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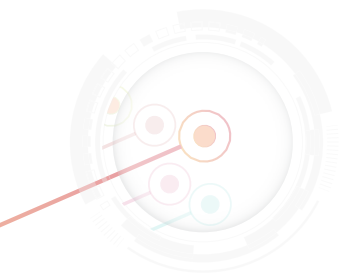
Cultural Policy  
**TRACKER**

# Intersections of policy, culture and sustainability



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# editorial

Welcome to the second issue of the ENCATC Cultural Policy Tracker in 2024, which spotlights different dimensions of cultural policy that are emerging in response to global challenges. From regional cooperation and social impact to fair working conditions and ethical digital transitions, this edition offers a comprehensive view of the shifts required to support the sectors' future.

In an era marked by political, economic, and social complexities, regional cooperation is more than just an exchange of goods or services—it is an essential tool for fostering mutual understanding and development. The article on ASEAN-EU Cultural Cooperation authored by Lluís Bonet and David Ocón highlights the underdeveloped cultural ties between ASEAN and the EU, despite their long-standing political and economic relationships. The findings show that while other areas of cooperation, such as education and economic integration, have thrived, cultural exchanges remain limited by bureaucratic inefficiencies and a lack of long-term planning, and make a case for cultural cooperation as a strategic asset. By advocating for a pilot initiative to explore new avenues of cooperation, the piece invites policymakers to rethink the role of culture in global relations.

The London School of Mosaic (LSoM) reiterates the role of arts organisations in fostering social cohesion and urban regeneration through its article on Socially Engaged Arts and Policy, authored by Lauren England, Chandra Morrison and Ed Charlton. The case study of LSoM exemplifies how small, community-driven arts organisations can contribute to urban development, providing affordable spaces for artists while offering valuable social services. The article underscores the need for more flexible funding mechanisms that account for unpredictable economic shifts and calls for co-designed evaluation processes that capture the nuanced social value these organisations generate, beyond traditional economic metrics.



# editorial

The Fair Culture Charter, spearheaded by the German Commission for UNESCO, proposes an ambitious vision for the cultural and creative industries, applying Fairtrade principles to ensure fair working conditions and equitable global exchanges. In a world where artists and cultural workers, particularly in the Global South, face precarious working conditions, this article positions the Charter as a rallying call for global stakeholders—governments, private enterprises, and civil society—to join forces in creating a more just cultural economy. By addressing systemic inequalities in global cultural production and distribution, the Charter promises to not only protect cultural workers but also to strengthen the creative industries as engines of sustainable development.

Bringing focus to the ever-evolving digital dimension of culture, Julia Glesner's article examines how cultural policy adapts to digital transformations, analysing strategies by German regional governments. The article identifies tendencies towards institutional isomorphism, an overemphasis on retro-digitization of cultural heritage, and a disproportionate focus on visual arts over other forms like performing arts. It pertinently differentiates digitization (content conversion) from digitalization (transforming production principles) and critiques conventional participation processes and their exclusion of marginalized voices. Glesner advocates strategic thinking, a broadened cultural notion, and small, incremental steps for digital transformation to balance innovation with inclusivity and practicality.

In the same vein, the collaborative piece by Michael Culture Association and Culture Action Europe discusses the AI & Digital Action Group's efforts to align EU digital policies with the needs of cultural and creative sectors (CCS). Formed in 2024, the group's initiatives include surveys and workshops to address ethical AI use, copyright coherence, and the digital public space. The article identifies concerns such as copyright violations, algorithmic biases, and unequal access to digital tools, and underscores the necessity for education, advocacy, and community-driven policy development.



# editorial

In the concluding and provocative piece of the publication, Carmen Croitoru takes a bird's eye view to explore the systemic failures of cultural policies, attributing their ineffectiveness to rushed implementation, lack of societal need assessment, and insufficient methodological rigor. She argues that cultural policies often prioritize producers over beneficiaries, neglect comprehensive pre- and post-policy analyses, and fail to address barriers like geography, economics, and education. Croitoru recommends a balanced approach using quantitative and qualitative methods to evaluate impact and identify consumption obstacles, emphasizing the importance of a clear vision and adequate planning to ensure meaningful and sustainable cultural engagement.

The rich content of this edition of the Tracker offers valuable insights into the intersections of policy, culture, and sustainability. From the geopolitical potential of ASEAN-EU cultural relations to the grassroots impact of socially engaged arts, the transformative vision of the Fair Culture Charter, to the imminent impacts of culture's digital transformation, the messages are clear: fair and sustainable cultural practices are not just desirable—they are essential for the future of the creative industries.

By embedding culture at the heart of international cooperation, fostering flexible funding models, and advocating for fair working conditions and ethical policies, we can ensure that the creative industries remain vibrant and inclusive in the decades to come.

Yours truly,

**GiannaLia Cogliandro**  
ENCATC Secretary General

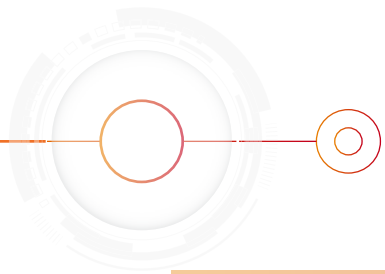
Why should we care about it?

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*David Ocón, Luis Bonet*

In an increasingly complex international landscape characterised by the rapid emergence and dissolution of alliances, the enduring presence of the *Association of Southeast Asian Nations* (ASEAN) and the *European Union* (EU) as prominent players in global politics marks a significant achievement. Given this shared perception of success, there are high expectations surrounding their cooperative efforts. Although the two regional organisations have collaborated for over 45 years, they only committed to elevating their relationship to “strategic partners” at the end of 2020. This partnership encompasses intensified collaboration on critical issues, including economic integration, climate change, environmental protection, sustainable development, maritime cooperation, and cybersecurity.

Cultural cooperation is often perceived as essential for fostering understanding and collaboration between countries and regions, extending beyond mere economic and political exchanges. However, **despite decades of bilateral cultural cooperation that have yielded valuable outcomes, multilateral cultural partnerships between ASEAN and the EU remain underdeveloped.** The lack of a cohesive multilateral framework has hindered the full potential of cultural exchanges between the two, and although political dialogue, trade, and economic cooperation have progressed over the years, the multilateral relationship in arts and cultural cooperation has been timid and lacking in long-term planning. That can be seen in the successive strategic plans of action, where culture and cultural matters are minimally represented, which indicates a pressing need for a dedicated space for culture within the ASEAN-EU relationship to bring up to speed the relationship.



## Aim and methodology

This study aims to address the gap in cultural cooperation between these institutions, advocating for a more targeted alignment of culture within the broader geopolitical context of ASEAN-EU relations. It provides recommendations based on

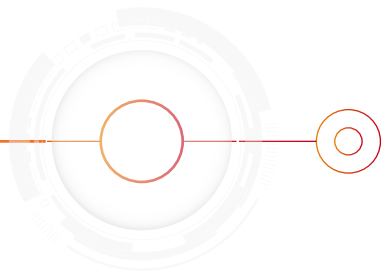
1. a comprehensive historical analysis;
2. a targeted survey involving 40 hand-picked experts from various sectors, including academia, government agencies, non-governmental organisations (NGOs), media, as well as arts managers, artists and other cultural practitioners, and international consultants; and
3. twelve in-depth interviews with key stakeholders in the cultural and non-cultural fields of the EU and ASEAN. By emphasising the pivotal role of culture, this study highlights its potential as a "hinge" that complements and supports other strategic areas of cooperation, ultimately enhancing diplomatic relations and fostering deeper understanding between the two regions.

## Main findings of the consultation process

The main trends and potentials of ASEAN-EU cultural relations can be summarised in the following fourteen aspects:

- 1 Despite a relationship spanning more than 45 years, ASEAN-EU **cultural cooperation has, historically speaking, remained low**. This may be attributed to discrete mutual geostrategic interests, which have shifted over time. The European Union recently showed an increased interest in Southeast Asia, which is linked to the rise of China both regionally and globally.
- 2 Consequently, there is a **significant lack of visibility** of ASEAN in the European context and of the European Union in the ASEAN context, particularly among the region's civil societies.

- 3 Currently, there is a **lack of institutional cultural cooperation mechanisms** between ASEAN and the EU. Most cultural exchanges and projects occur bilaterally or through third parties such as European national cultural institutes (e.g. Goethe-Institut, Institut Français, Instituto Cervantes, etc.), and multilateral organisations such as ASEF. However, these organisations have different mandates and stakeholders, leading to **significant gaps** in ASEAN-EU collaboration.
- 4 Cultural practitioners, artists and managers perceive the EU and ASEAN as **slow, inefficient and overly bureaucratic**. Cultural departments are often understaffed, especially in ASEAN, and **lack the necessary funds and human resources** for long-term collaborations.
- 5 **Administrative and logistical hurdles**, such as visa challenges for Southeast Asians and large income disparities, further impede the cultural relationship between the two regions.
- 6 Despite establishing an ASEAN-EU strategic partnership at the end of 2020, **culture is not considered to be strategic** in official documents, declarations and statements regarding ASEAN-EU collaboration. The near-total absence of 'culture' from the latest action plan (2023-2027) underscores the marginalisation of cultural priorities in the relationship.
- 7 With active discussions and collaborations in other areas, such as education, youth dialogue and sustainability, in both public offices and civil societies, there is an **increasingly perceived need for enhanced partnerships in cultural cooperation**. This growing interest underscores the recognition that culture can foster mutual understanding, strengthen ASEAN-EU relations and be an economic asset, for instance through collaboration in cultural industries.
- 8 The deficit in cultural cooperation tools results in **numerous shortcomings affecting the regions' civil societies**, including professional development opportunities, co-creation initiatives, education and training programmes, and heritage conservation and restoration efforts. These shortcomings are particularly acute in the case of ASEAN.



- 9 ASEAN-EU cultural cooperation **lags behind other strategic relationships**, such as the ASEAN-US and especially the ASEAN-China strategic partnership, which stresses the importance of cultural exchange at all levels, advocating for joint cultural initiatives like performances, exhibitions and festivals. It promotes people-to-people exchanges in various arts, supports ASEAN-China Cultural Forums and encourages the development of cultural enterprises. The partnership also facilitates knowledge-sharing in cultural heritage preservation and supports professional exchanges and development in cultural institutions.
- 10 **Alternative collaboration mechanisms and/or structures are necessary** to carry out cultural cooperation between ASEAN and the EU beyond their main institutions (the ASEAN Secretariat and the European Commission) which, however, need to be involved in the processes.
- 11 **Increased cooperation between the ASEAN Secretariat and the European Commission (particularly their cultural departments and other associated bodies) and civil societies** is essential for advancing cultural relationships between the two regions. These partnerships can enhance mutual understanding and appreciation and pave the way for sustainable cultural exchange, encouraging long-term relationships that benefit both regions through capacity-building interventions and shared knowledge, experiences, and resources.
- 12 **Core funding** is necessary to elevate ASEAN-EU cultural cooperation to an acceptable level.
- 13 The regions' cultural actors and professionals representing civil arts and culture society-led organisations prefer **long-term, sustainable engagements and commitments** over ad hoc arrangements.
- 14 Both institutions and civil societies should **engage in areas where they find common ground and feel comfortable**, including contemporary artistic practices, diversity, CCI, and less explored topics like food and gastronomy. Traditional cultural practices in the ASEAN context should also be considered, and potentially controversial topics should be avoided.

## Recommendations

Given Europe's increasing geostrategic and socio-cultural interest in Southeast Asia and vice versa, as well as the importance of cooperation with European cultural actors for ASEAN member countries, we propose the following recommendations to enhance the cultural relationship between ASEAN and the EU. The recommendations have been divided into three sections: strategic, conceptual and operational.

### STRATEGIC

Endow the arts and culture with **enhanced centrality** as part of the broader ASEAN-EU institutional cooperation. Culture needs to be able to participate and play a more decisive role in the interregional cooperation debates at all levels, particularly those addressing global challenges such as sustainable development, migration and refugee crises, social inclusion and inequality, political stability and governance, and digital transformation, among others, including Ministerial (AEMM) and Senior Officials' (SOM) Meetings, as well as Joint Cooperation Committees (JCC). We recommend that ASEAN and the EU scrutinise how ASEAN and China have integrated culture as part of their more than two-decade-long strategic partnership.

#### Specific recommendation

We recommend enhancing the role of culture in the mid-term through an interim two-year pilot project (for instance, 2026-2027). This initiative, monitored and evaluated accordingly, can prepare ASEAN and the European Union for a more pivotal role of culture in the future ASEAN-EU Plan of Action 2028-2032.

## CONCEPTUAL

We have identified the following six areas which could be prioritised for an enhanced ASEAN-EU cultural cooperation:

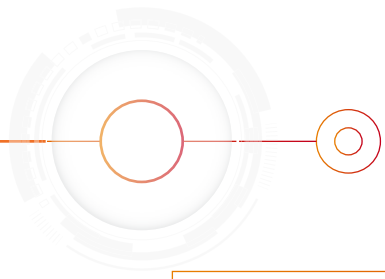
- professional development
- education and training programmes
- mobility and exchange opportunities
- strengthening collaboration and engagement among Civil Society Organisations (CSOs)
- co-creation initiatives
- heritage conservation and restoration efforts
- In addition, the authors believe it is important to balance contemporary and traditional arts and cultural practices as well as to explore less-travelled avenues for cooperation, such as food and gastronomy, and give due emphasis to the creative and cultural industries (CCIs)

## OPERATIONAL

- a. We recommend that ASEAN and the EU **allocate a sizeable core budget** for interregional cultural cooperation to operate in a long-term multi-year initiative. In the first phase, as highlighted in the strategic recommendation, they propose a two-year pilot project (2026-2027) to be subjected to a monitoring process and evaluation.

We propose two potential ways of channelising this hypothetical financial support:

- ▶ 1. **Delegate the management of the ASEAN-EU cultural cooperation and its allocated funds to a third-party regional organisation.** The authors believe the ASEAN Foundation could be a potentially



suitable interim host for the pilot endeavour mentioned above, leveraging its experience in handling similar initiatives like the KONNECT ASEAN programme, established and funded by the ASEAN-Korea Cooperation Fund in 2020. Another possibility could be to delegate this task to the Asia Europe Foundation (ASEF) as a temporary pilot project.

- ▶ 2. **Enable the formation of a consortium of cultural organisations and initiatives with operations in both ASEAN and/or European contexts.** This consortium could provide expertise and targeted actions which could benefit specific fields in Southeast Asia and Europe, from the mobility of artists and cultural operators to cultural management education, amongst others. Concerning this, and as a possible follow-up to this study, the authors recommend the creation of a curated mapping of relevant organisations and initiatives currently working in different arts and cultural areas, both regionally and at the national level, which could be a part of or partner to this consortium.

- b. The **organisation of a recurrent ASEAN-EU Arts Festival**, alternating between Southeast Asia and Europe, serving as a platform for showcasing both regions' rich cultural heritage and contemporary artistic expressions. This initiative addresses the lack of mutual visibility and awareness while providing a privileged space for exchanging cooperative initiatives and co-productions. The format and content of this festival should be a core component of co-creation and collaboration and developed in partnership with cultural operators and stakeholders from ASEAN and the EU to ensure inclusivity and relevance.

- c. Address the challenges imposed by the EU in obtaining **short-term/stay visas** for most ASEAN nationals to enter the EU/Schengen countries, particularly for purposes such as artistic performances and exchanges, participation in conferences and short training programmes.

This article results from an [in-depth analysis](#) carried out by the authors and published by [ifa](#) (Institut für Auslandsbeziehungen).

## AUTHORS



**Dr David Ocón** is an interdisciplinary cultural anthropologist who works on the intersections of Asian cultural heritage with preservation, digitalisation, tourism, geopolitics, and sustainability. He also analyses cultural diplomacy and cooperation in the Asian region, particularly between China, Japan, South Korea, and the ASEAN countries, as well as with external parties like the EU.

David has twenty years of experience in the arts, culture, and heritage sectors. As a practitioner, he led departments at organisations such as the *Asia-Europe Foundation* (ASEF, Singapore), ENCATC (Belgium), and *Cervantes Institute* (Beijing, China), where he was the head of culture. He is currently an Assistant Professor at *Singapore Management University*, where he leads courses including *Cultural Relations and Diplomacy in Asia*, *Urban Cultural Anthropology*, and *Cultural Heritage and Social Sustainability*. His academic career includes previous positions at City University of Hong Kong and James Cook University, and for over a decade, he has been a visiting faculty member at the *University of Barcelona's* International Cultural Cooperation and Management Postgraduate Programme.

Dr. Ocón has authored numerous book chapters and articles published in renowned peer-reviewed journals such as *Sustainability Science*, *The Hague Journal of Diplomacy*, *The International Journal of Heritage Studies*, *The Journal of Asian Public Policy*, *The Journal of Cultural Heritage Management and Sustainable Development*, and the *European Journal of Cultural Management and Policy*. Most recently, he co-authored an in-depth study exploring the realities and untapped potential of ASEAN-EU cultural cooperation.



**Lluís Bonet** Professor of Applied Economics and Director of the Cultural Management Program at the University of Barcelona. His field of specialization focuses on the culture sector, with a long career as a researcher and trainer in cultural economics, arts management and cultural policies. Professor Bonet coordinates the line of research on management of culture and heritage at the doctoral program Society and Culture.

He has been a visiting researcher at the Massachusetts Institute of Technology, the University of Montpellier and the Kunnskapssverket National Center for Research on Cultural Industries in Norway. He has lectured in more than fifty different countries in Africa, America, Asia, Europe, and Oceania. He has participated in a large number of international research and cooperation projects funded by the European Union, AECID, the IDB, the OEI, the Research Council of Norway, and the Ibero-American Union of Universities. He has coordinated the EULAC Focus (Horizon2020) and CHARTER (Erasmus +) projects and is currently participating in Be SpectACTIVE! (Creative Europe), Crowdcu! (Research Council Norway), MESOC (Horizon2020), Stronger peripheries (Creative Europe) and Sus-Ter (Erasmus +).

Winner of the CAC Research Prize (2002) and Encatc Award for Outstanding Contribution (2023), Dr. Bonet has chaired the Cultural Policy Research Award. He also has been a member of the jury for various international awards, served on the boards of various academic journals and has served on the jury of more than twenty PhD dissertations. Institutional responsibilities include chairing the European Network of Cultural Administration Training Center, vice-president of Abacus Cooperative and the Association of Arts Administration Educators (AAAE), or being a board member of the Association of Cultural Economics International (ACEI), the Tr3sc Culture Club and the Cercle de Cultura. He is currently a board member of the Bosch i Gimpera Foundation.



# Socially engaged arts organisations and policy

A case study of the London School of Mosaic

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*Lauren England, Chandra Morrison, Ed Charlton*

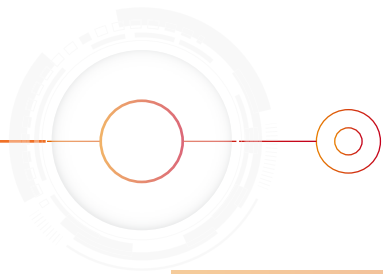
## Introduction

This policy brief highlights the key findings and recommendations from the 'Socially Engaged Art and Policy' project, funded by the British Academy (2021-23). This was a collaborative, co-designed research project with the London School of Mosaic (LSoM) and RESOLVE Collective, led by Dr Chandra Morrison (London School of Economics) alongside Dr Lauren England (King's College London) and Dr Ed Charlton (Queen Mary University).

The project's main guiding research questions were:

- **How do socially engaged arts organisations work with local policymakers?**
- **How can the value of socially engaged arts organisations be better understood and represented?**

The research team explored these questions through an in-depth case study of LSoM, using co-design principles and creative and ethnographic research methods. This included piloting a participatory mapping exercise as a way to surface the School's latent value. We briefly introduce the case study of LSoM here before highlighting the key findings and recommendations from the research. We focus on practical ideas for addressing identified policy bottlenecks and highlighting fruitful areas for creative research methods to support evaluation and community consultation processes.



## London School of Mosaic

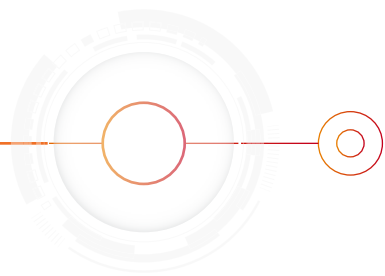


Figure 1. London School of Mosaic exterior. Source: Chandra Morrison

LSoM (originally founded as Southbank Mosaics in 2004) is a small (3-5 core staff) arts organisation that teaches mosaic studies through short courses and accredited qualifications. They also work with their local communities by running free sessions in mosaic-making and other arts activities for vulnerable groups and those at risk of marginalisation. In 2017 the School expanded<sup>1</sup>, rebranded and relocated to the Ludham and Waxham Estate, located in the Gospel Oak ward of Camden, a Borough in North London. Gospel Oak is the most deprived ward in Camden and among the 15% most deprived wards in England as a whole (Ministry of Housing, Communities & Local Government, 2019) and is a priority area for community investment and regeneration due to high levels of relative deprivation relating to health, income and employability (Camden Council, 2017). LSoM subsequently redeveloped the Ludham Undercroft (the building's garages) into 30 affordable workshops and artist studios, opening in 2023<sup>2</sup>.

<sup>1</sup> Supported by an investment (an unsecured repayable loan) from NESTA through the Arts Impact Fund

<sup>2</sup> Funding sources included capital funding from the Mayor of London's Good Growth Fund (Greater London Authority - GLA), match funding from Camden Borough Council, grants from Arts Council England (£53k), Garfield Weston and a community crowd funder.



Socially engaged arts organisations like LSoM are deeply embedded in place (Olsen, 2019) and committed to inclusive models of urban development, engaging with the funding bodies and policymakers that similarly support these approaches to citymaking. In the UK, public funding for socially engaged arts is often linked to the 'societal benefits of active participation and the hope that they might support wider strategies of social cohesion and inclusion' (Belfiore, 2022: 2). LSoM is typical here, forging key policy 'attachments' (Grey, 2007) as part of their work with marginalised groups and contribution to local urban regeneration and economic development through the undercroft artist studios. The expansion of LSoM and development of the undercroft can also be seen as a response to pressures on arts organisations to adopt entrepreneurial approaches to 'income diversification' (Ashton, 2023).

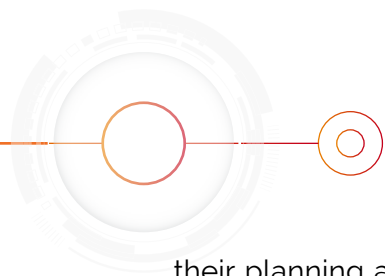
Organisations like LSOM will often seek multiple sources of funding for large projects (such as the Undercroft redevelopment) from multiple funders (public and private). As we note in this research, this can result in key points of tension emerging in relation to managing multiple stakeholders, project deliverables and evaluation/reporting requirements to demonstrate both economic and social impact (Belfiore, 2020).

## Key findings

### Funding and relationship management

The case study of LSoM highlights some of the key bottlenecks that can inhibit constructive collaboration between the organisation and policymakers in generating effective, sustainable contributions to place.

LSoM engages simultaneously with multiple levels and areas of policy in London as well as other private funders and stakeholders. On an everyday level, **the School navigates between cultural, educational and social policy, each of which have their own priorities and complex evaluation criteria.** This is challenging for a small organisation to audit, requiring ongoing innovation and adaptation in



their planning and reporting. The situation additionally requires regular reactions to sometimes unforeseeable events and policy changes as well as unexpected building maintenance and associated costs.

The School highlighted a number of occasions where strong negotiation had been required with funders regarding the need for flexibility in funded projects when faced with unforeseeable events and policy changes (such as the announcement of higher education reforms preventing the establishment of the BA Mosaics programme, the impact of COVID-19, high levels inflation and the cost of living crisis in the UK) as well as unexpected building maintenance delays and associated costs.

The organisation's relationship with funders is not predetermined; it is shaped by the attitude, effort and level of engagement of each party. **Misaligned expectations and a lack of flexibility could also negatively impact the School's relationship with funders and local stakeholders.** For example, the capital funding from the GLA to redevelop the Undercroft did not allow for flexibility changes in the economic climate (specifically high rates of inflation and rising energy costs) when costing the planned development works. Ultimately, these circumstances put pressure on the ability of LSoM to deliver 'affordable' artist studios while remaining solvent, generating tension between the local community and both Camden Borough Council and the GLA as funders.

However, there were also examples of positive relationships between the School and local councillors, and with senior members of Camden Council; for example, in their joint engagement with residents of the Ludham and Waxham Estate to communicate the purpose of the Undercroft development and prospective benefits. This was supported by a good relationship between LSoM and key community leaders, notably the Chair of the Tenants and Residents Association.

**Beyond financial challenges, navigating multiple funders and policy areas requires the management of diverse, often complicated funder evaluation requests.** Both the burden of reporting and the lack of joined up

thinking between different organisations regarding reporting requirements emerged as key issues in need of better solutions. The emphasis on quantitative measurement (partially to enable economic value approximations) was also viewed as limiting the ways in which LSoM could effectively capture and communicate their value and work with the community. It was noted, however, that **some arts funders are moving towards more narrative/creative forms of evaluation**, and this was seen as a welcome shift.

What appears to be missing in these conversations with funders about reporting and deliverables is a way to recognise the many smaller, cumulative impacts that LSoM has on the local environment and community. This is where co-designed approaches and creative methods can excel, especially when it comes to revealing the micro-assets of value that animate people's daily lives. In this project we used a participatory mapping exercise developed by RESOLVE to capture different LSoM stakeholder perspectives on spaces of social value within the local area and their connection with the school's activities.

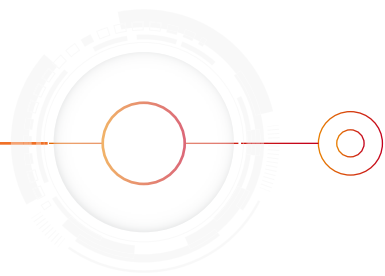


Figure 2. Maps at two scales for the creative mapping workshop. Source: Chandra Morrison

## Recommendations

- Funders (at all levels) need to allow for greater flexibility in the delivery of proposed outcomes, especially in the face of unpredictable or uncontrollable economic circumstances.
- Enhancing channels of communication between funders and recipients throughout the lifespan of a project, especially during key development periods, is imperative to build trust and understanding between both parties.
- There is a need for fair lease agreements and clarity over legal responsibility for infrastructure and large maintenance issues, especially when small arts organisations contribute to the redevelopment of local authority assets.
- We recommend the implementation of long-term social-value leases (supported by further research) which recognise and further encourage the specific contribution of socially engaged arts organisations to the local area.
- Creative, participatory research approaches tap into deep local knowledge, showcase diverse voices and encourage community building. Their further use by arts organisations and policy makers (using co-design) could improve understanding of organisational strategy, community engagement and policy consultation.
- We recommend that arts organisations and community members collaborate in the design of evaluation procedures and reporting requirements for funding. This approach would avoid burdensome and often blunt top-down metrics and capture more diverse perspectives on value.

**These recommendations are all designed to support the idea of the good city, one in which all members of the urban community may thrive. Moreover,**



they affirm the essential value of socially engaged arts organisations to enable processes for more equitable and sustainable urban growth. Their capacity for creativity and collaboration make them important sites for developing inclusive community engagement and the implementation of fair policy.

While our research project was based on a single in-depth case study of LSoM, it is nevertheless a valuable example of the ways in which **small arts organisations must work across multiple layers of policy, pursuing income diversification strategies in response to the current arts funding and policy landscape**. LSoM's experiences may well inform the work of other socially engaged arts organisations. They are particularly relevant to those considering or currently based in local authority property and seeking to grow.

The full policy report from the project 'Small arts organisations, social value and policy' is available to download [here](#).

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## AUTHORS



*Dr Lauren England* is a Lecturer in Creative Economies at the Department for Culture, Media and Creative Industries at King's College London (UK).

She is interested in creative enterprise and education with a focus on craft and sustainable development in both global North and global South contexts. Lauren has published research on the evolution of craft skills, craft and fashion entrepreneurship, higher education and social enterprises and the impact of COVID-19 on creative workers. In addition to this project on urban cultural policy relationships for small arts organisations in London, she has ongoing research on creative economy development and fashion entrepreneurship in Africa.



*Dr Chandra Morrison* is a Research Associate of the Department of Geography and Environment, London School of Economics (UK).

She is an urban ethnographer who specialises in public art practices, cities, and social justice in Latin America and, more recently, the UK. Her work embraces multimodal and visual research methods to generate creative forms of knowledge exchange. During this project on socially engaged art and policy, she held the post of Leverhulme Early Career Fellow at LSE.



*Dr Ed Charlton* is a Lecturer in Postcolonial Studies in the School of English and Drama, Queen Mary, University of London (UK).

His research focuses on global urban culture, specifically questions of urban and racial justice. He has interests in a range of expressive media, including photography, film and literary writing. In his published research on London, he examines the damaging impact of austerity and emergency forms of governance on the character of the city. Before his current role at Queen Mary, he was a research fellow at LSE Cities, London School of Economics.



# The Fair Culture Charter - why you should join the movement!

*The German Commission for UNESCO facilitates and coordinates the Fair Culture initiative.*

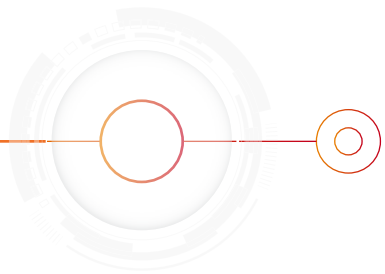
The Fair Culture Charter is a brand-new document that aims to support the creation of a global movement through which Fairtrade principles will be applied to culture and the creative industries with a view to ensuring decent working conditions and fair remuneration globally.

## **Precarity, injustice and a shocked system**

Artists, creatives and other cultural workers around the world live and work in precarious conditions, especially in low- and middle-income countries. Even in a rich country like Germany, about half of all artists have an income that defines them as solidly poor. 95% of all exports of cultural goods and services originate in high-income countries. The Covid-19 pandemic has exacerbated these inequalities.

It is truly urgent, it is a matter of human dignity and it is also a matter of the survival of society that these precarious and unjust circumstances change. **We critically need vibrant culture and healthy creative industries to inspire the global shift towards sustainable development.**

Today is the perfect time to upscale work for justice, for decent working conditions and fair pay! Right now, digital platform economies and artificial intelligence are changing all value chains anyway. Unfortunately, the current changes are mostly to the detriment of artists, creatives and cultural workers. We have to shape such change to be beneficial!



We do not start from scratch. In fact, 20 years ago, UNESCO created binding international law with its 2005 Convention on the Protection and Promotion of the Diversity of Cultural Expressions. This UNESCO Convention has been ratified by more than 150 countries around the world and has successfully strengthened their cultural policies. But progress towards justice has been too slow. We need more momentum, more commitment, more partners, more networks.

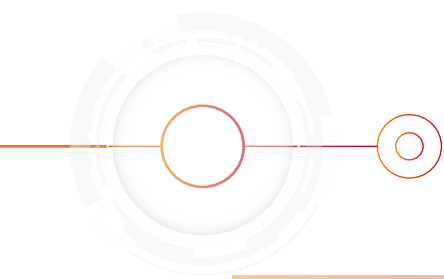
### Learning from Fairtrade

We can and should also draw on the 30 years of experience of the Fairtrade movement. Fairtrade has improved the lives of millions of farmers and their families. It has transformed markets and value chains for commodities such as coffee, cocoa and bananas. Of course, products such as music, fashion, film and games have very different value chains to agricultural commodities. But we can still look to learn from Fairtrade for the creative industries!

Such learning has already been achieved, through a landmark study by Canadian expert Professor Véronique Guèvremont in 2021, commissioned by the German Commission for UNESCO and funded by the German Ministry for Economic Cooperation and Development. According to the study, **Fairtrade in culture and the creative industries is *indeed* possible** - but in adapted formats and on a sector-by-sector basis. Fairtrade is promising in most sectors of the creative industries. Labelling and certification are possible, albeit for the business model rather than the individual creative product or artist.

**Fair Culture labelling and certification does not yet exist.** How do we get there? **Through the combined efforts of hundreds of partners. This is what Fairtrade did. Fairtrade created a foundational document that was specific enough, yet general enough, for hundreds and thousands of partners to join forces.**

This is exactly what the Fair Culture Charter aims to do. We are also taking inspiration from the Fairtrade Charter at a procedural level - **we want to move towards a global movement for decent working conditions for all artists, creatives and other cultural workers around the world.**



## Formulating the Fair Culture Charter

For this reason, more than 10 organisations came together at the UNESCO World Conference on Cultural Policies (Mondiacult, Mexico City) in **September 2022**. They formed the **first Alliance for Fair Culture**. This Alliance included Fairtrade International itself, the Goethe Institute, the International Federation of Actors, the International Federation of Coalitions for Cultural Diversity, the International Federation of Musicians and several National Commissions for UNESCO. UNESCO itself has been closely associated throughout the process. The entire process has been organised and coordinated by the German Commission for UNESCO.

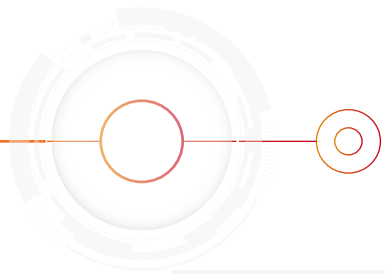
Even though artists and creators worldwide are facing precarious conditions, those in the Global South are facing particularly dire circumstances. It was therefore of utmost importance that the Fair Culture Charter was formulated by experts, artists and practitioners from the Global South. To this end, a group of nine people (4 men and 5 women) were commissioned to draft the Charter. They came from countries such as Colombia, India, Mexico, Morocco, the Philippines and Zimbabwe. The aforementioned Véronique Guèvremont chaired the group through more than ten working sessions during 2023.

The aforementioned alliance of ten (now thirteen) organisations adopted the final text of the Charter in early 2024. It has been translated into other languages and is now available in English, French, Spanish and German, with other languages in preparation. The Charter was launched in a 2-hour, 4-language digital event on 10 September 2024 ([www.youtube.com/live/4tQF43zoJq4](https://www.youtube.com/live/4tQF43zoJq4)). The Charter can be viewed and signed at [www.fair-culture.org](https://www.fair-culture.org)

## The goals of the Fair Culture Charter



The aim of the Fair Culture Charter is to promote the respect, protection and fulfilment of social, economic, cultural, and other human rights of artists, creatives, and other cultural workers, by ensuring fairer labour practices and more balanced exchanges at the local, national, regional, and global levels, notably by:

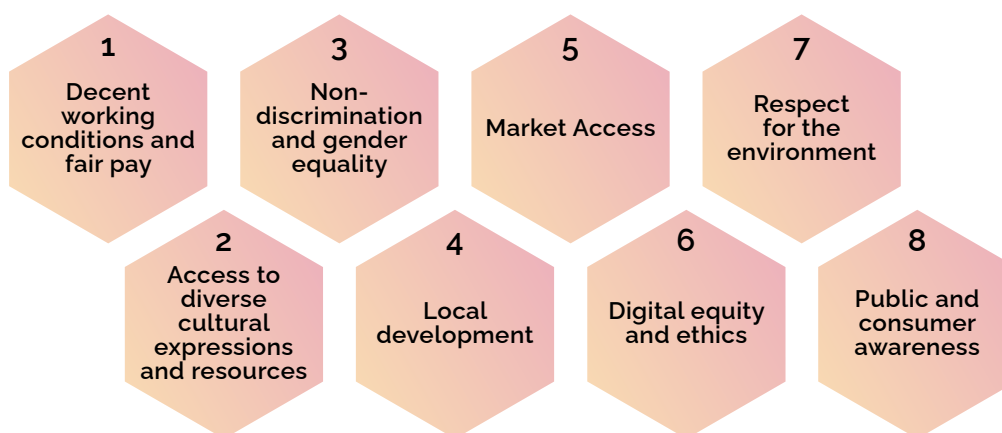
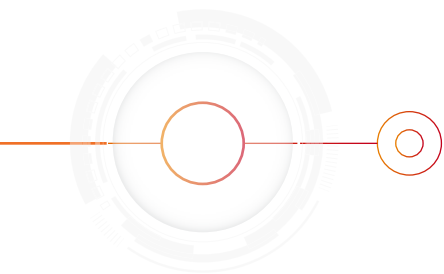


1. Promoting and upholding decent working conditions of artists, creatives and other cultural workers. This includes their right to collective representation and fair remuneration, recognition, and compensation for cultural and creative work – in particular an effective implementation of intellectual property rights – including in the digital environment.
2. Establishing an enabling environment to enhance competitiveness and long-term reliability of cultural and creative value chains, with policy coherence. Such an enabling environment should also eradicate inequalities and disparities in the areas of trade and cooperation, and ensure more balanced exchanges of cultural goods and services globally and inclusive access to digital tools and skills, enhance mobility, strengthen capacities and formalize the sector when it is for the benefit of the artists, creatives and other cultural workers.
3. Engaging the private sector, especially multinational enterprises and tech companies, in innovative partnerships with governments, state institutions, and civil society organizations across sectors and world regions in the implementation of Fair Culture principles and due diligence measures.
4. Raising public awareness among consumers and audiences about the importance of protecting and promoting the diversity of cultural expressions, including safeguarding the rights and working conditions of artists, creatives, and other cultural workers.



### The eight principles of the Fair Culture Charter

At the heart of the Fair Culture Charter are eight "principles", which set out in detail what those who sign up to the Charter will be committing themselves to. The titles of these principles are:



The content of these principles was hotly debated during the drafting process. It is certainly not trivial or common sense. For example, Principle 7 reads: "... In particular, the negative environmental impact of the use of digital technologies and cultural events and activities with large carbon footprint needs to be addressed. Innovative and systemic solutions are needed; there may be potential in more decentralized approaches.....". This means that the Fair Culture Charter defends the need for artists to tour so that audiences can get to know them. What the Charter does not support, however, is the recent trend towards centralised tours - major artists playing up to a dozen concerts in one venue, with audiences flying in from across continents.

### What next and what can you do?

The Fair Culture Charter can be signed online at [www.fair-culture.org](http://www.fair-culture.org). Several dozen organisations and individuals have already signed the Charter. Their names are listed on the website.

Signing the Charter is not a certification and cannot be used to make statements about your own business practices. Signing the Charter is a signal of support to take next steps towards Fair Culture based on the content of the Charter. In particular, these next steps include moving towards concrete models of certification and labelling, sector by sector in the cultural and creative industries.

## AUTHORS



fairpicture



INSTITUTO MARACÁ

IKPI.



**unesco**  
Commission nationale  
française pour l'UNESCO



**unesco**  
Kenya  
National Commission



**unesco**  
Korean  
National Commission  
유네스코한국위원회



**unesco**  
German Commission  
for UNESCO

The German Commission for UNESCO facilitates and coordinates the Fair Culture initiative since 2018, bringing together several dozens of organizations from around the world. The German Commission for UNESCO, created in 1950, is one of 200 National Commissions for UNESCO; its core task is to ensure the best possible participation of Germany in UNESCO and the best possible implementation of UNESCO international law and UNESCO programmes in Germany. It acts as a link between the state and civil society in all UNESCO fields of activity.



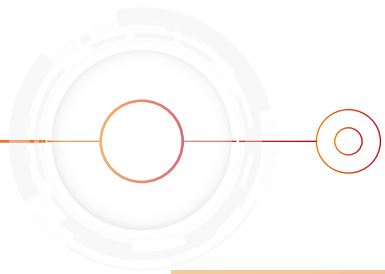
# Shaping Digital Cultural Policy Strategically

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*Julia Glesner*

## Introduction

The “digital condition” (Stalder, 2018, 8), the new *conditio sine qua non* of today’s lifestyle in modern societies, not only influences all modes of production and reception both in the publicly funded as well as in the commercial cultural sectors, but also regarding how humans perceive, consume and participate in a digital society and its culture. Cultural policy under the digital condition has been recently described as a “contingent, complex, and convergent policy area field” by cultural policy researchers Ole Marius Hylland and Jaka Primorac (Hylland/ Primorac, 2024, 15). Although the term digital cultural policy “remains to be fully unravelled” according to Roberge and Chantepie (2017, 295), its scope manifests itself “in an intersection between sectorial and culture-specific policies and cross-sectorial policies relevant to all sectors, including general regulation of digital infrastructure”, say Hylland/ Primorac (2024, 193). In a field where “literature that is explicitly relating digitalization to cultural policy is still quite sparse” (ibid., 12), Hylland and Primorac offer a new working definition. They understand digital cultural policy as “the part of cultural policy that explicitly relates to digital production, distribution or consumption of cultural expressions” (Hylland/ Primorac, 2024, 14) and that is explicitly “treating the nexus created by digitalization, culture, and policy” (ibid., 15).



## The Research Project

A policy analysis in the field of digital cultural policy focusing on how one of the leading cultural policy actors in Germany, the 16 regional governments, intend to strategically shape the digital transformation processes in the cultural sector.

Methodologically, the results are based on a meta-analysis of the strategic statements on digital transformation in the cultural sector adopted by the regional governments, either by way of their cultural strategies or of their digital cultural strategies, if existent. The following text is an excerpt from the results.

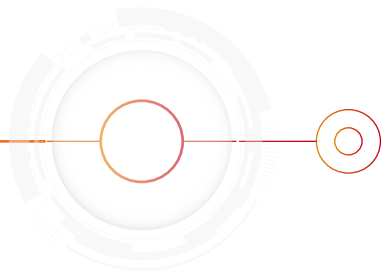
### Findings

#### *Tendency to Isomorphism*

Structure and content of (digital) cultural strategies adopted by regional governments are often similar. There, as in many other fields, is a tendency towards organisational isomorphism (DiMaggio & Powell, 1983, 150): This term refers to the process by which organizations in the same field become increasingly similar to each other over time, often due to shared norms, regulations, or competitive pressures. Strategies as text types are on the one hand the result of this isomorphism. On the other hand, they can also have the effect of a coercive isomorphism.

#### *Retro-Digitization of Cultural Heritage Dominates*

In addition to infrastructural measures and the digitization of organizational and production structures, the promotion of cultural heritage and the LAM sector (libraries, archives, museums) and thus retro-digitization dominates. This reflects the cultural policy funding focus at EU level with the Europeana project (Burri 2024, 165f.).



### *Focus on the Visual Arts*

(Digital) cultural policy strategies focus one-sidedly on the visual arts. When the term 'digital arts' is used, it usually refers exclusively to the visual arts in the broad sense, sometimes with the addition 'including media art'. Only the regional government of North Rhine-Westphalia decided to focus on the performing arts by founding the Academy for Theatre and Digitality.

### *Proven Methods Reach their Limits*

In most cases, cultural strategies are developed by means of extensive participation processes. These processes focus either on cultural stakeholders or citizens. Despite their broad access, however, they often only reach established organizations and actors. Other, marginalized voices remain unheard (Glesner 2023). Another method is the expert interview, which in many cases is the method of choice for strategy development processes when it comes to obtaining expertise. This method reaches its limits if the experts come exclusively from existing structures.

## **Digitization vs. Digitalization**

Under the 'digital condition', two modes of transformation – digitization vs. digitalization – should be distinguished for further analysis (Hylland/Primorac, 2024, 9): The term digitization refers to the process of converting extant content into digital formats.

This so-called retro-digitization is promoted above all in libraries, archives and museums. Digitalization, however, relates to using digital technologies to change the principles of production and reception, i.e. of a business model (Verhoef et al., 2021). This is often, but not consistently referred to as digital transformation. If the idea that all production and reception processes are changed in the process of digitalization is accepted, this can have far-reaching consequences. In the field of digital theatre for example, the question arises as to what extent these formats will change the common understanding of theatre that is tied to physical co-presence (Hawthorne, 2023).

## Recommended Actions

*Think Strategically!*

“ *Strategic planning isn't strategic thinking.  
One is analysis, and the other is synthesis* ”  
Henry Mintzberg

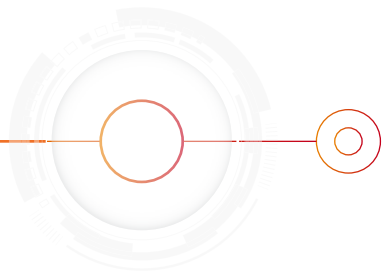
Even if there is no standard definition for the term strategy, in the field of business administration it traditionally refers to a mostly long-term, planned approach to achieving goals, usually for organizations or organizational units. The importance of strategies is criticized because they assume that complex organizational environments can actually be planned for such a long term (Mintzberg 1994). For strategy papers to be effective, they must not be decoupled from the real work in the organization. It is less important to fulfill format requirements when developing them. What is central is the identification of strategic levers that either implement existing organizational goals or make it possible to test new forms of organization and production in the sense of an experiment. **Don't let strategic thinking become routine!**

*Review the notion of culture!*

The selection of fields of action and measures in the strategy papers allows conclusions to be drawn about the notion of culture on which the considerations were based. This shows that socio-cultural organization or other, less organizational forms of culture are hardly considered. Consequently, certain population groups are also neglected. **Operate on a broad, non-normative notion of arts and culture!**

*Diversify the participation processes and invite marginalized expertise!*

Participation processes favor professionals from existing structures such as publicly funded cultural organizations or established organizations from civil society. Newcomer and unconventional thinkers tend to be left out. Involve people who do not come from funded cultural organizations or established networks and lobby organizations! **Experts from established organization tendentially replicate**



the existing, e.g. national or funding, structures. As new perspectives and insights are needed, include experts from marginalized expertise! Do pay them, as sharing their expertise with you is work!

### Digital Transformation "Beyond the Grand Gestures"!

“Despite all the urgency and pressure to change, only the means and forms that are actually available are available.”

Armin Nassehi

German sociologist Armin Nassehi advocates change in small steps, "beyond the grand gestures" (Nassehi 2024, 21). He argues: **You cannot transform against society, but only in it and with it - and only with its own means** (Nassehi 2024). Employees, guests, as well as political and social stakeholders have to be able to accept the results of the digital transformation.

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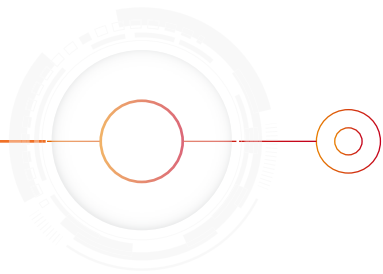
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## AUTHOR



**Julia Glesner** is a professor of cultural management at the University of Applied Sciences in Potsdam, Germany. She served as member of the board of directors of Klassik Stiftung Weimar, where she oversaw communications and marketing as press spokesperson. Prior to this, she was responsible for marketing and fundraising at the Erfurt Opera House and the Erfurt Dome Festival. Her research focuses on governance in the performing arts. *Opera for all. The Biography of Sir Peter Jonas* was published in 2022. Orcid-ID: 0000-0002-4263-8307



# Engaging with Digital Policies: The Digital & AI Action Group

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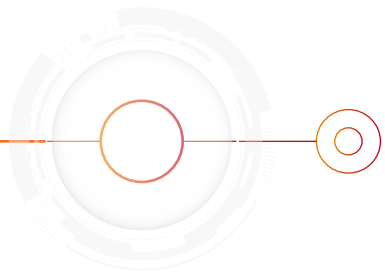
*Michael Culture Association and Culture Action Europe*

The EU's cultural and creative sectors (CCS) have been closely monitoring recent technological developments and their policy implications, as seen in the recently adopted Artificial Intelligence Act and initiatives such as the Common European Data Space for Cultural Heritage and the European Collaborative Cloud for Cultural Heritage.

To address these challenges and help shape the evolving policy landscape around AI and digital issues, Michael Culture Association (MCA) and Culture Action Europe (CAE) launched the AI & Digital Action Group in March 2024. The group currently includes 70 participants; all of them are MCA and CAE members.

The Action Group's mission is to advocate for EU digital policies that reflect the unique needs of the cultural and creative sectors and to establish a unified voice in the decision-making process. Through collaborative workshops, surveys, and position papers, the group has set priorities focused on:

- the digital public space and the cultural sector's future within it;
- ethical concerns around AI and digital tools;
- stronger coherence and enforcement in copyright protection;
- and a community-centred approach to digital policy development.



From the start, MCA and CAE emphasised a participatory approach, working with over 70 members to co-create a survey. It became clear that a primarily reactive position, driven by member concerns over ethics and copyright issues, should be complemented by a more forward-looking approach. The Action Group's task, then, was not only to respond but also to propose new, proactive position for addressing digital policy in CCS. Recognising the need for accessible terminology, the group incorporated a glossary of key terms into each section of the survey.

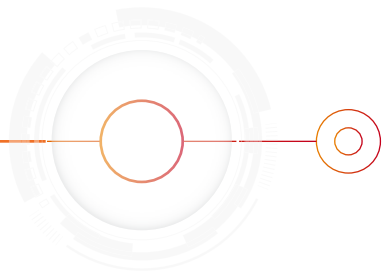
The survey remained open for responses throughout the summer of 2024. The responses reflected the diverse nature of CCS but also underscored clear commonalities, forming the foundation of the Action Group's mission statement.

## Survey Respondents

A total of 150 individuals completed the survey. Respondents varied in age, with the largest group aged 55-64 (31%), followed by those aged 45-54 (28%) and 35-44 (25%); younger participants formed a smaller percentage. All 27 EU member states took part, showing a strong presence from Germany (47%), France (8%), and Italy (8%), as well as a small representation from non-EU countries (7%).

Approximately half of the respondents are self-employed or freelancers. Just under a quarter (23%) are from civil society organisations, while the remainder are evenly spread across various types of organisations and institutions.

Responses came from a broad range of CCS fields. The most represented sectors were Audio-Visual (13.5%), Visual Arts (12.5%), and Translation (12%), with the remaining responses evenly distributed across other CCS categories.



In Issue No. 7 of the ENCATC Policy Tracker, Valentina Montalto stated that 'having data upon which politicians can act and people debate is extremely important as it can help integrate new voices and perspectives in public policies, as a basis for long term changes in our actions.'<sup>1</sup> In line with this approach, collected data resulted in the Action Group's Mission Statement. This document reflects the initial findings, with plans to expand the data further to make the Action Group a useful reference in this area.

However, the survey is not fully representative of the entire CCS sector. Instead, it offers a partial view, largely reflecting input from MCA and CAE members, along with strong interest from the translators' sector. This consultation is a first step; given the fast-changing digital policy landscape, both organisations remain open to updating the direction and incorporating new data.

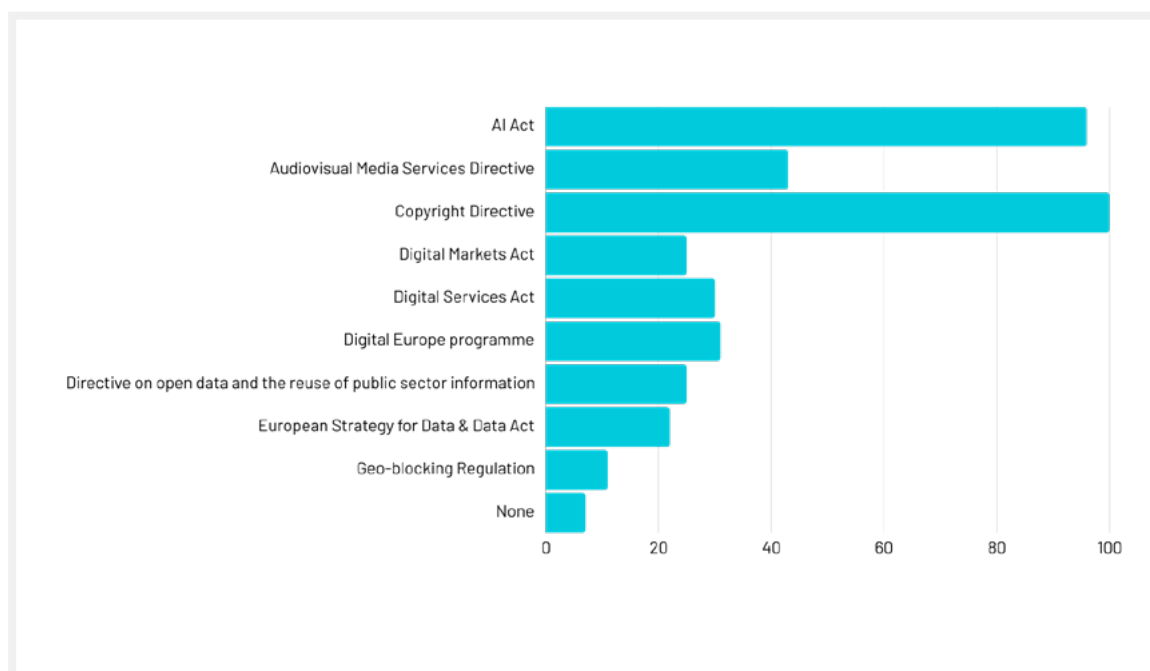
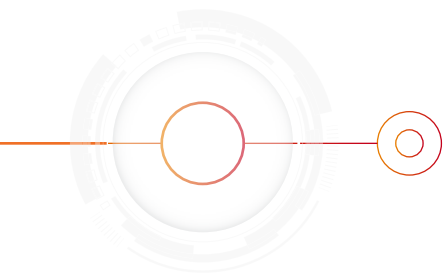
The following sections present some of the collected data, along with the focus areas and conclusions it informed.

## 1. Digital policies: how much does the cultural sector know about them?

The survey assessed respondents' knowledge of digital policies in the EU. Overall, respondents report moderate awareness, averaging 2.8 on a scale of 1 to 5. Awareness varies significantly by sub-sector, however: professionals in literature and publishing rate their awareness the highest, with an average of 3.44, indicating a relatively informed stance compared to other sectors.

This variation likely reflects differing levels of exposure to digital policy discussions. In sectors like publishing, where copyright concerns are crucial, higher awareness may stem from recent policy changes that directly affect their work. When asked about specific policies relevant to their field, respondents in publishing, translation, and visual arts most frequently cited the AI Act and the Copyright Directive. Meanwhile, the heritage sector representatives indicated familiarity with the EU Data Act (Regulation 2023/2854) and the Directive on open data and reuse of public sector information (Directive 2003/98/EC). Civil society organisations likely play a role here, helping members stay updated on relevant legislation.

<sup>1</sup>[https://encatc.org/media/7447-encatc-policy-tracker\\_issue-7\\_2024.pdf](https://encatc.org/media/7447-encatc-policy-tracker_issue-7_2024.pdf)



*Compiled answers to the question: Which of the following digital policies and programmes (starting from 2019 onwards) are most relevant or applicable to your/your organisation's activity?*

The disparity in knowledge across sectors may hinder a shared understanding of digital policies within the CCS. For instance, the Copyright Directive includes key provisions for the heritage sector (Articles 3, 8, and 9 of Directive 2019/790), while the Data Act and Common Data Spaces have a significant impact on publishing. Knowledge of these policies is essential for engaging with and shaping future legislation.

To address this, MCA and CAE outlined two main priorities:

**to educate and decode:** to equip members with insights into digital policies, enabling them to leverage opportunities and identify gaps that need advocacy.

**to coordinate advocacy:** both organisations will strengthen joint advocacy efforts to amplify the CCS voice, pushing for the CCS inclusion in policymaking processes through advisory panels, consultations, and other platforms to ensure a human-centred, culturally-informed perspective in policy discussions.<sup>2</sup>

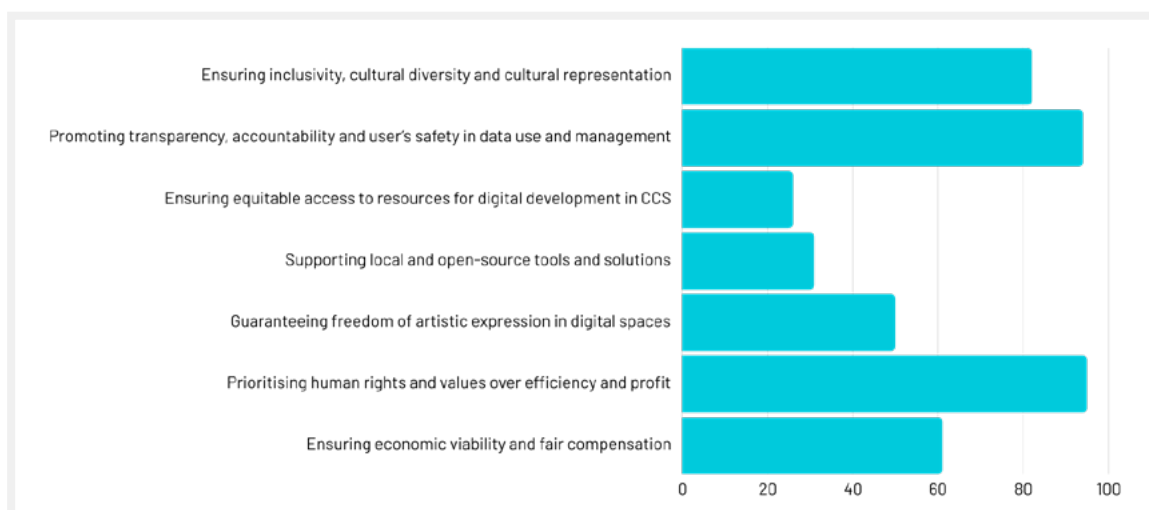
<sup>2</sup> From the Action Group - Mission Statement, p.9

## 2. Ethical concerns and opportunities

Digital transformation brings significant potential for CCS, improving accessibility (70%) and preservation (47%) of cultural content, and fostering cross-cultural collaboration (41%). However, these benefits are accompanied by ethical challenges that vary across CCS sub-sectors. The Action Group adopted a broad working definition of digital ethics as 'principles and guidelines that govern responsible and fair behaviour in the use and development of digital technologies.'<sup>3</sup>

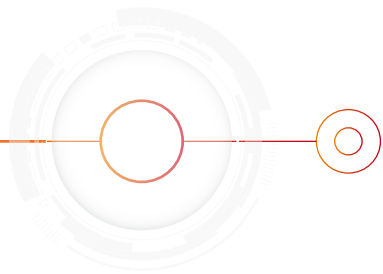
The main ethical concerns identified include biased AI algorithms (57%), lack of transparency in digital development (65%), and copyright violations (68%). Respondents, particularly in audiovisual and video game sectors, highlighted copyright issues related to unauthorised reproduction and content manipulation (over 20% reported piracy and unauthorised use). AI biases are also a concern, as they risk limiting cultural representation and reinforcing stereotypes, impacting diverse art forms and emerging voices.

The digital transformation affects each sector differently. For instance, the heritage sector prioritises preservation (82%) and accessibility (68%), the audiovisual sector values accessibility (75%) and promotion (32%), and the literature and publishing sector emphasises digital preservation and fair access, particularly in light of concerns around AI scraping and misuse of literary works.



*Compiled answers to the question "What are the most important ethical considerations and values that should be translated into digital policies for cultural and creative sectors?" - Respondents were allowed to select up to 4 answers.*

<sup>3</sup> OECD (2020), Digitalisation and Responsible Business Conduct: Stocktaking of policies and initiatives



The ethics of the digital realm are complex, as definitions of 'fair' and 'just' vary widely and are not necessarily tied to any one sector. However, respondents shared certain core values:

**Prioritise human rights and humanistic values**, so that the cultural rights and intellectual property of cultural and creative professionals are respected, protected, and enhanced in the digital domain.

**Promote transparency and accountability in data use and management**, advocating for policies that mandate clear ethical guidelines and enforceable standards for both AI and digital tools in cultural applications.

**Ensure inclusivity, cultural diversity and representation of all cultures**, providing equal opportunities for participation and representation in cultural life, with a digital space that supports diverse voices.

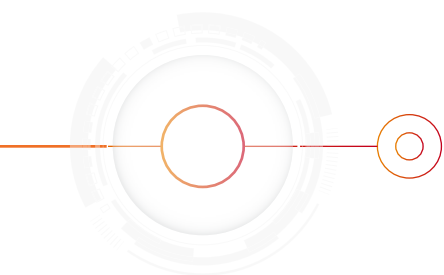
**Ensure economic viability and fair compensation**, advocating for strong enforcement of intellectual property rights and fair compensation for creators, addressing copyright violations in AI-generated and reused digital content.<sup>4</sup>

### 3. Artificial Intelligence: the talk of the town

When CAE & MCA launched the Action Group, AI was chosen as an overarching theme, closely tied to ethics in the digital realm and copyright concerns. Early discussions highlighted the need for clear guidance to address AI's challenges, particularly with General Purpose AI models (GPAI), which soon became a specific focus.

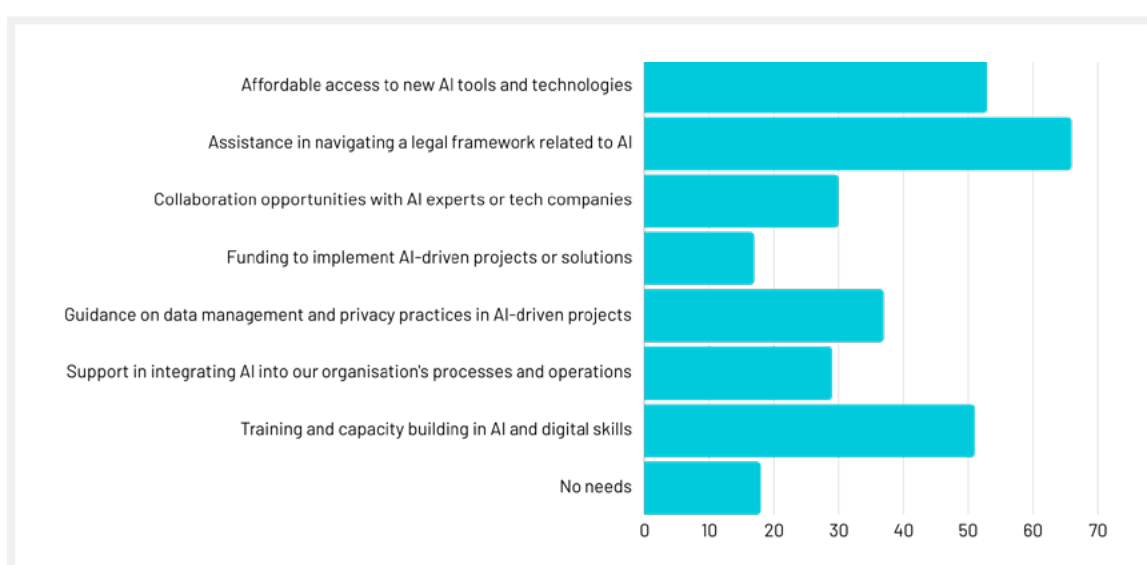
Survey respondents raised several key issues regarding AI. Copyright violations emerged as a top concern, with 71% of respondents advocating for opt-out mechanisms under the AI Act to protect their work from unauthorised use in AI training. Some respondents insisted on opt-in options in their comments, even though these are not currently envisioned in the Act. Respondents also flagged exploitative practices like price dumping and unfair competition impacting freelancers. There is a strong call for clear guidelines on copyrighted content use, particularly in reference to Article 53 of the AI Act and Article 4 of Directive 2019/790, which address text and data mining

<sup>4</sup>From the Action Group - Mission Statement, p.6



(TDM). 61% of respondents support mandatory disclosure of AI algorithms and data sources to improve transparency.

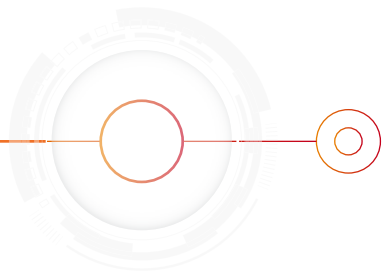
Each sector has distinct priorities: the heritage sector emphasises affordable AI tools (63%) and data privacy (46%), while audiovisual and video games professionals focus on legal navigation (45%) and AI skills training (23%). Performing arts and music sectors seek capacity building in AI (54%) and affordable access to new technologies (42%). Literature and publishing stakeholders highlight the need for legal frameworks (44%) and transparency for AI's role within their content production chain.



*Compiled answers to the question "What are the primary needs of your organisation related to AI?". Respondents were allowed to select all the answers they wished.*

84% of respondents emphasised that AI policies must prioritise ethical guidelines and standards. They strongly support the creation of codes of practice by the European Commission's AI Office (as outlined in the AI Act) to ensure AI developers are held accountable for data usage. 79% agree with the regulation's proposal for mandatory labelling of AI-generated content (Article 50(7)). Respondents also support the establishment of independent oversight bodies to monitor AI development and maintain transparency in the sector.

The survey results revealed that AI as a technology is perceived more as a source of concern than opportunity, which contrasted with the more balanced perspective the Action Group held at the beginning. This is not true homogeneously in each analysed sector: in general, those sectors where creators are involved tend to view AI



more as a concern, while professionals in sectors like cultural management, heritage and education see this type of technology as a resource to implement in their work. Dichotomies and commonalities in this domain are to be explored..

In this context, MCA and CAE plan to:

**Interact with the post-AI Act decision-making**, strengthening the presence of the cultural and creative sector in the consultation process with the AI Office and Plenary. Opt-out options, the template for the summary of content used for data training, and labelling of the AI-generated or manipulated content constituting deep fakes are three main provisions of the AI Act, which both organisations will focus on in the Code of Practice drafting process.

**Decode AI for CCS**, including its functioning, limitations and opportunities;

**Call for for policies enhancing affordable access to ethical AI tools and technologies** through financial support mechanisms, such as grants or subsidies.<sup>5</sup>

### Next steps

The journey of the Action Group on Digital & AI captures the shifting digital policy landscape affecting CCS. The immediate priority is to **publish a position paper on the AI Act** implementation and the Code of Practice. MCA and CAE were selected as participants of the European Commission's Plenary for the General-Purpose AI Code of Practice.

Based on survey findings and member feedback, the plan is to develop **recommendations for EU funding programmes** to ensure future financial support in the digital domain addresses the identified gaps and concerns.

These initiatives reflect a human-centred, culturally inclusive approach to digital policy-making and aim for the future where digital transformation supports the CCS while preserving creative integrity and diversity.

<sup>5</sup>From the Action Group - Mission Statement, p.9

## AUTHORS



*Michael Culture Association* (MCA) is a trans-sectoral European network, gathering more than 200 public and private organisations from all over Europe and beyond, for the preservation, the promotion and the valorisation of heritage and digital cultural contents, and its communities. MCA provides knowledge, tools and services for cultural institutions and the general public, to support the role of cultural heritage as a pillar of inclusive and sustainable European societies.



*Culture Action Europe* (CAE) is the major European network of 250 cultural networks, organisations, artists, activists, academics and policymakers from 35 countries. As the only intersectoral network it brings together members and strategic partners from all areas of culture. Culture Action Europe is the political voice of the cultural sector in Europe, the first port of call for informed opinion and debate about arts and cultural policy.



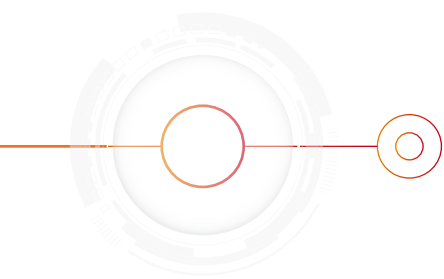
# Why Don't Cultural Policies Work?

*Carmen Croitoru*

Cultural policies are public policies shaped by various factors, including economic conditions, government priorities, and the cultural education of the population. Cultural policies play a crucial role in shaping how a community's heritage, arts, and identity are preserved and promoted. They also have a significant impact on social well-being, economic development, and the preservation of cultural heritage, ensuring that culture remains a vibrant and integral part of community life. These policies aim to improve the production and distribution of cultural goods for the benefit of the community, recognizing the role of culture in fostering social cohesion and development. However, the creation of such policies often overlooks crucial steps.

Cultural policies are often expected to have a significant impact, but many fail to deliver, despite being initially promising. While some policies may be tangential to culture or merely popular in public discourse, others with real potential often falter due to common missteps. Over the past 15 years, the most frequent reasons for this failure include insufficient time, the absence of methodology, the lack of a real need at societal level, and a lack of expertise. Another key issue is that many cultural policies focus more on the producers than on the actual beneficiaries.

One major issue is the tendency to rush these policies into existence due to political urgency or opportunity. This can prevent the necessary ex-ante (preliminary) and ex-post (evaluative) analyses, which are critical for understanding both the need for the policy and its likely impact. Regardless if they are bottom-up or top-down, public policies that are not accompanied by a vision or a plan to evaluate the consequences risk being unproductive.



To truly understand the need for a cultural policy and evaluate its effectiveness, a combination of quantitative and qualitative assessments is essential. Quantitative approaches provide statistical insights into cultural consumption patterns, while qualitative methods help explore the deeper social and cultural factors influencing those patterns. However, these processes require time, which is often in short supply due to pressure from authorities and cultural producers seeking immediate solutions.

Without a structured plan for assessing the policy's impact, these initiatives can quickly become ineffective. The combination of quantitative and qualitative data remains the most reliable way to identify the barriers that prevent cultural consumption.

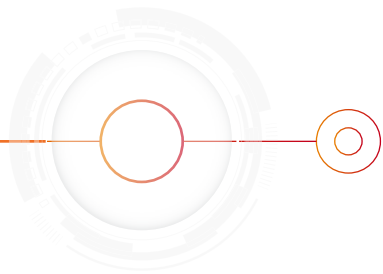
### Key Barriers to Cultural Consumption

These barriers can include geographical, economic, social, and educational obstacles.<sup>1</sup> "The first, and most classical, approach to increasing access consists of identifying, and removing, the obstacles that may hinder participation. As shown by research, such obstacles may be physical (especially for people with disabilities), financial (e.g. entrance fees, public transport tickets), geographical (for people living in rural areas), but they may also be more intangible, such as barriers in culture (interests, life choices, linguistic barriers), in terms of attitudes (the institutional atmosphere), and in perceptions (e.g. the perception of cultural institutions as exclusivist, the refusal of some forms of cultural expression, or the low priority given to cultural participation)."<sup>2</sup>

One of the main obstacles is geographical and physical in nature. A lack of cultural infrastructure and insufficient facilities in public institutions or cultural organizations can limit access. Similarly, poor transport infrastructure can make it difficult for people to reach cultural venues, further hindering participation. Economic barriers also play a significant role. Limited financial resources often prevent the production of cultural events and restrict people's ability to attend or engage with them. Additionally, economic constraints can limit leisure time, further reducing opportunities for cultural consumption.

<sup>1</sup> <https://cultureactioneurope.org/wp-content/uploads/2023/07/culture-and-democracy-the-evidence-NC0822225ENN.pdf>

<sup>2</sup> Open method of coordination (OMC) Working group of EU Member States' experts on better access to and wider participation in culture, 2012, p.39



Social barriers, such as widening social inequalities, particularly in disadvantaged areas, exacerbate these challenges. In some cases, the cultural offer may not be adequately promoted or communicated, making it difficult for certain groups to access available opportunities. Educational barriers also affect cultural participation. A lack of cultural literacy and education, combined with an inability to understand the value of cultural consumption, can prevent individuals from engaging. Many people also struggle to interpret cultural symbols and metaphors, further distancing them from cultural experiences. „Moreover, several studies highlight the fact that participation in artistic/cultural activities brings benefits not only at the individual level, but also at the community level. An increased cultural participation positively influences the quality of life, not only at the level of people, but also at the level of interpersonal relationships.”<sup>3</sup>

### Insights from Quantitative Analysis

Quantitative analysis provides valuable information about the broader landscape of cultural consumption. It can identify general consumption levels across different cultural sectors, track changes over time, and highlight emerging trends. This type of analysis also reveals the barriers to consumption and allows for comparisons between different patterns of engagement, such as public versus private or omnivorous versus univorous consumption.

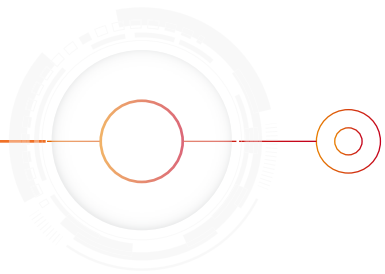
Through quantitative analysis, it becomes possible to segment consumer groups and tailor interventions accordingly. It also sheds light on which populations are more interested in building social capital versus cultural capital—critical information for both policymakers and cultural producers. An example of this can be seen in the The Cultural Vitality of Cities – 2021 Edition Report<sup>4</sup>.

### Insights from Qualitative Analysis

Qualitative analysis complements these insights by offering a more nuanced understanding of cultural consumption. This approach helps identify specific measures to reduce barriers, synchronize consumption behaviors, and ultimately

<sup>3</sup> Croitoru, et al., The 2022 Cultural Consumption Barometer. Cultural Participation and Democratic Perspectives, Universitaria Publishing House, Bucharest, 2024.

<sup>4</sup> [www.culturadata.ro/the-cultural-vitality-of-cities-2021-edition-top-performing-cities-in-culture](http://www.culturadata.ro/the-cultural-vitality-of-cities-2021-edition-top-performing-cities-in-culture)



increase participation. Higher levels of cultural participation are directly proportional to higher levels of social participation, making this an important goal for cultural policies. "Cultural participation is *la raison d'être* of the cultural infrastructure. These two sub-indices are closely related, as the cultural infrastructure needs an audience in order for it to have a meaning, a purpose. Cultural consumption is the most basic, the most important outcome that a city may have from the standpoint of the cultural infrastructure."<sup>5</sup> "What is important for a high cultural consumption is the variety of cultural infrastructure resources, the variety of performances and especially the facilitation of the access to a diverse cultural life (cultural participation may manifest differently according to age, lifestyle, residence area)."<sup>6</sup>

Qualitative research also plays a role in democratizing culture. It can help promote cultural consumption through cultural education and thus broaden access to culture, addressing the social challenges faced by vulnerable groups such as teenagers or the elderly. Consistent consumption patterns in high-brow culture maintain and encourage a drive towards cultural consumption. Additionally, qualitative analysis can address the rural-urban divide, providing solutions to ensure that rural populations have better access to cultural opportunities. It also highlights the importance of heritage preservation, ensuring that cultural heritage is not over-exploited by commercial tourism but is instead sustained for future generations.<sup>7</sup>

As seen in The Cultural Consumption Barometer. Cultural Participation and Democratic Perspectives<sup>8</sup>, this form of analysis also aids in transforming sporadic or accidental participation into regular engagement with cultural activities. It can encourage youth mobility, reduce economic migration, and foster a deeper understanding of contemporary art forms, such as visual arts, symphonic music, and experimental music. Furthermore, it promotes the importance of cultural education in preserving heritage, while discouraging the over-commercialization of culturally significant sites.<sup>9</sup>

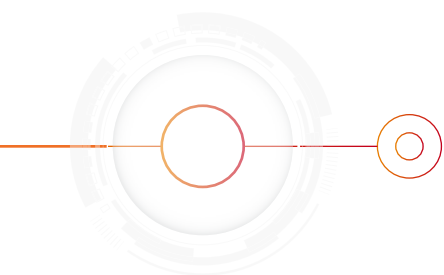
<sup>5</sup> Croitoru, et al., *The Cultural Vitality of Cities – 2021 Edition. Top Performing Cities in Culture*, Universitaria Publishing House, Bucharest, 2022, p. 51.

<sup>6</sup> Croitoru, et al., *The Cultural Vitality of Cities – 2021 Edition. Top Performing Cities in Culture*, Universitaria Publishing House, Bucharest, 2022, p. 51.

<sup>7</sup> [https://ifacca.org/media/filer\\_public/5e/41/5e416ea9-47c5-4d3e-959e-074d624da3bb/ifacca\\_-\\_culture\\_as\\_a\\_public\\_good\\_report\\_-\\_july\\_2024\\_-\\_english.pdf](https://ifacca.org/media/filer_public/5e/41/5e416ea9-47c5-4d3e-959e-074d624da3bb/ifacca_-_culture_as_a_public_good_report_-_july_2024_-_english.pdf)

<sup>8</sup> <https://www.culturadata.ro/the-2022-cultural-consumption-barometer-cultural-participation-and-democratic-perspectives/>

<sup>9</sup> [https://ec.europa.eu/assets/eac/culture/policy/strategic-framework/documents/omc-report-access-to-culture\\_en.pdf](https://ec.europa.eu/assets/eac/culture/policy/strategic-framework/documents/omc-report-access-to-culture_en.pdf)



In the field of cultural management, there is a saying: “before you start doing something, you have to do something else.” This reflects the need for thorough analysis before implementing any cultural policy. Since national cultural systems are often asynchronous, policies should not be adopted across all countries simply because they are fashionable or offer short-term financial benefits. Instead, each policy must be thoughtfully tailored to the specific cultural, social, and economic conditions of the country it aims to serve.

To better contribute to the shaping of cultural policies, we need a broader set of comparable indicators, aggregated at an international level. These should follow the example of EU Council programs, which have generated models of best practices, such as the Compendium of Cultural Policies, helping to guide and inform cultural development globally.

By taking the time to conduct comprehensive analyses and designing policies with proper methodologies and expertise, cultural policies can become more effective. Only through careful planning and evaluation can these policies truly enrich communities, foster social cohesion, and enhance cultural participation.

Seventy years after the adoption of the Cultural Convention by the Council of Europe, we can now speak of a transformed cultural landscape, shaped by the influence of cultural policies. It is up to us to continue promoting a democratic vision through improving these policies.

## AUTHOR



**Carmen Croitoru** is a professor, Senior Researcher and expert in Cultural policies and strategies, General Manager of the National Institute for Cultural Research and Training - Culturadata.ro.

She is one of the first generations to promote Cultural management in Romania, working for over 40 years in the cultural system, both in the private and public sectors.

She continuously worked alongside with the Ministry of Culture for over 15 years, engaged in developing the profession of cultural manager and promoting the law on management for public cultural institutions. Carmen Croitoru has also made an essential contribution to the scientific field by publishing works related to the system and administration of culture, the consumption of culture, and the analysis of the Cultural and Creative Sectors: *White Paper for activating the economic potential of the cultural and creative sectors in Romania; Atlas of Culture - Cultural settlements in rural areas; Trends in cultural consumption during the pandemic; Particularities of Cultural Marketing; 130 years of Theatre Legislation – a compendium of laws concerning theatres.*

She also is the author and coordinator of *Functional analysis of the cultural ecosystem in Romania, 2021 and The Sectoral Strategy for Culture 2023-2030*. Since 2012 she has coordinated the *Cultural Consumption Barometer* (an annual study on national level) and research studies for implementing *UNESCO Culture for development Indicators*.

As member of the several international cultural networks (Compendium of Cultural Policies and Trends, ENCATC, Europeana, ECURES, Culture Action Europe etc.) she has been involved in developing strategies that pave the way for a coherent regulatory framework for culture in Romania.

Since 2014, she has taken over leadership and reorganized the National Institute for Cultural Research and Training in the formula in which it operates today, succeeding to be an essential link between authorities, cultural institutions / organizations, and beneficiaries. Through her coordinated works, she has permanently campaigned for the development of statistical research in the field of culture, organizing national and international conferences.

She currently serves as Vice President in the Bureau for the Steering Committee for Culture, Heritage and Landscape - CDCPP, Council of Europe and member of the Scientific Council of the UNESCO Regional Office for Science and Culture in Europe (Venice).

Recently Mrs. Croitoru was awarded the Order of "Cultural Merit" in the rank of Knight for the "Promotion of Culture" by the President of Romania.

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Editor: GiannaLia Cogliandro Beyens

AUTHORS: David Ocón, Luis Bonet, Lauren England, Chandra Morrison, Ed Charlton, Julia Glesner, Michael Culture Association and Culture Action Europe, Carmen Croitoru

Sub-editor: Pravalí Vangeti

Coordinator and Creative Director: Nerina Finetto

Layout Design & Production: Davide Faggiano

CONTACT: T +32 (0)2 201 29 12 WEBSITE: [www.encatc.org](http://www.encatc.org)

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### CONTACT

T +32 (0)2 201 29 12

[info@encatc.org](mailto:info@encatc.org)

[www.encatc.org](http://www.encatc.org)

### ADDRESS

Avenue Maurice 1

1050 Brussels,

Belgium



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