



Digitalisation and digital transformation in Malta

Implications for persons with disabilities

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Implications for persons with disabilities

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1 Executive summary

The National Strategy for Digitalisation is entitled *Digital Malta 2014-2020*¹ and is the result of a collaboration between the Malta Information Technology Agency (MITA) and the Malta Communication Authority (MCA). The eSkills Malta Foundation is the entity that is responsible for the implementation/coordination of the national strategy. It is the Ministry for the Economy, Investment and Small Business (MEIB), together with MITA and MCA as main actors, that is responsible has the overall governance of the e-Government vision, strategy and associated programmes and has ultimate responsibility for the successful delivery of the ICT programme on the Maltese islands. Among the programmes and initiatives included in the strategy are the e-learning and e-health platforms, building capacity and skills programmes, and initiatives to facilitate access and use of ICT by all.

The Foundation for IT Accessibility (FITA) is the main body that provides services related to digital inclusion in Malta. It is funded by the government through MITA.

As shall be seen in Section 2, most generic or sector specific government-led strategies on digitalisation and digital transformation are not directly tackling disability-ICT-related issues and, although they acknowledge disabled people's right to grow as e-citizens, they provide mostly generic recommendations, such as to promote accessibility and continuous e-skills learning for 'minority' or 'vulnerable' groups.

The National Disability Strategy² does not address digitalisation or digital transformation and opportunities specifically (i.e. as one of its 13 Objectives). However, it addresses aspects of these throughout its various objectives, mainly Objective 2 (Accessibility) and Objective 5 (Access to Information – Audio, visual & literary media).

The National Literacy Strategy for All in Malta and Gozo 2014-2019³ dedicates a whole chapter to children with learning difficulties and disabilities but fails to mainstream disability-related issues in the rest of the document.

The Equality Policy for the Public Service⁴ dedicates a section to persons with disability, where it outlines the government's commitment to inclusivity at the workplace and to implement – as far as reasonably possible – the principles of the Equal Opportunities (Persons with a Disability) Act.⁵ Nonetheless, it fails to oblige the public service to ensure different formats of circulars, such as audio, Easy Read, Braille and

¹ <https://digitalmalta.org.mt/en/Documents/Digital%20Malta%202014%20-%202020.pdf>.

² Parliamentary Secretariat for Rights of Persons with Disability and Active Ageing, National Commission Persons with Disability and The Focal Point Office. 2015. *Consultation Document: The Malta National Disability Strategy*. Available at: <https://activeageing.gov.mt/en/Pages/Malta-National-Disability-Strategy.aspx>.

³ Ministry for Education and Employment. 2014. *A National Literacy Strategy for All in Malta and Gozo 2014-2019*. Available at: <https://education.gov.mt/en/Pages/Literacy.aspx>.

⁴ Office of the Prime Minister. 2013. *Equality Policy for the Public Service*. Available at: <https://publicservice.gov.mt/en/people/Documents/People-Support-Wellbeing/Policies%20and%20Guidelines/Equality-Policy.pdf>.

⁵ Laws of Malta: Chapter 413. 2000. *Equal Opportunities (Persons with Disability) Act*. Available at: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=8879&l=1>.

Sign Language so that employees with disabilities who have difficulty accessing them would not be discriminated against.⁶

The National Strategic Policy for Poverty Reduction & for Social Inclusion 2014-2024⁷ fails to address the barriers encountered by persons with disabilities with regard to digital opportunities, both by failing to mainstream disability throughout the document, as well as by not considering disabled persons as one of the groups most affected by poverty and social exclusion.

The disability NGOs who were approached for the purpose of this report stated that ICT is beneficial for disabled people in their quest for independent living, education and employment. The major barriers they reported consist of limited funding for the access of ICT and related assistive technologies, and the lack of coordination and fragmentation of related services.

Good practices

- The National Strategy for Digitalisation includes initiatives to facilitate access and use of ICT by all, e.g. making free access to wireless internet available in public places such as public buildings, squares and public gardens.
- As a result of FITA's requests for greater emphasis to be placed on accessibility as a criterion for project evaluation, arrangements have been put in place to provide funds for digitalisation efforts to be disability inclusive. These funds are targeted at private enterprises and provide subsidies to support the creation of accessible websites.⁸ The 'Business Re-Engineering and Transformation Scheme', which started in November 2020 and is due to end in December 2023, is available for small to medium-sized enterprises to enable them, among other aims, to make their websites accessible. These enterprises can be awarded a maximum of EUR 5 000, covering 50 % of related costs, once during the running of the scheme.⁹
- The National Literacy Strategy for All in Malta and Gozo 2014-2019¹⁰ is based on feedback from various stakeholders and expert consultative working groups, one of which was the Children with Learning Difficulties and Disabilities working group. As a result of this working group, a whole chapter was dedicated to these children. In the main objectives for Children with Learning Difficulties and Disabilities, there is no reference to digitalisation or transformation, but one of the objectives for youth is specific: "Ensure that persons with learning difficulties and disabilities are helped to improve their literacy skills through bespoke programmes, also through the use of technology" (p. 12). When discussing

⁶ Bezzina, L. (University of Malta and Commission for the Rights of Persons with Disability). 2019. *Systematic Review: Legislation, Policies, Strategies and Guidelines relating to Disability in Malta*. Available at: <https://www.crpdp.org.mt/project-research/past-research>.

⁷ Ministry for the Family and Social Solidarity. 2015. *National Strategic Policy for Poverty Reduction & For Social Inclusion 2014-2024*. Available at: <https://family.gov.mt/en/Documents/Poverty%20Strategy%202014%20English%20Version.pdf>.

⁸ Personal communication from Mr Stanley Debono, FITA CEO, 26 April 2021.

⁹ 'Business Re-Engineering and Transformation Scheme', Malta Enterprise, <http://maltaenterprise.com/reengineering-and-transformation>.

¹⁰ Ministry for Education and Employment. 2014. *A National Literacy Strategy for All in Malta and Gozo 2014-2019*. Available at: <https://education.gov.mt/en/Pages/Literacy.aspx>.

adults, the strategy recommends that, “Persons with learning difficulties and disabilities are helped to access literacy through bespoke programmes, including also the use of technology” (p. 46). The only recommendations that are (directly or indirectly) related to digital opportunities for children with learning difficulties and disabilities are that “Schools are offered more opportunities to invest in resources appropriate for children with learning difficulties” (p. 48); and that “Public libraries [should] offer reading material and software that are appropriate for learners with reading difficulties” (p. 48).

Recommendations

1. MITA: Promote and Implement the mainstreaming of disability issues related to accessibility to, and access and use of ICT.
2. Ministry for Education and Employment: Increase access and training in the use of ICT-related assistive technologies (AT), starting at an early age. Disabled people themselves to be trained and employed as trainers in the AT field.
3. Ministry for the Economy: Increase in funding related to assistive and other enabling technologies.
4. Commissioner for the Voluntary Sector: Increase human and economic ICT-resources to disability-NGOs.
5. Ministry responsible for Research and Innovation: To finance empirical research on the potential and impact of digitalisation and digital transformation on disabled persons.

2 Are government strategies and plans on digitalisation and digital transformation disability-inclusive?

2.1 Disability inclusion in generic strategies on digitalisation and digital transformation

In its Introduction, the **National Strategy for Digitalisation** entitled *Digital Malta 2014-2020*¹¹ states that:

It is essential that the benefits of this nation's knowledge society are enjoyed by every citizen irrespective of age, gender, sexual orientation, disability, education, economic means or race. This will be achieved through intervention to circumvent obstacles. There will be action to enhance digital literacy and social equality, increase access for all and stimulate local content. (p. 8)

This indicates that, in principle, the Strategy aims to reach every Maltese citizen. When discussing the importance of ICT in introducing or bringing back people into the workforce, the Strategy stresses that more needs to be done to provide access and training of eSkills to unskilled citizens including persons with disabilities. Beyond employment, the Strategy is very generic, as can be seen in the paragraphs below. It describes digital technologies as "social equalisers" (p.24) which can make of every citizen a digital citizen enabling them to participate in and contribute to Maltese society.

Among the Actions mentioned in Section 4.3 of the Strategy there are two entitled *Enhancing Digital Literacy and Social Equality* and *Access for All* respectively. Point 4 is dedicated to accessibility and assistive technology:

Internet accessibility standards will be promoted to enable everyone, irrespective of disability, to navigate and access content to access and use of assistive technologies will be promoted and facilitated to help independent living of the elderly and vulnerable groups. This will also stimulate market demand for diverse, affordable technologies. (p. 28)

The above point implies that moving beyond technology that is designed specifically for persons with disabilities, to technology, whether assistive or mainstream, that works for them will have implications for increased use of accessible digital technology as part of transformation.

Points 5 – 9 include initiatives to facilitate access and use of ICT by all, e.g. making free access to wireless internet available in public places such as public buildings, squares and public gardens.

The **National eSkills Strategy 2019-2021**¹² was launched by the eSkills Malta Foundation to complement the Digital Malta 2014-2020 strategy (see above). The vision for the strategy is to digitally enable all citizens and communities in the Maltese islands, to improve services and assist businesses to grow through ICT. The Foundation was set up in 2014 and is the co-ordinator of all initiatives proposed in the strategy. It is made up of various stakeholders from the government, education and industry sectors. "Malta is one of the first countries to have invested in a specific

¹¹ <https://digitalmalta.org.mt/en/Documents/Digital%20Malta%202014%20-%202020.pdf>.

¹² https://eskills.org.mt/en/nationaleskillsstrategy/Documents/National_eSkills_strategy.pdf.

national eSkills strategy” (p. 7) and the Foundation’s coalition model is considered at EU-level as a model of best practice. Notwithstanding this, and although extensive nation-wide research was carried out in order to construct the Strategy, disabled people were only minimally mentioned except to acknowledge that the digital skills gap must be narrowed and that they “should grow as a digital citizen with rights, responsibilities, and abilities to access and use ICT” (p. 24). No specific recommendations emerged from the research regarding disabled persons but there is an indirect proposal to “support minority groups and promote the concept of continuous learning” (p. 79).

2.2 Disability inclusion in focused or sector-specific strategies on digitalisation and digital transformation

1. The National Health Systems Strategy for Malta 2014-2020¹³ suggests “Actions to develop the strategic overarching role of information and communication technology in Health (Health ICT)”. Action 1(a) speaks of the further development of the myHealth and e-health systems by upgrading the myHealth Portal to render it more user-friendly (p. 84). In fact, the myHealth Portal,¹⁴ through which citizens and medical doctors can access health-related data in relation to various health services, demonstrates an Accessibility Statement prepared on 5 June 2019 in accordance with the Accessibility of the Websites and Mobile Applications of Public Sector Bodies Regulations (Legal Notice 89 of 2019, dated 7 May 2019). It also invites users of the myHealth website to provide feedback or complain if the portal is found to fail in complying with the regulations. At the time of writing of this report, there were no complaints presented in this regard.
2. One of the key principles in the Strategic Plan for the Digital Transformation of the Public Administration 2019 – 2021¹⁵ states that “Technology shall be implemented in line with accessibility standards to meet the requirements of persons with differing needs” (p. 22). In Section 2, “Plans for Sector Specific Programmes”, however, there is no direct reference to the disability sector although there are specific plans for the sector related to elderly people. There are indirect benefits for disabled people and their families when it comes to the plans regarding the digital sharing of data amongst various government ministries and entities via online collaborative data platforms. This would prevent disabled people having to undergo multiple assessment processes for different purposes and when accessing different services. The end date for the implementation of this initiative is quarter 4 of 2021 and therefore it is still early to evaluate the outcome of this project on disabled people’s lives.
3. Although the ‘National Research and Innovation Strategy 2020’¹⁶ acknowledges that “ICT plays an important role in R&D and innovation in all sectors by facilitating the development of new goods, processes and services to modernise the economy and transform it to a knowledge-based one” (p. 20), it does not mention persons with disabilities anywhere in the document. This implies that the disability sector is not yet high on the agenda where research and innovation in Malta is concerned. However, given that the Vision of the Strategy aims at “Embedding research and innovation at the heart of the Maltese economy to spur knowledge- driven and value-added growth and to sustain improvements in the

¹³ <https://deputyprimeminister.gov.mt/en/Documents/National-Health-Strategies/NHSS-EN.pdf>.

¹⁴ <https://myhealth-ng.gov.mt/Home/About>.

¹⁵ https://publicservice.gov.mt/en/Documents/MappingTomorrow_StrategicPlan2019.pdf.

¹⁶ <https://mcst.gov.mt/wp-content/uploads/2017/02/National-RI-Strategy-2020-June-2014.pdf>.

quality of life.” (p. 15), it is hoped that the reference to the quality of life means improvements in the quality of life for all, including disabled people. This would indicate the beginnings of mainstreaming disability issues in truly inclusive strategies and policies.

4. “Establishing A Digital Strategy for The Maltese Justice Sector” is an initiative launched in 2020, between the Maltese Ministry for Justice, Equality and Governance and the European Commission for the Efficiency of Justice and is funded by the Directorate General for Structural Reform Support of the European Commission. Resources like guidelines and toolkits prepared by the CEPEJ will be used by the Maltese authorities to put together a Digital Justice Strategy and subsequent Action Plan built on European best practices. The need for the strategy was felt because although discrete digital initiatives had been taken to improve the efficiency of the Maltese justice systems, their implementation was fragmented and isolated.¹⁷ It is hoped that in the consultation process that is to be held with all stakeholders, persons with disabilities and their organisations are approached for first-hand experiences and concerns regarding their right for access to justice. This regards not only their role as users of the system but also as employees within the courts or in prisons. Another possible advantage that can be derived from improved IT systems in the judicial sector, regards the facilitation of disability equality training courses that are provided by the national Commission for the Rights of Persons with Disability to members of the judiciary and employees within this sector. The project “Establishing a Digital Strategy in the Maltese Justice Sector” is rather generic and does not specifically address the accessibility of digital justice systems for persons with disability.

¹⁷ <https://www.coe.int/en/web/cepej/establishing-a-digital-strategy-for-the-maltese-justice-sector1>.

3 Do disability strategies address the potential of and challenges pertaining to digitalisation and digital transformation?

3.1 How digitalisation and digital transformation are addressed in the national disability strategy

The **National Disability Strategy**¹⁸ – which, at the time of writing in April 2021, is still a consultation document – does not address digitalisation specifically (i.e. as one of its 13 Objectives). However, it addresses aspects of digitalisation throughout its various objectives, mainly Objective 2 (Accessibility) and Objective 5 (Access to Information – Audio, visual & literary media):

- Objective 2 – Strategy Initiative 16. Website Accessibility. This Objective dedicates a Strategy Initiative (16) towards websites having disability features. It states that the Foundation for Information Technology Accessibility (FITA)¹⁹ will design guidelines which comprise essential disability features to be available on all websites providing services. Once these guidelines would be agreed upon with the Commission for the Rights of Persons with Disability (CRPD),²⁰ the Parliamentary Secretariat for Rights of Persons with Disability and Active Ageing (PSDAA) and the Malta Information Technology Agency (MITA),²¹ MITA would be responsible for updating government websites while FITA would monitor and audit all state and private websites providing services to the public.
- Objective 2 – Strategy Initiative 21. Airport Terminals. The Strategy envisions that airport terminals will be equipped with the electronic equipment necessary to ensure that persons with sensory disabilities can make use of the Malta International Airport (MIA)²² independently. To this end, the Strategy envisions ongoing meetings between the CRPD, MIA and the Ministry for Transport, Infrastructure and Capital Projects (MTIP).²³ A strategy plan based on Universal Design – and in conformity with MTIP and CRPD guidelines is to be drafted and presented to the PSDAA for implementation discussions with the MIA.²⁴
- Objective 5. This objective recognises that access to media is an important aspect of socialisation, and that persons with disabilities have the right to both access information as well as be represented in a dignified manner. This Objective includes various Strategy Initiatives targeted at achieving this, including:
 - organising training for all persons with disabilities to facilitate their physical, informational and communication accessibility;
 - rendering public broadcasting programmes / television programmes accessible and available for persons with disabilities; organising training to the media sector; and setting up a Standing Committee to monitor media accessibility within the Broadcasting Authority.

¹⁸ Parliamentary Secretariat for Rights of Persons with Disability and Active Ageing, National Commission Persons with Disability and The Focal Point Office. 2015. *Consultation Document: The Malta National Disability Strategy*. Available at: <https://activeageing.gov.mt/en/Pages/Malta-National-Disability-Strategy.aspx>.

¹⁹ <https://fitamalta.eu>.

²⁰ <https://www.crpd.org.mt>.

²¹ <https://mita.gov.mt>.

²² <https://www.maltaairport.com>.

²³ <https://mtip.gov.mt>.

²⁴ Emails to the MIA to obtain further information about this went unanswered.

It is to be noted that, as mentioned in the beginning of this section, the National Disability strategy is still a consultation document (despite being issued in 2015). Furthermore, the Strategy (in its current format) does not detail timeframes or deadlines, nor is there always a clear indication of which entity is responsible for monitoring the implementation of the Strategy and its various Objectives.

3.2 How digitalisation and digital transformation are addressed in specific disability-related strategies

It is to be noted that the **National Policy on the Rights of Persons with Disability**,²⁵ published in 2014, is more or less structured in the same manner as the National Disability Strategy (see section 3.1), and indeed comprises the same objectives with regard to Accessibility and Access to Information.

Regrettably, other sector-specific strategies and policies relevant to the rights of persons with disabilities often fail to comprehensively / address the potential challenges – and, indeed, opportunities - of digitalisation and digital transformation in relation to disability. Below are three examples of such strategies from the sectors of education, employment and poverty reduction.

Education: The National Literacy Strategy for All in Malta and Gozo 2014-2019²⁶ is mentioned here as, while its implementation period has come to an end, there seems to have been no other literacy strategy issued since then and represents a missed opportunity to address digitalisation regarding students with disability.

The Strategy is based on feedback from various stakeholders and expert consultative working groups, one of which was the Children with Learning Difficulties and Disabilities working group. The strategy aims at, among other objectives: promoting concrete measures to ensure social inclusion, a literate community, participatory democracy, bilingualism and biliteracy in Maltese and English, and balanced literacy teaching and learning; and consolidating and integrating existing initiatives and programmes related to literacy. The Strategy also dedicates a whole chapter to children with learning difficulties and disabilities, which comprises multiple objectives including:

- reinforcing the referral system;
- promoting continuous professional development for educators;
- covering a broader spectrum of learning difficulties;
- promoting multisensory teaching;
- providing intensive literacy courses to students with severe literacy difficulties;
- providing support - through classroom assistants - to students who struggle with literacy.

²⁵ Parliamentary Secretariat for Rights of Persons with Disability and Active Ageing, National Commission Persons with Disability and Kumitat Azzjoni Lejn Soċjetà Gusta. 2014. *National Policy on the Rights of Persons with Disability*. Available at: <https://activeageing.gov.mt/en/Pages/Download-National-Policy-on-the-Rights-of-Persons-with-Disability.aspx>.

²⁶ Ministry for Education and Employment. 2014. *A National Literacy Strategy for All in Malta and Gozo 2014-2019*. Available at: <https://education.gov.mt/en/Pages/Literacy.aspx>.

Nonetheless, the Strategy fails to address disability and related issues in other chapters (i.e. it does not mainstream disability throughout the document), including the one dealing with digital literacy. This despite the fact that digital technology can be of great support to students with disability and can provide possibilities to mitigate the challenges they encounter. Thus, while it identifies the main objectives of digital literacy as including, for instance, eContent to be adapted to the literacy needs of the learners at each school, it does not delve into the particular opportunities or requirements that students with different disabilities face when dealing with eContent.²⁷

Employment: The Equality Policy for the Public Service²⁸ was published by the Public Administration Human Resources Office in 2013 and aims to ensure that the public service safeguards the principle of non-discrimination - directly or indirectly – on multiple grounds, including disability. The Policy does dedicate a section to persons with disability, where it outlines the government’s commitment to inclusivity at the workplace and to implement – as far as reasonably possible – the principles of the Equal Opportunities (Persons with a Disability) Act.²⁹ Here the Policy also states that employees with a disability may contact the FITA to benefit from its services.

Nonetheless - where the Policy states that all employees who have access to email will be furnished with an electronic copy of all the circulars issued, while those who do not have such access will be furnished with a hard copy - it fails to oblige the public service to ensure different formats of circulars, such as audio, Easy Read, Braille and Sign Language so that employees with disabilities who have difficulty accessing them would not be discriminated against.³⁰

Poverty Reduction: The National Strategic Policy for Poverty Reduction & for Social Inclusion 2014-2024³¹ was published by the then Ministry for the Family and Social Solidarity³² in 2015, with the aim of providing a framework promoting wellbeing and improving the quality of life, in particular for those at risk of poverty and social exclusion. The Policy identifies older persons, unemployed persons, the working poor and children as the four groups that are at greater risk of poverty and social exclusion. It focuses on six aspects: income / social benefits, employment, education, health and environment, social services, and culture.

The Policy fails to address the challenges / obstacles encountered by persons with disabilities with regard to digitalisation, both with regard to not mainstreaming disability throughout the document, as well as by not considering disabled persons as one of the

²⁷ Bezzina, L. (University of Malta and Commission for the Rights of Persons with Disability). 2019. *Systematic Review: Legislation, Policies, Strategies and Guidelines relating to Disability in Malta*. Available at: <https://www.crp.org.mt/project-research/past-research>.

²⁸ Office of the Prime Minister. 2013. *Equality Policy for the Public Service*. Available at: <https://publicservice.gov.mt/en/people/Documents/People-Support-Wellbeing/Policies%20and%20Guidelines/Equality-Policy.pdf>.

²⁹ Laws of Malta: Chapter 413. 2000. *Equal Opportunities (Persons with Disability) Act*. Available at: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=8879&l=1>.

³⁰ Bezzina, L. (University of Malta and Commission for the Rights of Persons with Disability). 2019. *Systematic Review: Legislation, Policies, Strategies and Guidelines relating to Disability in Malta*. Available at: <https://www.crp.org.mt/project-research/past-research>.

³¹ Ministry for the Family and Social Solidarity. 2015. *National Strategic Policy for Poverty Reduction & For Social Inclusion 2014-2024*. Available: <https://family.gov.mt/en/Documents/Poverty%20Strategy%2014%20English%20Version.pdf>.

³² The Ministry for the Family and Social Solidarity has now become the Ministry for the Family, Children’s Rights and Social Solidarity.

groups most affected by poverty and social exclusion (although it considers physical and / or mental health difficulties as factors that increase the risk of poverty, and also refers to disabled people in sections dealing with income and social benefits, employment and social welfare services). It includes disabled people with “other vulnerable groups” (p. 41) and observes that since the policy cuts across the life course, it also addresses all those who are at risk of poverty and social inclusion, including disabled people.³³

However, the lack of mainstreaming of disability issues in sections of the policy such as those dealing with education leads to the fact that, for example, the document does not mention disability issues when dealing with improving digital literacy.

³³ Bezzina, L. (University of Malta and Commission for the Rights of Persons with Disability). 2019. *Systematic Review: Legislation, Policies, Strategies and Guidelines relating to Disability in Malta*. Available at: <https://www.crpdp.org.mt/project-research/past-research>.

4 Promoting disability inclusion through funding, education and training

4.1 How funding promotes disability-inclusive digitalisation and digital transformation

The Foundation for IT Accessibility (FITA) is the main body that provides services related to digital inclusion in Malta. It was set up in the year 2000 by the government's main technology agency, the Malta Information Technology Agency (MITA) and the National Commission Disabled Persons (KNPD – which has since been renamed as the Commission for the Rights of Persons with Disability) which is also state funded. Therefore, the budget for FITA, including staff salaries, equipment, overheads, costs related to its work and other expenses are funded by government.³⁴

FITA has made requests for greater emphasis to be placed on accessibility as a criterion for project evaluation. As a result of these requests, arrangements have been put in place to provide funds for digitalisation efforts to be disability inclusive and accessible. These funds are targeted at private enterprises and provide subsidies to support the creation of accessible websites.³⁵ The 'Business Re-Engineering and Transformation Scheme', which started in November 2020 and is due to end in December 2023, is available for small to medium-sized enterprises to enable them, among other aims, to make their websites accessible. These enterprises can be awarded a maximum of EUR 5 000, covering 50 % of related costs, once during the running of the scheme.³⁶

Funding is also available through the Malta Community Chest Fund, a non-governmental organisation that operates under the patronage of the President of Malta, for persons with disability to purchase ICT equipment. Recommendations for funding are made by FITA following assessments.³⁷ Relevant devices also include the latest assistive tech, specifically for AAC and information access/mobility for persons with disability. For example, Accent800 device and ORCAM products.³⁸

4.2 How disability inclusion is promoted through the education and training of digital professionals

Following a recent cabinet reshuffle in the Maltese government, FITA now forms part of the portfolio of the Ministry for Research, Innovation and the Co-ordination of Post COVID-19 Strategy (MRIC). FITA is now working within this Ministry to provide training of business owners and digital professionals in order to address the requirements of the EU Accessibility Act. However, as yet no plans have been put in place.³⁹

FITA currently also offers information and consultancy services for private enterprises. These services include:

³⁴ About FITA, <https://fitamalta.eu/news-page-2/about-fita/>.

³⁵ Personal communication from Mr Stanley Debono, FITA CEO, 26 April 2021.

³⁶ 'Business Re-Engineering and Transformation Scheme', Malta Enterprise, <http://maltaenterprise.com/reengineering-and-transformation>.

³⁷ Assessments: Malta Community Chest Fund (MCCF) applications for ICT equipment, <https://fitamalta.eu/fita-services/mccf-reports-and-applications/>.

³⁸ Personal communication from Mr Stanley Debono, FITA CEO, 31 May 2021.

³⁹ Personal communication from Mr Stanley Debono, FITA CEO, 26 April 2021.

- information about the Web Accessibility Directive and steps for implementing accessibility;
- ICT accessibility checklist for websites and advice about creating accessible websites;
- information about digital accessibility and e-commerce.

FITA also offers a certification service for websites to be confirmed as accessible.⁴⁰

4.3 How digital inclusion and accessibility is addressed in the education and training of accessibility and inclusion professionals

There is no such training in place. However, as part of FITA's restructuring within MRIC, efforts are underway for it to have a wider remit which may include training for education professionals.⁴¹ The Department of Disability Studies, Faculty for Social Wellbeing of the University of Malta offers two study-units to undergraduate Occupational Therapy students which cover Universal Design⁴² and Assistive Technology.⁴³ Both study-units include topics related to accessibility. The Department of Communication Therapy, Faculty of Health Sciences also offers one related study-unit entitled Alternative/Augmentative Means of Communication.⁴⁴

4.4 How digital inclusion is addressed via the training of people with disabilities

Since its inception, FITA has been providing training for persons with disabilities to gain and improve their knowledge and skills of using information and communication technology.

The FITA website also states that:

In 2002 FITA had carried out surveys across disability NGOs, which revealed that there is not enough information about what ICT products and services are available to disabled persons. Many individuals also lack the knowledge to make effective use of the technology, even when this is available to them. The study suggested that too often persons with disability give up on improving their ICT skills simply because they assume that no adequate services are available, to suit their needs. Since then, FITA has joined forces with partner organisations in order to help address this gap in service provision with a range of ICT courses.⁴⁵

This is a list of topics that are being covered by online information sessions being held by FITA in 2021:

- introduction to FITA, Computers and Assistive ICT;
- social media such as Instagram, Twitter, WhatsApp, Viber, Snapchat, Pinterest, TikTok, LinkedIn and Facebook;
- useful Keyboard Short Cuts for MS Teams, MS Outlook for MS Windows;

⁴⁰ Accessibility certification, <https://fitamalta.eu/fita-services/consultancy-services/>.

⁴¹ Personal communication from Mr Stanley Debono, FITA CEO, 26 April 2021.

⁴² <https://www.um.edu.mt/courses/studyunit/DBS3001>.

⁴³ <https://www.um.edu.mt/courses/studyunit/OCT4019>.

⁴⁴ <https://www.um.edu.mt/courses/studyunit/CMT3045>.

⁴⁵ Training Courses, <https://fitamalta.eu/fita-services/ict-training/>.

- using the WeWalk navigational aid for improved mobility and independence, (together with ADVICE);
- different email solutions, principles of email use and basic accessibility aspects;
- apps, tablets, smartphones and their use as part of custom accessibility solutions;
- open session meant to address participants' (ICT users with an impairment and not ICT professionals) ICT accessibility queries (generic) using Skype accessibility features for maximum productivity.⁴⁶

Furthermore, FITA provides ICT training for persons with visual impairment which ranges from covering the basic uses of the computer through to ECDL and other specific needs identified for individual users. Training is also provided for persons with an intellectual or communication difficulty. These courses also cover a wide range of topics and include ECDL and the use of social media. The training material used for these courses has been developed by FITA itself. One-to-one mentoring is also provided for individuals with mobility difficulties.⁴⁷

Tech.mt, a Maltese company, is partner in the Erasmus-funded project ICT4Elderly which aims to produce and pilot a training manual for people aged 55 to 74.⁴⁸

⁴⁶ FITA Info Sessions, Schedule for 2021, <https://fitamalta.eu/fita-services/info-sessions/>.

⁴⁷ Training Courses, <https://fitamalta.eu/fita-services/ict-training/>.

⁴⁸ ICT4Elderly, About the Project, <https://ict4theelderly.com/about-the-project/>.

5 The opportunities and challenges presented by digitalisation and digital transformation to the rights of persons with disabilities

5.1 The most significant opportunities presented by digitalisation and digital transformation for persons with disabilities

Digitalisation and digital transformation present great opportunities for persons with various disabilities.⁴⁹

As the chairperson of the Muscular Dystrophy Group Malta⁵⁰ explains, persons with muscular dystrophy – especially those with less movement in their arms and legs – benefit hugely from technologies such as assistive devices and accessible computers. Such technologies enable persons with muscular dystrophy to be more independent, both in their personal lives as well as their work lives.⁵¹

Persons with intellectual disabilities – including those who are not literate – also benefit greatly from information technology, especially in terms of smartphones and tablets, as well as computers. Persons with intellectual disabilities in Malta consider technology as invaluable in their lives, both for educational and recreational purposes. Persons who are not literate are able to make use of the visual and aural aspects of such technologies, thus benefiting as well. Some persons with intellectual disabilities receive support to use such technologies at the Day Centres⁵² they attend, with one Centre also having an offer for their clients to be able to buy tablets at a reduced price and training clients and their parents in the use of tablets.⁵³

Regarding persons with visual impairment, as the secretary of ADVICE - Assistive Devices Visual Impairment Centre,⁵⁴ created by the Association to Assist Visually Impaired Persons in 2015, explains, the Centre was set up in order to mitigate some of the challenges, persons with visual impairment encounter in this area (see 5.2). At the Centre, visually impaired people can also try out a wide range of devices including software that can be downloaded on their computers or smartphones, processes that at times they are unable to carry out on their own. The Centre also assists them with procuring the necessary devices, providing training and support and making the necessary adaptations once they are procured. Regarding the procurement of such devices, the previous president of the country procured tablets for students with visual impairment and ADVICE was able to provide training to the students and their parents. However, this was a one-time initiative.⁵⁵

⁴⁹ Attempts to obtain relevant information with regard to persons with hearing impairments did not prove fruitful at the time of writing this report in April 2021.

⁵⁰ <https://www.facebook.com/Muscular-Dystrophy-Group-of-Malta-147586236823>.

⁵¹ Written interview with Ms Rita Vella, Muscular Dystrophy Group Malta President, 22 April 2021.

⁵² <https://sapport.gov.mt/en/Services/Pages/Day-Service-Current-Centres.aspx>.

⁵³ Callus, A-M. and Bonello, I. 2017. *Over-protection in the lives of people with an intellectual disability in Malta: research findings*. Available: https://www.um.edu.mt/_data/assets/pdf_file/0020/337502/Reportonoverprotectionresearch.pdf.

⁵⁴ <https://www.facebook.com/advicemalta>.

⁵⁵ Interview with Mr Joseph Tabone, ADVICE Secretary, 21 April 2021.

5.2 The most significant challenges faced by persons with disabilities in relation to digitalisation and digital transformation

When it comes to assistive devices for persons with physical disabilities, the president of the muscular dystrophy association explains that the situation in Malta is difficult because of the lack of finances often faced by persons needing such technologies and who do not always have the financial means to procure them. While *Aġenzija Sapport*⁵⁶ – through the Empowerment Scheme – provides some financial contribution towards this, the amounts are small when compared to the costs of such devices.⁵⁷

With regard to persons with visual impairment, before the set-up of ADVICE (see 5.1), persons who have a visual impairment were disadvantaged, compared to other European countries, in the sense that there was little opportunity for them to obtain information (at a shop / agency) on devices and technologies that might assist them. This is further exacerbated by the dearth of research on visual impairment (e.g. on the epidemiology of this impairment) in Malta, which largely depends on European-level research in this regard. Thus, ADVICE provides both a physical place where persons with visual impairments can peruse, try out and obtain support with such technologies and assistive devices (ranging from magnifying glasses to reading devices, verbal glasses and intelligent white canes); as well as a facility / inventory cataloguing all such devices (emanating from other European countries such as France and the UK, as well as other countries outside Europe), developed after research carried out by ADVICE.

However, ADVICE does not have the finances to purchase the devices. It also faces challenges in raising awareness about its work. Furthermore, the fragmentation of voluntary organisations in Malta (not only in the disability / visual impairment field, but also in other areas) poses further obstacles for the work of ADVICE. The existence of approximately five associations of blind / visually impaired persons in such a small country – as well as the lack of a national agency for the blind – poses a challenge both in terms of access to resources as well as unification for the purposes of lobbying and advocating for rights. Lack of coordination, collaboration and support from the government and relevant agencies (e.g. in the areas of education and employment, where there is a need for the re-training of visually impaired persons or those who are losing their eyesight, as well as the need for psychological support) further exacerbates the situation. While ADVICE helps, the voluntary organisation is also limited in the support it can offer. There is a huge need for a holistic approach to services for the community of persons with visual impairment.⁵⁸ Research also shows that there are elements of technology which are inaccessible, including the Voice Recognition Software (which FITA installs for persons with visual impairment) in Maltese.⁵⁹

Participants with physical and sensory impairments who took part in a local research study⁶⁰ recommended that greater investment should be made in the education system, to prepare disabled students for the world of work. This preparation, they suggested, could include training in independent living (including vocational) skills, and

⁵⁶ <https://sapport.gov.mt>.

⁵⁷ Written interview with Ms Rita Vella, Muscular Dystrophy Group Malta President, 22 April 2021.

⁵⁸ Interview with Mr Joseph Tabone, ADVICE Secretary, 21 April 2021.

⁵⁹ Bezzina, L. and Suarez, H. (Inspire and Richmond Foundation) 2018. *Obstacles and Challenges encountered by Oersibs with Disabilities in Malta*. Available at: <https://know-ur-rights.com/research-study-obstacles-and-challenges-encountered-by-persons-with-disabilities-in-malta/>.

⁶⁰ Gauci, M.V. (2018). *Enabling Technology in the Workplace: Exploring the dis/ability-assembly*. PhD dissertation, University of Leeds.

training in technical skills such as in ICT. The provision of AT and related e-skills to individual disabled persons, however, should go hand in hand with the transformation of work environments and practices to make them always more inclusive. The participants in this same study also complained of the lack of specialised professionals not only in the knowledge of AT devices and systems but also when it comes to maintenance and repair. They said that more often than not, it is their peers (with their same impairment) and not professionals, who advise them which AT is available and its advantages and disadvantages, because they become experts through experience. It is because of this situation that it would be recommendable to have disabled AT users of various impairments trained and employed in this sector.

6 Conclusions and recommendations

6.1 Conclusions

It is commendable that in its National Strategy for Digitalisation, Malta specifically mentions the right of access to ICT for all, including persons with disability. It is also positive that there are initiatives, such as providing free internet in its public buildings and spaces, to ensure that this right becomes a reality for all its citizens. However, the main responsibility for the promotion of ICT inclusion (including public sector accessibility) is still mainly in the hands of the Foundation for IT Accessibility or FITA (disability-specific remit) and therefore Malta is still far from the mainstreaming of digital inclusion in all sectors of life.

6.2 Recommendations

1. MITA: Promote and Implement the mainstreaming of disability issues related to access and use of ICT, starting with government entities as an example to the private sector.
2. Ministry for Education and Employment: Access and training in the use of ICT-related assistive technologies as part of early intervention programmes for disabled children in all schools, with the long-term goal of preparing e-skilled adults for the world of work. It is recommended that disabled people themselves are trained and employed as trainers in the Assistive Technology sector (ICT-related and others).
3. Ministry for the Economy: Increase in funding related to assistive and other enabling technologies such that disabled people and their families can have a wide range of availabilities of such technologies. Funding must comprise the training of professionals in the specific sector of ICT-related assistive technologies which Malta is lacking.
4. Commissioner for the Voluntary Sector: Increase support (human and economic resources) to disability-NGOs not only so that they may have fully accessible and updated ICT systems to carry out their work in an ongoing manner, but also to invest in assistive technology access and training for other disabled persons who may not be aware of the benefit that such technologies may grant them.
5. Ministry responsible for Research and Innovation: To consult and involve stakeholders from the disability sector in all its work in a bid to promote digital inclusion for all, also in this sector. Malta lacks empirical research on the potential of digitalisation and digital transformation and its impact on disabled persons. Local innovation projects relating e.g. to the design and manufacture of assistive technologies should be encouraged and prioritised in order to make these tools more available both materially and economically to many more disabled persons allowing them more choice and control over the various aspects of their lives.

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