

Public consultation on digital access to European heritage - Position paper

We, Wikimedia Sverige, welcome the European Commission's consultation on the opportunities offered by digital technologies to the cultural heritage sector.

We're convinced that digital technologies are a decisive factor for the relevance of Cultural Heritage, now and in the future. However, the survey does not address key aspects that we consider central to a successful EU-policy on access to digital cultural heritage. This is why, beyond responding to the public consultation, we wish to contribute to the conversation with a position paper where we would like to reinforce certain aspects as being of great importance to future and improved access to digital cultural heritage.

Our survey response and this paper has been shaped in dialogue with the Swedish Wikimedia community. Wikimedia Sverige has also coordinated with, and contributed to the responses of, the [Free Knowledge Group EU](#) and [Avoim GLAM](#), the Finnish group of the [OpenGLAM network](#). Even if we may differ in details and emphasis, we fully support their responses.

A note on COVID-19, access and inaccess

First a note on COVID-19 as the consultation often refers to the current crisis. The note is that, in regards to access to cultural heritage, what *most have now experienced is what many have always experienced* i.e. that they cannot access and experience cultural heritage, on location or digitally. Because they're too far away to visit, because their broadband connection is poor, because their computer crashes when it tries to open a big 3D-model, because what they're interested in is not exhibited but in storage, because the website of the museum they're interested in doesn't work with their assistive technology, and so on. There are multiple

reasons individuals, even in “normal times”, cannot access cultural heritage or perhaps don’t even feel invited to experience it, even when it’s free.

The issue of and importance of access to digital cultural heritage has not really grown during COVID-19, it’s just that many more people and people with a strong voice in society have now experienced inaccessibility to cultural heritage.

The importance of open practices

Wikimedia Sverige firmly believes that for the public, and the cultural heritage organisations themselves, to fully benefit from the digital transformation it’s essential to increasingly adopt open practices and that citizens and communities are actively invited to participate in the work of cultural heritage organisations.

Open licences and a safeguarded public domain

The vast majority of cultural heritage objects were created by individuals who have been long dead, well beyond the typical Life+70 years requirement for a work to be free of copyright limitations.

We believe it is imperative that what is in the public domain in physical formats must remain in the public domain when represented digitally. This principle is well expressed in [Europeana’s Public Domain charter](#). The principle is also, at least partially, intended to become law as part of the implementation of [Article 14 of the Directive on Copyright in the Single Digital Market](#). We call on the Commission, itself or via Europeana, to monitor the implementation of Article 14 at the national levels and its practical effect on under what terms digital representations of out of copyright works of art are made available. Further, we call on the Commission to require that digital representations of out of copyright works of art resulting from EU-funded projects must be marked in a standards compliant and machine readable way as being in the public domain.

For digital representations of works that remain in copyright, or born digital works, where cultural heritage organisations hold the copyright we call on the Commission to require the use of standards compliant and machine readable licences and to encourage the use of [open licences](#).

Metadata free of copyright

Descriptive, technical, and administrative metadata does not typically meet the criteria of original creation to be considered as falling under copyright. However, leaving the copyright status implicit puts the onus of clarifying the status on the user and prohibits machines from “reading” the copyright status of datasets.

We therefore encourage the EU to when funding digital heritage projects to require that metadata resulting from the funding be dedicated to the public domain via a [CC0 waiver](#) and by doing so explicitly also relinquish the [database rights](#). Without relinquished database rights metadata cannot be imported in bulk to [Wikidata](#), the free knowledge database of the Wikimedia movement.

An extended and harmonised freedom of panorama in Europe

[Freedom of panorama](#) is a prerequisite to comprehensive digitisation of public art and architecture. Conversely, lack of freedom of panorama may negatively impact digitisation, including 3D-captures, of public spaces and monuments. A more permissive and harmonised freedom of panorama in Europe would be beneficial to the digital documentation of public spaces, especially urban spaces.

Open file formats

To facilitate use, reuse, and long-term availability and preservation of digital representations of heritage and of born-digital works we encourage the Commission to, when funding digital projects, require that resulting digital representations of heritage is made available in open file formats. By open file formats we mean file formats unencumbered by patents or is in other ways limited in their use by intellectual property rights.

Open source software

Cultural heritage organisations represent a (comparatively) small market while at the same time having (comparatively) rare and specific functional needs. That type of market structure typically results in customers with a high degree of dependence on a small group of vendors. Cultural heritage is no exception - it's the vendors' market and vendor lock-in effects are often in play.

Given the large proportion of cultural heritage organisations that are publicly funded we would encourage the Commission to support the development of openly sourced alternatives to proprietary softwares aimed at the cultural heritage market. This should in no way be seen as being in opposition to a free market, but an encouragement towards a switch towards one where companies sell services rather than licences.

Open to collaboration with citizens

By OpenGLAM we do not only refer to the work of (some) GLAMs to release their digital collections under free licences or marked as out of copyright. We refer also to participatory practices where GLAMs involve and work with their communities and users. Volunteer contributions are essential to GLAMs, many GLAMs are indeed completely volunteer-driven, and this should increasingly translate also to the digital space - to "digital volunteers".

Digital volunteers can work with GLAMs in many ways e.g. photographing sites, monuments, and protected natural environments, transcribing texts, translating texts, correcting OCR:d texts, translating descriptive metadata, geolocating where photographs were taken, and identifying motifs in images. To name but a few!

The Wikimedia movement's [GLAMWiki community](#) is already active in such collaborations and eager to participate in more.

The importance of digital fundamentals

The survey questions focus almost exclusively on 3D-technologies and immersive experiences. While these are technologies that are currently riding high on the hype cycle, and may well become more important in the future, the vast majority of GLAMs are still working to get their digital fundamentals right.

We believe it is important that the EU and the Commission consider these fundamentals as being equally important as technologies in the vanguard. The tip of the pyramid needs a strong base to stand on.

Persistent identifiers

Link rot remains a major issue when linking to or citing digitised cultural heritage resources. All too frequently links from other online resources to digitised cultural heritage resources lead only to a missing page. This issue is of great importance to the Wikimedia community, and to everyone for who wishes to link to or cite web resources, who rely on authoritative sources when eg. writing Wikipedia articles or adding objects to Wikidata. It's also harmful to the cultural heritage organisations themselves, negatively affecting discoverability and use of their web resources.

Consistent, correct, and standards compliant rights statements

Large amounts of digitised content is still published with unclear or undeclared copyright status. While this has partially been alleviated through the good works of many - including the EU-funded Europeana initiative - the issue is not solved.

Claiming copyright over faithful digital reproductions of works that have long since passed into the public domain also remains common. We encourage the Commission to follow-up on the implementation of Article 14 of the Directive on Copyright in the Digital Single Market and give preferential treatment in funding projects that adhere to it.

Shared linked open data vocabularies

While there has been great progress in aggregating the digital collections of European heritage organisations on the national, thematic and European levels the aggregations suffer from poor discoverability as a result of semantic non-interoperability and poor multi-lingual discoverability and display (see also below).

We suggest that greater emphasis should be given to overcome this issue in the EU's funding programmes, supporting the creation of interoperable vocabularies and authorities that cover all the official languages of the EU and potentially all minority languages as well. This would in most cases not require creating new vocabularies, but the extension of the language coverage and increased interlinking of existing ones.

Finally, we suggest that the Wikimedia-provided Wikidata platform and its volunteer community are key components in overcoming this issue and we would welcome GLAMWiki-collaboration in this regard.

Multilingual discovery and access

With 24 official languages in the EU, and many more minority languages and languages represented in heritage materials, multilingual discovery and access is very far from a solved problem. We would therefore like to reinforce the importance of language technology, as well as curation and contextualisation, to truly make heritage findable and understandable across language barriers. Linked data vocabularies is a key technology in this as it allows a clean separation between the identifier of a thing and its label and synonyms in multiple languages.

We encourage the Commission to look into ways to combine development of language technology and discoverability and accessibility, including accessibility for users with disabilities, of cultural heritage resources. Further, we urge the Commission to in particular grant support to the development of highly multilingual and linked open data compliant cultural heritage vocabularies, authorities, and thesauri. Starting from such existing resources it would be one of the quickest and most efficient ways to improve cross-language discoverability and semantic interoperability of digitised cultural heritage collections.

Accessible and usable web services

Digital cultural heritage is of little value if it cannot be made available so in an accessible fashion. The [EU Web Accessibility Directive](#) has now been in force since 2016 and the implementation period is approaching its deadline. Yet even a cursory review of the web services of publicly funded cultural heritage organisations would reveal a high proportion of non-compliance.

We encourage the Commission to, itself or via the Europeana DSI, monitor and follow-up on web accessibility compliance within the sector.

The importance of local heritage and “small stories”

Numerically, the large majority of cultural heritage organisations are local, small and often volunteer driven. It's the local history or archaeology society closely connected to the community that is the most common touchpoint with heritage for many European citizens. Small, local and volunteer driven cultural heritage organisations are in great need of support, financial and professional. This includes support to digitise their collections - in a very cost-efficient manner - and to “digitise” their people, to record and document personal stories and local histories before they are gone.

We encourage the Commission to consider how it, and resource-rich national heritage organisations, can better support the digital development of local and small cultural heritage organisations (including perspectives and experiences of minorities and under-represented social groups).

The importance of capacity building

Digital transformation is not only a technological challenge, different technologies will always come and go. Intelligently adapting them and utilising them in heritage requires a higher level of in-house digital knowledge, know-how, and organisational preparedness than what is typical

now. This is of far greater importance in the long-term than focused R&D on specific technologies.

We encourage the Commission to not focus as much on specific technologies, be they 3D or something else, but to encourage and fund digital capacity building in the cultural heritage sector with a focus on the tactics and practices of leading and responding to digital transformation.