

Submission # 94

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How would you define the stakeholder community or communities to which you belong?

Civil society

Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?

IFLA and its members welcome the opportunity to respond to the UNESCO second consultation for Defining Internet Universality Indicators. You will find below a mixture of general comments and specific suggestions on indicators, as requested in the questions in the consultation. On an overall level, it will be important to be clear about how, and by whom, the results may be used. While there is not necessarily the intention to compare countries (although it is only in looking across the board that it becomes possible to establish stand-out results for one country or another), a number of indicators already benchmark a given country against others. Certainly, the development of some sort of index could be a powerful tool for driving change, but at the same time may reduce take-up of this work. More specifically, it would help to define more clearly what is understood by freedom of access to information throughout. Occasionally it seems to refer to government information, but just as often, it could be taken to mean access to broader knowledge. For IFLA, while access to government information is crucial for achieving many goals, the Internet is about much wider access. We could also define 'government' more clearly – is national, regional, local or something else intended in each case? Finally, we also need to take care about 'indicators' which do not allow us to measure – sometimes the questions are more like observations. For example, the indicator for Multistakeholder, B4, is the source, not what a researcher would be looking for within the source. The same would go for Rights-Based, E4.

1. Are there any additional themes, questions or indicators which you believe should be included in the framework?

Aware of the need not to expand the framework unnecessarily, and so risk diluting its effectiveness

by

making things too ambitious, we do not propose any major new themes. Instead, there are ways in which,

we hope, it will be possible to gain added insights from existing data through small changes and additions at

the indicator level (or even within this).

One example would be the subject of information poverty. What picture can we draw, from the data collected, of the number and nature of the information poor in a given country. Household surveys can help,

although of course are expensive and time-consuming. An easier means of doing this is to ensure that

indicators help identify those who are missing out. Means of doing this could include:

- Including poverty rates in the Contextual Indicators section

- Including an indicator of support to people who aren't online in accessing government services (Rights-Based, D4).

- Going into more depth in the question about perceived barriers to going online (Accessible, B4). Certain factors should be made explicit, and so explored, such as cost, lack of interest, or fear.

- Taking a more comprehensive view of the characteristics of different age groups in Accessible, D3 –

rather than just compare the old to the young, look at a range of age groups, in order to make it easier to understand who is missing out.

- Have a focus on the low-skilled. For example, Accessible, F3 only focuses on the high-skilled.

We

should also look to explore what share of the population is not able to use the Internet, in line with the overall desire in the 2030 Agenda to leave no-one behind.

We are also keen to ensure that the role of language is well reflected in the framework. This could be done

in the following way:

- C4 (Rights-Based) – given that not providing information in a language national residents cannot understand has a discriminatory effect, it should be considered in this indicator.

- F2 (Rights-Based) – we would encourage inclusion of differences in Internet use by different language groups, as well as between communities/ethnicities.

- C5 (Open) – we would encourage mention of regional or language-based services. Also, under theme

C, we should consider language as an issue to bear in mind for making open access meaningful. In E2, we should also refer to whether governments have taken a responsibility to promote minority languages.

We should ensure that questions about skills and confidence are mainstreamed throughout the survey, and

that here in particular disaggregated data is sought.

Finally, we would strongly recommend that the need for effective digital preservation policies, as already

promoted by UNESCO's PERSIST initiative. Governments should themselves make sure that the documents

they public are not only freely available online, but should also be authenticated and subject to a serious

long-term preservation policy. Libraries and cultural heritage solutions must be empowered – through

copyright exceptions as appropriate – to preserve the digital historical record.

It is important that the section on the right to participate in cultural life (Rights-based, F) not only underlines

the importance of encouraging digital creativity, but also explicitly underlines the human right to benefit

from the results of scientific research (UDHR, Article 27a).

Finally, the last sections could be enlivened with something more positive, such as asking if they are

optimistic about the future of the Internet in their country. We understand that this might require survey work, and so not be practical in all cases. Expert views could provide an alternative.

Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?

Among the indicators already chosen, there is still a strong variation in the types of information sought, from the existence of a policy, to whether it is enacted, to whether it is being used. Within the 'Open' section questions E1 and E2 are models in this regard, containing all three elements. Where possible, this should be systematically replicated across policy-related questions. We recognise that this is difficult, but it will provide additional value, beyond questions about numbers having undergone training for example (Rights-Based, A4). The risk otherwise is that this tool encourages a formalistic, rather than an outcomes-focused approach to Internet governance and policy. An issue that is currently gaining in prominence is the degree to which it is not governments but platforms which are carrying out filtering or restriction. Questions focusing on restrictions, such as Rights-Based B3 and C2 should bear this in mind. Another controversial issue is the Right to be Forgotten, currently the subject of a number of court cases. We should decide what sort of right to be forgotten system we want (i.e. there is a right, but it must be properly balanced with the public interest. In the Openness section, as has already been shared, there are concerns about reference to intellectual property. Indeed, this is one of the legal frameworks that must be updated for the digital (A1). Similarly, we would suggest that looking at whether there are digital-ready exceptions and limitations to copyright might say more than just enforcement. A2 also could also be expanded to include individuals, and not just governments and businesses.

On public access (Accessible, A5), we would recommend a move away from suggesting that public access is a poor-man's Internet. In the transition countries of central and Eastern Europe, it is noticeable that even as home Internet access has increased, the use of public Internet access in libraries has stabilised. Among the indicators, the second should focus just on the number of libraries and other places offering access, rather than comparing this to anything. A further indicator could be of the number of places offering the necessary technology to get online. Any further comparisons (with the numbers of people offline, those with low skills, or simply the poor in general) can then be left up to the reader. Linked to this, we would recommend including libraries in the list of institutions offering ICT training (Accessibility, F1), especially given their role in providing support to people throughout their lifetimes, rather

than just in their years of formal education. Libraries should also be included in Cross-cutting, C7. We strongly appreciate the inclusion of media and information literacy as a subject (Accessibility F2). On access for people with disabilities (Accessible, D5), we would recommend also looking at the overall proportion of websites (or perhaps the share of the X most visited sites) which are accessible, regardless of whether they are governmental or private. We would also recommend a focus on what programmes are in place through governments (and so not just laws and regulations), to help people with disabilities access and use the Internet. On local content, we would recommend including not just local language content on major sharing sites (Accessibility, E5), but also the growth of local services – including apps – which respond to local concerns and/or are in local languages. We recognise some of the concerns expressed about using Wikipedia articles as a measure of local content (Accessible, E2), although note that this remains a relatively simple way of measuring volumes of local content, and note the efforts of the Wikipedia movement to broaden the range of content included.

What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?

The process of expert consultations in the pilot programme seems very positive. Further information on how UNESCO will select its experts will be valuable, not least in order to show transparency. Experience from other organisations carrying out such ambitious research shows that this can be useful. The International Federation of Library Associations and Institutions is publishing its Library Map of the World, which includes information on numbers of libraries giving access to the Internet. This data, based on contributions from library associations and experts, could make a useful contribution. We also recommend working with other stakeholders to ensure that Internet Universality aspects are mainstreamed in broader data collection practices. For example, the OECD's PISA study could include digital and information literacy skills.