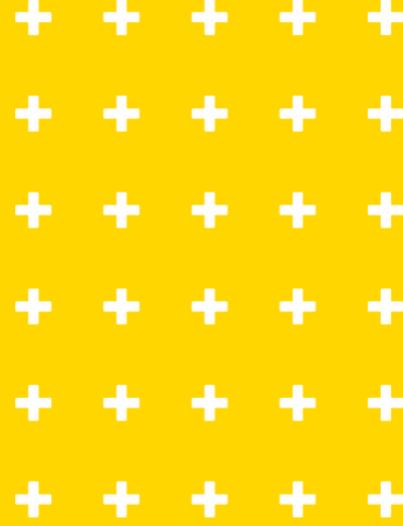# NATIONAL CULTURAL POLICY CONSULTATION

Submission by the ARC Centre of Excellence for Automated Decision-Making and Society (ADM+S) together with the Digital Media Research Centre (DMRC).

ADM +S

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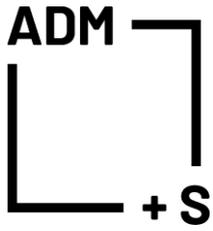
National Cultural Policy consultation

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About the ADM+S

The ARC Centre of Excellence for Automated Decision-Making and Society (ADM+S) is a cross-disciplinary, national research centre, which aims to create the knowledge and strategies necessary for responsible, ethical, and inclusive automated decision-making. Funded by the Australian Research Council from 2020 to 2026, ADM+S is hosted at RMIT in Melbourne, Australia, with nodes located at eight other Australian universities, and partners around the world.

ADM+S brings together nine of Australia's leading universities, and more than 80 researchers across the humanities, social and technological sciences, together with an

international network of partners and collaborators across industry, research institutions and civil society. More information about the ADM+S, our researchers and research projects can be found on our website: www.admscentre.org.au.

About the DMRC

The QUT Digital Media Research Centre (DMRC) conducts world-leading interdisciplinary research for a flourishing digital society. The Centre addresses local, national and global challenges at the forefront of digital transformation, across five research programs: Transforming media industries; Digital publics; Computational communication and culture; Governing digital societies; and Digital inclusion and participation. More information is available at the DMRC website: https://research.qut.edu.au/dmrc.

Executive Summary

Thank you for the opportunity to submit to the consultation on a new National Cultural Policy for Australia. We welcome this initiative and agree that *Creative Australia* is an appropriate starting point for ensuring much needed policy supports are in place as soon as practicable. Our submission focuses on the role of digital media and digital technologies in Australia's arts and cultural sectors, in particular the need for coordinated training in digital skills across these sectors.

There is a concerning disconnect between cultural policy development and work in related domains – both within and outside government – about jobs and digital transformation. We note that explicit reference to digital or technology has been removed from the five 'distilled' pillars put forward for consultation. *Creative Australia* included a goal (Goal 5) to "ensure Australian creativity thrives in the digitally enabled 21st century". The digital is more relevant than ever to Australian arts and culture, and digital technologies need to be considered as enablers of all five pillars of the policy.

Automation already plays a role in many aspects of the arts and cultural sector, such as through recommender systems to locate and display content, and this influence is only likely to grow. Yet, many artists, creators, cultural workers, and institutions lack strong understandings and specialised capabilities in automation technologies. More troubling, however, is that these digital divides are not limited only to advanced technologies. The COVID-19 pandemic and associated restrictions have drawn the sector's uneven digital capabilities into stark relief.

A national cultural policy that does not specifically address digital technologies, their role, and the capacities required to leverage their affordances for the sector's benefit runs the risk of widening these digital divides and further segregating an already highly divided sector. **We recommend that government ensure attention to digital technologies is embedded within each of the five pillars, recognising that these will be important to all aspects of contemporary cultural policy.**

We have structured our submission by reference to each of the five pillars. We make the following arguments and recommendations in relation to each pillar:

1. **First Nations:** cultural policy about First Nations stories should be driven by First Nations people; digital inequality remains a serious problem for First Nations Australians with consequences for cultural participation.

   Recommendation: Government should promote efforts to close the digital divide, especially for Indigenous Australians.

2. **A place for every story:** diversity is impeded by the digital inequality of marginalised Australians; the Government should consider not just the creation of diverse stories but also how those stories are discovered and accessed.

   Recommendation: Government should note (1) the increasing importance of automated systems in making content visible and accessible to audiences.; and (2) the need to ensure automated systems present content that reflects a diversity of stories.

3. **The centrality of the artist:** artists require some flexibility in the copyright system to create and disseminate their works; reform of the *Copyright Act 1968* is needed to provide this flexibility.

   Recommendation: Copyright law should be amended to remove unnecessary barriers to creation and to ensure that cultural heritage can be shared. At a minimum, provisions should be enacted for the lawful use of orphan works, and Australia should have an exception for fair quotation.

4. **Strong institutions:** cultural institutions are lagging in their digital capabilities, with direct impact on their capacity to digitally connect audiences with stories.

   Recommendation: a strong focus is required on coordinating training for digital skills in the sector to improve digital capacities and to develop programs for connecting audiences with stories via digital means.

5. **Reaching the audience:** ensuring that Australian stories reach broad audiences requires coordination across a range of government policies and initiatives, including broadcast and telecommunications, internet, copyright, data and automation, and digital infrastructure.

   Recommendation: Government should revisit the recommendations of the Convergence Review and should finalise the proposed Streaming Services Investment and Revenue Scheme. Crucially, Government should prioritise digital availability, discoverability, and accessibility of Australian content as a central element of national cultural policy.

We understand these are complex issues that encompass many aspects of government policy, including broadcast and telecommunications policy, internet regulation, copyright law, AI and data, digital literacy, and infrastructure. However, a national cultural policy cannot operate in isolation from all the factors that determine whether and how Australian citizens and institutions can create, disseminate, and experience Australian art and culture. This was recognised in the *Creative Australia* report. We urge the Department to take a similar approach and carefully consider how various laws, regulations, and policies that impact on cultural production and distribution can be streamlined to ensure Australian stories reach their audiences. One mechanism for enabling this would be to follow the Australian Broadband Advisory Council's Creative Industries Expert Working Group's recent recommendation that a specific agency is created to deliver the cross-cutting and coordination required. Agencies such as this have international precedence (e.g., the United Kingdom's NESTA and The Space) and have had significant success in enabling digital transformation within and across arts and cultural sectors.

The ARC Centre of Excellence for Automated Decision-Making and Society and the QUT Digital Media Research Centre are deeply engaged with understanding these questions and we welcome any opportunity to consult further with the Department on the development of a national cultural policy suitable for a digital economy and society.

1. First Nations: recognising and respecting the crucial place of these stories at the centre of our arts and culture.

First Nations peoples and communities are central to Australian arts and culture, but there is an urgent need to improve digital inclusion for First Nations Australians to ensure this centrality.

It is appropriate that a national cultural policy should start with a pillar recognising the value of Aboriginal and Torres Strait Islander cultures and stories, which are foundational to Australian history and identity. Any cultural policy about or applying to First Nations citizens should be driven by them. After centuries of law and policies that exclude and disempower First Nations people, it is critical that government recognise Aboriginal and Torres Strait Islanders' inherent capabilities to make their own decisions, and to lead Australia's arts and cultural sectors.

The distilled pillar focuses on the centrality of First Nations' stories, but it is important to note that First Nations' involvement in arts and culture goes beyond stories, to languages, art, and customs. A national cultural policy should also seek to foster the conditions to enable Aboriginal and Torres Strait Islander peoples to participate fully in Australian arts, culture,

and society. This includes, on a very practical level, the infrastructure to access and disseminate content and participate in national conversations.

First Nations Australians living in remote communities are among the most digitally excluded people in the country. This digital exclusion is due to intertwined challenges of remoteness, insufficient infrastructural provision, intergenerational poverty, and low English literacy levels. The 2016 ABS Census revealed that while 83% of the metropolitan First Nations population had a home internet connection, this dropped to 73% in regional locations, 61% in remote and less than half in very remote Australia (Rennie et al., 2019). We note that internet access questions have since been removed from the Census and so up-to-date data regarding these questions are not available.

There are already projects that are gathering data about the extent of digital inequity in Australia. For example, the Australian Digital Inclusion Index[1] collects data at the national level, and the Mapping the Digital Gap[2] project focusses specifically on First Nations digital inequity in regional and remote areas. Collectively, these projects provide valuable information about the kinds of barriers to digital access, and the costs and skills required to improve digital inclusion outcomes. This, in turn, can point towards the challenges First Nations artists and institutions (e.g., art centres) may face in reaching audiences, fellow artists, and artistic organisations and support-networks online.

The renewed National Agreement on Closing the Gap has stipulated in Target 17 that by 2026, Aboriginal and Torres Strait Islander people should have equal levels of digital inclusion. We submit that this target not only has an impact on life outcomes for Indigenous people (as noted in the Closing the Gap agreement) but also on the ability of Indigenous people to participate fully in Australian art and culture. We recommend that the Department pay particular attention to experiences of First Nations digital inequality, informed by the data that is already being collected on digital inclusion but also where there may be gaps in the data – such as in the digital capabilities of First Nations arts and cultural institutions. While

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[1] Led by ADM+S Centre director Distinguished Professor Julian Thomas and Professor Anthony McCosker, and delivered in collaboration with Telstra, the Australian Digital Inclusion Index sets out to measure the levels of digital inclusion experienced by Australians across the country, by different social groups, and over time. The Index measures digital inclusion across three dimensions of access, affordability, and digital ability. The Index has been widely taken up by policy makers and the not-for-profit sector. Data and analysis are regularly published on the website: www.digitalinclusionindex.org.au.

[2] Led by Dr Daniel Featherstone at the ADM+S Centre at RMIT and funded by Telstra, the Mapping the Digital Gap project is working with 12 remote First Nations communities over 4 years to collect data that will provide much needed insight into the levels of digital inclusion experienced in these communities and over time. The project is collecting qualitative and quantitative data, with quantitative methods aligned to those that underpin the Australian Digital Inclusion Index, enabling comparison with the national findings. Data and analysis will be published on the Index website: www.digitalinclusionindex.org.au.

there is significant scholarly work that touches on this topic[3], to properly understand the contemporary (post-COVID) context, this data urgently requires updating.

2. A place for every story: reflecting the diversity of our stories and the contribution of all Australians as the creators of culture.

It is important to ensure that diverse stories are not only produced, but also that they are *discoverable* and *accessible* by Australian audiences

Diverse stories and diverse representations of people within stories are critical to a rich, strong, and united national cultural identity. We encourage the Department to pay attention to who is being empowered and supported to tell their stories. Again, digital equality plays a role here. Research from the United Kingdom has shown that those who are most likely to participate in the cultural sector are also those who are most digitally included.[4] Further, for diverse stories to be impactful, the representations within the stories must be complex and accurate (not stereotypes). The depth that is needed for this complexity and accuracy can only be achieved when those who have historically and structurally been unable to tell their own stories are empowered to do so.

There is a tendency in cultural policy to emphasise the creation or production of stories, but production is only part of the picture. Distribution, access, and discoverability are all critically important if stories are to reach audiences and if audiences are to experience those stories.

The *Creative Australia* report recognised, at the time, that cultural policy was being developed alongside the Convergence Review and the ALRC review of copyright law. The policy issues examined in these reviews remain relevant today. For instance, so far as stories are told through film and television, subscription video-on-demand services ('SVODs') like Netflix have disrupted the legal and policy landscape for how we might ensure that Australian

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[3] For example: Acker, T., Stefanoff, L., & Woodhead, A. (2013). Aboriginal and Torres Strait Islander art economies project: Literature review (CRC-REP Working Paper CW010). Alice Springs, Australia: Ninti One Limited. Retrieved from https://nintione.com.au/ resource/CW010_ArtEconomiesProject_LiteratureReview.pdf

Bartleet, B., Sunderland, N., O'Sullivan, S. & Woodland, S. (2019). Creative Barkly: Sustaining the arts and creative sector in remote Australia. Creative Barkly. https://apo.org.au/node/270666

Throsby, D., & Petetskaya, K. (2019). Integrating art production and economic development in Arnhem Land, Northern Territory: National survey of remote Aboriginal and Torres Strait Islander artists. Research Paper 3/2019. Department of Economics, Macquarie Business School. https://apo.org.au/node/257301

[4] For example: Mihelj, S., Leguina, A., and Downey, J. (2019). Culture is digital: Cultural participation, diversity and the digital divide. *New Media and Society, 21*(7): 1465—1485.

stories continue to reach Australian audiences and that audiences are exposed to diverse stories and representations. The Department should be guided by the findings from the Convergence Review, by developments occurring overseas such as the UK government's white paper on their vision for the broadcasting sector[5], and by academic research (including within the ADM+S) on the role of recommender systems in promoting or obscuring diverse content on SVODs.[6] These are all relevant to the *discoverability* of diverse stories.

Copyright law is relevant to the distribution and access of diverse stories and cannot be ignored in the development of any national cultural policy. We discuss copyright regulations below in relation to pillar 3.

3. The centrality of the artist: supporting the artist as worker and celebrating their role as the creators of culture.

Artists have many roles and require digital skills and a copyright regime that is flexible to support innovation.

The tech sector is Australia's third biggest industry, currently employing 860,000 Australians and set to grow to over 1 million by 2025[7]. Tech sector jobs include graphic design, user experience design, information architecture, customer engagement, content creation, publishing, and broadcasting – all roles that are centred around or interact with culture and the arts more broadly. Australian artists and cultural workers should be at the forefront in developing innovative content and cultural experiences using digital technologies and platforms. Arts and cultural sector workers need to be skilled and trained for the opportunities and jobs of the future which will increasingly require digitally skilled creative talent across many sectors of society. As digital technologies evolve, so too do the capabilities that artists and creative workers will require. This ongoing training and support should be recognised within the new national cultural policy.

However, we caution that in framing this pillar as 'the centrality of the artist', the Department does not view artists in only one dimension. Artists are not only creators of culture, but also

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[5] UK Government Department for Digital, Culture, Media & Sport, Policy paper on the government's vision for the broadcasting sector (CP 671), presented to Parliament by the Secretary of State for Digital, Culture, Media and Sport by Command of Her Majesty on 28 April 2022, ref: E02740713 04/22.

[6] See, for instance, work by Dr Kylie Pappalardo on her ARC funded DECRA project on Australia's screen industries ('Reconceptualising copyright to improve access to screen culture DE210100525), and research by A/Prof Ramon Lobato and Dr Alexa Scarlata on the ARC Future Fellowship Project, 'Australian television in the smart TV ecosystem: smart TV platforms, content distribution and discoverability'.

[7] Tech Council. (2021). The economic contribution of Australia's tech sector. https://techcouncil.com.au/wp-content/uploads/2021/08/TCA-Tech-sectors-economic-contribution-full-res.pdf

users and disseminators of culture. In their work as artists, they may wear many hats – explorer, experimenter, student, teacher, maker, remixer, distributor. Artistic work is a process, and it does not begin and end with the creation of a singular cultural object. Artists are also members of communities and society – like everyone, they benefit from vibrant dialogues about culture heritage and cultural futures, and culture as it is currently experienced.

All these activities require a copyright system with enough breathing space to enable artists to engage in their creative processes without being unduly hindered by copyright rules and restrictions. Copyright is intended to promote creativity, but research has found that it can do the opposite[8] – creativity can be stifled when artists are not permitted to draw inspiration from existing works in ways that might *technically* infringe copyright, but which do not harm the original creator and do not transplant the original work in the market. Australia still does not have provisions for the use of orphan works and does not have an exception for fair quotation of an existing work. The copyright system is complex, and artists may struggle to navigate the licensing terrain, both in using existing works and in disseminating their own creations. The Department should be mindful of the complexities created by copyright law and, in crafting a national cultural policy, we recommend the Department be guided by the in-depth work undertaken by the ALRC in their 2014 report on *Copyright and the Digital Economy*. More detailed suggestions about the best structure and wording of any new provisions for orphan works and fair quotations were made in the DMRC submission to the *Copyright Amendment (Access Reforms) Bill 2021* discussion paper.[9]

Finally, for Australian artists to be able to work, connect with their audiences, and disseminate their creations successfully into the future, it is crucial they have the necessary digital access and competencies to engage with internet and streaming platforms and new forms of technology. Close attention to digital inequity is therefore critical to ensuring artists—as workers—are equipped in their role as creators of culture. The Australia Council's suggestion that "digital skills and literacy at all levels of the sector, including new approaches to digital practice, distribution and platforms" form a focus area for the sector in their framing submission for the National Cultural Policy is welcomed. We note, however, that to the best of our knowledge there is currently no dataset, nor agreed upon approach, for measuring or evaluating such outcomes. Consultation with the sector and with subject matter experts (including within the ADM+S and DMRC) to understand and develop a best practice approach to this work would be a meaningful step forward.

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[8] Kylie Pappalardo, Patricia Aufderheide, Jessica Stevens and Nicolas Suzor, *Imagination Foregone: A qualitative study of the reuse practices of Australian creators* (2017) https://eprints.qut.edu.au/115940/.

[9] Kylie Pappalardo, Nicolas Suzor, Sasha Ness and Lucinda Nelson, QUT Digital Media Research Centre submission to the Copyright Amendment (Access Reforms) Bill 2021 and Discussion Paper, https://eprints.qut.edu.au/231873/.

4. Strong institutions: providing support across the spectrum of institutions which sustain our arts and culture.

Cultural institutions need urgent support to develop their digital capabilities

As with individual artists, the digital competencies of arts and cultural institutions and their workers is a fundamental factor in ensuring their strength and sustainability. More data is required to properly understand how arts and cultural institutions are using digital technologies, where barriers to this use are impinging, and their consequences. We note that the Australian Centre for the Moving Image (ACMI) is a leader in this regard. ACMI is using the UK's Cultural Compass (developed by Culture 24) to assess the digital skills held by their workforce. In addition, they have established the ACMI CEO Digital Mentoring Program (funded by the Australia Council and Ian Potter Foundation) to support cultural leaders in strengthening their digital capabilities[10]. We strongly endorse this type of collaborative, cross-sectoral investment in capacity building for digital skills and expertise across the sector.

The need for cultural institutions to have strong digital competencies is particularly pertinent during global pandemics that sometimes require physical locations to shut down for indeterminate periods of time. A strong digital presence allows institutions to continue to connect with their patrons and audiences during times of lock-down. Outside of lockdowns, digital competencies enable cultural institutions to expand their reach, enabling geographically distant audiences and enhancing audience accessibility (albeit if only for digitally included audiences). We note that this overlaps with Pillar 5 and return to this below.

The Goethe Institut's recent report on *(Re)-Engaging Digital Audiences in the Cultural Sectors*[11] highlights that the Covid-19 pandemic has brought into stark relief the importance for cultural institutions of "digital audience management", but that many still lack digital literacy and data management skills within their workforce. The report calls for an "urgent need" within Europe for "technical and structural support" to assist cultural institutions in transitioning to digital delivery and digital audience management.

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[10] The ACMI CEO Digital Mentoring Program is being evaluated by ADM+S Researcher Dr Indigo Holcombe-James. The pilot Program evaluation can be found here: https://apo.org.au/node/317920.

[11] Goethe Institut. (2022). (Re)-engaging digital audiences in the cultural sectors: Improving audience data. https://voicesofculture.eu/wp-content/uploads/2022/06/VOICES_OF_CULTURE_REPORT_150622_FINAL.pdf

There is similar need within Australian cultural institutions[12]. This need is especially acute for smaller and regional institutions. Post-covid-lockdowns, institutions with smaller budgets are struggling to maintain both digital and in-person services under current funding and resourcing structures, even though Australian audiences now expect to have some level of digital access to cultural services. In recent interviews conducted by ADM+S-researcher Dr Indigo Holcombe-James, local council operated galleries have expressed their consciousness that they are funded by geolocated rates-payers and so should focus their efforts on serving those constituents. Without the digital competencies to identify and understand who and where digital audiences are, already under resourced institutions are unlikely to invest in developing digital services. And, as noted under Pillar 1, the digital inequality experienced by First Nations Australians—particularly those living in remote areas of the country—directly impacts that of artists and institutions.

Data collection designed to better understand where arts and cultural institutions need greater support to implement and manage digital technologies is urgently needed. Drawing on this data, concerted efforts to close the digital divides experienced by the spectrum of institutions which sustain our arts and culture are crucial to ensuring they are supported to deliver on this critically important mission.

5. Reaching the audience: ensuring our stories reach the right people at home and abroad.

Digital availability, discoverability, and accessibility of Australian content are crucial elements of national cultural policy. Law and regulation should be harmonised across broadcast and online media to facilitate this.

We welcome this pillar's emphasis on reaching audiences, which we regard as a vital element in cultural policy. The success of a national cultural policy can be measured in part by the wide availability, accessibility, and discoverability of Australian content both domestically and internationally. We believe Government has an important role to play here, especially in relation to supporting discoverability, accessibility and availability of Australian content on digital platforms

In addition to the points regarding digital inequality noted throughout this submission, the audience focus of Pillar 5 requires engagement with a host of difficult and significant issues related to regulatory settings for content distribution. These include:

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[12] Holcombe-James, I. (2022) Digital access, skills, and dollars: applying a framework to digital exclusion in cultural institutions, *Cultural Trends, 31*(3): 240-256. DOI: 10.1080/09548963.2021.1972282

Holcombe-James, I. (2021). COVID-19, digital inclusion, and the Australian cultural sector: A research snapshot. Melbourne: Digital Ethnography Research Centre. https://apo.org.au/node/309894.

- The need to harmonise and reform regulation across broadcast and online media, especially with regard to local content requirements.

- The need to ensure maximal and equitable *availability* of Australian stories to audiences, both in terms of being effectively distributed under copyright and contract laws and being affordable to audiences from all socio-economic backgrounds (noting the proliferation of fee-based subscription services for content delivery and the structural decline of free-to-air TV broadcasting). For example, recent research by the Australian Communication Consumers Action Network (ACCAN) found that although streaming services are popular, broadcast television is still a valuable source of news and entertainment, especially for older Australians, less wealthy Australians and Australians who live further from capital cities.[13]

- The need to improve technological infrastructure in regional, rural and remote Australia to enable optimal access to Australian stories.

- The need to make Australian stories accessible to *all* Australians, including those with a disability. Screen Australia has required projects to include captions and audio description as a condition of funding since 2011 but there are still significant policy gaps around broadcasting and streaming access for persons with vision and/or hearing impairments.[14]

- The need to comprehensively support institutions and artists, including First Nations artists, to further build capacity in regard to effective and meaningful audience engagement

In addition to these recognized priorities, we wish to foreground the importance of a new and challenging aspect of cultural policy: **digital discoverability.** An important function of a national cultural policy will be to provide an overarching set of expectations regarding

[13] ACCAN 2022 Research Snapshot: How Australians Watch TV. Available at: https://accan.org.au/files/Reports/ACCAN%20Research%20Snapshot%20How%20Australians%20Watch%20TV.pdf

[14] Screen Australia 2011. *IMPROVED ACCESS MEANS MORE AUDIENCES FOR AUSTRALIAN FILMS*. Available at: https://www.screenaustralia.gov.au/sa/media-centre/news/2011/06-09-accessibility-improvements

Ellis, K., Locke, K., Peaty, G., Hersinta & Kao, K. 2021, *Access on Demand: An analysis of the accessibility options on streaming television*, Australian Communications Consumer Action Network, Sydney. Available at: https://accan.org.au/AccessOnDemand_Curtin_CCAT_web.pdf

ACCAN 2022. *ACCAN Research Snapshot: How Australians watch TV*. Available at: https://accan.org.au/files/Reports/ACCAN%20Research%20Snapshot%20How%20Australians%20Watch%20TV.pdf

discoverability of Australian content across all platforms, and to clarify the role and extent of government intervention. In our view, the purpose of discoverability regulation is to ensure a reasonable baseline level of visibility of local content across the digital media ecosystem, sufficient to sustain audience engagement with Australian stories, stars, and content over the long term. At this early stage, we feel it is also necessary for regulators to establish concretely the expectation that there is a public interest in discoverability, which relates directly to crucial issues such as media diversity and accessibility. In considering the public-interest rationale for discoverability regulation, government may find useful the Council of Europe's (CoE) recent guidance.[15]

As part of the new national cultural policy, government should clearly communicate to industry its expectations about the obligations of major digital platforms to make Australian content discoverable. This process has begun with the 2022 *Streaming Services Reporting and Investment Scheme* (SSRIS)*,* which proposes a mandatory reporting framework for major SVOD services. However, the design of this framework can be significant strengthened and improved. ADM+S researchers A/Prof Ramon Lobato and Dr Alexa Scarlata have provided suggestions to government in their submission to the SSRIS.

Another priority for government in the years ahead will be to build policy and research capacity to track, measure, and assess the impacts of discoverability design for the distribution of local content, particularly in regards to algorithmic recommendations. Internationally, a range of approaches are being used to measure discoverability and to model effective policy approaches, including discoverability audits, audience research, and interface analysis. ADM+S researchers, with expertise across the fields of computer science, media studies, law, and regulation, are available to assist the Government in developing comprehensive understandings of and strategies about algorithmic regulation and content discoverability.

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[15] Council of Europe, 'Guidance Note on the Prioritisation of Public Interest Content Online', 2 December 2021, https://rm.coe.int/cdmsi-2021-009-guidance-note-on-the-prioritisation-of-pi-content-e-ado/1680a524c4