

# Submission to the next National Cultural Policy consultation

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Subject: Embedding access as cultural infrastructure in Australia's next National Cultural Policy

## Executive summary

I write as an independent regional artist and arts worker with a practice spanning visual art, multisensory installation, photography, moving image, sound, scent and accessible exhibition design, and as a member of the federal Implementation Advisory Group for Equity: The Arts and Disability Associated Plan. This submission is made in a personal capacity.

Revive and Equity have established important foundations: disability is more visible in national cultural policy, a national arts and disability framework exists, lived-experience advice has been formalised and targeted disability arts funding has begun important work.

Recognition is not the same as structural change. The next National Cultural Policy should move from recognition to implementation by embedding access as cultural infrastructure across the whole policy framework. Access must be built into funding, governance, artist labour, employment, audience experience, infrastructure and evaluation from the beginning, not added beside them.

Whether or not a dedicated access pillar is adopted, access must be explicitly embedded across the entire National Cultural Policy and any associated plans.

This submission makes nine core recommendations:

1. embed access as a core principle, delivery responsibility and accountability mechanism across the National Cultural Policy, all five pillars and any associated plans;
2. ensure the successor to Equity is integrated within the National Cultural Policy, not added beside it as a separate or secondary framework;
3. use a distributed implementation model that leverages peak bodies, disability-led organisations, First Nations organisations, regional arts organisations and specialist experts, with formal obligations, not only goodwill;
4. strengthen mainstream funding pathways so d/Deaf and disabled practitioners are not pushed only into disability-specific streams;
5. recognise access work as skilled labour and ensure access costs do not reduce artist fees, production quality or career outcomes;
6. resource and position the national Code of Practice for d/Deaf and disabled artists as a practical mechanism for standards, funding conditions, training and accountability, with a clear implementation pathway, not only publication;
7. simplify and align funding administration across agencies and government partners to reduce unpaid labour for independent, regional and disabled practitioners;
8. embed regional access for d/Deaf and disabled artists and audiences within place-based regional cultural policy; and
9. measure impact through clear data, not only policy commitments or delivered actions.

## 1. Access must be embedded across the whole policy framework

I support the principle behind calls for a dedicated access pillar. Access is not a subset of inclusion. It is the condition that allows participation, cultural contribution, artistic development, employment, leadership, and audience engagement to occur.

At the same time, access cannot depend on a single structural location in the policy. Whether or not a sixth pillar is adopted, the entire National Cultural Policy and any associated plans must embed access.

If the next National Cultural Policy retains the five-pillar structure of Revive, access must be integrated across all five pillars:

- **First Nations First:** First Nations d/Deaf and disabled artists, arts workers and audiences need to be recognised within both First Nations cultural policy and disability cultural policy, not lost between them. The specific intersections of First Nations cultural governance and disability should be led by First Nations disability-led voices rather than assumed within either policy stream.
- **A Place for Every Story:** d/Deaf and disabled people are not a niche audience or specialist story. They are part of Australia's full cultural life. This includes disabled artists pursuing ambitious, contemporary, non-disability-specific work, whose access needs should not be read as a lesser claim on public resources or a qualification on their creative ambition.
- **Centrality of the Artist:** Disabled artists need fair assessment, proper fees, flexible timelines, accessible production models and support workers where required. Access needs, support structures or different working methods do not indicate a lack of professionalism. They are conditions of practice, like any other.
- **Strong Cultural Infrastructure:** Infrastructure must include accessible venues, digital systems, touring systems, employment systems, governance systems, funding systems and communication systems.
- **Engaging the Audience:** Audience access must be planned from the beginning and should not depend on individuals having to ask, explain, disclose or negotiate every time.

This approach honours the intent of an access pillar while recognising that access must shape the full policy architecture.

## 2. The next Equity plan must be integrated within the National Cultural Policy

Equity is a four-year plan. Four years is not long enough to produce lasting structural change across the cultural sector.

The next National Cultural Policy should commit to a clear successor framework for arts and disability. The next Equity plan must be embedded within the National Cultural Policy from the beginning, not added later as a separate stream after the main policy architecture has been set.

This matters because disability is still too often treated as a separate program area rather than as a core part of cultural policy. Disability-specific initiatives remain essential, but they cannot carry the full responsibility for disability equity. d/Deaf and disabled artists apply for mainstream grants, work in mainstream organisations, present in mainstream venues, lead ambitious contemporary practice and participate in the full cultural life of the nation. Disabled audiences attend mainstream events, not only disability-specific programs.

A successor to Equity should maintain lived-experience leadership, targeted investment, disability-informed assessment, ongoing consultation, and disability-led expertise. It should also require mainstream cultural systems to demonstrate how they are improving conditions for d/Deaf and disabled artists, arts workers and audiences.

As a member of the Implementation Advisory Group for Equity, I have seen the value of lived-experience advice and the importance of access being taken seriously at a national level. I have also seen why advisory structures cannot become the only place where disability knowledge sits. The next stage must move this knowledge into mainstream policy design, funding, governance, sector standards, and evaluation. Advisory input is valuable; structural embedding is the goal.

### 3. Delivery should be shared through peak bodies and specialist organisations

The next National Cultural Policy should be ambitious, but realistic. One way to make it realistic is to treat partnership, collaboration, and outsourcing to specialist expertise as core policy tools.

The Federal Government does not need to design, write, test and deliver every access resource, training program, template or sector standard itself. Australia already has strong peak bodies and specialist organisations with deep knowledge of artform conditions, sector practice, artist labour, access, disability leadership, First Nations cultural governance, regional delivery, and audience engagement.

The policy should therefore use a distributed implementation model:

- the Federal Government sets national expectations, policy priorities, minimum standards, and reporting requirements;
- Creative Australia, the Office for the Arts, Screen Australia and relevant agencies embed those expectations into funding, assessment, research and sector development;
- peak bodies translate national policy into artform-specific standards, tools, training and guidance;
- disability-led organisations and d/Deaf and disabled experts lead access knowledge and are paid for that expertise;
- First Nations organisations lead First Nations cultural governance and self-determined approaches;
- regional arts organisations translate policy into place-based regional delivery;
- publicly funded organisations implement proportionate access, employment and reporting obligations; and
- independent artists and small organisations are supported with practical tools, simplified processes and access resources rather than only compliance pressure.

This model would achieve more without assuming that all implementation must sit inside federal departments. It would also recognise that many peak bodies and service organisations want to contribute to national standards, training, and sector development.

Distributed implementation must not rely on goodwill alone. Where peak bodies or specialist organisations are asked to deliver policy outcomes, there should be formal partnership agreements, clear and defined roles, adequate resourcing, reporting requirements and accountability mechanisms. National investment in peak bodies, whether through direct funding or formal policy partnerships, should come with explicit delivery obligations. Where peak bodies are trusted to translate national standards into artform-specific tools and guidance, the policy framework should specify what delivery looks like and what oversight applies. Goodwill is a starting condition, not a delivery mechanism.

## 4. The Code of Practice should become a practical standards mechanism

The national Code of Practice supporting access for d/Deaf and disabled practitioners, workers and audiences is a significant opportunity. It should not sit alone as another advisory document. It should become an umbrella framework for access, equity, artist rights, employment conditions, audience engagement, disability leadership, and accountability.

The Code's value will depend entirely on implementation. A Code that is published but not connected to funding, training, or accountability will have limited practical impact. For the Code to function as a genuine standards mechanism, the next National Cultural Policy needs to answer a question that has so far been left open: what gives it authority?

Options include connecting the Code to funding conditions for publicly funded organisations, enabling peak bodies to develop artform-specific standards that reference the Code as a national baseline, or linking it to accreditation processes within relevant industry bodies. The exact model matters less than the principle: the Code needs a clear implementation pathway, not only publication.

Where peak bodies are resourced and formally positioned to translate the Code into artform-specific guidance, those roles should be formally supported and reported against. For example:

- visual arts guidance could address exhibition contracts, access riders, installation labour, public programs, gallery access information and artist fees;
- museums and galleries guidance could address visitor access, staff training, touring exhibitions, regional venues and public programming;
- performing arts guidance could address rehearsal conditions, flexible timelines, access workers, Auslan, captioning, audio description and front-of-house practice;
- screen and games guidance could address development pathways, workplace access, digital access and disability-led creative control; and
- regional arts guidance could address place-based access barriers, freight, travel, local suppliers and regional audience access.

Training should be a central part of implementation. The next policy should support a national disability access capability program, comparable in intent to sector-wide cultural capability training models (such as AMaGA Cultural Capability Training), but tailored to d/Deaf and disabled access, leadership, cultural safety and artform practice. This should be delivered through peak bodies and disability-led organisations with relevant expertise.

Training should reach assessors, program staff, executives, boards, curators, producers, front-of-house workers, installers, public programs teams, communications staff, contractors, and volunteers. Front-facing workers are often the people who determine whether an artist, arts worker or audience member feels safe, welcomed and respected.

## 5. Access, fair pay and artist labour must be linked

Access is labour. It requires time, knowledge, planning, communication, relationships, and specialist expertise.

Access work includes access planning, access riders, accessible public information, image descriptions, sensory information, plain English, Easy English, audio description, tactile materials, captions, Auslan, Braille, accessible digital content, quiet spaces, seating, support coordination, flexible working models, audience communication and advocacy.

This labour is often expected to be absorbed by artists, especially independent, regional and disabled artists. That creates inequity. It means disabled practitioners are often required to do unpaid labour to make systems accessible while also navigating underpayment, access barriers and the ordinary demands of sustaining an arts practice.

Fair pay and access cannot be separated. If access costs come out of a fixed creative budget, they reduce artist fees, production quality, public outcomes, and career development. If artists are already underpaid, access work becomes another absorbed cost. If access knowledge is expected from disabled practitioners without payment, the sector is relying on unpaid cultural labour to function.

This connection runs beyond disability. Across the visual arts and independent practice more broadly, unpaid labour, including consultation, installation, administration, advocacy and public programming, is a structural problem. Access work sits within this broader pattern of unrecognised labour, and policy should address both together. Stronger remuneration standards, recognition of hidden labour, minimum fee frameworks and access budget provisions reinforce each other.

The next National Cultural Policy should recognise access work as skilled labour and ensure access costs do not reduce artist fees, production quality or career outcomes. This could be supported through:

- access budget lines in relevant grants;
- access loadings or supplementary access funding;
- actual-cost access support where appropriate;
- clearer artist fee standards across publicly funded activity;
- recognition of access labour in contracts and funding agreements;
- paid disability expertise in advisory, assessment and training roles; and
- funding models that do not penalise artists for needing flexible timelines, support structures or different working methods.

True accessibility means access needs are not treated as a lack of professionalism. It also means the sector stops relying on disabled people doing unpaid labour to make systems work.

## 6. Funding administration should be simplified and aligned

Disability-specific funding remains essential because mainstream cultural systems have not historically been equitable. However, disability-specific funding should not become a lower-value parallel pathway.

A fair system requires both targeted disability arts funding and mainstream funding pathways that are accessible, equitable, and realistically winnable for d/Deaf and disabled practitioners. A disabled artist pursuing ambitious, contemporary work should be able to compete for mainstream resources on the strength of their practice, with their access needs appropriately supported rather than counted against them.

This requires disability expertise in mainstream assessment. d/Deaf and disabled expertise should be embedded in mainstream funding decisions, not only when disability is the program topic, but as a standard component of any panel that shapes cultural careers and public culture. The same principle applies to the National Cultural Policy advisory process. Across the current expert panels, only a couple of people with lived experience of disability are represented, and no panel includes dedicated accessibility or disability expertise. To address access meaningfully across all five pillars, the panels should be supported by expert d/Deaf and disabled advisors with relevant artform and access knowledge. This would also avoid placing an unreasonable burden on those individuals: a d/Deaf or disabled person is not a proxy for all disability experience, just as an Indigenous person in a policy advisory role should not be expected to carry the full weight of First Nations cultural knowledge.

Separately, some of the most useful improvements to the funding system would be low-cost administrative reforms that reduce unnecessary burden. Artists and small organisations currently spend significant time reframing the same project to suit different program languages, criteria, budget categories, and reporting requirements. This unpaid labour disproportionately affects independent artists, regional artists, disabled artists, small organisations and practitioners managing fatigue, cognitive load or access needs.

The next policy should encourage agencies, state and territory partners, and major funders to work towards clearer, more consistent, and reusable processes. This could include shared definitions, common access budget categories, standard access-cost lines, plain English guidelines, and compatible reporting categories. These changes would reduce unpaid labour, improve equity of access to public funding, and allow artists to spend more time making work. They represent meaningful savings in applicant time without requiring new funding.

## 7. Regional access must include regional d/Deaf and disabled artists and audiences

Regional access is not only about taking metropolitan culture to regional audiences. It is also about making it possible for regional artists, including regional d/Deaf and disabled artists, to work sustainably.

Regional Australia is not a single, uniform context. Cultural policy needs to recognise the different conditions across regional cities, rural communities, remote areas, First Nations communities, small towns, touring circuits, regional galleries, community organisations, artist-run spaces, festivals, and independent practices.

I support a place-based regional framework embedded across the five policy pillars. A regional framework should strengthen the whole creative ecology: artists, arts workers, organisations, audiences, communities, local governments, regional galleries, education providers, health and social systems, tourism, small businesses and cultural infrastructure.

For regional d/Deaf and disabled artists and audiences, place-based policy is essential. Access barriers are often intensified by geography. Artists may have to manage travel, installation, freight, accommodation, fatigue, local staffing differences, venue limitations, inconsistent access knowledge, and limited local suppliers. Audiences may face inaccessible venues, limited public transport, long travel distances, limited access services, poor digital connectivity, and fewer local cultural options.

As a regional practitioner, I know that the additional labour of distance is often invisible. Regional artists can be expected to deliver work to national standards while navigating fewer suppliers, longer travel, higher freight costs, limited technical support, and reduced access infrastructure. For d/Deaf and disabled practitioners, those pressures compound quickly. What looks like underperformance in a funding assessment is often the cost of geography and access, absorbed without recognition.

The next National Cultural Policy should treat regional access as both an audience issue and a practitioner issue. This should include:

- regional access loadings or actual-cost access support;
- accessible touring, freight, accommodation and installation support;
- regional supplier development and access service directories;
- disability access capability training for regional organisations and venues;
- regional artist development, commissioning and employment pathways;
- digital and hybrid access for regional artists and audiences; and
- data that tracks regional distribution and disability access outcomes.

Regional cultural policy should not assume that access can be solved by asking individual artists or small organisations to work harder. Regional access requires investment, coordination, training, infrastructure, and accountability.

## 8. Audience, communication and cognitive access should be planned from the beginning

The principle at policy level is simple: audiences should not have to repeatedly ask, explain, disclose or negotiate to find out whether they can participate. Public access information is often incomplete, hard to find, or only available if a person asks. That is a planning failure, not an individual one.

The next National Cultural Policy should set a clear expectation that publicly funded cultural activity provides useful access information before audiences attend, proportionate to the scale and funding level of the activity. This includes communication access for d/Deaf people, people with cognitive access needs, neurodivergent people, people with fluctuating capacity, and people who require clear information before they can safely attend or participate. Code-linked guidance could identify what applies in different contexts.

Government and agencies should also model the standards they ask of the sector. Consultation processes, grant guidelines, advisory materials, and policy documents should be available in accessible formats, with plain English summaries as standard practice. The accessibility of this consultation process is itself a test of that commitment.

## 9. Delivery does not equate to impact

The next National Cultural Policy should measure impact, not only delivery.

A program may exist, a consultation may occur, or a policy action may be marked as delivered while d/Deaf and disabled artists, arts workers and audiences continue to experience the same barriers. Progress should be measured by material change.

This is especially important for Equity. Its establishment was a significant achievement, but the next stage must ask what has changed in practice: whether disabled artists are being funded, commissioned, employed, represented in governance, supported in regional contexts, assessed fairly, paid properly and able to work without disproportionate unpaid labour. It must also ask whether d/Deaf and disabled audiences can reliably access cultural life without needing to negotiate basic access each time.

Government should publish regular data on disability-related cultural outcomes, including:

- mainstream and targeted funding application and success rates;
- access costs requested, awarded, reduced or declined;
- representation in assessment, governance and leadership;
- employment and commissioning outcomes;
- audience access provision and outcomes;
- access reporting by funded organisations and national institutions;
- regional distribution and regional access outcomes; and
- participation outcomes across artforms.

This data should be used to improve policy over time, not simply to report activity. Publishing it creates accountability to the sector and to the public. It also makes visible the gap between what policy promises and what practitioners and audiences experience, which is the gap this submission is asking the next policy to close.

## Conclusion

The next National Cultural Policy has an opportunity to move beyond symbolic inclusion and into structural access.

True accessibility would mean that d/Deaf and disabled people are part of how cultural value is defined, how public money is allocated, how organisations are governed, how artists are paid, how audiences are welcomed, how cultural infrastructure is built and how outcomes are measured.

Access should not depend on exceptional goodwill, unpaid labour, specialist side programs, a single policy pillar or individual negotiation. It should be embedded in the ordinary functioning of Australia's cultural system and integrated across the National Cultural Policy and its associated plans.

That is the next step for national cultural policy: not only a place for every story, but the conditions that allow every story to be made, shared, heard, felt, and experienced.