presents a set of professional recommendations written by the MusElT partners that can be used as practical guidance for enhancing co-creation with people with disabilities. The recommendations are clustered by target groups, such as technological developers, museum and cultural institutions, Social Sciences and Humanities researchers, and performing arts professionals, to reflect the different roles and responsibilities involved in designing, researching, and delivering inclusive cultural experiences.

At the same time, these categories are not intended to be rigid: recommendations may move between groups, and responsibilities often overlap. Working with interactive technologies in cultural contexts is inherently a **trans-sectoral process**, requiring close collaboration across disciplines, institutions, and areas of expertise.

To support clarity and practical uptake, the recommendations are presented in a **do's and don'ts format**. This format translates complex project learnings into short, action-oriented guidance that highlights effective practices to adopt (“do's”) alongside common pitfalls to avoid (“don'ts”). Rather than prescribing fixed solutions, the do's and don'ts aim to support reflection, informed

decision-making, and adaptation to local contexts, making them accessible and usable across different professional settings.

Due to its interdisciplinary nature and applied research approach, MusElT formulates recommendations for four key stakeholder groups that play a decisive role in inclusive cultural innovation:

- **Technological stakeholders**, often designing, developing, and maintaining digital and physical technologies that shape access to participation.
- **Museums and cultural institutions**, who act as mediators between heritage, audiences, and technologies, and are central to ensuring that technologies translate into sustainable cultural experiences.
- **Performing Arts professionals**, as this is a field in which MusElT conducted concrete explorations, experimenting with embodied, multisensory, and technology-supported co-creation processes.
- **Social Sciences and Humanities (SSH)** researchers, as they engage in researching cultural participation, accessibility, and disability, and play a key role in shaping ethical, reflexive, and participatory research frameworks.

## For Technological Professionals

### Do

#### 1. Problem Framing and Domain Understanding

- Understand keenly in which domain you are solving problems (human, data, network, computing).
- Grasp the core dependencies for your technology working, and come up with solutions aimed at resolving such constraints.

#### 2. Responsible Use of AI and Advanced Technologies

- Understand the benefits and risks when working with AI, generative or otherwise.
- Understand the engineering complexity, cost impacts, validation metrics, and due diligence involved when leveraging such technology.
- Understanding AI solves specific problems, and is not a replacement for human feedback and compatibility.

#### 3. Collaboration and Knowledge Sharing

- Collaborate closely with people with disabilities but also cultural institutions and Social Sciences and Humanities researchers.
- Frequently ask for advice and input from others involved (including tangentially) on the same problem.
- Be proactive in helping out with roadblocks that arise during the course of the project.

#### 4. Prototyping and Development Strategy

- Prototype early and often.
- Prototype heavily, embracing this as a valid iterative approach.
- Plan properly and don't deviate.

#### 5. Communication and Documentation Practices

- Provide clear and accessible documentation, using where appropriate plain language or other media.
- Adjust language to the listener to make sure they understand what you've implemented.
- Inform and communicate about progress and ideas pretty much non-stop.
- Understand that any documentation you're going to come across is subject to suspicion and distrust. Verify, don't assume.
- Document its tested scenarios and setups.

#### 6. Testing, Validation, and Real-World Use

- Test technologies under real-world conditions and situations.
- Test technologies with real users in diverse contexts to ensure functionality and usability across abilities.
- Test prototypes with diverse user groups. Validate usability and inclusivity by involving participants with varying abilities in iterative testing.

## 7. Accessibility-First Design and Inclusion

- Build solutions that are accessible to the widest range of users, reducing barriers across physical, cognitive, and sensory domains.
- Design with accessibility in mind from the start of development, not as an afterthought.
- Integrate users with lived experience into design teams throughout development, ensuring their views are genuinely heard and acted upon in decision-making.
- Clearly explain design choices, limitations, and opportunities for feedback to build trust with participants.
- Document accessibility features clearly in user guides and technical specifications to support adoption and reuse.
- Ensure that the accessibility of the tools is preserved over time for long-term sustainability

## Don't

### 1. Risky Assumptions and Limited Planning Practices

- Prioritize innovation over usability
- Take domain problems out of the domain; a network problem is a network problem, not a data problem.
- Experiment at the last moment unless otherwise necessary
- Release late.
- Deviate from your strategy unless it's proven to not work.

## 2. Development, Testing, and Deployment Pitfalls

- Late check real-world use cases for your tech setup, especially data-related ones
- Assume things will work themselves out in time
- Use jargon at everyone

## 3. Co-creation, Co-design, and Participation Risks

- Ignore principles of co-creation and co-design
- Ensure that co-creation activities are not limited to advanced tech users; provide alternative formats and entry points.
- Don't treat user involvement as a checkbox exercise, avoid token participation and seek meaningful collaboration.
- Failing to integrate participant feedback undermines trust and reduces the relevance of the technology.

## 4. Accessibility and Inclusive Design Anti-Patterns

- Avoid treating accessibility as an add-on. It must be embedded throughout the design process.
- Don't assume a single mode of interaction (e.g. visual or audio) will suit all users.
- Don't overlook compatibility with assistive technologies, standards, and existing platforms.

## For Museums/Cultural/ Performing Arts Professionals

### Do

- Ensure diverse disabilities and typically excluded target groups are represented among your stakeholders and participants, especially those who face barriers in accessing cultural heritage.
- Design inclusive activities with accessible mobility in mind, making sure participants can easily reach and navigate the location.
- Use thoughtful and inclusive language, paying close attention to wording, as language can be a powerful tool for either inclusion or exclusion.
- Use clear, plain language and targeted support to ensure communication is inclusive for all audiences
- Collaborate with disabled communities in curatorial decisions, including what is exhibited, how it is presented, and how visitors engage with it, and together with them co-create inclusive exhibitions and experiences.
- Provide multisensory alternatives for accessing exhibits, including tactile, auditory, and haptic elements.
- Explore multisensory and interactive methods by reviewing best practices and experiencing existing accessible exhibitions first-hand for inspiration.
- Use creativity to design engaging multisensory interactions, recognising that effective solutions can be simple, low-cost, and highly impactful.
- Train staff in inclusive practices to ensure respectful, informed, and confident visitor engagement.

### Don't

- Assume that any detail is obvious, as even small elements may create barriers or confusion for participants;
- Promise commitments you cannot guarantee, as managing expectations honestly is key to maintaining trust.
- Don't limit access to visual or textual content only, explore multiple sensory formats.
- Don't rely on one-size-fits-all solutions; adapt approaches to different needs and settings.
- Don't treat accessibility as optional or secondary to curatorial or aesthetic priorities.
- Don't assume accessibility requires expensive technology, innovative yet simple tools can dramatically enhance engagement.
- Don't overlook basic access needs, such as legible text size, consistent placement of labels, adequate lighting, and clear pathways.

## Specifically for Performing Arts professionals

### Do

- Provide accessible spaces for performances
- Allow remote performances from comfortable locations
- Support performers with setup where requested
- Provide comfort breaks and accommodate requests for pauses
- Check in on everyone's wellbeing periodically

### Don't

- Take control or expression away from people
- Introduce too much clutter, preventing access

## For Social Sciences and Humanities Professionals

### Do

- Engage people with disabilities from the earliest stages and take care of their valuable opinion.
- Reflect critically on your own personal biases to avoid reinforcing stereotypes or paternalistic approach.
- Engage participants as co-researchers and value lived experience as an essential form of expertise.
- Use inclusive and reflective language that aligns with contemporary disability perspectives and avoids deficit framing.
- Disseminate research in accessible formats to ensure findings reach and benefit diverse audiences.

### Don't

- Hurry the co-creation process: meaningful participation grows through trust and continuous feedback.
- Don't extract narratives or data without reciprocity, ensure participants gain something meaningful from taking part.
- Don't rely solely on academic or theoretical perspectives, balance these with insights from disability communities and practitioners.
- Don't ignore structural and environmental barriers when analysing cultural participation and accessibility.

## Recommendations for Policy Makers

We wrote a set of recommendations to be addressed and disseminated to policy makers from the national to the European levels by all partners.

The first policy brief (09/2024) provides an analysis of current European Union policies related to the accessibility of cultural experiences for people with disabilities, with a focus on the integration of multisensory, user-centred interactive technologies. This brief aims to highlight the urgency of addressing gaps in existing policies and to propose strategic areas for further reflection and development.

The second policy brief (07/2025) draws on the findings from the project together with systematic literature review, to map out the types of data needed, their sources, and associated metadata frameworks. It highlights key challenges and policy gaps, offering actionable recommendations to EU policymakers, aiming to make culture accessible to all. This brief is the two-pages digestible version of a longer version showing how the policy research has been conducted.

The third policy brief (12/2025) calls for a systemic, rights-based approach to cultural accessibility in the European Union. As the EU prepares its next Multiannual Financial Framework and the Culture Compass is now published, the document urges policymakers to move beyond fragmented, project-based efforts and embed accessibility as a democratic and human rights when developing cultural policies and initiatives. Drawing from successful national models and case studies, the brief identifies three critical gaps in

Europe (policy fragmentation, funding disconnects, and weak data infrastructure) and proposes a paradigm shift toward Universal Design and co-creation, emphasizing that culture must be designed *with* people, not *for* them.

All MuseIT Policy Briefs are available here:  
<https://www.muse-it.eu/outcomes/publications>





## Policy Brief - 1 (O9/2024)

### First MuselT Policy Perspectives

#### 1. Introduction

The objective of this policy brief is to provide an analysis of current European Union policies related to the accessibility of cultural experiences for people with disabilities, with a focus on the integration of multisensory, user-centred interactive technologies. This brief aims to highlight the urgency of addressing gaps in existing policies and to propose strategic areas for further reflection and development.

The inclusion of people with disabilities in cultural life is not only a matter of rights but also an essential element of a diverse and inclusive society. The key questions guiding this brief are: How effectively the current EU policies cover comprehensive access to culture for people with disabilities? What gaps exist in the integration of multisensory experiences in policies, and how can these be addressed through future policy development? Key findings indicate that significant progress has been made, especially through the ratification signed by 164 countries - including all members of the EU and the EU itself - of the UN Convention on the Rights of Persons with Disabilities (CRPD) and the European Accessibility Act, but there is room for improvement. We conclude that there are notable deficiencies for artists with disabilities as well as in multisensory integration, sustainability of inclusive practices, and support for technological innovation in cultural accessibility.

#### 2. Policies Overview

Why is it important to talk about it?

Access to culture and cultural heritage for people with disabilities is crucial because it promotes inclusion, self-expression, and the recognition of diverse identities. Cultural participation is a fundamental human right enshrined in the **UN Convention on the Rights of Persons with Disabilities (CRPD)**, which emphasises that people with disabilities should have the same opportunities to enjoy, participate in, and contribute to cultural life as others. **Article 30 of the CRPD** mandates the removal of barriers to cultural participation, stressing that access to cultural venues, materials, and artistic expression is essential for achieving full inclusion in society.

The most important outcome of the CRPD is, nevertheless, the **change in perspective** on people with disabilities: what the signatories of this document have pledged is to shift from a “medical” view of disability to a “social” dimension. **Disability is socially constructed by barriers** (both material and immaterial) **and perpetuated through discrimination and oppression**; it is up to public policies to eliminate them. Physical barriers, obstacles to the accessibility of artistic and heritage products, and limitations related to social, financial, and attitudinal factors are all issues that need to be addressed and solved in the context of cultural life for people with disabilities - especially in regards to people with multiple disabilities. Moreover, talking about cultural rights allows us to broaden the discourse to artists with disabilities: the “*Time to Act*” report of the Europe beyond access project points out that “*the European cultural sector structurally marginalises disabled people as artists and arts professionals [...]*”. Data shows a lack of knowledge about the work of artists with disabilities, and increasing their visibility would mean truly accomplishing what is set up by Art.30 of CRPD.



EU policies play a vital role in realising these rights by setting standards, guiding member states, and funding projects that foster accessibility and inclusivity in the cultural sector. Effective EU policies can bridge existing gaps, promote the use of multisensory and innovative technologies, and ensure sustainable and systematic changes across member states. Without dedicated EU action, the cultural rights of people with disabilities are up to the Member States and risks being overlooked, preventing the realisation of a more inclusive and diverse cultural landscape.

### Existing EU & European-level Policies and Initiatives

We identified the main EU and European-level policies and initiatives concerning the activation of CRPD Art. 30 (and Art. 21 in extension).

- **European Accessibility Act - Directive (EU) 2019/882:** The directive provides a framework for harmonising accessibility requirements across the EU, particularly in digital and audiovisual media. It aims to reduce barriers and costs while ensuring that people with disabilities can fully participate in the digital single market.
- **EU Disability Card:** piloted in eight Member States, the card offers people with disabilities equal access and mainly free admission to cultural venues, a visual and audio guide, sign language tours and information geared towards the visually impaired, thus helping to overcome financial and physical barriers.
- **European Access City award:** Since 2010, the European Commission has organised the Access City Award to recognise EU cities prioritising accessibility for people with disabilities. Criteria scrutinise, among other factors, accessibility to the built environment and public spaces and accessibility to information and communication, including information and communication technologies.

- **Marrakesh Treaty:** The EU's ratification of the Marrakesh Treaty is a significant step towards making published works accessible to people who are blind, with visual impairment, or with a print-disability. However, the treaty focuses primarily on visual impairments, with limited consideration for other sensory modalities.
- **Council of Europe Disability Strategy 2017-2023:** this continuously updated 7-year strategy emphasises the importance of cultural participation for people with disabilities by framing it as a fundamental human right, essential for dignity, inclusion, and active participation in society. The Council of Europe's commitment involves promoting universal design, reasonable accommodations, and assistive technologies, advocating for policies that not only facilitate access but also promote the cultural contributions of people with disabilities as active members of the community. The Council of Europe's strategies are not legally binding for its members.

### Identified Gaps

Looking at the policies presented here in light of Muse-IT's experience, key elements were identified as missing or insufficiently present:

- **Limited Multisensory Integration:** Current policies predominantly focus on singular sensory modalities, such as visual or auditory, neglecting the potential of multisensory technologies that incorporate haptic, kinetic, and other sensory inputs. This gap limits the inclusivity of cultural experiences for those with complex or multiple disabilities.
- **Focusing on Access and Participation to Culture and Cultural Heritage:** The specific needs of people with disabilities in accessing and creating cultural assets are often overshadowed by broader

accessibility initiatives. There is a need for targeted policies that address the unique challenges faced in the context of cultural participation, both from the perspective of the audience and that of creators of culture. These obstacles are not just physical barriers, but include obstacles to the accessibility of artistic and heritage products, limitations related to social, financial, and attitudinal factors, and visibility of the work of artists.

- **Sustainability and Continuity of Inclusive Practices:** Many inclusive practices are left depending on the commitment of specific individuals within cultural institutions, leading to risks of **discontinuation** when these individuals leave. There is a need for these practices to be institutionalised within organisational structures to ensure their longevity.
- **Comprehensive Data Collection and Monitoring:** Existing policies lack robust mechanisms for systematic data collection on the **usage** and effectiveness of accessible cultural services – the CRPD evaluation system depends on the national reports coming in every four years, and states are not required to report on every article. This deficiency hampers the ability to evaluate and improve these services based on real-world data and user feedback.
- **Support for Technological Innovation:** While EU policies promote inclusive participation, there is insufficient emphasis on the co-creation **of** cultural assets with people with disabilities, particularly in the realm of technology. This gap limits the development of innovative tools that could significantly enhance accessibility.
- **Transversality of Universal Design:** The concept of universal design is **not** consistently applied across all cultural systems, focusing in the EU on the ICT and digital universe. This limits the effectiveness of accessibility initiatives to cultural assets, both from the audience and creators' perspective.

### 3. Future reflections

Given the identified gaps, this policy brief proposes the following areas for further reflection and development, paving the way to the final recommendations:

- It is essential to **prioritise cultural accessibility and participation** at the policy level, not by limiting efforts to isolated initiatives, but by institutionalising **these processes through comprehensive EU-level policies**.
- Future policies should include the **integration of multisensory technologies and approaches**, ensuring that cultural experiences cater to a wide range of sensory needs – with a focus on the transversal application of universal design principles. Standards for multisensory experiences in cultural contexts and the promotion of research and innovation in this area are two possible ways forward. Muse-IT is especially active in this domain.
- There is a need for policies that mandate **comprehensive data collection and monitoring of accessible cultural services**. These frameworks should include both quantitative metrics and qualitative insights from users, with a particular focus on understanding the experiences of people with disabilities.
- A significant knowledge gap persists in **understanding the true potential of technological solutions for cultural accessibility and cultural visibility**. Technology and digital options can both improve access to culture and help in developing one's potential as creator and professional. Research and initiatives in this area must be conducted both **systematically and at a granular level**. Analysing existing solutions, their implementation in cultural institutions, and the availability of public incentives remains a central focus for Muse-IT.

## Policy Brief - 2 (O6/2025)

### Development of technologies enhancing accessibility and participation to culture for people with disabilities: a data-centered perspective

#### **Introduction**

Inclusive digital technologies are vital for enabling people living with disabilities to fully participate in cultural life. Data are the foundation of such technologies, shaping how content is accessed, experienced, and personalised. From virtual reality tools to haptic systems, the quality, origin, and structure of data directly influence the outcomes. This policy brief draws on the findings from the MuselT project together with systematic literature review, to map out the types of data needed, their sources, and associated metadata frameworks. It highlights key challenges and policy gaps, offering actionable recommendations to EU policymakers, aiming to make culture accessible to all. This brief is the two-pages digestible version of a longer version showing how the policy research has been conducted.

#### **What type of data?**

Technologies designed to improve accessibility of cultural heritage assets depend on diverse types of data. Some of the most frequently used include 2D and 3D models, environmental and object data, physiological and gesture data, and socio-cultural inputs. For example, 3D models enable the tactile exploration of artefacts via haptic devices, providing access for visually impaired individuals. Similarly, 2D images are essential for AI tools that perform image-to-text conversions. Environmental data supports navigation tools, especially in museums, while object data feed into AR/VR systems to simulate textures or movement. Physiological data support emotion-based interaction, while gesture data enable communication through sign language interfaces. Finally, socio-cultural

data ensure that technologies reflect the lived realities and diverse cultural contexts of users.

The consultation of 10 technological and research MuselT partners confirmed these findings, reporting heavy use of visual data (80%) and metadata (40%). They also highlighted the need to expand data types, such as audio data for descriptions, haptic data for tactile interaction, and multi-layered reading content to support cognitive accessibility. The consensus is clear: data must be varied, high-quality, and adaptable to different sensory modalities to create meaningful, inclusive cultural experiences.

#### **Where does this data come from?**

Data provenance is as diverse as the technologies they support. Common origins include digital archives, sensor-based inputs, and digital platforms such as Europeana/ Common European Data Space for Cultural Heritage. This has been highlighted by 45% of MuselT partners as a key resource of digitised cultural content. Other sources include cultural heritage websites, WikiArt, and open repositories like Wikidata. Environmental sensors and wearables capture real-time physiological and contextual data, crucial for adaptive technologies. Audio recordings and speech datasets are essential for documenting oral traditions and enabling voice-controlled applications. Mobile devices offer location-aware data, supporting spatial navigation tools. Cameras and eye-tracking devices provide information about user interaction and gesture. Moreover, participatory research involving people with disabilities ensures that collected data is relevant, ethical, and user-informed. User-generated content from social media also helps map public engagement and emotional responses to cultural content. Despite the richness of these sources, significant gaps remain. National and proprietary repositories are underutilised, possibly due to access restrictions and/or licensing issues. The integration of these diverse data types is essential to support a range of cultural experiences, but it requires

structured frameworks and clear protocols. Overall, the origin and treatment of data must prioritise inclusivity, accessibility, and co-creation with users.

### How to deal with metadata?

Metadata plays a pivotal role in transforming raw data into accessible, actionable and reusable information. For cultural technologies, it serves three key functions: improving discoverability, enhancing user interaction, and supporting adaptive systems. Accessibility metadata, such as alt-text (alternative texts), captions, or indicators of hazards, enables assistive technologies to tailor content for users with specific needs. Structural metadata informs how content is organised, allowing for easier navigation through digital documents. Contextual metadata enriches understanding by connecting items to broader cultural or historical frameworks. MuselT findings suggest that metadata should go beyond usual descriptors to include emotional, sensory, and semantic layers. For example, affective metadata can label emotional tones of visual or audio assets, aiding users with limited sensory access. Ontologies and semantic models are also crucial to complete and enrich this metadata, enabling reasoning across systems and enhancing interoperability. These tools allow developers to define relationships among users, tasks, and cultural items, offering more responsive and personalised experiences. Crucially, metadata should be standardised and adopted across platforms. Fragmentation in metadata frameworks hinders reuse and consistency. Initiatives like the Europeana Data Model offer a starting point, but an EU-wide standard for accessibility-focused metadata is urgently needed. Rich, human- and machine-readable metadata underpins effective digital inclusion in the cultural domain.

### Challenges in Data collection and use

Despite progress, multiple challenges hinder the collection and effective use of data for accessibility. The diversity of disabilities makes it difficult

to collect data that is representative of all users. For instance, visual impairments vary widely, and co-occurring disabilities further complicate the picture. This diversity challenges the creation of one-size-fits-all datasets. AI-based technologies, especially those using deep learning, require large, high-quality, and diverse datasets. However, existing public datasets are often limited in scope. Developing new datasets through experimental studies is expensive and ethically complex, especially when they aim to simulate stress or emotional conditions. Inter-individual variability adds another layer of difficulty. Cultural data often lacks structure. While digitisation efforts exist, much multimedia content remains unstructured, making it difficult to annotate, index, or reuse. Metadata creation, especially for accessibility, is time-consuming and sometimes beyond the capabilities of automated tools. Ethical concerns also arise when using AI to generate or interpret data, with risks of bias or misrepresentation.

MuselT partners identify inclusive design as the biggest challenge (66.7%), followed by data scarcity and weak metadata standards. Suggestions include the need for policy frameworks that enforce data and metadata standardisation, promote long-term data preservation, and incentivise co-creation with users. A stronger governance structure is necessary to address these interlinked challenges.

### Identified policy gaps

The analysis of data usage in accessibility technologies reveals five critical policy gaps at EU level.

- **Lack of recognition of culture within disability policies:** Cultural participation is not treated as a stand-alone right in EU disability frameworks. Although the EU ratified Article 30 of the UN CRPD, which enshrines cultural rights for persons with disabilities, the European Disability Strategy only references culture under “leisure”. This marginalisation undermines the policy foundation

needed to prioritise technological innovation in cultural access and participation.

- **No standardised metadata frameworks:** While initiatives like the Europeana Data Model exist, there is no standard to take accessibility into account and recommendations or guidelines for incorporating this perspective into existing standards. This lack of standardisation limits the potential for interoperability, enrichment, and reuse of cultural datasets across assistive technologies.
- **Governance gaps for semantic and multimodal interoperability:** EU data strategies focus on FAIR principles, but do not adequately address the complex needs of semantic and multimodal data for accessibility, following CARE data principles.
- **Limited user co-creation:** Despite inclusive intentions, current funding frameworks lack clear requirements for the active involvement of people with disabilities in technology design and data collection: this would help the development to answer to real needs. Mandatory participation quotas could ensure representation.
- **Fragmentation in long-term preservation and reuse of accessibility-enhanced cultural data:** Despite various digitisation initiatives, long-term preservation of enriched cultural data remains inadequately addressed. Existing infrastructures often lack capacity or protocols for storing and maintaining enhanced datasets for future reuse, especially due to the already mentioned lack of standards. The EU could mandate and fund the integration of accessibility-enriched datasets into trusted digital repositories, namely the Common European Data Space for Cultural Heritage.

## Policy Brief - 3 (12/2025)

### Cultural Accessibility and Participation in the European Union

With negotiations underway for the next multiannual European funding programmes and the publishing of the new "Culture Compass," a window of opportunity has opened to embed cultural accessibility and participation for people with disabilities at the heart of the European project. This brief distills expert insights from the MuselT project's activities and policy roundtables into a strategic analysis and a set of targeted recommendations for policymakers.

The core argument of this brief is that a fundamental shift is required: we should move beyond fragmented, project-based and individual-based initiatives to a systemic, rights-based approach to cultural accessibility, strengthening the democratic fabric and shared values of the European project itself. By ensuring that every person can participate in, contribute to, and enjoy culture, we affirm the Union's commitment to a truly inclusive society.

#### 1. A rights-based approach to culture

To build a truly inclusive cultural landscape, accessibility and participation should be framed as fundamental human and democratic rights. This strategic reframing shifts the focus from accommodating specific groups to redesigning our cultural ecosystem to be inherently welcoming for all. It is a matter of ensuring that the cultural offerings co-financed by all citizens are, in fact, available to all citizens, including people with disabilities. This rights-based framework is built on three interconnected principles that expand the definition of access beyond the purely physical:

- **Culture as a vital component of social participation:** Access to culture is a prerequisite for full inclusion and active participation in

society. It is the connective tissue that fosters a sense of belonging and shared identity.

- **Beyond physical access:** Openness is both removing barriers both physical and immaterial. It encompasses the ability to understand content, enjoy services, and participate fully in the cultural experience, from communication and signage to staff training and reception.
- **Informed and independent choice:** A cornerstone of cultural access & participation is providing clear, comprehensive, and accessible information. This empowers individuals to make their own informed, independent, and safe choices about which cultural experiences to engage with, based on their unique needs and desires.

#### 2. Analysis of the current EU landscape: identifying gaps

Despite a shared commitment to inclusion, the current European policy, funding, and data landscape for cultural accessibility and participation is marked by significant gaps that hinder systemic progress. Analysis from the MuselT project's policy briefs, corroborated by expert testimony, reveals a series of interconnected deficiencies that prevent the EU from moving from aspiration to implementation.

##### 2.1. Policy and legislative fragmentation

A persistent gap exists between high-level discourse on "inclusion" and the lack of detailed, long-term EU policy focused specifically on accessibility and participation for people with disabilities. The first MuselT policy brief finds that accessibility is not sufficiently highlighted at the EU level, often subsumed under broader, less actionable terms. This fragmentation is mirrored at the national level in many Member States where a disconnect between ministries for culture and those in charge of accessibility policies hinders the development of a cohesive, cross-sectoral strategy. This fragmentation is cemented by a policy omission: cultural participation is not recognized as an independent right



in European Union disability strategies. This failure to explicitly codify cultural access as a right weakens its standing in policy debates and funding priorities. The new Culture Compass by the Commission proposes a “Report to support Member States in increasing the participation of and support to persons with disabilities in culture” to be ready by the end of 2028: while this a useful initiative, still actions at European level is needed rather than leaving the matter only in Member States hands.

## 2.2. Funding and Implementation Disconnects

Current funding structures contain a critical flaw: user co-creation is consistently “under-supported.” This leads to solutions being designed *for* rather than *with* the very communities they are intended to serve. This disconnect results in a lack of relevance and sustainability. The danger is that excellent initiatives often become dependent on “single people” or short-term project funding. When that person leaves or the funding cycle ends, the initiative ceases, preventing the long-term institutional change, or “institutionalization,” required for sustainable impact.

## 2.3. Deficiencies in data and digital infrastructure

Progress in digital accessibility is being hampered by significant data-related challenges. As identified in the second MuseIT policy brief, these deficiencies form a major barrier to innovation and interoperability:

- Lack of diverse and inclusive datasets needed to train and validate accessibility tools.
- Weak or fragmented metadata standards for describing accessibility features.
- Poor long-term preservation and reuse strategies for enriched cultural data.

The European Common Data Space for Cultural Heritage should be enhanced to better handle other types of data, specifically structured data

on accessibility and participation for people with disabilities. Without a robust data infrastructure, efforts to scale up digital solutions will remain isolated and ineffective. These systemic failures in policy, funding, and data are not isolated issues; they are symptoms of a flawed, top-down design paradigm. Addressing them requires a philosophical and operational shift toward Universal Design.

## 3. The Universal Design: shifting from 'For' to 'With'

Universal Design and co-creation are technical methodologies and part of a mindset needed to move from a paradigm of accommodation to one of genuine inclusion. This approach puts people, in all their diversity, at the very center of the design process. The most important element of this shift is the commitment to designing with people, not for them. This principle directly confronts the flawed practice of creating solutions based on abstract assumptions about a user's needs.

This collaborative process is crucial for bridging the “user-researcher divide.” His experience in projects where researchers struggled to understand users and users struggled to understand researchers underscores the need for deep, empathetic, and sustained engagement. Co-creation is the only way to ensure that solutions are relevant, respectful, and genuinely useful. This human-centered philosophy is also essential for governing the role of technology, ensuring it serves as an enabler, not another barrier. The practical application of this philosophy is already visible in the varied approaches of different national frameworks and leading cultural institutions.

## 4. National Models and Institutional Change: Lessons from the Field

Examining different national approaches and institutional case studies provides invaluable, concrete evidence of both the challenges and successful strategies in implementing accessibility. These examples from across Europe demonstrate how policy frameworks and organizational culture can either enable or inhibit progress, offering powerful lessons for the path forward.



#### 4.1. Contrasting National Frameworks

A comparison of national policies reveals the significant impact of legislative frameworks. The "mandatory" Accessibility and Discrimination Acts in Sweden and Norway give them a distinct advantage over Denmark's less formal, recommendation-based model. This mandatory structure provides cultural operators with clear legal responsibilities and drives institutional action, contrasting sharply with countries like France, which, despite having legislation, is described by experts as "very late" in effective implementation. The key difference lies in enforcement and political will: a mandatory framework transforms accessibility from an option into a core operational requirement.

#### 4.2. Case Study: The Italian experience in practice

Italy provides compelling examples of proactive implementation. The journey of the Teatro Stabile di Torino offers a powerful lesson in organizational learning. They openly admit to starting their accessibility journey with "great ignorance," initially focusing on technology. They quickly learned that real success required building relationships and listening to users *before* implementing any tools. For their first accessible show, *Much Ado About Nothing*, they made a crucial error by forgetting to signal the interval, a powerful and humbling reminder that designing for an experience one has not lived requires deep listening, not assumptions. With this we understand that true accessibility is not about adding a feature but about fundamentally changing perspective to create a museum that "does not leave anyone behind."

#### 4.3. The Necessity of Institutionalization

The most critical lesson from the field is the imperative to internalize and embed accessibility within the institution itself. Professionals agree about the need to build in-house expertise rather than simply outsourcing services. This strategic choice is essential to "effectively change the mentality and the company culture." This strategy of internalization directly addresses the critical flaw of unsustainability identified earlier,

where excellent initiatives cease when a single champion or project grant disappears. By embedding expertise, the institution ensures continuity and transforms accessibility from a fragile project into a core operational value. This deep institutional commitment is the only way to ensure the sustainability and continuity of accessibility practices, making them a permanent part of an organization's DNA.

#### 5. Strategic recommendations for a cohesive European Strategy

Derived directly from expert discussions, the following actionable recommendations for EU policymakers are targeted at key stakeholder groups. Their collective implementation can foster a cohesive, sustainable, and impactful European strategy for cultural accessibility, transforming principles into practice.

- **Institute mandatory accessibility action plans:** all public cultural grants and capital projects funded by the EU should require mandatory, co-designed accessibility action plans. These plans must include measurable targets and be subject to annual progress reporting. This shifts EU policy from aspirational guidelines to enforceable standards, ensuring accountability and turning political will into measurable progress.
- **Elevate Accessibility & Participation to a strategic funding criterion.** Accessibility must become a "mandatory and qualifying element" and a "strategic asset" in high-profile European cooperation projects and initiatives. This sends a powerful signal that inclusion is a non-negotiable component of cultural excellence. Italy's plan to implement this standard from 2028 provides a clear model.
- **Standardize and Support Accessibility Data.** The EU should fund projects to develop core standards for accessibility metadata. Furthermore, it must ensure the European Data Space for Cultural Heritage is equipped to ingest, manage, and make this vital data exploitable, thereby creating the technical foundation for interoperable digital solutions at a European scale.