



**Submission re. (56) (d)**  
**Copyright and Innovation, A Consultation Paper, Dublin 2012**

ChildVision is the only educational centre for blind children in Ireland. Two departments in particular are affected by current and future copyright legislation on a day-to-day basis, the National Braille Production and the Children's Library.

**National Braille Production**

The National Braille Production Department at ChildVision (formerly National Braille Production Centre at St. Joseph's Centre for the Visually Impaired) is a recognized agency and the only body in Ireland for the transcription textbooks and educational material for all children with a registered visual impairment in the Republic of Ireland. It is fully funded by the Department of Education and Skills. In March 2012, the number of children availing of this service is 570 with an upwards trend. The textbooks are transcribed into braille, large print, text-only word files and DAISY files (mp3 format which combines text, graphics, audio and easy navigation for the user).

Alternative formats are produced by extracting the text content (for braille production and text only files) or text and graphics content (for large print and DAISY production). This can be done in-house, but fast scanning and the creation of a pdf from the original print copy. Alternatively publishers make the pdf of a book available to the NBP. Once content is extracted, it is transcribed into the different formats by highly skilled transcription and braille production staff.

Since its foundation in 2000, the NBP has sought copyright permission for each individual book title from educational and other publishers. Although under section 104. (Provisions of modified works) not strictly necessary for

St. Joseph's Centre for the Visually Impaired, trading as ChildVision, Gracepark Road, Drumcondra, Dublin 9.

Tel.: +353 1 837 3635 email: [info@childvision.ie](mailto:info@childvision.ie) [www.childvision.ie](http://www.childvision.ie)

Registered in Ireland: 453711 Registered Charity No.: CHY 817. Registered Office: 2/3 Terminus Mills, Conskeagh Road, Dublin 6, Ireland

Directors: Anthony Bates (Chairman). David Myers. Patrick Pierce. Desmond Kenny. Alan Crosbie. Maureen Mulligan.

Aoife Thornton. Anthony Slein. Catherine Ryan.

each case, this process has been continued throughout, because of the following reasons, which are reflected in the proposed new 104A and 104B:

1. Accountability

Creating a track record for both the publisher and the transcriber when copyright permission was agreed for which title (and whether there were any additional conditions attached to the agreement).

This would tally with the proposed 104B. (6)

2. Multiple copies of a master

Arrangements have also been made with publishers about how to report back about formats required and number of copies.

3. New formats and emerging formats

New formats (i.e. text files, DAISY) have emerged, that are sent to the users in electronic data form, which was not the case when the NBP's service started in 2000.

## **The ChildVision Children's Library**

The ChildVision library stocks leisure reading material for blind and visually impaired children and young people living within the republic of Ireland. Our members range in age from 2 years up to 22 years. The library stocks just over 700 titles in Braille, Large print, audio and tactile formats, to cater for the diverse needs, and interests of our members.

Most of the library's Large print and braille books are purchased from charity organisations in the U.K. however the cost of these adapted books can be prohibitive with a basic large print book (no pictures) costing GB £50, 8 to 10 times more expensive than the regular print version. Also as these organisations are catering for the British market there is an absence of books of Irish interest or by Irish authors available. The library is commencing the conversion of our current large print stock into digital (DAISY) and Braille format, so that these titles are more accessible and easier to adapt to the individual needs of members. The library is also working to expand our collection of Books of an Irish interest and therefore seeks copyright permissions from publishers to do so.

St. Joseph's Centre for the Visually Impaired, trading as ChildVision, Gracepark Road, Drumcondra, Dublin 9.

Tel.: +353 1 837 3635 email: [info@childvision.ie](mailto:info@childvision.ie) [www.childvision.ie](http://www.childvision.ie)

Registered in Ireland: 453711 Registered Charity No.: CHY 817. Registered Office: 2/3 Terminus Mills, Conskeagh Road, Dublin 6, Ireland  
Directors: Anthony Bates (Chairman). David Myers. Patrick Pierce. Desmond Kenny. Alan Crosbie. Maureen Mulligan.

Aoife Thornton. Anthony Slein. Catherine Ryan.

## Submission

The following would make the work of both the NBP and the Children's Library at ChildVision more effective for children with a visual impairment:

1. Permission to exchange master copies of alternative format texts with other recognized agencies (both national and international)
2. Clarification on and inclusion of e-alternative-formats in copyright permission under the new section 104.
3. Clarification on copyright granted for ALL elements of a textbook (including pictures etc.), so that publisher does not have to refer back to individual copyright holders whose work was included in textbook.

**ChildVision supports the reproduction for persons with disabilities, as permitted by EUCD, to be incorporated into Irish law. However, as for the definitions of disability, the relevant one for ChildVision services is visual impairment and/or print disability. The experience and international professional exchange over the last few years has shown that the category of "print disability" has been very helpful for partner organisations in the UK to further and simplify the provision of accessible material to people who need it.**

ChildVision, Dublin, 12.04.12