

DASSH response to the Call for Comment on the draft guidelines for the National Program for Excellence in the Arts

The Australasian Council of Deans of Arts, Social Sciences and Humanities (DASSH) welcomes the opportunity to make a submission in response to the Ministry for the Arts invitation for public comment on the draft guidelines for the National Program for Excellence in the Arts (NPEA).

DASSH represents ASSH disciplines across Australia and New Zealand, including 37 Australian universities. DASSH supports the Program's objectives set out on page 3 of the guidelines,¹ especially in regard to the creation of "a wide range of quality arts and cultural experiences" as well as the focus on developing arts and cultural initiatives and on ensuring access to the arts for all Australians. Nonetheless, DASSH is concerned about the proposed process for assessing funding applications, the level of funding and support for small-to-medium arts organisations and individual artists, and the explicit exclusion of some arts sectors from access to funding.

Currently, the Australia Council for the Arts (Australia Council) is the primary funding body for creative arts research in Australia and funds a large proportion of the non-traditional research outputs in ASSH disciplines that contribute to Excellence for Research in Australia (ERA) evaluation. DASSH is particularly concerned about the impact on academic research in the arts, arts practitioners and industry partners that would arise from the proposed shift of Australia Council funding to NPEA. DASSH is also concerned, not only with the effect that the late release of the NPEA guidelines has had on the arts community (such as the scrapping of the Australia Council June grant round, the suspension of the six-year funding for organisations program, and the cessation of the ArtStart, Creative Communities Partnerships Initiative and Arts in Residence programs²), but by the potential long-term impact of the changes on high quality art and cultural performance.

The draft guidelines do not ensure rigorous, independent peer review of funding applications, does not ensure an accountable and transparent process of distributing public funds and does not ensure that support for quality arts and cultural experiences will occur without departmental or political interference. The proposed assessment process has three elements that militate against rigorous independent peer review. First: the "assessors reviewing funding applications includes Ministry of the Arts assessors (and in some programs officials from DFAT or members of the International Arts and Cultural Diplomacy Panel), this is not independent peer

¹ Ministry for the Arts (2015), [Draft Guidelines for the National Program for Excellence in the Arts](#), [Accessed 22/07/2015].

² "[Australia Council Outlines 2015-16 Budget Impact](#)", Australia Council for the Arts, press release 21 May 2015, [Accessed 15/07/2015].

review. Second: “The Ministry for the Arts may moderate assessments to ensure each assessment has properly considered the funding program objectives, Government policy objectives, and issues of overall funding balance” (p. 8). This step undermines the role of the independent assessors, given that these features are either already within the criteria that the independent assessors are to evaluate (pp. 6-7) or are not among the criteria that applicants are expected to address. Third: the assessment process is not designed to ensure consistent application of the criteria and mechanisms to ensure applicants to be treated fairly. The draft guidelines indicate that *post hoc* adjustment to assessors’ rankings may occur - “measures will be in place to ensure ... that there is also an appropriate mix across art forms and types of activity, between regional, urban and international projects and across a range of communities” (p. 8) - and that applications will not necessarily be reviewed in a consistent manner: “Where the level of information provided is not sufficient for the assessors to make a recommendation they may, but are not obliged to, seek more information from the applicant. It is therefore recommended that you thoroughly address the criteria in your application” (p. 8).

The guidelines would be more robust and defensible if the funding objectives and criteria were explicit, if independent peer assessors (and not officials or departmental staff) evaluated the projects in line with those criteria consistently, and if the recommendations of the assessors were to be moderated by a panel of independent assessors who then made a recommendation to the Minister, without the level of post hoc moderation and adjustment permitted in the proposed guidelines. This would allow for a level of rigorous peer assessment for funding equivalent to the ARC or NHMRC.

David Berthold (Artistic Director of Brisbane Festival) has outlined ten reasons why the principles of independent peer review are vital in the awarding of funding, particularly within the arts.³ DASSH specifically draws attention to his third and fourth points, that **independent peer review protects not only artists’ freedom of expression** (from political taste, interference and censorship), **but also the government** (from public criticism of funding decisions) **and society as a whole** (ensuring they are exposed to a free, culturally diverse creative environment). DASSH believes that independent, rigorous peer assessment serves a vital role for all government funding of research and is the most appropriate way to deliver what is required for Australia’s creative future.

A further aspect of the assessment process that concerns DASSH is that the Minister has retained the right to not disclose a grant recipient if “officials assess that publishing grant information... could adversely affect the achievement of government policy outcomes” (Commonwealth Grant Rules and Guidelines, paragraph 5.7) (p. 8).⁴

³ Berthold, D. (2015). “[The Principles of Arts Funding and Why It's Unwise to Cut Off Your Arm](#)”. Carving in Snow, 18/05/2015. [Accessed 15/07/2015]

⁴ Ministry for the Arts (2015), “Application and Assessment Process: What we will do”, in [Draft Guidelines for the National Program for Excellence in the Arts](#), [Accessed 22/07/2015].

By retaining this right, the Minister⁵ threatens the transparency and accountability of the process and the credibility of the Program. DASSH stresses the importance of transparency in the process of awarding funds and recommends that this provision be removed from the guidelines.

One of the greatest strengths of the Australia Council has been the provision of funding to a wide variety of artists and organisations. From large arts organisations to small collectives and individual artists, from well-known established artists, to the young and emerging artists, the Australia Council has funding available for the promotion of excellence in the arts.

DASSH is concerned about the level of funding and support that will be provided by the NPEA for small to medium arts organisations and individual artists, particularly in light of the abolition of Australia Council programs directed at these groups. These organisations and artists are the life-blood of the Australian arts sector. These grants provide opportunities for testing new ideas and art forms. They demonstrate the substantial ingenuity and creativity in the Australian arts sector and should be nurtured. Focusing solely on large arts organisations to the detriment of the smaller operations is short-sighted, because it will prevent the natural growth of small companies to large companies over time: “from little things, big things grow”. At the heart of these small companies are students and young people – our next generation of artists. These cuts will further erode their confidence in the system, hinder their ability to get projects off the ground, and limit their opportunities to pursue a career in the creative arts.

DASSH is concerned that the lack of support for emerging and smaller arts organisations will have an immediate effect on the arts higher education sector. Universities play an important role in the ecology of the arts, in that we train the next generation of Australia’s creative talent, and for building creativity and design capacity in the economy. A likely repercussion to the guidelines’ explicit exclusion of “projects by individuals” and “business start-up costs” from NPEA funding within our sector is that students will be discouraged from studying the arts as they see that the government’s declared emphasis on established organisations and audience demand does not indicate support for emerging artists, innovation experimentation and diversity. DASSH strongly recommends that the government ensure significant funding opportunities for small to medium arts organisations and individual artists.

Along with the exclusion of individual artists, DASSH is concerned with the Program’s lack of support for new media, in particular interactive games, and the apparent dismissal of writing and publishing. The exclusion of these projects appears contrary to the Program’s pledge to “support participation in, and access to, the arts and encouraging greater private sector support for the arts” and “to celebrate the intrinsic capacity of the arts to engage, inspire and make meaning for all Australians” (p. 3).⁶

⁵ Ibid.

⁶ Ministry for the Arts (2015), “Introduction”, in [Draft Guidelines for the National Program for Excellence in the Arts](#), [Accessed 22/07/2015].

The new media industry is a worldwide growth industry. For the past two decades, it has grown from a niche market to being firmly entrenched within the entertainment industry, with an annual turnover that in 2011 was more than twice the size of the recorded-music industry, nearly a quarter more than the magazine business and about three-fifths the size of the film industry, counting DVD sales as well as box-office receipts.⁷ The industry is now bigger than Hollywood and continues to grow. In PriceWaterhouseCooper's Global entertainment and media outlook 2015-2019 report, they estimate that the video gaming industry revenue will be worth US \$93.10bn by 2019.⁸ However, the government is continuing to cut funding to the industry. Not only are our creative artists excluded from access to funding from the NPEA, but the Abbott Government has also abolished the \$20 million Australian Interactive Games Fund.⁹

DASSH is also apprehensive about the apparent sidelining of literature and publishing from the NPEA. While funding for this sector of the arts could potentially be accessed through support for writers' tours and festivals, and potentially publications, workshops, international writer visits and residences, it appears as if this sector has been forgotten. In addition, with individual artists ineligible for funding, projects within this sector would have to take place in a collective to be eligible, an option for only a proportion of the sector. It is possible that the establishment of the Book Council of Australia that the Prime Minister and Minister for the Arts announced in December 2014 will compensate for the cuts to the Australia Council's grant budget and the lack of apparent funding via the NPEA for this sector. However, with no further information emerging about the structure of the new Council, or what kind of funding support and to whom is going to be available, the writing and publishing sectors of the arts are currently adrift.

DASSH is anxious about the potential long-term effect the exclusion of these two art forms from the "high quality, diverse and vital arts and cultural sector" of Australia may have on students of these disciplines and in turn the ability for Australia to compete globally in these fields. The potential stigma attached to these art forms and disciplines by students and the general public by their exclusion could result in students moving away from these disciplines, or looking for opportunities in this area overseas. DASSH therefore recommends the inclusion of both interactive games and the writing and publishing sectors to the eligible art form list.

DASSH has significant concerns with the proposed NPEA guidelines and urges the government to substantially revise the approach taken and to continually consult

⁷ Cross, T. (2011). "All the world's a game". *The Economist*, 10 December 2011, <http://www.economist.com/node/21541164> [Accessed 23/07/2015].

⁸ PriceWaterhouseCooper (2015). [Global entertainment and media outlook 2015-2019](#). [Accessed 23/07/2015].

⁹ Ludlam, S. (2015). "[Greens level up* and secure inquiry into Australian video game industry](#)", press release 22 June 2015, [Accessed 22/07/2015]



with stakeholders from a wide range of sections within the sector throughout the establishment and implementation of the NPEA.

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About DASSH

The Australasian Council of Deans of Arts, Social Sciences and Humanities (DASSH) is the authoritative agency on research, teaching and learning for the Arts, Social Sciences and Humanities (ASSH) in Australian and New Zealand universities.

DASSH supports those within these institutions who have responsibility for the governance and management of research and teaching and learning in their universities. DASSH also supports those who aspire to these positions through a Network of Associate Deans (Learning and Teaching) and a Network of Associate Deans (Research).