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# National disability strategies as rights-based cultural policy tools

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## ABSTRACT

A growing attention to cultural participation of people with disabilities has been propelled by the entry into force of the UN Convention on the Rights of Persons with Disabilities (CRPD). Being strictly connected to the implementation of the CRPD, the focus on cultural participation of people with disabilities has accrued outside the remit of national cultural policy. This article carries out a thematic analysis of national disability strategies across 27 Member States of the European Union plus the UK and explores the extent to which these strategies can be considered rights-based cultural policy tools. It identifies four themes recurring across those strategies: enhancing accessibility of cultural heritage, cultural institutions and cultural content; supporting persons with disabilities as creators of culture; awareness-raising about cultural participation of persons with disabilities; and protecting disability identity and culture. It then discusses the measures linked to these themes that national disability strategies adopt. On the whole, this article argues that national disability strategies can be, to varying degrees, considered cultural policy tools, and display significant rights-based elements. It concludes with reflections on the broader implications of those findings for cultural policy.

## ARTICLE HISTORY

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## Introduction

Participation of people with disabilities in cultural life has been long neglected. Only relatively recently has culture been deemed essential to combat marginalisation of persons with disabilities in society. Tatić posits that participation in culture is ‘one of the essential dimensions of life, both for persons with disabilities and for those without disabilities’ (Tatić 2015, 6). In a similar vein, it has been suggested that participation in cultural life not only results in the inclusion of persons with disabilities into society, but is also a means to challenge stereotypes, to pursue their self-realization and recognition, to obtain acknowledgment, or to otherwise improve their overall quality of life (Bantekas et al. 2018, 874).

The growing focus on cultural participation of people with disabilities has been propelled by the entry into force of the UN Convention on the Rights of Persons with Disabilities (CRPD) in 2008. The CRPD is a ground-breaking human rights treaty that reflects a conceptualisation of disability based on the social model (Kanter 2015), or socio-contextual model of disability (Broderick 2015). In that, it construes disability as an ‘an interactive process between persons with impairments and societal barriers’ (Broderick and Ferri 2019, 3). Furthermore, the CRPD epitomizes the ‘human rights model of disability’, placing emphasis on dignity of persons with disabilities and inclusive equality (Quinn and Degener 2002; Degener 2017; CRPD Committee 2018), and making clear that persons with disabilities

are holders of the whole panoply of human rights (Degener 2016a). In fact, the CRPD, alongside civil, political, economic and social rights, provides for the right to participate in cultural life in Article 30. The latter provision stipulates *inter alia* that:

1. States Parties recognize the right of persons with disabilities to take part on an equal basis with others in cultural life, and shall take all appropriate measures to ensure that persons with disabilities:
  - a) Enjoy access to cultural materials in accessible formats;
  - b) Enjoy access to television programmes, films, theatre and other cultural activities, in accessible formats;
  - c) Enjoy access to places for cultural performances or services, such as theatres, museums, cinemas, libraries and tourism services, and, as far as possible, enjoy access to monuments and sites of national cultural importance.
2. States Parties shall take appropriate measures to enable persons with disabilities to have the opportunity to develop and utilize their creative, artistic and intellectual potential, not only for their own benefit, but also for the enrichment of society.
3. States Parties shall take all appropriate steps, in accordance with international law, to ensure that laws protecting intellectual property rights do not constitute an unreasonable or discriminatory barrier to access by persons with disabilities to cultural materials.
4. Persons with disabilities shall be entitled, on an equal basis with others, to recognition and support of their specific cultural and linguistic identity, including sign languages and deaf culture.

Article 30 CRPD should be interpreted in light of the overall aim of the Convention, which is that of ensuring that persons with disabilities enjoy their rights on an equal basis with others. It should be read in conjunction with other principles and rights contained therein, in particular Article 9 CRPD on accessibility, whereby accessibility constitutes a precondition to realising the right to participate in culture (CRPD Committee 2014) and applies to heritage, as well as cultural goods and services. The implementation of Article 30 CRPD also tallies with the realisation of Articles 8 (Awareness-raising), 21 (Freedom of expression and opinion, and access to information), and 19 (Living independently and being included in the community).

Being strictly connected to the implementation of the CRPD, the focus on cultural participation of people with disabilities has accrued outside the remit of national cultural policy, which is usually defined as the sum of a government's activities 'with respect to the arts (including the for profit cultural industries), the humanities, and the heritage' (Schuster 2003; Mulcahy 2006; Hylland 2020; Betzler et al. 2021). In particular, measures to foster cultural participation of people with disabilities have been mostly part of disability policy, which includes a cross-cutting range of soft law measures that aim to ensure equality for people with disabilities and respect for their rights, complementing legislative non-discrimination measures and other hard law instruments that protect disability rights (Ferri 2021). At the national level, the primary disability policy tool which supports the implementation of the CRPD have been national disability strategies (Flynn 2011). The term national disability strategies is used as an umbrella term to encompass an array of policy documents termed as strategies, or action plans, or other policy plans that 'set out how people with disabilities are to be included in domestic society as fully participating citizens through measures to improve access to education, employment, transport, housing, income, personal support, etc' (Flynn 2011, 1).

Against this background, this article carries out a thematic analysis of national disability strategies across 27 Member States of the European Union (EU) plus the UK and explores the extent to which these national disability strategies can be considered rights-based cultural policy tools. It is acknowledged that 'culture' is a complex concept (Riddell and Watson 2003) and that international human rights law, including Article 30 CRPD (Broderick and Ferri 2019), views culture as 'a broad and inclusive concept encompassing all manifestations of human existence' (UN Committee on Economic, Social and Cultural Rights 2009, para 11). This contribution, however, focuses primarily on how disability strategies address access to and participation in creative and arts practices – understood as 'practices associated with different art forms, including literature, dance, music, theatre, visual arts and so on' (Caust 2019, 17) – and heritage.

In that regard, the article, while embracing the 'human rights model of disability' standpoint, identifies four main themes recurring across national disability strategies: enhancing accessibility of cultural heritage, cultural institutions and cultural content; supporting persons with disabilities as creators of culture; awareness-raising about cultural participation of persons with disabilities; and protecting disability identity and culture. This thematic analysis supports the discussion on the extent to which disability strategies can be considered cultural policy tools specifically aimed at promoting the dissemination, marketing, and consumption of the arts *for* and *by* people with disabilities, and the production of cultural goods expressing the distinct cultural and linguistic identities of persons with disabilities. In that regard, the thematic analysis also allows to understand whether disability strategies can be conceived of as *rights-based* cultural policy tools, aligning with the recent trends in cultural policy highlighted by Baltà Portolés and Dragičević Šešić (2017). Those authors suggest that 'cultural rights have become an oft-cited rationale for cultural policies', and have in certain contexts even replaced or complemented the economic and social rationales of cultural policy (Baltà Portolés and Dragičević Šešić 2017, 160), while still building on the long-standing idea of democratisation of culture (Evrard 1997). In a similar vein, Vickery (2018, 6) looked at rights-based cultural policy as developed at international level, and submitted that a rights-based approach implies 'a range of obligations generally absent from traditional cultural policy'.

Following this introduction, we first discuss national disability strategies, and then outline the method used for their analysis. We then present our thematic analysis and its results.

## National disability strategies

As already noted above, we use the term national disability strategies to embrace an array of policy documents – usually termed as strategies, or action plans, or plans – that 'set out how people with disabilities are to be included in domestic society as fully participating citizens through measures to improve access to education, employment, transport, housing, income, personal support, etc' (Flynn 2011, 1). These documents coordinate and lay down policy on disability at national level 'by highlighting areas which will be at the forefront of government action' (EU Fundamental Rights Agency 2014). Simply put, national disability strategies are 'guides as to how the law and policies [on disability] will be put into place nationally' (PeerConnect 2021).

While such strategies are not a novelty (Flynn 2011, 1), their number has grown significantly after the entry into force of the CRPD in 2008. Namely, although disability policy plans predate the CRPD, the adoption of a national and comprehensive strategy has become more frequent after 2008. According to McCallum, national disability strategies are 'one of the best steps that countries can take' in pursuing the aims of the CRPD (McCallum 2011, xvii). Flynn recognises national disability strategies as a 'key ingredient in embedding the dynamic of change envisaged by the CRPD at the domestic level' (Flynn 2011, 2). The CRPD does not explicitly require the State Parties to adopt a national disability strategy (Lorion 2019, 243) – although such an obligation was proposed during the drafting process (UN Enable 2015). However, the CRPD Committee continuously reiterates the pivotal place of national disability strategies in bringing the CRPD to life (Lorion 2019, 255; Broderick 2018, 92). Lorion found that out of 55 Concluding Observations issued at the time of writing their

article, the CRPD Committee raised the issue of a national disability strategy in 28 of them (Lorion 2019, 255). Indeed, some scholars consider the adoption of such strategies ‘an implied obligation on states’ (Flynn 2011, 3). In this regard, it can be argued that the CRPD indirectly requires the adoption of national disability strategies and sets ‘itself as a blueprint for domestic action plans designed to promote and protect the rights of people with disabilities’ (Flynn 2011, 1).

The ‘human rights model of disability’ that underpins the CRPD (Degener 2016b; Lawson and Beckett 2020) acts as a ‘roadmap for change’ (Degener 2016b) and should inform these strategies. As Lawson and Beckett observed, the prescriptive nature of the human rights model requires the progression of disability law and policy ‘in line with human rights and principles, as set out in the CRPD’ (Miller and Yúdice 2002, 364). Furthermore, to comply with the CRPD, national disability strategies should be designed as ‘comprehensive, coherent and long-term’ documents and include ‘clear timelines, benchmarks and budget allocations’ (CRPD Committee 2019, para 6). Given the emphasis in the CRPD on positive measures, with the State Parties required to respect, protect and fulfil the rights of persons with disabilities, national disability strategies should also make sure to include detailed policy measures. As O’Cinneide suggests, the CRPD ‘adopts a particular conceptual view of the state’s role in securing individual rights’ which requires states not only to refrain from abusing individual’s rights, but rather ‘to play an active role in creating the social conditions necessary for individuals to be treated with dignity’ (O’Cinneide 2009, 164). Specifically, with regard to cultural participation, the UN Human Rights Indicators on Article 30 CRPD highlight that such strategies should, *inter alia*, include specific measures on participation in cultural life of persons with disabilities; on the accessibility of public libraries and their stock of accessible materials, as well as on the collaboration with publishers, libraries, education institutions, and universities; on accessible and inclusive facilities, programs and activities for persons with disabilities in areas such as theatre, dance and music; and on access to cultural, heritage and touristic sites (OHCHR 2020).

As yet, not all national disability strategies fulfill the criteria highlighted by the CRPD Committee (2019), and in practice differ in scope, period length, areas covered, structure, and types and specificity of measures they envisage. In several instances, national disability strategies tend to broadly set out objectives and actions, without detailing specific benchmarks. The language (as it will be further discussed) can be vague, failing to detail concrete steps to achieve policy objectives outlined. In fact, the line between statements of objectives and specific measures can often be blurred. In other instances, strategies list best practices to signal their commitment, but they lack an overarching consistent approach. Yet, one aspect that the examined national disability strategies have in common is that they all refer to the CRPD, albeit to varying degrees.

## Methodology

This article is based on a qualitative analysis of national disability strategies adopted by 27 EU Member States plus the UK from 2008 onwards (regardless of whether a specific State has signed and/or ratified the CRPD at that point or not). The year 2008 was chosen as the starting point as it was at this time that the CRPD entered into force. While acknowledging that the EU has also adopted disability strategies, i.e. the European Disability Strategy 2010–2020 (European Commission 2010), and the Strategy for the Rights of Persons with Disabilities 2021–2030 (European Commission 2021), we deliberately focus on *national* disability strategies, on the account that the Member States hold primary responsibility for developing and implementing cultural policy (European Commission 2018, 2; Psychogiopoulou 2008). The scope of the research was limited to comprehensive national disability strategies, purposely excluding sectoral plans (e.g. plans on accessibility, or employment). Where a State adopted multiple policy documents for the same period, for example a strategy and an implementing plan, only the primary policy document (i.e. the high level policy document, which primarily sets out the objectives of State action on disability and determines the framework of that action) was examined, whereas any other document adopted to support its implementation was excluded from the scope of the research.

We identified national disability strategies for 25 of the 28 States examined. The States which have not adopted a national disability strategy in the timeframe considered and as of the time of writing this article are Greece, Belgium and France.<sup>1</sup> Half of the States have adopted more than one national disability strategy in the relevant period (Bulgaria, Cyprus, Czechia, Finland, Germany, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Portugal, Sweden, and the UK). Eight strategies adopted were related to a period up to 2020, and some of the countries in question did not, as of yet, adopt a subsequent strategy (Austria, Croatia, Romania, Slovakia, Spain). We included Estonia's 'Welfare Development Plan' in the analysis, although we note that this document does not focus specifically on disability. Altogether, we identified and analysed 43 national disability strategies. Six of them are very recent, having been adopted in 2021.

Table 1 (National disability strategies) shows the strategies examined, the original title and its English translation, and the year of their adoption. Throughout the article, we will refer to each strategy by its title as translated in English, sometimes in a shortened version.

We undertook a thematic analysis 'for identifying, analysing, and interpreting patterns of meaning ("themes") within qualitative data' (Clarke and Braun 2017, 297). While this method is theoretically flexible, it is not atheoretical (Braun and Clarke 2021, 337). In that regard, as noted above, the use of thematic analysis is here informed by the human rights model of disability underpinning the CRPD. The particular approach chosen was 'reflexive' thematic analysis (Clarke and Braun 2017; Braun and Clarke 2020), and followed the steps articulated by Braun and Clarke, including familiarisation; coding; generating initial themes; reviewing and developing themes; refining, defining and naming themes (Braun and Clarke 2006, 86–93; Braun and Clarke 2021, 331). One of the co-authors engaged with coding and generated initial themes. This is in line with the view that in adopting a 'reflexive' thematic analysis approach, 'a research team is not required or even desirable for quality', *inter alia* because it – differently to 'coding reliability' thematic analysis or 'codebook' thematic analysis – does not require a coding framework (Braun and Clarke 2021, 333–334). Then, the authors reviewed and developed themes through a collaborative process, and proceeded with refining and defining themes.

Specifically, sections and parts of the national strategies that referred to culture and/or cultural and linguistic identity were first identified. One of the co-authors integrated both inductive and deductive coding, and developed initial codes. Coded data were then developed into initial themes, which were further collaboratively reviewed and refined. For example, an initial theme of 'sign language and Deaf culture' was established, but upon revision of the coded sections of national disability strategies, it was broadened into a theme on 'disability identity and culture', to better capture the data. An initial theme relating to the therapeutic role of culture was generated, but was subsequently abandoned, as there was not enough data to support it as a (recurring) theme (Braun and Clarke 2006, 91; Nowell et al. 2017).

This process resulted in the identification of four main recurring themes in relation to the way strategies address participation of people with disabilities in cultural life. The first theme relates to enhancing accessibility of heritage, cultural institutions and cultural content, to allow participation of persons with disabilities as audience or consumers of cultural goods. The second theme relates to the support of artists with disabilities, and to the enhancement of active participation of persons with disabilities as creators of culture. The third theme concerns awareness-raising around participation in culture of persons with disabilities. The fourth theme relates to the protection of disability identity and culture.

Particular attention was paid to policy measures that States adopted or proposed in relation to a particular theme. Strategies often use vague wording, referring to *providing conditions*, *supporting*, *encouraging etc* without further specifying the steps to be taken, and mention *public funding*. Importantly, the aim was not to evaluate individual national disability strategies, or to quantify exactly how often a specific theme appears across national disability strategies. In fact, a theme is not necessarily dependent on quantifiable measures but rather on whether it



Table 1. National disability strategies.

State	National disability strategy	National disability strategy (English translation)	Year of adoption
Austria	Nationaler Aktionsplan Behinderung 2012–2020: Strategie der österreichischen Bundesregierung zur Umsetzung der UN-Behindertenrechtskonvention	National Action Plan on Disability 2012 – 2020: Strategy of the Austrian Federal Government for the implementation of the UN Disability Rights Convention	2012
Belgium	Ратегия за осигуряване на равни възможности	/	/
Bulgaria	На хората с увреждания 2008–2015 г. Национална стратегия за хората с увреждания 2016–2020 г. Национална Стратегия	National Strategy for Equal Opportunities for Disabled People 2008–2015 National Strategy for Persons with Disabilities 2016–2020 National Strategy for Persons with Disabilities 2021–2030	2008 2016 2020
Croatia	За хората с увреждания 2021–2030 г. Nacionalna strategija izjednačavanja mogućnosti za osobe s invaliditetom od 2017. do 2020. godine	National Strategy for Equalization of Opportunities for Persons with Disabilities 2017 – 2020	2017
Cyprus	Πρόγραμμα Ένταξης Δράση για την Ανάπτυξη 2013 – 2015 Πρόγραμμα Ένταξης Στρατηγική για την Ανάπτυξη 2018 – 2028	First National Disability Action Plan 2013 – 2015 First National Disability Strategy 2018 – 2028	2013 2017
Czechia	Národní plán vyváření rovných příležitostí pro osoby se zdravotním postižením na období 2010 – 2014 Národní plán podpory rovných příležitostí pro osoby se zdravotním postižením na období 2015–2020 Národní plán podpory rovných příležitostí pro osoby se zdravotním postižením na období 2021–2025	National Plan for the Promotion of Equal Opportunities for Persons with Disabilities 2010–2014 National Plan for the Promotion of Equal Opportunities for Persons with Disabilities 2015–2020 National Plan for the Promotion of Equal Opportunities for Persons with Disabilities 2021–2025	2010 2015 2020
Denmark	Handicappolitisk handlingsplan 2013: Et samfund for alle	Disability policy action plan 2013: One society for all	2013
Estonia	Heaolu arengukava 2016–2023	Welfare Development Plan 2016–2023	2016
Finland	Vahva pohja osallisuudelle ja yhdenvertaisuudelle le: Suomen vammaispoliittinen ohjelma VAMPO 2010–2015	A strong basis for inclusion and equality: Finland's Disability Policy Programme VAMPO 2010–2015	2010
	Oikeus osallisuuteen ja yhdenvertaisuuteen: Ykn vammaisten henkilöiden oikeuksien yleisoppimukseen	Right to social inclusion and equality: The National Action Plan on the UN Convention on the Rights of Persons with Disabilities 2018–2019	2018
	Oikeus osallisuuteen ja yhdenvertaisuuteen: Ykn vammaisten henkilöiden oikeuksien yleisoppimukseen kansallinen toimintaohjelma 2018–2019	Right to social inclusion and equality: National Action Plan on the UN Convention on the Rights of Persons with Disabilities (2020–2023)	2021
France	Unser Weg in eine inklusive Gesellschaft: Der Nationale Aktionsplan der Bundesregierung zur Umsetzung der UN-Behindertenrechtskonvention	Our path to an inclusive society: The National Action Plan of Germany's Federal Government to Implement the UN Convention on the Rights of Persons with Disabilities	/
Germany	Unser Weg in eine inklusive Gesellschaft: Nationaler Aktionsplan 2.0 der Bundesregierung zur Umsetzung der UN-Behindertenrechtskonvention (UN-BRK)	Our path to an inclusive society: The National Action Plan 2.0 of Germany's Federal Government for the UN Convention on the Rights of Persons with Disabilities (UNCRPD)	2016
Greece	Az Országos Foglalkoztatási Programról (2015–2025) szóló 15/2015. (IV. 7.) OGY határozat	National Disability Program (2015–2025)	/
Hungary			2015

(Continued)



Table 1. (Continued).

State	National disability strategy	National disability strategy (English translation)	Year of adoption
Ireland	National Disability Strategy Implementation Plan 2013–2015 National Disability Inclusion Strategy 2017–2021	National Disability Strategy Implementation Plan 2013–2015 National Disability Inclusion Strategy 2017–2021	2013 2017
Italy	Programma d'Azione Biennale per la promozione dei diritti e l'integrazione delle persone con disabilità Secondo programma di azione biennale per la promozione dei diritti e l'integrazione delle persone con disabilità (2017)	Biannual Action Plan for the promotion of rights and the integration of people with disabilities Second Biannual Action Plan for the promotion of rights and the integration of people with disabilities	2013 2017
Latvia	Apvienoto Nāciju Organizācijas Konvencijas par personu ar invaliditāti tiesībām īstenošanas pamatnostādnes 2014.–2020.gadam Plāns personu ar invaliditāti vienlīdzīgu iespēju veicināšanai 2021.–2023. gadam	Guidelines for the implementation of the United Nations Convention on the Rights of Persons with Disabilities 2014–2020 Plan for the Promotion of Equal Opportunities for Persons with Disabilities 2021–2023	2013 2021
Lithuania	Nacionalinė neįgalųjų socialinės integracijos 2013–2019 metų programa Neįgalųjų socialinės integracijos 2021–2023 metų veiksmų planas	National Programme for Social Integration of Persons with Disabilities 2013–2019 Action Plan for Social Integration of Persons with Disabilities 2021–2023	2012 2020
Luxembourg	Aktionsplan der Luxemburger Regierung zur Umsetzung der UNO-Behindertenrechtskonvention Nationaler Aktionsplan zur Umsetzung der UN-Behindertenrechtskonvention 2019 – 2024	Action Plan for the Implementation of the UN Convention on the Rights of Persons with Disabilities 2012–2017 Action Plan for the Implementation of the UN Convention on the Rights of Persons with Disabilities 2019–2024	2012 2019
Malta	National Policy on the Rights of Persons with Disabilities Freedom to Live: Malta's 2021–2030 National Strategy on the Rights of Disabled Persons	National Policy on the Rights of Persons with Disabilities Freedom to Live: Malta's 2021–2030 National Strategy on the Rights of Disabled Persons	2014 2021
The Netherlands	Programma VN-verdrag Onbeperkt meedoel: Implementatie VN-verdrag inzake de rechten van mensen met een handicap Strategie na ruzec osób z niepełnosprawnościami 2021–2030	Unlimited Participation! Implementation of the UN Convention on the Rights of Persons with Disabilities Strategy for People with Disabilities 2021–2030	2018 2021
Poland	Strategia na rzecz osób z niepełnosprawnościami 2021–2030	Strategy for People with Disabilities 2021–2030	2021
Portugal	Estratégia Nacional para a Deficiência Estratégia Nacional para a Inclusão das Pessoas com Deficiência 2021–2025	National Disability Strategy 2011–2013 National Strategy for the Inclusion of People with Disabilities 2021–2025	2010 2021
Romania	Strategia națională 'O societate fără bariere pentru persoanele cu dizabilități' 2016–2020	National Strategy: 'A barrier-free society for people with disabilities' 2016–2020	2016
Slovakia	Národný program rozvoja životných podmienok osôb so zdravotným postihnutím na roky 2014 – 2020	National program for the improvement of living conditions of persons with disabilities for the years 2014 – 2020	2014
Slovenia	Akcijški program za invalide 2014–2021	Action Programme for Persons with Disabilities 2014–2021	2014
Spain	Estrategia Española sobre Discapacidad 2012–2020	Spanish Strategy on Disability 2012–2020	2011
Sweden	En strategi för genomförande av funktionshinderspolitiken 2011–2016	A Strategy for the Implementation of Disability Policy, 2011–2016	2011
The UK	Nationellt mål och inriktning för funktionshinderspolitiken Roadmap 2025: Achieving disability equality by 2025 Fulfilling Potential: Making It Happen	National Goal and Focus on Disability Policy 2017 Roadmap 2025: Achieving disability equality by 2025 Fulfilling Potential: Making It Happen	2017 2009 2013
	National Disability Strategy	National Disability Strategy	2021



captures something important in relation to the overall research question (Braun and Clarke 2006). Our objective was to gauge whether the themes identified lead us to conceive of national disability strategies as rights-based cultural policy tools.

## **Participation of people with disabilities in cultural life in national disability strategies**

### ***Enhancing accessibility of cultural heritage, cultural institutions and cultural content***

The first theme that we identified relates to improving access to heritage, cultural institutions and cultural content.

Almost all national disabilities strategies refer to the need to guarantee accessibility of cultural heritage and/or of cultural institutions, in terms in particular of physical accessibility of the built environment. In some national disability strategies, the discussion on the accessibility of places of cultural performances and services ('cultural places') is included in the specific section on culture, while in others, the physical accessibility of cultural places is dealt with jointly with physical accessibility of other places, such as public buildings. A few national disability strategies also explicitly recognize the *lack* of physical accessibility of cultural places (e.g. Bulgarian National Strategy 2008, 8; Czech National Plan 2020, 32; Finnish Disability Policy Programme 2010, 60; Dutch Unlimited Participation Programme 2018, 21; Lithuanian National Programme 2012, 18). Yet, it is also an area where specific measures that have been adopted have been considered, at least to some extent, successful. For example, the feedback of people with disabilities on accessibility of public spaces, presented in the Polish Disability Strategy for People with Disabilities (2021, 31), shows that cultural facilities are perceived as more accessible by people with physical impairments than by Deaf people. This seems to indicate that architectural barriers in cultural places have been dealt with more successfully than the barriers in relation to accessibility of cultural content.

Some national disability strategies do not specify the type of measures that they plan to adopt in order to enhance accessibility. Rather, they discuss in general terms of the need for refurbishing and adapting existing buildings and/or making new buildings accessible (Bulgarian National Strategies 2016, 29, and 2020, 28 and 30; Irish National Disability Inclusion Strategy 2017, 34).

A handful of strategies, however, indicate that States plan to introduce general regulatory standards, including through legislative intervention, and make accessibility requirements part of the planning process. For example, the Dutch Unlimited Participation Programme (2018, 21) explains that current measures for providing a more inclusive cultural sector focus on, *inter alia*, 'assessing requests for refurbishment/building permits for cultural institutions in terms of accessibility', while plans to ensure that access to exhibitions in museums and galleries is 'standardized' for persons with limited mobility 'in accordance with [legislation]' can be discerned from all three of the Czech National Plans (2010, 42, 2015, 61, and 2020, 76). Further, national disability strategies promise funding to support architectural improvements to dismantle physical barriers (Maltese National Policy 2014, 121; Bulgarian National Strategy 2008, 8). Some strategies list specific architectural requirements that should be put in place, such as adapted access, entrance and bathrooms, appropriate markings and facilities, and specialised seats in cultural places (Bulgarian National Strategy 2008, 13). Institutions that are to benefit from these measures are cultural halls (Bulgarian National Strategy 2008, 13), museums (Austrian National Action Plan 2012, 50; Czech National Plans 2010, 42, 2015, 61, and 2020, 76), libraries (Austrian National Action Plan 2012, 50), galleries (Czech National Plans 2010, 42, 2015, 61, and 2020, 76), monuments and archaeological sites (Irish National Disability Strategy 2013, 18; Polish Strategy for People with Disabilities 2021, 164).

Several national disability strategies also refer to accessibility of cultural content, recognising that access to culture does not equate only to physical accessibility. For example, the Austrian National Action Plan (2012, 50) notes that the challenge in the field of accessibility of culture is 'not only ensuring the accessibility of buildings, but to enable people with sensory impairments and those with learning disabilities to experience and understand the arts and culture'. The German National

Action Plan (2011, 17) submits that ‘accessibility must not end outside cinemas or at the theatre box office’. As with physical accessibility, some national disability strategies explicitly acknowledge the *lack* of accessibility of cultural content, or at least some of its elements (e.g. Finnish Disability Policy Programme 2010, 60; Finnish National Action Plan 2018, 59; Latvian Guidelines for the Implementation of the CRPD 2014, 47 and 51; Lithuanian National Programme 2013, 13–14 and 18).

In order to enhance accessibility of cultural content, specific measures that States aim to support and implement include guides, literature and other materials in easy to read/audio/printed in Braille formats; tactile tours and exhibitions; digitisation of cultural content; signage in large print; sign language interpretation; subtitling, captioning and audio description; induction loops; availability of hearing aids; assistive personnel; free or discounted entry; access cards; and copyright exceptions (Austrian National Action Plan 2012, 51; Czech National Plan 2020, 77–78; Danish Disability Policy Action Plan 2013, 17; Irish National Disability Strategy 2013, 15; Polish Strategy for People with Disabilities 2021, 161–162; Portuguese National Strategy 2021, 62–64; Finnish National Action Plan 2021, 114; and UK National Disability Strategy 2021, 80). In some instances, national disability strategies simply state that a certain measure will be *supported*, without providing any further specification on the form of this support. For example, in the Slovak National Program (2014, 34), the plan put forward is to ‘support’ initiatives aimed at making audio-visual works, theatre performances and art exhibitions accessible. Most often, however, national disability strategies support the implementation of these accessibility measures by providing *public funding or subsidies*, or imposing accessibility conditions on other funding. The Czech National Plan (2020, 77–78), for example, explicitly mentions subsidies in relation to a number of its measures, such as: issuing printed materials in an easy-to-understand or digital form; offering audio books and other technical facilities in public libraries; subtitling, audio-description, and interpretation in sign language of audio-visual works; and interpretation into sign language in theatres. The Croat National Strategy (2017, 121) envisions providing state, regional and local funds for adapting cinematic and theatrical performances, as well as audio-visual creations of Croat production. Funding as a form of support for accessibility measures is also explicitly mentioned in the Polish Strategy for People with Disabilities (2021, 163–164); the Dutch Unlimited Participation Programme (2018, 23); the Slovene Action Programme (2014, 20); the Finnish National Action Plan (2021, 110); and the Portuguese National Strategy (2021, 62). Further, the German National Action Plan (2016, 145) links film funding to requirements on producing accessible versions, while the Finnish National Action Plan (2021, 114) includes accessibility and non-discrimination as criteria for giving out grants. Another financial measures proposed by some national disability strategies are *discounts* and *free entries* to cultural places for persons with disabilities and/or their personal assistants. For example, the Austrian National Action Plan (2012, 51) plans for free admission to museums for children and young people, and the Finnish National Action Plan (2018, 59) notes that assistants of persons with disabilities have been granted free access to cultural events, however neither specifies where the funding for these measures comes from, nor in which institutions should the measures be applied. The Czech National Plans (2010, 43, 2015, 61, and 2020, 77) intend on ‘motivating’ institutions partially funded by the State to provide discounts on admission fees for people with disabilities.

National disability strategies often envisage the implementation of these accessibility measures through ‘*specialized*’ *cultural institutions* for persons with disabilities, particularly for the provision of books. Specifically, a number of national disability strategies indicate the set-up of a library for the blind (e.g. Czech National Plan 2020, 78; Slovak National Program 2014, 34; Lithuanian Action Plan 2020, 11; Slovene Action Programme 2014, 20; and Finnish National Action Plan 2021, 110) or a specific centre tasked with making literature accessible (Swedish Strategy 2011, 6; Finnish National Action Plan 2021, 108 and 115).

Several strategies envisage *guidelines* and *reviews of best practice* as important tools to enhance accessibility of heritage, cultural institutions and cultural content. For example, the Dutch Unlimited Participation Programme (2018, 23) proposes updating accessibility guidelines for public libraries. The Portuguese National Strategy (2021, 62) envisions creating accessibility plans for monuments,

museums, palaces, theatres, cinemas, art centres, etc. The Maltese National Strategy on the Rights of Persons with Disabilities (2021, 77) envisions producing a set of guidelines on accessibility of cultural places, accompanied by an action plan. These guidelines are sometimes planned to be developed through *pilot projects, dialogue, and networking*. For example, the German National Action Plan (2016, 144) plans to create a network 'Culture and Inclusion' as a forum for dialogue and exchange of ideas, as well as to hold a symposium to discuss best practice for inclusive educational work at museums and other cultural institutions with the aim of developing long-term, cross-institutional approaches to action for state museums in Berlin. The Dutch Unlimited Participation Programme (2018, 21) indicates organising a 'round-table meeting' with stakeholders and interest groups to identify bottlenecks in the area of accessibility of culture, and to determine follow-ups. In the Austrian National Action Plan (2012, 51), plans are laid out to integrate projects developed as part of increasing accessibility of cultural content in schools into the respective museums' general offering. The Czech National Plan (2015, 61) advances that the methodology for working with persons with disabilities developed in the Centre of Presentation of Cultural Heritage could be extended to other museums and galleries. *Specific projects* are also often considered an avenue for providing accessible cultural content. For example, the Polish Strategy for People with Disabilities (2021, 167) lists projects such as '*Literatura*' on raising literary awareness and publication of literary works in forms accessible to people with disabilities, and 'Digital Culture', which aims to develop and digitize cultural heritage resources and make them accessible.

In connection with the theme of enhancing accessibility of heritage, cultural institutions and cultural content, national disability strategies also mention *training* of staff and relevant professionals on accessibility issues. An illustration of this can be found in the Polish Strategy for People with Disabilities (2021, 164), which introduces training on accessibility for civil servants that issue permits to carry out conservation, restoration or construction works on monuments. In the Luxembourgish Action Plan (2019, 52), the government proposes organizing training for cultural professionals that are in charge of communication and public relations to support services for persons with disabilities, and offers the option to apply for financial support from the Ministry of Culture to bring in external experts for this purpose.

Finally, national disability strategies also discuss a number of measures related to the availability of information on accessibility of heritage, cultural institutions, and cultural content (e.g. Austrian National Action Plan 2012, 58; Luxembourgish Action Plan 2019, 16–17; and Irish National Disability Strategy 2013, 18). For instance, the Danish Disability Policy Action Plan (2013, 17) indicates plans to adopt 'accessibility labelling' of cultural institutions for different 'groups' of people with disabilities, and indicates that smartphones could be used for accessing such information (56).

### **Supporting persons with disabilities as creators of culture**

Most national disability strategies also include measures related to the support of persons with disabilities as creators of culture. The Portuguese National Strategy (2021, 17) notes that inclusion encompasses 'not only the dimension of cultural enjoyment, but also the encouragement and increased participation of these citizens as creators, performers or performers of works, thus also fostering diversity in the national artistic panorama and encouraging the emergence of projects led by artists with disabilities'.

Measures in national disability strategies linked to the theme of persons with disabilities as creators of culture sometimes take the form of *inclusion of persons with disabilities in (mainstream) projects, programmes, events etc* (the 'mainstream' element is not explicitly set out in regard to some of these measures, but the criterion for inclusion herein was that there is no reference to a certain project/programme/event being intended specifically and/or exclusively for persons with disabilities). The Croat National Strategy (2017, 120), for instance, places among its objectives: '[n]etworking and inclusion of persons with disabilities in cultural projects at the international, national, and local level', and providing 'conditions for creative and artistic development of persons with disabilities

through inclusive programmes'. An illustration of a measure ensuring participation is provided in both German National Plans (2011, 2016), which point to the project '*Kultur im Kleisthaus*'. Kleisthaus is the seat of the Federal Government's Commissioner for Matters relating to Persons with Disabilities (2011, 104), which serves as a place of cultural events, organized with the participation of persons with disabilities and their associations, and artists with disabilities are given as much space as artists without disabilities (2016, 160). The German government also aims on introducing a pilot project 'Art and Inclusion' to improve access of artists with disabilities to established cultural institutions and training centres (German National Plan 2016, 144). The Maltese National Strategy on the Rights of Persons with Disabilities (2021, 78) intends to coordinate discussions among stakeholders with the aim of implementing initiatives that encourage 'active participation of disabled persons in mainstream society, through cultural events'. The Slovak National Program (2014, 34) refers to supporting festivals, competition shows and creative workshops as cultural activities of, and for, persons with disabilities.

Several strategies refer to *art education* as a means to support active participation in culture. The Finnish Disability Policy Programme (2010, 61), for example, recognises that providing equal opportunities for persons with disabilities to be 'creators and producers of culture' requires 'equal opportunities for entering the education in the fields of culture and the arts and to become employed there'. Also, Bulgarian national strategies (2008, 21, 2016, 29, and 2020, 31) encourage art schools, groups of artists, and cultural institutions to include programs in which children with disabilities can participate. The Swedish Strategy (2011, 50–51) points to the initiative 'Creative School' aimed at increasing the collaboration between schools and professional cultural life, which has increased participation in cultural life of students with disabilities. The Luxembourgish Action Plan (2019, 49) expects to encourage the inclusion of students with special educational needs in music lessons in school, including through training for teachers, thus emphasising the relevance of awareness-raising measures in this area as well.

*Specialized projects, programmes, events* are often presented as best practices to enhance opportunities for persons with disabilities to create culture or have visibility as creators of culture. For example, in the Lithuanian National Programme (2013, 18) references are made to the national professional choir 'Vilnius', which brings together persons with disabilities, and 'the National Colour Music Orchestra', which consists mainly of persons with intellectual disabilities. The Croat National Strategy (2017, 120) points to the International Theatre Festival of the Blind and Visually Impaired BIT, and the Festival of Equal Opportunities, although it is observed that persons with disabilities should participate 'at regular cultural events' as well. National disability strategies sometimes encourage *cooperation* among artists with disabilities. The Slovene Action Programme (2014, 20), for example, advocates for the cooperation between organizations for persons with disabilities, cultural and arts groups and individual artists with disabilities. It also mentions the establishment of societies and similar cultural associations of artists with disabilities. The Maltese National Policy (2014, 60) also envisions encouraging the formation of disability performing art companies.

Some national disability strategies tend to place emphasis on '*amateur*' culture, rather than on 'professional' creators of culture (e.g. Hungarian National Disability Program 2015, 20; Romanian National Strategy 2016, 34). On the other hand, a number of national disability strategies recognise that persons with disabilities can also engage with art and culture in a professional capacity, and in this connection provide for incentives for employment of persons with disabilities in the art sector (Maltese National Policy 2014, 60; Finnish Disability Policy Programme 2010, 61; Croat National Strategy 2017, 120 and 123; Lithuanian National Programme 2013, 19).

### ***Awareness-raising about cultural participation of persons with disabilities***

National disability strategies also conceive of cultural participation of persons with disabilities as a tool for a change of societal attitudes. For example, the German National Action Plan (2011, 103) recognises that '[a]rt and culture offer an important experimental space for the change of

perspectives', and emphasises in particular the educational value of film, theatre, literature and art that engage in the subject of disability. The German National Action Plan (2016, 149) considers the presence of persons with disabilities in cultural life a precondition of their inclusion into society.

Often, there are no specific measures accompanying these principled statements. This is the case, for instance, of the Slovak National Program (2014, 34), and the Hungarian National Disability Program (2015, 20). Similarly, the Austrian National Action Plan (2012, 50) simply argues that the 'wariness of society' in relation to cultural events including persons with disabilities as active participants should be 'reduced', and the Finnish National Action Plan (2018, 61) sets out as one of its long-term measures to promote 'the equal participation of persons with disabilities in [...] art and culture [...] by raising awareness of the rights of persons with disabilities'. One measure that national disability strategies tend to adopt in order to raise awareness about cultural participation of persons with disabilities is the presentation of *awards*. The German National Action Plan (2016, 142), for example, awards a BKM Award, a prize for cultural education from the Federal Government, which 'promotes awareness of the abilities and artistic contribution of persons with disabilities'.

### ***Disability identity and culture***

The theme of disability identity and culture was generated most notably having regard to references to sign language and Deaf culture. Those references are relatively common in relation to various areas, such as education, access to information, health, justice, rehabilitation, independent living, and political and public life. Occasionally, national disability strategies highlight the linkage between sign language and cultural and linguistic identities of persons with disabilities. The Finnish National Action Plans (2018, 36; 2021, 49) highlights that the Finnish sign language is the sign language users' 'own language', and, similarly, the Austrian National Action Plan (2012, 41) refers to sign language as 'a language in its own right'. The Luxembourgish Action Plans (2012, 4, 7 and 10; 2019, 7) describe the German sign language an 'independent' and 'full' language, as well as the 'mother tongue' of people with severe hearing impairments. The Bulgarian National Strategy (2016, 18–19) conceptualises Bulgarian sign language as a 'natural language'.

The recognition of sign language is most often achieved through legislation, or even the constitutionalisation of it. In terms of the latter, Austria and Finland point to provisions in their respective constitutions that protect sign language (Austrian National Action Plan 2012, 41; Finnish Action Plans 2018, 35; 2021, 49). Even more commonly, national disability strategies emphasise legislative acts on sign language, which have been, or are planned to be, adopted (Croat National Strategy 2017, 5 and 111; Czech National Plan 2015, 16; Slovene Action Programme 2014, 4 and 12; Hungarian National Disability Programme 2015, 14; Finnish Action Plans 2018, 36; 2021, 32, 49 and 60; Portuguese National Strategy 2021, 21; Irish National Disability Inclusion Strategy 2017, 2; Lithuanian Action Plan 2021, 13). Further, the recognition of the status of sign language can be discerned from including it in language policy programmes, as is pointed out in the Slovene Action Programme (2014, 9) and in the Finnish Action Plan (2021, 32). Other types of measures appearing in national disability strategies aiming to support sign language include the creation of dedicated centres for sign language (Luxembourgish Action Plan 2012, 22; Spanish Strategy on Disability 2011, 3; Austrian National Action Plan 2012, 101; Portuguese National Disability Strategy 2010, 5), and the provision of funding, for example for bearing the costs of sign language interpretation (Austrian National Action Plan 2012, 41; Bulgarian National Strategy 2016, 27–28), and for training sign language interpreters (Czech National Plan 2020, 49; Irish National Disability Inclusion Strategy 2017, 18).

Sporadically, Deaf culture, as well as the cultural identity of persons with disabilities more generally, are referred to. For example, the Finnish Action Plan (2021, 86–87) includes the theme of community and culture of the Deaf (Deaf studies) as part of the in-service training for sign language teachers. The German National Action Plan (2011, 21 and 101) discusses the problematic portrayal of persons with disabilities in the media which does not align with 'the self-image – the collective or subjective identity – of disabled people', and also notes that in cultural production,

there has been an increasing interest in the cultural dimension of disability (21, 104). The Lithuanian National Programme (2013, 18) recognises that the inability to participate in culture prevents persons with disabilities from learning about their cultural identity, including about Deaf culture. The Finnish Disability Policy Programme (2010, 66) alludes to the specific cultural identity of persons with disabilities by noting 'the connection of people with different disabilities to their own culture' as an emerging research theme. The Romanian National Strategy (2016, 34) includes the aim of creating conditions for the visibility and presentation of the specific culture of people with disabilities. In the Luxembourgish '*Centre de Logopédie*', persons with disabilities would be able to familiarise themselves with Deaf culture (Luxembourgish Action Plan 2012, 22). The Maltese National Policy (2014, 70) considers persons with disabilities a minority, and similar could be discerned from the Finnish Action Plan (2021, 32, 89 and 109–110). However, besides some measures that have already been discussed under the theme of awareness-raising, national disability strategies do not adopt specific measures towards recognizing the cultural identity of persons with disabilities.

### **Discussion: to what extent can national disability strategies be considered rights-based cultural policy tools?**

As noted in the introduction, cultural policy broadly refers to the State's involvement in the realm of culture, involvement that encompasses the many phases in the process that ranges from the production to the consumption of culture (Miller and Yúdice 2002; Schuster 2003; Mulcahy 2006; Katz-Gerro 2015). Similarly, Hylland explains that cultural policy is usually considered to have three basic components: '1) a government or public entity that in some way 2) supports and/or regulates 3) the production and/or distribution of culture (cf. Mulcahy 2006; Bell and Oakley 2014; IJCP 2019; Mangset and Hylland 2017)' (Hylland 2020, 144–145). It should also be noted that cultural policy can take the shape of not only explicit cultural policy, i.e. 'any cultural policy that a government labels as such', but also implicit cultural policy, i.e. 'any political strategy that looks to work on the culture of the territory over which it presides' (Ahearne 2009, 143).

National disability strategies do refer to the State's involvement in culture with the aim of supporting participation of persons with disabilities in cultural life. It is evident that national disability strategies envisage a central role of the State in promoting access to and participation in culture. This aligns also with the CRPD's view of the State as the bearer of responsibility for respecting and actively protecting and fulfilling the rights of persons with disabilities including to participation in cultural life. In connection to the themes identified, the analysis conducted shows that national disability strategies include an array of what could be termed traditional cultural policy measures, i.e. measures aimed at promoting access to and consumption of cultural goods and services by people with disabilities and measures aimed at supporting and upholding artistic freedom of persons with disabilities.

In relation to accessibility, regulatory measures (i.e. legislation, bylaws or other regulatory standards) are mentioned, often in combination with public funding. While the strategies are relatively vague in this respect, it is likely that public support takes mostly the form of non-repayable subsidies, rather than credit-based instruments. Furthermore, national funding is likely to be complemented by regional and local funding. However, the extent to which the targeted measures listed and dedicated funds are indicative of a consistent approach remains unclear.

Moreover, the analysis shows that national disability strategies focus more on the consumption side, as opposed to the production of culture by people with disabilities. In that regard, general legislative measures are not cited with reference to artists with disabilities, and rather than direct subsidies for arts organizations, artists and other cultural workers with disabilities, national disability strategies tend to focus on specific projects that have been funded.



In relation to disability identity and culture, regulatory measures, namely legislation, are central in protecting them. This is the case, in particular, of sign language. Other promotional measures (i.e. establishment of specific institutions, and funding) are generally envisaged. However, while disability identity, including Deaf culture, is often recognised, references in national strategies are to a large extent nominal, and are not backed by specific supporting measures.

The national disability strategies examined, in several cases, do not identify who is in charge of implementing the various measures, although some of those are to be implemented by public (or state funded) cultural institutions or arts councils or other public agencies. For example, the Swedish government assigned the Swedish Film Institute and the Swedish Post and Telecom Agency the responsibility to implement a project aimed at investigating and developing the conditions for increased accessibility of Swedish film in digital cinemas for people with disabilities (Swedish Strategy 2011, 53); in the Netherlands, it is the National Library that is 'in charge' of providing literature accessible to people with reading disabilities (Dutch Unlimited Participation Programme 2018, 23). Similarly, the Irish National Disability Strategy (2013, 28–29) entrusts the Arts Council with a number of tasks, including to pilot accessible performances, and roll out a networking partnership between the Arts Council, Arts and Disability Ireland, and selected local authorities.

As such, national disability strategies can indeed be considered cultural policy *tools*. They allocate a central role to the State – including the government, ministries and also public entities such as national museums, galleries and libraries – to support and regulate the consumption and the production of culture by persons with disabilities. In particular in relation to greater accessibility of heritage, cultural institutions, and cultural content, the range of measures tallies also with the fact that the implementation of the CRPD 'encompass[es] a panoply of duties that is much broader than the mere adoption of legislation' (Broderick 2018, 119). In such a context, measures associated with traditional cultural policy gain an underlying theoretical justification responding to the human rights model of disability envisaged in the CRPD.

However, the language of the strategies, as noted above, tends to be vague and compounds different measures that are planned and measures that have already been adopted. In this respect, while we did not endeavour to carry out a comparative analysis, the thematic analysis makes evident that different underpinning cultural policy regimes do not lead to different approaches to cultural participation of persons with disabilities. All the strategies somewhat leverage on the importance of public funding to support access to and participation in culture. However, in relation to active participation of persons with disabilities, and to supporting disability identity and culture, States do not utilise the whole range of cultural policy tools available to them.

National disability strategies can be conceived of as cultural policy tools. However, most notably, we argue that they can be characterised as *rights-based* cultural policy tools as they are strongly informed by the CRPD. Almost half of the strategies explicitly mention either the social or the human rights model of disability, and many reiterate the CRPD's definition of disability. Further, a number of strategies explicitly mention Article 30 CRPD on participation in cultural life. The four recurring themes that we identified also broadly correspond to the obligations laid out in Article 30 CRPD. It transpires that strategies frequently take the provision as their inspiration in designing their measures on cultural participation of persons with disabilities, even when they do not specifically refer to it.

The themes that we identified as prevalent in national disability strategies and the adjoining measures broadly focus on addressing the obstacles to participation in cultural life – identified by Baltà Portolés and Dragičević Šešić (2017, 161–165) as an area of action for rights-based cultural policies. National disability strategies mostly highlight measures that are targeted at the removal of physical, financial, linguistic, and social barriers. This is further consistent with the rights-based model of disability, of which removal of barriers is a crucial aspect (Kayess and French 2008), including in relation to culture (Johnson 2020, 73–74; Leahy and Ferri 2022).

Further, while sign language and Deaf culture are generally absent from States' cultural policies, they feature in national disability strategies. This points towards the rights-based nature of cultural policy in national disability strategies, and demonstrates the stated potential of such policies to tackle issues of



social justice, social cohesion and inclusion (Kraak 2017, 433; Laaksonen 2005, 1). The theme of awareness raising, including the aspect of 'education of society', can also be seen as an evidence of a rights-based rationale of cultural policy measures in national disability strategies.

However, national disability strategies do not encapsulate all areas of a rights-based cultural policy, as set out by Baltà Portolés and Dragičević Šešić (2017). In particular, themes and measures related to participation in policy decision-making and management in cultural life rarely appear in national disability strategies. This is particularly striking as the CRPD emphasises the importance of participation of persons with disabilities in governance structures in general (see in particular Article 4(3) CRPD). Yet national disability strategies fail to translate this principle to measures such as, for example, including persons with disabilities on relevant national and local boards and councils for culture and on boards of arts organisations, and employing persons with disabilities in a Ministry that deals with culture, and have thus not fully utilised the potential of rights-based cultural policies to '[strengthen] the voice of affected groups in shaping cultural policy' (Kraak and Aykan 2018, 8).

## Concluding remarks

The analysis conducted shows that cultural policy goals are pursued beyond the remit of specific cultural strategies. Indeed, as tools of 'implicit' cultural policy, national disability strategies seem to be decisively shaping the policy on cultural participation of persons with disabilities. However, broader attention is given to the consumption side, as opposed to the production of culture by people with disabilities.

The thematic analysis conducted also evidences that national disability strategies can be construed as rights-based cultural policy tools. Nonetheless, it should be acknowledged that, even as such, they might not be sufficiently effective on their own. Notably, these strategies in general do not include links with 'explicit' cultural policy plans. Such confinement of policies on participation in culture for persons with disabilities to national disability strategies runs the risk of tokenism and patchy approaches (exactly the contrary of what the CRPD would require).

## Note

1. Our analysis has strived to include national disability strategies adopted up to September 2021.

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