IFACCA D'ART REPORT № 9

The Independence of Government Arts Funding

A Review

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CONTENTS

Foreword

The degree of independence that governments afford arts support is an issue that has been central to International Federation of Arts Councils and Culture Agencies (IFACCA) since its establishment at the First World Summit on the Arts and Culture in 2000. While debate has often centred on the choice between arts council or ministry, such a dichotomy enormously oversimplifies the issue of independence, which, as this paper suggests, is determined not just by agency type, but also by the mix of policy instruments, decision making processes, formal and informal rules and even individual personalities.

The topic of independence is universal, and is bound at some point to challenge any government that supports artistic creativity. Recent years have seen the rise of a mixed approach to arts and culture support. Greater recognition of the significance of culture in government policy making appears to have lead to a growth in the role and reach of ministries of culture in some countries. At the same time, however, a number of governments have established an arm's length arts agency to complement their culture ministry or department. The constantly evolving cultural policy landscape can substantially alter the degree of independence of government arts support.

This report aims to provide background to the issue of independence of government arts support. It does not argue for any particular institutional model or approach. It takes a neutral stance, looking at cultural policy models and frameworks, surveying the incidence of different approaches around the world, and summarising expert opinion about the strengths and weaknesses of the main approaches.

I would like to congratulate and thank IFACCA's former Research Analyst, Christopher Madden, who wrote and revised this report several times over nearly four years. The first version was discussed by the IFACCA board at its meeting in Colombia in November 2005. It was then circulated to IFACCA members as a discussion paper and has been debated at various meetings since then. This final version contains a range of updates and inputs received from members of the IFACCA network over that period.

In the lead-up to the 4th World Summit on Arts and Culture in Johannesburg in September 2009, we take this opportunity to release the report to an international readership. Other publications, news and events on the subject of independence of government arts funding can be found at the 'topic' page on the IFACCA website at http://www.ifacca.org/topic/independence-of-arts-funding-from-government/

Comments, feedback and additional information resources are welcomed. The report concentrates almost exclusively on English language literature and resources, but resources in other languages are also welcome.

We hope that this unique international overview provides a useful context for thinking about the issues of government funding for the arts and culture at a national and even local level, and that, ultimately, it helps improve current practices, structures and policies for the benefit of artists and the community.

Sarah Gardner
Executive Director

Background and context

The degree of independence of arts funding from government is a central issue in arts policy. Mundy (2000; 13) argues that 'the issue of political interference in artistic and intellectual freedom is a constant one in almost all European societies'. Independence is one out of 21 key 'strategic dilemmas in cultural policy' identified in Matarasso and Landry's landmark publication *Balancing Act: Twenty-one Strategic Dilemmas in Cultural Policy* (Matarasso and Landry, 1999).

This research report provides global perspectives on a number of issues surrounding the degree of independence of arts funding from government. The report does not argue for any particular model of arts funding, nor for any particular degree of independence. Instead, it provides a context to the issues and explores at the 'pros and cons' of different approaches.

The report presents information from a literature review and data analysis on two main issues relating to political involvement in arts support: how much influence do governments have over arts funding?; and how much influence should governments have over arts funding?

The main focus is on the institutional structures and decision making processes used in government funding of the arts, and their implications for the degree of government control over such funding. The report therefore concentrates on just one 'instrument' of arts policy: direct expenditure, or 'subsidy'. Governments around the world use myriad other instruments to support the arts. While this report does not focus on these other policy instruments, it must be noted that many have implications for the degree of independence of arts support (for example, tax concessions, a common instrument in arts policy, locates decision making about what types of art gets supported with the citizenry, rather than the bureaucracy).

SCOPE OF THE REPORT

The questions addressed in this review report touch on a range of arts policy issues. The core questions addressed are: how much control or influence *do* governments assert over arts funding decisions; and how much *should* they have? Within these questions lie a number of critical issues, including:

- What are the institutional structures framing arts funding (e.g. arts council, ministry, department, national endowment, non-government organisation)?
- Who are the decision makers (e.g. ministers, bureaucrats, arts experts, arts administrators, artists, or community representatives)?
- What are the decision making processes (e.g. how are decision makers appointed, governed, and influenced; to whom are they accountable; and how do they make their decisions)?

As in any area of policy analysis, there is a wide range of related issues, including:

- Accountability and transparency in government
- Government censorship or curatorship of the arts it supports
- Governance of public and subsidised arts agencies
- Democracy, democratisation and human rights
- Désétatisation, decentralisation, and new approaches to public management.

A report such as this could therefore draw on substantial literature from outside of cultural policy, particularly literature on public policy theory and analysis. Similarly, a variety of methodological issues impact on the report. By necessity, the report simplifies complex politico-institutional structures for the purposes of cross-national comparison. The value of doing this is not always obvious. As Everitt (1998; 193) argues: 'In my judgment, it is wrong to see arts funding systems as abstract models which can readily be transferred from one culture to another'. If the review in this report is to be used to compare arts policy models and

frameworks around the world to develop recommendations for good practice, then consideration should be made of methodological limitations of comparative cultural policy analysis and cross-country policy transfer.

Furthermore, the report concentrates primarily on English language resources. This means that a number of non-English language resources have not been reviewed, such as the review and analysis of the arm's length principle in Sweden in Doracic and Edlund (2005).

The breadth and the importance of the topic mean that there is a substantial literature relevant to the topic. To keep the analysis to a manageable length, this report concentrates primarily on the cultural policy literature. This literature can be thought of as falling into two main types:

1. Descriptive, which documents arts and cultural policy frameworks, arrangements and mechanisms in various countries. This literature provides the empirical base for exploring and comparing different approaches.
2. Evaluative, which presents arguments for and against independence of arts funding, or attempts to assess what is the best balance between government influence and artistic freedom. This literature explores the strengths and weaknesses of various models and approaches.

The data presented in this report come from IFACCA's own database and from a survey of government arts support agencies undertaken in the lead-up to the first World Summit on the Arts and Culture, Ottawa, Canada, in 2000.

IFACCA'S RELATED WORK

Since its establishment, IFACCA has regularly engaged with issues of arts funding frameworks and the independence of arts funding from governments. A full history of the Federation's involvement is set out in appendix 1.

In summary, IFACCA has undertaken work on the topic in a variety of contexts, including:

- At the First World Summit on the Arts and Culture, 2000
- In a D'Art question on the degree of arts councils' independence, 2002
- Discussion paper 'Independence of Government Arts Funding: How much influence do governments have over arts funding and how much influence should they have?', distributed in 2006
- 'Ask IFACCAs' and other queries, from 2002 to 2008
- Board discussions
- IFACCA database and directory
- Tracking trends around world

A dedicated page on the IFACCA website contains news items and publications that relate to the issue of independence of government arts funding. See http://www.ifacca.org/topic/independence-of-arts-funding-from-government.

Possible future work that could be undertaken by IFACCA on this topic is detailed in the conclusion of this report.

OTHER LONG-TERM PROJECTS

Besides IFACCA's own work, there appears to be few other long-term or ongoing projects dedicated specifically to the topic of independence of arts funding. The issue of independence of arts funding from government is universal, so it would be futile to reference the many projects around the world that touch on the issue in some way. Nevertheless, there are currently four projects of which IFACCA is aware that are focussed specifically on the issue of independence.

1) Budapest Observatory
   The Budapest Observatory is involved in ongoing data gathering and analysis under its project entitled *Public Grant Agencies for Culture*. Contracted by the Hungarian cultural ministry, to find out about the selection and financing procedures adopted by arm's length agencies around the world, the Observatory has written analytical reports and has published detailed profiles of the decision-making procedures of arts funding agencies from a number of countries. The profiles include information on: decision-making bodies; appointment of members; procedures and mandate of decision-making bodies; time mandate; and a variety of details about grant payments and acquittals. The project page is at http://www.budobs.org/public-grants/public-grants/grant-paper-2002.html.

2) Policies for Culture online forum
   In 2004, Policies for Culture, a cultural policy network for South East European countries, began an online forum entitled *Relevance, utility and use of (quasi-) arm's length financing mechanisms for culture in South Eastern Europe.* The forum was launched with a background paper written by Delia Mucica, an independent cultural policy analyst (Mucica, 2004). The forum generated just one response, and it appears that the network has since ceased operating, although its website remains online.

3) Telemark University College, Norway
   Academic Per Mangset has been working on a research project on the institutionalization of cultural policy in post-war Western Europe. The project, described in Mangset (2008), is based on a range of empirical materials, qualitative interviews with cultural administrators, politicians and artists in Britain, France and Sweden, and longitudinal data for the Arts Council Norway.

4) Anna Upchurch PhD topic
   Anna Upchurch is a PhD candidate at the Centre for Cultural Policy Studies at the University of Warwick, England (the Centre's Director, Professor Oliver Bennet, founded and is editor of the International Journal of Cultural Policy). Ms Upchurch's subject is *The Intellectual Origins of the Arts Council Movement: the Cases of Great Britain, Canada and the United States*.

The IFACCA secretariat welcomes any additional information about current and recent research projects on issues surrounding the degree of independence of arts support.

MODELS OF CULTURAL POLICY

Matarasso and Landry (1999; 7), suggest that 'the development and management of cultural policy is…one of the most complex areas of modern government.' Such complexity is mirrored in models and maps of government administrations of cultural policy (for example, the entity-relationship models of Washington State cultural policy in Schuster, 2003b, 15-16). However, the complexity is not just administrative, it is also conceptual. As Hugoson (1996) points out, culture is an abstract construct, and cultural policy consequently also has highly abstract elements. And as Volkerling (1996), Gray (2000; 99) and Toepler (1996) argue, cultural policy structures, processes and 'instruments' are embedded in a wider net of theoretical and ideological complexities. International comparisons of cultural policies have the added complexity that understandings and definitions of cultural policy vary significantly between countries (Gray, 1996; 215).

It is not surprising, then, that there are a variety of ways of conceptualising, making sense of, and thinking about cultural policy. A number of high-level approaches – what might be thought of as meta- or philosophical models – are discussed in Flew (2005), who argues for a reconfiguring of traditional approaches to cultural policy to respond to changes in the cultural sector itself. This report does not review these higher level, more philosophical approaches. Instead, it concentrates on more detailed models and maps of current cultural

policy structures and processes with the aim of providing background and clarity to the central theme of the report, the independence of arts funding from government.

A number of common modelling approaches are reviewed in appendix 2. These are:

Typological models
This is the predominant cultural policy model, typified by Chartrand and McCaughey's (1989) classification of cultural policy as four main types: Facilitator, Patron, Architect, and Engineer. As the discussion in appendix 2 indicates, this enduring model has been added to and modified over the years, and alternative typologies proposed. Most of these typologies are based on the degree of government control over arts and cultural policy, and are therefore highly relevant to topic of this report.

Entity-relationship models
Entity-relationship modelling is a common approach to 'mapping' government cultural administrations. Entities are actors in the cultural policy system, such as agencies and individuals, and relationships are the linkages between entities. Although the models can become highly complex, reflecting the complexity of the cultural policy system itself, important elements of the models are critical to understanding the degree of government control over arts policy.

Decision-making model
Mark Schuster's 'decision-making model' of arts policy asks a series of questions about key elements of an arts policy. How these questions are answered can provide information on the degree of independence of arts funding from government.

Institutional and neo-institutional economic frameworks
The institutional and neo-institutional economics approach is similar to entity-relationship modelling in that it breaks systems down into key players and considers the ways in which these key players interact. Interactions are analysed as 'contracts' between entities; the nature of some of these contracts – for example, between the executive and the arts council – have implications for the level of government control over arts policy. The contracts view is evident in the proposals for better governance of the complex relationships between ministers, ministries and arm's length agencies resulting from government-wide reviews in the UK and Australia (information on which will be outlined later in this report).

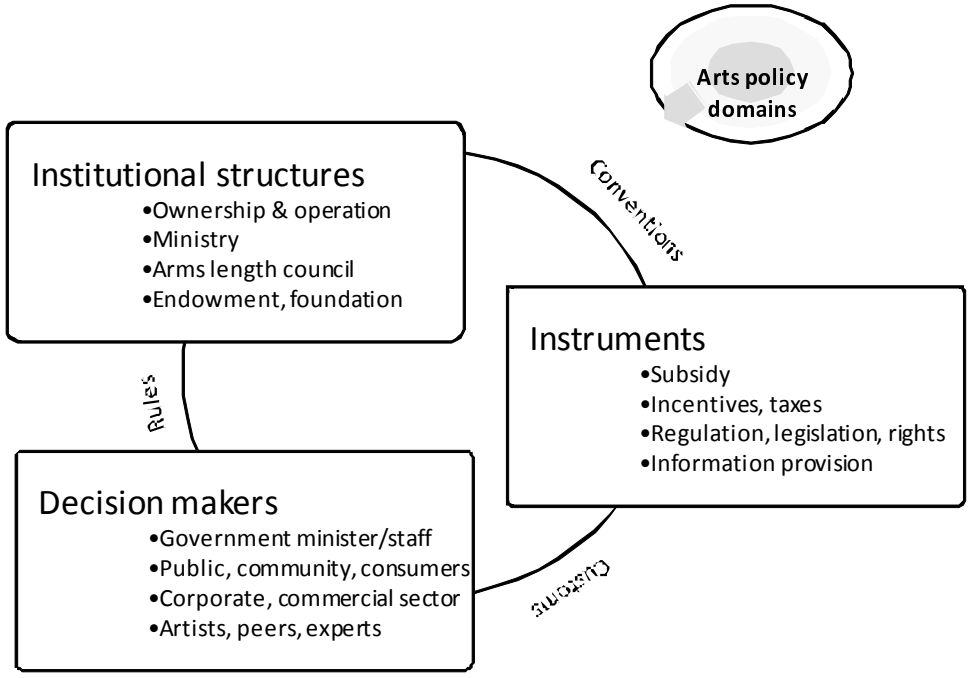
Domain models
Also very common in cultural policy, domain models define cultural policy by a series of cultural or artistic 'domains' (such as visual arts, indigenous, broadcasting etc.). The review in appendix 2 indicates that domain models of cultural policy tend to be multidimensional and hierarchical, and that they highlight important transversal linkages. The models systems are useful in considering the degree of vertical integration within a cultural policy system, and the degree of horizontal integration between cultural policy and other areas of government policy. As will be evident later in this report, these aspects have implications for the level of government control over arts policy and the comparative advantages of agencies in a mixed-model system.

IFACCA MODEL OF KEY INGREDIENTS OF AN ARTS SUPPORT SYSTEM

Based on the review of models outlined above, the IFACCA Secretariat has developed its own model of arts policy, summarised below (a full version of which is in appendix 3). The model characterises the system of arts support as a mixture of five main ingredients or components:

1) Arts/cultural domains
2) Institutional structures
3) Decision makers and decision making processes
4) Policy instruments (or 'tools')
5) Formal and informal rules, conventions and customs.

Figure 1: Key elements of an arts policy



Source: IFACCA

While independence touches on all components of the model, this report focuses primarily on 2 and 3 (institutional framework and decision making processes), and focuses mainly on just one type of instrument (subsidy).

Some data on component five (formal and informal rules, conventions and customs) are presented later in the report. Data for this component are, however, severely limited by the visibility of crucial factors influencing the degree of independence in arts support systems. These limiting factors are discussed in detail below.

Formal rules, informal customs and personalities
A major limitation on empirical analysis of the independence of arts funding and support is that the degree of government influence does not just depend on the formal, visible, aspects of the support system, such as the regulations and rules established in legislation, but also on informal, invisible, aspects of the system, such as understandings, unwritten codes and other informal modus operandi – what might be called the 'culture' of the system.

For example, the degree of control or freedom experienced by an arm's length agency such as an arts council might depend on:

- The rules and regulations laid down in legislation and statutes (which in themselves can be loose, vague or open to multiple interpretations);
- Service contracts negotiated between the minister and the arm's length agency (which may not be public, and may allow room for manoeuvre depending on the aggressiveness with which a minister wishes to enforce the contract);
- Procedural rules developed outside of statutory and contractual requirements; and
- Informal codes of conduct, accepted procedures and 'understandings'

Mangset (2008; 5) provides a more detailed set of nine questions about these rules and procedures to aid analysis of the degree of independence of the arts support system.

Not all of these rules and codes are quantifiable or stable. Formal rules and service contracts may provide an indication of the balance between control and freedom of an arm's length organisation, but they do not tell the complete story: the character of a minister of culture, the unwritten codes of conduct that lie beneath the ministry-agency relationship, the hidden influences and personalities of individuals may ultimately determine the level of freedom enjoyed by an arm's length agency. As Battersby (2005; 11) notes, even 'discreet telephone calls' are a possible instrument of government influence over an arm's length body.

The visible structures and processes used to generate empirical data such as those presented in Figure 6 of this report should therefore be interpreted only as illustrating the potential for freedom or control. As Mucica (2004) suggests, 'we should consider not only the degree of independence legally granted, but also, the more important issue of the degree of independence actually achieved.'

More on these issues can be found in Galligan (1993; 263), David Pratley Associates (2002), Battersby (2005), and Mucica (2004).

Arm's length arts funding: Review of the literature

> *[A] new poll suggests that the majority of people agree with the principle of 'arm's-length' funding of the arts.*
> BBC News, 2006; 1

As the models in the previous section indicate, the arts support system is complex, containing many interrelated elements, each with implications for the degree of independence of arts support from government. This complex system is often simplified in the literature through reference to the 'arm's length' of arts support and especially 'the arm's length principle'. But what does arm's length support mean? What is the arm's length principle? This section reviews some of the literature on these issues.

THE MATARASSO-LANDRY CONTINUUM: FREEDOM VS. CONTROL

Matarasso and Landry's landmark publication for the Council of Europe, *Balancing Act: 21 Strategic Dilemmas in Cultural Policy* (Matarasso and Landry, 1999), is a rare attempt to formally represent the issue of independence from government of arts support.

Balancing Act sets out 21 key issues, or 'strategic dilemmas', common in cultural policy. Each key issue has a continuum, a range between two extremes, along which Matarasso and Landry invite policymakers to locate their own cultural policies. The suite of issues is designed as a practical tool to aid strategic thinking about cultural policies. One practical application of the tool is in a review of Scottish cultural policy in Pratley (2002).

The sixth issue in the suite is called 'Direct control or insulation from the political process' (Matarasso and Landry, 1999; 23). This section summarises the Matarasso and Landry approach to this issue, and explores the approach in more detail.

Matarasso and Landry explain:

> The European experience includes a broad spectrum of approaches to the issue of actually providing financial support [i.e. direct funding] for culture. At one end lie countries such as Italy or France which do not see a distinction between culture and any other area of social policy… Other countries, such as Ireland, Finland, and the United Kingdom, have recognised the unique nature of cultural issues and [have] seen a value in trying to preserve the detailed planning and decision-making from the risk of political interference… In the Netherlands, an effective half-way house has been developed, with considerable devolution of planning and decision making, but the approval of the national cultural plan by Parliament.'
> (Matarasso and Landry, 1999; 23)

The spectrum is presented in the form of a diagram, which is reproduced below.

Figure 2: Matarasso-Landry continuum

How should cultural funding be distributed?

Direct control — Insulation from the political process

5 4 3 2 1 - 1 2 3 4 5

Source: Matarasso and Landry (1999; 24)

The terms 'direct control' and 'insulation from the political process' are, however, rather vague. It is not exactly clear what they mean: Control by what or whom? What is 'the political process'? The text

quoted above suggests the extremes are represented by 'Countries…which do not see a distinction between culture and any other area of social policy' and countries that '[try] to preserve the detailed planning and decision-making from the risk of political interference.' But still, these are vague notions.

A reformulation of the continuum with absolute end points and generic terminology is set out in figure 3 below.

Figure 3: The arm's length continuum - generic

Degree of influence government has over arts funding decisions

Complete										None
5	4	3	2	1	-	1	2	3	4	5

Arts policy elements and continuum position

As the discussion in the previous section suggested, there are a variety of ways that governments can exert control over arts funding allocation decisions, from the design of institutional structures, processes and rules. Many analysts describe the level of independence of arts funding as a choice as between an arts council and a ministry (i.e. institutional type). However, as O'Hagan (1997; 148) points out, 'the distinction between an arts council and a government ministry is not nearly as marked as some make out. For example, most arts councils must report directly to a Minister, and most Ministries use panel review and other expert group systems, just like arts council do, in allocating public money to the arts.'

The choice is therefore not simply between types of institutions, but also, as suggested in the IFACCA model in the previous section, between decision processes, instruments and formal and informal rules dictating behaviour of actors in the system of arts support. The multiplicity of factors suggests that a multidimensional approach is required to model the level of independence of a nation's arts policy, rather than the one-dimensional approach of a single continuum. If, for example, arts policy was thought to pivot on three crucial factors, these could be plotted in a three-dimensional space, rather than on a single continuum.

Each axis would be a continuum between two extremes, such as that devised by Matarasso and Landry. One such axis is developed in more detail below, based on the decision making process and, more specifically in terms of Schuster's decision making model, on who is making the decisions.

Example: who decides?

As suggested earlier, one of the key elements in the design of an arts policy is choosing the appropriate 'decision making processes'. A crucial consideration within this element is the choice of who will make the decisions over arts funding allocations. In the cultural policy literature, it is common to see this consideration posed as a choice between bureaucrats or artists. However, if the continuum is to be seen as a choice between extremes, then the right-hand side of the continuum should extend beyond artists to non-arts experts, or citizens (as in Cummings and Katz, 1987a and b). The inclusion of citizens in arts funding decision making is common. A review of the NEA's panel systems in 1990 led to the introduction of 'knowledgeable laypersons' to guard against charges of special interest and cronyism (Galligan, 1993; 268). And Swiss citizens are regularly given voting power over cultural expenditures via referenda (Peacock, 1994; 173, Rushton, 2002c, Mangset, 2008). Instruments other than subsidy also involve citizens as well as artists. In tax incentives, for example, decisions over what arts receive government support are made by consumers themselves; the government merely facilitates the purchase.

Figure 4 shows a continuum that represents the dimension of independence that relates to who makes decisions over the allocation of public support to the arts.

Figure 4: The arm's length continuum by decision makers (ii)

Decisions over allocation of government funding to the arts are made by:

Ministers										Citizens
5	4	3	2	1	-	1	2	3	4	5

Appointed ministers – Elected ministers – Bureaucrats – Quangocrats – Artists – Lay experts – Citizens.

In theory, it would be possible to develop continua for all the critical factors that determine the degree of independence of arts funding from government. However, this would be a daunting task, as the mixture of key elements and processes in arts policy and their interactions make for a complex web for modelling.

While the continuum approach is a valuable one, the trick to applying it to practical policy development is to determine the level of detail with which to use the technique. At its most simple one-dimensional level, the continuum is a good 'rule of thumb', but it is too general to use to generate practical policy options. As more detail is sought, the technique becomes unwieldy and begins to lose practicality.

Similar continua could be constructed for the other key elements of the cultural policy model; institutional structures, instruments, and rules.

THE ARM'S LENGTH AS A 'PRINCIPLE'

Much of the debate and discussion over the degree of influence government has over arts funding decisions is couched in terms of the 'arm's length principle'. This section reviews some of the key themes of the literature on the principle, and considers related issues.

Definitions

Much has been said about the arm's length principle in arts policy. Yet definitions of the principle differ greatly, and are often vague. Quinn (1997; 153) finds that a 'lack of precision in the commonly accepted description of [the arm's length principle] has created opportunities [for it to be] twisted to apply to situations which are often contrary to [its] theoretical understanding.'

The following is a selection of descriptions of the arm's length principle from the arts policy literature:

> '[A] public policy concept applied to a wide range of public relations in many countries. It may well be considered as one of the building blocks in the general system of separation of powers and of "checks and balances" fundamental to a pluralistic democracy. In the cultural sector, it is primarily used to designate a typical Anglo-Saxon mechanism and public body, indeed so typical that in many other languages it is even difficult to come up with an adequate translation. And evidently if the mere translation of the word is difficult, the implementation of the concept in a totally different legal and administrative environment poses far greater problems.' Mucica (2004; 1)

> Money voted by Parliament is granted to…quasi-independent bodies…[to] determine their own policies and spending choices.

> (Matarasso and Landry, 1999;23)
>
> Arts councils should exist and operate with relative autonomy from central government… Political influence over council activities should be kept to a minimum.
> (Quinn, 1998; 88)
>
> The government provides funding support to the arts but 'does not determine which artists or arts organizations will receive support.'
> (Chartrand, 1987; 1).
>
> Government has no 'authority to establish [an arts support agency's] priorities, policies, and funding programs and make grant decisions.
> (Canada Council, 2002).
>
> Ministers set the financial, administrative, legal and overall policy framework for the public bodies, but the bodies themselves have a considerable measure of independence in individual decision-making.
> The United Kingdom Parliament (1999)
>
> The view that public support should be provided in a way that insulates the arts from political or other pressures that might influence organizations to develop on terms other than their won artistic terms.
> Cwi (1983; 39)
>
> In the purest expression of this model there is no necessary connection between the policies and actions of the intermediary body and public policy. The very concept of an arms-length body is designed to distance decisions about cultural policy and funding from the political pressures of other issues of State, to serve the constituency of the arts - giving primacy to the needs of the creative artist, and to allocate resources where this supports the best quality creative work.
> David Pratley Associates (2002; 21)

In the arts policy literature, the arm's length principle is often defined as the combination of two elements of the model in figure 1: (i) an autonomous funding agency and (ii) peer assessment decision making processes. However, these are two discrete elements of the arts policy system, and there is nothing in public administration theory and practice that states that the two are necessarily co-dependent.

The term 'arm's length principle' is therefore rather vague and complex, and is used to represent different notions with varying degrees of rigour. Quinn (1998; 91) finds that the phrase is not 'an inviolable principle', but a 'term of convenience' that has been 'twisted in its modern usage'. Everitt (1998; 199) states that in the UK, '[t]he principle was never formalised into a written agreement and has no more status than that of custom and practice.'

Moreover, many argue that the principle, in its purest form, is unachievable. Wyszomirski (1995; 75) suggests that it is 'naïve to believe that political considerations could be divorced from purposes, procedures, and evaluation of a federal agency. Indeed, no public policy can be insulated from politics.' And Quinn (1998; 89) suggests 'it is absurd to suggest that arts councils could ever be kept at 'arm's length' from government.'

Similar sentiments are not hard to find. West and Smith (2006; 281) suggest that, in the UK, 'the "arm's length" principle of arts funding has disappeared, meaning that the state's involvement is now so close as to stifle the very creativity that is being supported'. Sheffield (2001) describes the arm's length principle as a 'palpable fiction.'

Alternatively, in the arts policy literature, references to the 'arm's length principle' could be taken as shorthand for the ethos that arts funding should be subject to the minimal interference from governments as is practicable.

Mangset (2008; 11) comments that:

> '..the [British debate] seems to have some kind of ideal type vision of the arm's length principle – and of an arm's length body – as a point of reference. In this ideal type arm's length arts funding system:
>
> 1) All allocation of public support to the arts should be done by independent personalities with artistic competence, appointed for a limited time period.
> 2) These personalities should be as independent as possible from political instructions.
> 3) They should not be appointed by, or dependent on, artist unions or other interest groups in the cultural field.
> 4) The arm's length body should not be obliged by very specific statutory, politically decided support schemes.
> 5) The arm's length body should instead have substantial freedom to allocate their funds within the framework of their budget.
> 6) The allocation of support should happen only and solely on the basis of artistic quality criteria, not for instance on welfare or equity criteria.
> 7) The allocation of support should be impartial, i.e. it should not be characterised by nepotism and/or clientelism.
>
> Such ideal type arm's length bodies do of course not exist in any direct and concrete shape anywhere. But it may exist as an efficient rhetoric reality.'

Couched in terms of the 'generic' continuum in figure 3, the literature suggests that the arm's length ideal, at the far right of the continuum, is a point that is unachievable in practice. The practical question for the design of arts policy is, therefore, not whether to have arm's length funding or not, but how close to or far away should arts funding be from the ideal advocated by the arm's length principle?

Objectives of arm's length funding

Arm's length funding in the arts has a variety of objectives, usually relating to freedom for artists from state influence (and, in return, protection of the state from adverse publicity) and improved decision making. As Arts Council of Wales (2004; 7) states:

> 'Classically the concept of an arms-length body is designed to distance decisions about cultural policy and funding from the political pressures of other issues of State, to serve the constituency of the arts by giving primacy to the needs of the creative artist, and to allocate resources where this supports the best quality creative work. In this classic formulation the convention is seen to have four virtues:
>
> - It protects the artist's freedom of expression from political interference
> - It ensures pluralism in taste
> - It protects the arts from inappropriate public policy pressures
> - It allows the criteria for funding to be focused on the single consideration of quality, without extraneous considerations.'

Most commentators in the cultural policy literature cite similar objectives. A selection is set out below.

Artistic freedom:

- Protection of freedom of expression from political interference (David Pratley Associates, 2002; 21).

- ‘The purpose [of the peer review panel] system is to prevent the development of a permanent bureaucracy that could control the flow of funds to the arts and ultimately impose an “official culture” on the nation’ (Heilbrun and Gray, 1993; 259).

Insulation of the political sphere:
- A buffer of independence between the cultural sector and the political sector. (Mundy, 2000; 33)

Improved decision making:
- Ensures that artistic quality is the major consideration in grant decisions and protects diversity of opinion and artistic freedom (Canada Council 2002)
- Allowing judgments [over allocation of arts funding] to be made on more artistically relevant grounds (Cummings and Katz, 1987a; 12)
- Reduce criteria of funding to the single consideration of quality (David Pratley Associates, 2002;21)
- Promote pluralism of taste in funding (David Pratley Associates, 2002; 21)
- Peer review panels bring ‘both integrity and aesthetic judgment to the review of grant proposals.’ (Galligan, 1993; 258).
- Peer panel review of funding decisions is based on two assumptions: (i) that peers are the individuals who are best able to judge quality and (ii) that decisions taken by peers best reflect the public interest in arts funding. Schuster (1995; 133)

Encouragement of innovation and experimentation:
- Supports experimentation through work that might be critical and challenging (i.e. to the government providing funding support) (Canada Council, 2002)

The first objective – freedom for the artist to be creative without state interference – is a particularly strong one. The principle of arm’s length arts support is seen to resonate well with the ideology of autonomous artistic expression (see in particular, the essays in Mirza, 2007). In Finland, the freedom of art is a constitutional right that acts as a cornerstone of the arts support system (Rautiainen, 2007).

Other policy areas

The notion of ‘arm’s length’ policy delivery is not exclusive to the arts. Chartrand and McCaughey (1989; 1) document a number of areas of government interest adopt an arm’s length approach, including the constitutional separation of powers of the judiciary, executive and legislative branches of government, and the freedom from government of the press and media in many countries. While this report will not review in detail literature from other policy areas, recent reviews in the United Kingdom (UK) and Australia provide good background and context for the debate within cultural policy. In Australia, arm’s length agencies are part of an institutional form known as ‘statutory authorities’. A government-wide review of these agencies was undertaken in 2003 (Uhrig, 2003). Australia’s national arm’s length arts agency, the Australia Council for the Arts, was subject to the review.

There is a substantial literature on UK arm’s length agencies, which are commonly referred to as either ‘Quasi autonomous non governmental organisations’ (Quangos) or Non-departmental public bodies (NDPBs). Employees of quangos are often referred to as ‘quangocrats’; the arm’s length equivalent to the bureaucrat. The UK has seen ongoing review and debate about these agencies, and major reviews have been undertaken as part of the UK government’s devolution of powers to Scotland, Wales and Northern Ireland (see Macleavy and Gay, 2005). The UK’s arts councils have naturally come under intense scrutiny as part of these reviews, and a substantial part of the more recent literature on arm’s length arts support comes from these ‘quango’ wars. The outcome of these reviews can be telling. As Birrell (2008; 46) notes in the case of UK devolution, ‘[i]n practice, the formulation of what were traditional and well established arguments for the use of arms-length approaches though quangos proved simpler than the formulation of a specific principle to justify the subsuming of quango functions into devolved government’. The UK’s arts council quangos

have to date proved resilient under fire (a detailed personal account for the case of Wales can be found in Davies, 2008). In Australia, too, the arts council came through review intact, with some additional elements incorporated into its formal relationship with the arts minister.

As already noted, much of the debate about arm's length funding of the arts concentrates on institutional types, with the arts council as the model arm's length arts institution. However, public policy theory suggests that there are a wide variety of different types of arm's length institutions: 'Quangos are varied species' (Greve et al, 1999; 17). This variety has prompted analysts to develop typologies for arm's length agencies, an approach which becomes even more complex in an international context, as Greve et al (1999; 2) note:

> 'Defining what is meant by the term quango is a confusing task within any country and it would be all but impossible to produce an international definition which is valid over a number of different constitutions and approaches to government. It is also questionable whether there is anything to gain from seeking to label one body a quango and another not. Indeed, it is simpler and more beneficial to see the world of quangos as a continuum from central government agencies, like the Next Steps in the UK and the *agentschappen* in The Netherlands, to specifically created external bodies and beyond into the world of contracting out, privatisation and regulation.'

It is interesting to note that a number of analysts adopt a continuum approach similar to Matarasso and Landry's. McConnel (1996b), for example, argues that arm's length agencies are 'a variety of bodies which lie on a continuum moving along the arm's length away from direct ministerial control. That broad continuum stretches from ministerial departments, through non-ministerial departments…and NDPBs to companies clearly in the private sector but performing some public tasks.'

Similar objectives for an arm's length approach can also be identified in the non-cultural policy literature. For example, among a number of reasons for having 'quangos', McConnel (1996a; 1) includes:

1) To obtain specialist or expert knowledge that would not otherwise be obtainable.
2) To involve a particular interest group, or others who might be deterred by the aggressive world of local politics.
3) To protect public administration from the cut and thrust of day-to-day politics.

Similarly, Uhrig (2003; 31) suggests that arm's length agencies are established when 'a degree of operating independence is seen to provide either objectivity or to promote efficiency…. There are several ways in which establishing [an arm's length agency] contributes to objectivity and efficiency. These include:

1) separating specialised activities from the broader and more complex set of requirements of a portfolio department
2) providing a narrow and clearly defined range of functions the authority is to fulfill
3) establishing a degree of independence through codifying the role of the authority and defining the powers of the Minister
4) creating a distinct body that might deal with cross-portfolio matters.'

Other useful references from the non-cultural policy literature are Manning and Matsuda (2000) and Scott (2006), both of which are published on the World Bank's website.

Trends in the length of the arm

Histories on the arm's length principle usually begin with the establishment of the Arts Council of Great Britain in 1945. However, Ministry of Education, Culture and Science (2003; 248) suggests that 'over the two hundred years it has been in existence, Dutch central government has practised taking an arm's length approach to the content of [government supported] art and culture.'

Recently, analysts have identified a 'convergence' in arts support around the world, by which it is meant that more governments have adopted a mixed model of arts support, with both arm's length and direct bureaucratic structures and processes. (In terms of the Matarasso-Landy continuum, this means that countries are at two positions on the spectrum). As far back as 1985, Schuster (1985; 23) noted:

> '[T]he experience of the eight countries [studied]..suggests a slow convergence of the ministry and arts council models of arts support. Countries with ministries have moved to the greater flexibility of the arts council model with greater involvement of the various artistic sectors themselves in decision making… [T]he arts council countries in our study have adopted elements of the ministry model, trying to incorporate some of the increased political clout of that model.'[1]

More recent analyses confirm that mixed systems are on the ascendency. Discussions of the processes and reasons for the rise of the mixed system can be found in David Pratley Associates (2002), Mucica (2003; 15), Everitt (1996), Inkei (2002), IFACCA (2005), and Mangset (2008).

A greater part of the literature on 'convergence' comes from countries with an arm's length agency, where the trend toward a mixed system has been decried as an erosion of the cherished arm's length principle. The essays in Mirza (2007) and in Warnock and Wallinger (2000) suggest that the shortening of the arm in the UK has been driven by two main factors: (i) a rise of 'managerialism' in public policy, which has brought greater accountability, transparency and evidence-based evaluation to arts policy; and (ii) a rise of 'instrumentalism' in arts policy, which has seen arts programs hijacked for non-arts objectives (such as social cohesion and crime reduction). Together, managerialism and instrumentalism have, it is claimed, shortened the arm of UK arts support by increasing government control and reducing artistic freedom in the arts. In the case of Norway, Mangset (2008; 14) finds that 'since the middle of the 1990s (especially since 2000) the arm's length between the political worlds and the Arts Council has...been shortened.' The shortening has been the result of a desire by governments to take a more active role in cultural policy. Although greater government interest in culture has seen an increase in funding to the arts, the increase has been in funding instruments over which the council has 'limited freedom of action': 'The new and enlarged "Arts Council" appears as a more hybrid public body than the old Arts Council.' (Mangset, 2008; 15).

Arm's length related issues

Wyszomirski and Mulcahy (1995; 131) note that the independence of arts funding has a number of related issues:

> 'Peer panel systems in government reflect enduring tensions between informed and participatory decision making, between expert and public authority, and between technical and political considerations. In the arts, advisory panels strive for decisions that are both well informed and broadly participatory. They must also attempt to reconcile the protection of creative freedom of individual applications with the agency's need for accountability to a general public and its representatives.'

As already noted, related issues include: public accountability; autonomy of the artist; censorship and curatorship; governance; democracy and human rights; and désétatisation, decentralisation, new approaches to public management and the devolving of power away from central government. This report will not investigate these related issues in detail, but many of these are touched on in the articles and resources referenced throughout this report.

[1] The eight countries in the study were Canada, Germany, France, Italy, Great Britain, Netherlands, Sweden, and the USA.

How much influence do governments have over arts support?

How much influence do governments wield in decisions over arts support around the world? There are a number of information sources that can be used to begin answering this question. Three main sources considered here are: online cultural policy databases; IFACCA's database; and IFACCA's national arts agency survey.

1. Online cultural policy databases
There are now a number of online sources of information on cultural policies around the world. The most substantial sources are linked to from a page on the IFACCA website entitled 'Cultural policies around the world'.[2] These online resources, of varying levels of sophistication and detail, offer a way to research cultural policy structures and processes in a variety of countries.

Of particular note is the ERICarts/Council of Europe Compendium on Cultural Policies in Europe (www.culturalpolicies.net). The Compendium allows a researcher to generate comparative tables on a number of cultural policy issues. For example, selecting 'Comparisons/Comparative Tables/Main Features of the Cultural Policy System' from the home page, produces a table that summarises the following broad characteristics of the cultural policy system across all countries in the database: whether the country has a centralised or decentralised system; the existence of a central ministry for culture; whether arm's length bodies exist; the existence of national cultural funds or foundations; whether the system features committees with representatives from different levels of government; and whether interministerial committees exist in the cultural policy system.

However, despite these resources providing substantial comparative information on cultural policy, not all are easy to use. To obtain cross-country data on structures and processes of arts funding and assess the degree of independence across countries can take a substantial amount of time. Although the Compendium makes the generation of comparative tables easy, the data only relates to European countries plus Canada, so it is not possible to obtain a complete picture of global arts support systems.

2. IFACCA's database
IFACCA's own database contains records of arts and cultural policy institutions in 201 countries. Data from the database on the institutional structures used in arts support around the world is presented later in this section.

3. IFACCA national arts agency survey
A survey was undertaken at the First World Summit on the Arts and Culture in Ottawa, Canada, in December 2000.3 The data was displayed on the Directory section of the IFACCA website. Between 2000 and 2006, new countries were added and profiles were updated, but the Federation has since discontinued adding and updating the data, and the data has been removed. Data from the survey are presented later in this section.

The rest of this section presents data on:
- national arts support institutional structures;
- aspects of the relationship between national arm's length arts agencies and government; and
- the incidence of peer review.

[2] www.ifacca.org/links/cultural-policies-around-the-world/.
[3] More information on the First World Summit is at www.ifacca.org/ifacca_events/first-world-summit /.

These data do not provide a complete picture of all of the aspects influencing independence, as identified in previous sections of this report. There are important gaps in the data, such as:

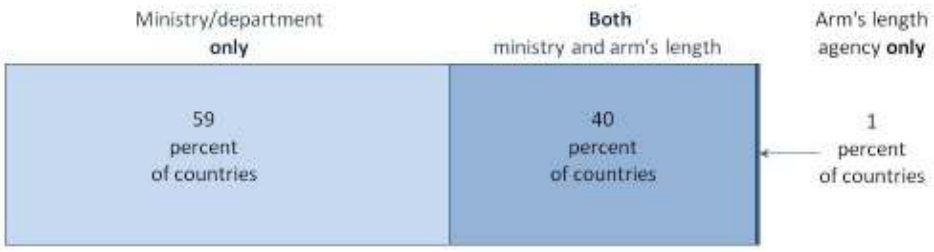
- Arm's length agencies often administer direct line funding on behalf of government (or 'tagged' funding). No data are presented on how much of the budget of arm's length agencies is discretionary, and how much is 'tagged' for specific government programs.
- Data from the IFACCA survey are representative of a sample of countries (29 arm's length agencies and 41 agencies in total).
- Data are from 2006 or before.
- Some data are for different years (between 2000 and 2006).

Moreover, out of necessity, the data are highly simplistic indicators of highly complex public policy systems. Nevertheless, they represent one of the few sources of empirical information on the issue.

Institutional structures

IFACCA's database contains records of arts and cultural policy institutions in 201 countries. Figure 5 presents summary data on institutional structures for arts support for those countries where the structures are known. Almost all countries (99 percent) have a ministry or a department with responsibility for culture, while just under half (40 percent) have a national arm's length arts support agency such as an arts council. The IFACCA database also indicates that the majority (nearly 90 percent) of ministries are mixed – i.e., culture is included with other policy domains such as sport, environment, church affairs, communications or tourism.

Figure 5: National arts agency institutional structures



Source: The IFACCA database

Arm's length agencies' relationship with government

Respondents to the survey were asked to tick which statements from a list describe their agency's relationship with government. Government ministries (or departments) are asked not to respond, as the questions do not make sense from a ministry perspective. Figure 6 summarises the survey responses. The data are divided into two main sections. The first section provides an indication of government involvement in an arts agency's operations. Data indicate the percent of arm's length arts agencies for which each statement applies. For example, just 8 percent of arts agencies indicated that the government selects the recipients for which the agency provides financial support, while 69 percent indicated that the government appoints the members of the governing body.

The second section provides an indication of the level of freedom from government that an arts agency enjoys. Again, data indicate the percent of arm's length arts agencies for which each statement applies. For example, 38 percent of arts agencies indicated that they appoint

their chief executive officer themselves, while 88 percent of arts agencies indicated that they determine their own current priorities.

Figure 6: Arm's Length Arts Agencies' Relationships with Government

Questions about degree of control/freedom	*Percent of arm's length agencies*
The Government:	
Selects the recipients of financial support from the agency	*7*
Appoints staff members (other than chief executive officer)	*10*
Establishes the strategic plan within which the agency works	*14*
Establishes the agency's current priorities	*14*
Establishes the various funding programs of the agency	*17*
Is represented on the governing body	*18*
Determines allocation of budget programs and activities	*28*
Appoints the chief executive officer	*45*
Establishes the overall policies within which the agency works	*50*
Determines the amount of funding the agency receives	*59*
Appoints the members of the governing body	*72*
The arts agency:	
Appoints its chief executive officer	*41*
Establishes its various funding programs	*66*
Determines allocation of budget to programs and activities	*79*
Determines who will receive its financial support	*79*
Establishes its own strategic plan	*79*
Determines its own policies	*83*
Determines its own current priorities	*83*
Selects its other staff members	*83*
General	
The agency's financial accounts are audited by the government auditor or an auditor appointed by the government	*72*
It is required to file an annual report with the legislature or government	*83*
The allocation of the agency's budget to various programs and activities is in part determined by government and in part by the organization	*31*
Within limits, the government can give directions to the agency	*55*

Total no. of valid agencies = 29

The third section in figure 6 contains general questions on the relationship between an arts agency and its government. The results of these questions are difficult to interpret, especially the final two, for which no measure was provided for ‘in part’ or ‘within limits’.

As discussed earlier, data such as these highlight the potential for control, but do not necessarily reveal the actual degree of control wielded. Unwritten rules, hidden influences and personalities will also play a role in this, though these, by their very nature, are not easily quantifiable.

Peer assessment

In another question in the survey, respondents are asked to indicate whether their agency uses peer assessment to evaluate applications for financial assistance. The question is relevant for both ministries and arm’s length agencies. The results are reproduced in figure 7.

Figure 7: Incidence of peer assessment, national arts and culture funding agencies 2006

	Responses	
	No.	*Percent*
Agencies:		
with peer assessment	22	*54*
without peer assessment	19	*46*
Total	41	*100*

Summary data such as this masks what can be a highly complex process subject to multiple and often competing incentives, as Wyszomirski and Mulcahy (1995; 131) note:

'[p]anels are expected to represent the diversity of America's peoples and cultures; to insulate the arts from centralized government control, yet help government make decisions concerning the arts; to act upon assumptions regarding the value and definition of art, artistic excellence and cultural priorities when such a consensus has not been politically forged; to make essentially subjective, qualitative decisions in ways that are seen to be fair and equitable; and even to embody standards of decency.'

For more detail on the complexities of peer review and decision making processes, see Wyszomirski and Mulcahy (1995), Quinn (1998; 293) and the Budapest Observatory 'profiles' (http://www.budobs.org/grant.htm). See also Sullivan (1989), which details on the nature of the peer panel processes in a number of arm's length agencies in the 1980s, and David Pratley Associates (2002; 32), which discusses the control/freedom mechanisms that existed for the UK's arm's length arts councils in 2002 (many of which are already outdated due to restructuring since).

How much influence should governments have over arts support?

> *[I am] not a great supporter of the arm's length principle ... I have never understood why we go through the angst of going out, fighting elections and winning elections only to hand all the fun over to somebody else who is unelected and never had to go out there and who, in the end, is responsible for these things, when we then have to take all the collateral damage here when it goes wrong.*
> British MP, Tony Banks, quoted in The United Kingdom Parliament (1999)

A further question, to add to the descriptive analysis in the previous section, is to obtain some idea of the normative question of how much influence *should* governments have over arts support decisions? This question is more difficult to address, as evaluation does not involve a simple and objective cost-benefit analysis; it inevitably involves making assumptions or judgments that may appear to favour a particular approach. IFACCA does not favour any particular model or approach to arts support. Rather than attempt its own evaluation of the different models, therefore, the IFACCA secretariat has simply reviewed the evaluative literature to document the perceived strengths and weaknesses of arm's length and direct line funding.

STRENGTHS AND WEAKNESSES OF THE TWO MAIN APPROACHES

The strengths and weaknesses of each are listed in figures 8.1 and 8.2. Sources are supplied at the bottom of each table. Each group of strengths and weaknesses has been sorted into general types.

For arm's length agency and/or peer review decision making these are:

- Decision making
- Insulation, buffering and 'firewall'
- Intermediary positioning
- Other

For ministry and/or ministerial and bureaucratic decision making they are:

- Policy integration
- Symbolism
- Accountability
- Decision making
- Instability
- Other

A number of points should be made about the two lists:

- Strengths and weaknesses are in no particular order, and are not assessed for their importance or relevance.
- The strengths and weaknesses represent opinions, preconceptions and intuitions as well as empirically-based findings. For example, many assume that a weakness of strict government control is that it stymies innovative, nonconformist, or avant-garde art. But Rueschmeyer (1993; 230) finds the opposite for the German Democratic Republic (i.e. East Germany under communism); under the country's stringent government controls over artists, she finds that 'ironically, nonconformist artists acquired a strong voice.' Zolberg (1993) finds that France's centralised ministry model may have hindered geographical cultural diversity, but not art form innovation.
- The strengths and weaknesses are taken solely from the cultural policy literature. There is a good summary of general problems with arm's length agencies in Manning and Matsuda (2000), and a good practice 'checklist' in Scott (2006).

- Some weaknesses noted for one system might be expected to be a strength of the other system, and vice versa. But not all such instances of ‘concomitant’ strengths and weaknesses are recorded – only those noted explicitly in the literature reviewed.
- In some instances, it is noted whether the author is referring to institutional structures (arts council/ministry) or decision making processes (peer review/bureaucratic). Where this is not noted, it should be assumed that the two are confounded at the source.

FIGURE 8.1: LONG ARM: ARM'S LENGTH AGENCY, PEER REVIEW

Strengths	Weaknesses
Decision making	
• Relevance: decisions will be 'in tune' with artistic trends due to rotation of members of peer panels • More innovative and 'daring' arts funded • Diversity: More diverse arts funded and more 'representative and fair' • Quality: Better decisions through hiring of expertise for assessment of quality • Credibility: 'engages' arts community in decisions, and improves arts sector confidence in allocation decisions, therefore more acceptable to arts constituency.' Represents an acceptable rationality'	• Lose relevance with expanding notions of what art is and expanding arts sector • Arm's length cannot respond to equity needs of minorities (which may be a core government task to ensure cultural rights) • Leads to 'producer capture', 'regulatory capture', 'cronyism', 'clans and coteries', 'peer prejudice', particularly in small countries with small arts communities • Peer review panels limit the sense of the wider public that arts funding should serve • Panels are faced with too many and often contradictory policy objectives – they are asked to do too much • Lower accountability or unclear lines of accountability to electorate/citizenry (i.e. lower level than for a ministry), because unelected official are responsible for allocation decisions, rather than elected politicians • Panels are time-consuming, inefficient, and suffer from 'comment pollution'
Insulation, or 'buffering', firewall from adverse influence	
1) *For artists:* • Firewall: Shields arts support decisions and arts sector from political influence and political tastes • Avoids political 'censorship' and influence • Promotes artistic freedom of expression and therefore innovative, exciting art • Recognises a fundamental aspect of art - that of critiquing government and society • Allows for 'creative disloyalty' 2) *For politicians*: • Insulates government from responsibility over arts funding decisions and particularly controversial arts decisions 3) *For decision makers:* • Freedom for arts funders from political influence • Peer assessment shields arts support decisions from pressures brought by outside interests (colleagues and friends of applicants, partisan or special interests)	• Substitutes government censorship with arts community 'censorship'; taste of politicians with taste of arts 'experts'. • Because pure arm's length model impossible to achieve in practice, government will influence in some way, perhaps when expedient - censorship will therefore still exist, and government can influence without seeming to influence; control without accountability • Weak accountability and non-transparency • Insulation from political influences leads to marginalization of arts and arts policy
Intermediary positioning and comparative advantages	
• Arm's length agencies have a unique status: a combination of distance from day-to-day policymaking and proximity to artists and cultural practitioners • Arm's length agencies can perform a valuable sectoral advocacy role, and present an independent case to government, which also improves transparency in arts policy development • Frees government to concentrate on overall arts policy, rather than day-to-day operational issues • Arm's length body better connected to the cultural sector (more 'in tune' with), which can bring arts sector expertise to policy and program delivery and specialist advice to ministers • Quangocrats potentially have greater sensibility to the needs of the sector than bureaucrats • Can clarify objectives in multi-faceted policy area • Can work to encourage private sector funding (this strength is noted for endowments) • Arts councils maintain a distance not just from government, but also from the arts community: they can be informed by the community through consultation but free from direct influence	• Special in-between position of arm's length agency serves interests of neither public nor cultural sector • Adds complexity to resource delivery and duplicates bureaucracy • Advocacy role for the arts is limited by ministerial oversight • Intermediary position between sector and government means that obligations are incompatible. Multiple stakeholders for arm's length agencies lead to ambiguous and conflicting objectives and actions (and they become everyone's enemy). • Government loses a level of control over public monies. • Discord (conflict) between funding delivery and considerations of public policy • Arm's length body less lobbying power for the arts due to distance from Cabinet/executive resource decision making • Arm's length body's policy mechanisms are limited. Eg subsidy - the mainstay of arm's length model - is becoming less fashionable/desirable; demand-based policy initiatives now better • Horizontally constrained - policy focus limited; eg sphere of cultural domain (the arts) narrow band of cultural policy • Government has less room to influence the direction of cultural policy
Other	
• Arm's length agencies allow long-term policy development - policies and planning 'not blown off course by the gusts of democratic opinion…every five years or so' • Better than alternatives: 'Peer panel review is the worst system of arts funding - except for all of the others' • The alternative (a ministry) is more expensive	• Arts Councils too 'unusually' volatile due to constantly changing panel members • Arts councils accused of institutional stasis, the 'tyranny of the status quo' • Arm's length agencies more vulnerable to government cutbacks and 'periodic upheavals' • Expensive: noted for peer panels and endowments

FIGURE 8.2: SHORT ARM: MINISTRY, MINISTERIAL AND BUREAUCRATIC DECISION MAKING

Strengths	Weaknesses
Policy integration	
• Level policy field; places arts policy at level of other government policies • Horizontal policy integration; help integrate/coordinate arts policy with related policy arenas and issues • Policy completeness (integration of policy instruments); avails arts policy with full compliment of policy mechanisms and actors (eg integrate subsidies with tax and incentives to achieve an overall policy strategy/approach) • 'Ability to get things done' • Vertical policy integration/resonance across arts policy hierarchies • Transnational political equivalence; to have political equivalents of major political/trading partners	• Marginalisation against competing government interests • Overplanning - unbalanced 'top-down' planning & influence on arts sector, rather than 'bottom-up'
Symbolism	
• Appropriate reflection of importance of arts in the political hierarchy/power structure • Symbolic gesture of government's commitment to the arts	
Accountability	
• Democratic resonance: a degree of political control over public funds reflects process of democratic representation • Accountability; clearer or greater than for an arm's length council	• Political nepotism: 'a change of government can lead to senior arts administrators being replaced by friends of the party or parties in power. • Undemocratic - artists excluded from decision-making and decisions favour of elite who have access to political power • Government censorship • Curatorship causes skewed development (eg spend funds on high profile, glamorous projects at expense of localised projects) • Less diversity • Undemocratic - In a ministry, political muscle will almost certainly prevail. • Aloof – as bureaucrats are 'cut off' from arts • Personality influences - appointed minister may be an arts 'philistine' or a champion for the arts, or stamp their own ideology
Decision making	
	• Poor decision making - non-experts/Ministers do not have ability to make decisions of the scale, range and complexity required • Depress creativity and innovation. Stasis and non-innovative arts supported, as bureaucrats are cut off' from world of the arts and have staid artistic tastes. Public service more risk-averse and less innovative
Instability	
• Ministries are more stable than arm's length agencies	• Instability – changes to the minister cause instability in arts funding • Instability due to 'short-termism', or changing government priorities
Other	
	• The model requires: freedom of artistic expression, status of the artist, and right to consultation of artists associations to be enshrined in law. In practice, this is not always the case, or these rights are not always well protected.

Sources: Applied Cultural Principles (1995), Artists Association of Ireland (2000), Arts Council of Northern Ireland (2005), Arts Council of Wales (2004), Battersby (2005), Beck (1991), Birrel (2008), Campbell (2000), Canada Council (1988), Canada Council for the Arts (2002), Canada Council for the Arts (2006), Chartrand and McCaughey (1989), Council of Europe (1997), Cummings and Katz (1987a and b), Cwi (1983), David Pratley Associates (2002), Davies (2008), Everitt (1996 and 1998), Frey (2001), Galligan (1993), Girard (1987), Hewitt (2005), Holloway (2008), House of Representatives (1986), Inkei (2001 and 2002), Katunarić (2000), Klamer, Petrova and Mignosa (2006), Knüsel (2005), Lewis (1994), Loosely (2002), Lowell and Ondjaatje (2006), Macdonnel (1992), Macleavey and Gay (2005), Mangset (2008), Morgan (2004), Mundy (2000), Pérez de Cuéllar (1995), Pick (1991), Quinn (1997 and 1998), R A Malatest and Associates (2007), Rautiainen (2007), Schuster (1995 and 1996), Select Committee on Culture, Media and Sport (1999), Sheffield (2001), Sirman (2008), Sullivan (1988), The United Kingdom Parliament (1999), van der Ploeg (2005), Wyszomirski (1995), Wyszomirski and Mulcahy (1995)

MIXED SYSTEM - CHOOSING THE MODEL FOR THE TASK

The lists above are offered as a starting point for thinking about the criteria for evaluating the two main approaches and considering which approach might be better suited in which contexts or for what purposes. This is what Everitt (1998; 204) calls the 'third way': 'Fortunately, it is not necessary to choose between the two contending systems. There is a third way, which seeks to combine the advantages of each, to get the best of both worlds.'

A number of analysts have attempted to identify which model is best suited to what tasks. Some opinions are reproduced here.

Comparing France's ministry model with arm's length models in the UK and USA, Girard (1987; 12) finds that:

i) there is little difference between the ministry and arm's length models on three criteria: budget commitment from government; artistic freedom; and rationality of decision-making;
ii) the arm's length model performs better than the ministry model when evaluated in terms of democracy and the degree of wasteful bureaucracy; and
iii) the ministry performs better for the 'image' of cultural policy.

Girard concludes: 'My personal view is…that the ideal system would be, first, a cabinet minister, very visible in the media and responsible for very few priorities, very few innovations and, second, arm's length bodies, by field, by discipline, as in the United States or [in the UK], and also by the level of local authorities.'

McRobert (1980; 54) argues that a ministry is better at serving for broader definitions of the arts, and for general arts participation rather than professional participation.

David Pratley Associates (2002; 36) identifies a new specialised mixed-model approach across the UK, in which government ministries get involved in broad strategic and public policy issues in the arts, while arm's length agencies deliver on specific objectives and allocation decisions.

In House of Representatives (1986; 52), the suggestion is made that ministries have an advantage in funding major arts institutions, and in developing 'transversal' policy linkages, such as with media industries and tourism.

House of Representatives (1986; 53) also considered the arts council model across three activities, concluding that:

- 'the arts council structure has an advantage in grants administration by tapping the expertise of the arts community in a way that a 'conventional bureaucratic organisation' would find difficult, and by providing a buffer between grant making and political pressure;
- the arts council model is better at arts advocacy; and
- the ministry model is better at policy development – 'if arts council is sufficiently representative of the small subsidised arts sector to effectively carry out its grants administration and advocacy roles, it is unlikely to have the broad view needed to resolve most of the important questions of art and culture. If the council's membership is sufficiently broad to competently address these questions, the specific arts expertise it is intended to supply may be excessively diluted.'

According to Volkerling (2001; 6), the UK's Department of Culture, Media and Sport argues that a department of state (such as a ministry) is better at 'strategic leadership' and 'taking forward' government objectives for and with cultural sector.

In arguing for the establishment of a ministry for culture in the USA to complement the arm's length National Endowment for the Arts, the Center for Arts and Culture (2001) suggest that

a ministry is needed for interagency cooperation and coordination, leadership, as a signal of importance of culture, and for inter-country cultural relations coordination and diplomacy.

Mangset (2008; 15) reports on the proposals of a committee to restructure Arts Council Norway into two distinct divisions based on the nature of the funds disbursed: (i) an autonomous/arm's length division and (ii) a less autonomous division that administers statutory support schemes delegated from the Ministry.

Van der Ploeg (2005; 32) draws from theories of delegation and control from the public policy literature considers that to conclude that 'the allocation of the execution of cultural policy should be delegated to an independent arts fund. The Minister of Culture can define a clear, yet broadly-defined mission for the arts fund. The division of responsibilities should also be clearly set out in a formal agreement that should not be altered over the policy cycle.

Davies (2008) argues for a split that sees ministers playing a leading role in championing the arts within government and encouraging cross-portfolio collaboration, while leaving allocation decisions to an arm's length agency.

Sirman (2008) suggests a division of responsibilities across the innovative-preservation nature of creative activities: the long arm being best suited to allocation decisions over innovative and high-risk creative expressions; the short arm model best suited to decisions over heritage activities and the preservation of 'the canon'. He does, however, state an important caveat: 'the funding models used are not as important as the conscious and deliberate will to achieve an agreed-upon end' (Sirman, 2008; 9).

Much of the problem with a mixed system is in ensuring the non-duplication and clear allocation of tasks and responsibilities between a ministry and its arm's length agency. Recent reviews in the UK have reinforced the value of the arm's length model, but have noted difficulties in the relationship between arts councils and their respective ministries and departments. Reviews have inevitably recommended clarifying the relationship and improving understandings on both sides about the specific roles of each agency.

The review of 'statutory authorities' in Australia (Uhrig 2003) finds that an understanding of success and a clarity of purpose are the cornerstones of good governance of arm's length agencies. The report makes a number of recommendations to achieve these cornerstones, with detailed 'templates' that outline the recommended roles for agencies and ministers.

Conclusion and suggestions for future work

An enduring debate in arts and cultural policy discourse has centered on what is the best way to deliver government support for the arts: via an 'arm's length' agency such as an arts council; or via a 'short arm' agency such as a ministry.

This report has reinforced that the degree of independence depends on a number of factors:

1. the institutional structures through which policy is delivered;
2. the decision makers who determine resource allocation;
3. the policy instruments (or 'tools') used; and
4. the formal and informal rules, conventions and customs that influence behaviours of agents in the system.

It is critical that all of these key dimensions are taken into account in determining the degree of independence in an arts funding system.

Data in this report suggests that a 'shorter arm' approach to arts support may be more common internationally than a 'longer arm' approach. In over half the countries of the world, a government ministry or department is the sole agency responsible for implementing a government's arts objectives.

That said, cultural policy analysts have noted a growing 'mixed approach' to arts support around the world: the arm has grown shorter in countries that have had a 'long arm', and vice versa. In mixed arts support systems, it is critical that the elements of the arts policy system – the agencies, instruments, personnel and rules – be applied where they are best suited. This report has provided some indication of where analysts and commentators judge that 'short-arm' and 'long-arm' policy elements are best utilised.

It is hoped that the data and analysis in this report will help planners, decision makers and commentators compare the different approaches and assess the balance in national mixed models of arts support. It is also hoped that the report will stimulate debate about the various models.

This report is based on a discussion paper that was released to IFACCA members in 2006. Comments on the discussion paper have raised a variety of ways for IFACCA or others to build on this work. Ideas include:

- Commissioning more research such as detailed country case studies and/or historical analyses of a selection of countries.
- Developing certain issues further such as the independence-censorship nexus, and issues of the independence of arts policy research.
- Commissioning experts to provide commentary or responses this report.
- Holding international meetings to discuss the topic further.

IFACCA welcomes ideas and input on future work at info@ifacca.org.

Appendix 1: IFACCA's work on independence of arts funding

Since its establishment, IFACCA has regularly engaged with issues of arts funding frameworks and the independence of arts funding from governments. The issue has been raised in a variety of contexts, including:

First World Summit on the Arts and Culture
At the first World Summit on the Arts and Culture, held in Ottawa, Canada, in November 2000, a 'networking session' was dedicated to the topic of arts support frameworks. Participants were charged with considering issues around support models with a view to making recommendations for national arts support agencies (be they councils, ministries, or other types of agencies) and the then yet to be established international federation of such agencies. The report on the session notes:

> The [networking session] group suggested that the new international federation support working principles rather than institutional forms, and that it take up the two issues the networking group did not have time to develop – i.e., recommending reports and studies which contribute to an intelligent discussion of the division of responsibilities between councils and ministries and acting as a forum for further discussion of the topic.
> Canada Council (2001; 30)

D'Art question on the degree of arts councils' independence
In 2002, IFACCA received a D'Art query from Mary Cloake, then Development Director of the Arts Council of Ireland. Ms Cloake was looking for information on a number of key questions relating to the independence of arts councils' in other countries, including:

- Are arts councils directed to adopt or follow government policies?
- Is government arts policy framed by the arts minister exclusively?
- Does government take account of arts council policies or policy advice?
- How is government policy made and in what way is it communicated to the arts council?
- What level of autonomy does the arts council retain over its decision making in situations where the active policy direction of the minister is a key element of public funding for the arts?

There were six responses to the D'Art request (listed below). Although Ms Cloake indicated that the responses were helpful, the Arts Council of Ireland did not produce a summary D'Art report.

Responses to D'Art question No. 9 were received from:
- Thorgeir Olafsson, Ministry of Education, Science and Culture, Iceland
- Christine Hamilton, Centre for Cultural Policy Research, University of Glasgow, Scotland
- Sydney Bartley, Ministry of Education, Youth and Culture
- Sivia Qoro, Secretariat of the Pacific Community, New Caledonia
- Ann Bridgwood, Arts Council England
- Philippe Pépin, Ministry of the French Community, Belgium
- Clive Gray, De Montfort University, England

The original question can be viewed at:
http://www.ifacca.org/topic/independence-of-arts-funding-from-government/

Discussion paper
A discussion paper prompted by the D'Art question above was drafted by Christopher Madden, IFACCA's Research Analyst, and distributed to members and other meetings for comment and input. The discussion paper formed the basis of the present report. A summary time-line of the discussion paper's evolution is presented below.

2002 October: D'Art question from Arts Council of Ireland
2006 March: Discussion paper distributed to IFACCA members.
April: Comments received from members
April: IFACCA board discussed the paper at its meeting in Amsterdam, the Netherlands
June: paper used as background for the IFACCA CEO seminar alongside the third World Summit on Arts and Culture, England.
October: board revisited the issue at its meeting in Beijing, China.
2007 March: Paper presented to the Second IFACCA Researchers' Workshop, Singapore.
March: Researchers' comments reported to IFACCA board at its meeting in Nairobi, Kenya.
2008 July: presented and discussed at 6th IFACCA Asian Chapter meeting Seoul, Korea.
November: discussed at the 2nd European members meeting in Glasgow, Scotland.

'Ask IFACCAs' and other queries
The secretariat has received a number of *Ask IFACCAs* and other general queries about related issues: where to find information to compare cultural policies and policy structures between countries; comparisons of government support for arts and culture; questions about arts councils, the arm's length principle, the assessment of cultural policies, and processes of peer review. Requestors include:

- Creative Scotland Transition project (April 2008) – models/comparative approaches
- Australia Council for the Arts (September 2006) – arm's length and major performing arts organizations
- Visual Artists Ireland (June 2006) – arts council personnel/appointments
- Australia Council for the Arts (October 2005) – models of arts support
- Arts Council England (2001, July 2005, Oct 2004) – peer review assessment processes.
- Australia Council (July 2005) – policy frameworks.
- Ukraine (July 2005) – policy frameworks.
- Bermuda (Feb 2004) – the national arts endowment 'model'.
- Curb Centre for Art, Enterprise and Public Policy (November 2004) – policy frameworks.
- Association of South East Asian Nations (July 2005) – policy frameworks.
- Papua New Guinea Arts Council (July 2005) – policy frameworks.
- Budapest Observatory, Hungary (November 2002) – arm's length principle.

These topics all relate in different ways to the 'length of the arm', and the secretariat has found that its responses to many of the queries have utilised a similar set of resources.

Board discussions
At its meeting in Barcelona in November 2002, IFACCA's interim board held a discussion session about arm's length funding, with inspiration provided by Péter Inkei, Executive Director of the Budapest Observatory on Financing Culture in East-Central Europe. The discussion resulted in the drafting of a project proposal for IFACCA to help develop materials to assist the arm's length arts support agencies that were emerging across Eastern and Central Europe as a result of fundamental political changes in those countries. For financial reasons the project has yet to proceed. The Board has discussed arm's length funding at various stages since (see for example the timeline above).

IFACCA database and directory
Since 2000, IFACCA has been constantly gathering and updating information on arts support structures and processes. IFACCA's own database contains information on government arts support agencies in almost every country of the world. Data from the database has been collated to present statistics in this report on the mix of government national arts agencies around the world (figure 5).

IFACCA also holds detailed information about the relationship between the national arts agency and the government in around 30 countries. The information was gathered in a survey undertaken in the lead-up to the first World Summit on Arts and Culture, held in Ottawa, Canada, in 2000, at which the Federation was established. Between 2000 and 2006, IFACCA updated and added to the information obtained in the survey. The survey questionnaire asks a number of detailed questions about the degree of involvement of government in a number of aspects of an arm's length arts agency's activities, including questions on government's role in appointments, policymaking and priority setting. The answers to these questions have been collated and are presented in this report under figures 6 and 7.

The survey that underpins the IFACCA directory is a particularly unique and rich resource. The secretariat is not aware of any other database or survey that gathers such detailed information.

Providing special access to data
IFACCA assisted Italian researcher, Giorgio Tavano Blessi, to develop a paper on different arts policy models for presentation at the Fourth International Conference on Cultural Policy Research (ICCPR) in July 2006 (http://www.iccpr2006.com/) and . The secretariat has provided Mr Tavano Blessi access to survey data used to construct the IFACCA Directory.

Tracking trends around world
The landscape of arts support is constantly changing. In the short time since the IFACCA secretariat began operating, arm's length arts agencies have been established (for example, in Central and Eastern Europe, Papua New Guinea, Germany, Malaysia and Namibia). In other countries, arm's length agencies have been disestablished (in Nova Scotia) or have experienced greater scrutiny from government over their funding decisions. In a number of countries, ministries of culture have been afforded greater powers to become involved and direct arts policy and program delivery.

Arts policy analysts suggest that a 'convergence' is occurring in arts support – that there is a worldwide trend for countries to adopt a mixture of 'arm's length' and 'direct line' approaches to arts funding. In some cases, IFACCA has been asked to 'take a position' or advocate a particular model. The secretariat has reiterated the board's desire – and the recommendation of delegates at the first World Summit – that it would not be appropriate for IFACCA to promote a preference for any particular model for arts support.

The issue of policy models, frameworks and the degree of government involvement is a recurring topic in ACORNS and other IFACCA fora. In its day-to-day activities, IFACCA is tracking and alerting its constituency to news and trends in these issues at the dedicated topic page of the IFACCA website, *independence of arts funding from government* (http://www.ifacca.org/topic/independence-of-arts-funding-from-government/).

The constant degree of interest in policy frameworks, and in the appropriate level of government involvement in arts support, coupled with IFACCA's unique position as a global information provider and broker on issues of arts policy, has motivated this oversight and summary of the issues.

Appendix 2: Models and frameworks for arts policy

This report is based on a model of the cultural policy system developed by IFACCA. The model has five key elements:

1) domains that are considered 'cultural' that define the scope of cultural policy (eg. visual arts, performing arts, broadcasting, film);
2) instruments (eg. subsidy, tax incentives, ownership);
3) institutional structures (eg. ministry, department, arms length agency);
4) decision making processes (eg. peer review, bureaucratic decree); and
5) rules and customs that determine the interaction of the above elements.

Each of these five key elements has implications for the degree of independence of arts support from government.

The IFACCA model was developed after a review and analysis of a range of existing cultural policy models put forward in the cultural policy literature. The major model types reviewed are described below. These are: typological models; entity-relationship models; decision making models; domain models; and institutional and neo-institutional economics.

TYPOLOGICAL MODELS OF CULTURAL POLICY

A common way of modelling variations in cultural policies globally is to group national cultural policies into types. Probably the most enduring typology is Chartrand and McCaughey's (1989) classification of cultural policy by Facilitator, Patron, Architect, and Engineer. However, a number of alternative classifications have been proposed. Typologies uncovered during the literature review for this report are:

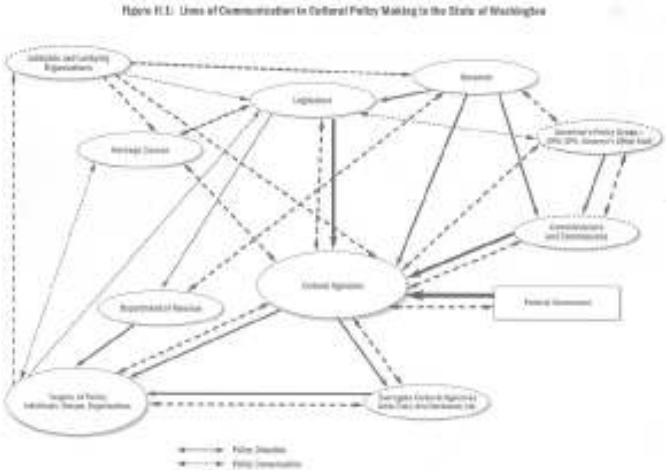
- Facilitator – Patron – Architect – Engineer (Chartrand and McCaughey, 1989), to which Wyszomirski (2003) adds: Entrepreneur – Advocate – Think tank.
- Patron – Market manipulator – Regulator – Impresario (Cummings and Katz, 1989)
- Architect – Impresario – Patron – Engineer (Katunarić, 2000;21)
- Pure panel - Bureaucrat with advice – Pure bureaucratic (Cummings and Katz, 1987b; 355)
- Allocation by bureaucrats – Panels of experts – Privatization of allocative decisions (Cummings and Katz, 1987b; 361)
- Single ministry – Multiple ministries – Quasi-public foundation – Impresario –Direct-line (adapted from Cummings and Katz, 1987a; 12)
- Royalist – Princely – Social-democratic – Liberal (Mulcahy, 1998; 250)
- Designer – Benefactor – Manager – Enabler (Mulcahy, 1998; 252)

These classifications cannot be seen as mutually exclusive approaches to arts and cultural policy: as Chartrand and McCaughey (1989; 4) note, a national arts policy may adopt a mixture of these types. And even though Cummings and Katz (1987a; 12) dub the 'single ministry' approach the 'French Ministry of Culture Model', the authors note that 'not even the French follow this model completely'.

ENTITY-RELATIONSHIP MODELS OF CULTURAL POLICY

Entity-relationship modelling is a common approach to 'mapping' government cultural administrations. Examples can be found in Schuster (2002 and 2003b), Peacock (2001, 28), Wiesand (1986; 23) and Pick and Anderton (1980; 11). As the examples of the Washington State arts policy system below show, entity-relationship maps can be very complex. Modelling the full range of agencies and their interrelationships in the system can easily result in 'spaghetti and meatball' diagrams. Such models lose the explanatory power that comes with simplicity.

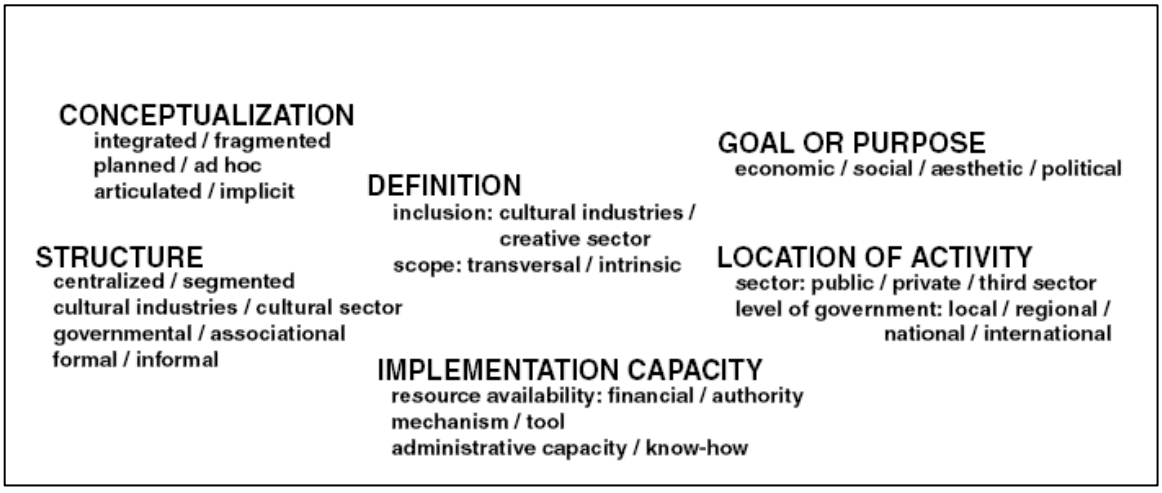
Figure 2.1: An entity-relationship model of arts policy



Source: Schuster (2003b)

Wyszomirski (2003) overcomes the complexity by using entity-relationship approach at a very high level.[4] Her model contains three interlinked areas – cultural policy, intervening variables, and outcomes. Within the cultural policy area, Wyszomirski lists six 'constituent components': Conceptualization, structure, definition, goal or purpose, location of activity, and implementation capacity (reproduced in figure 4.2 below). The components that relate most to the independence of arts funding from government are 'location of activity' and 'structure.'

Figure 2.2: Constituent components of a cultural policy



DECISION MAKING MODEL OF GOVERNMENT ARTS POLICY

Mark Schuster has developed a 'decision making model' of arts policy. The matrix below is adapted from the models in Schuster (1996) and Schuster (2001a). The various choices have obvious implications for the level of independence of arts funding from government.

[4] Figure 4 is at http://www.artsummit.org/summit2003/files/Margaret%20Wyszomirski%20-%20FromCostToValue%20Graphics.pdf.

Figure 2.3: Decision making model of arts policy

FOUR QUESTIONS FOR A CULTURAL POLICY:	CHOICES
WHO SHOULD PAY?	GOVERNMENT; DISINTERESTED PARTIES; SELF-INTERESTED PARTIES; PRIVATE CONSUMERS
WHO SHOULD DECIDE?	[MINISTER], PROFESSIONAL STAFF; PEER PANELS; LEGISLATURE 'DIRECT LINE' FUNDING [CABINET MINISTERS]; INDEPENDENT FORMULAS, INDIVIDUALS
WHAT FORM SHOULD IT TAKE?	TOOLS: OWN AND OPERATE, REGULATION, INCENTIVES AND DISINCENTIVES, ALLOCATION AND ENFORCEMENT OF PROPERTY RIGHTS, INFORMATION PROVISION, DO NOTHING
WHO SHOULD BENEFIT?	WELFARE CRITERIA
WHAT DIFFERENCE SHOULD IT MAKE?	IMPACTS AND OUTCOMES

OTHER MODELLING APPROACHES

Institutional and neo-institutional economic frameworks

The methodology of institutional and neo-institutional economics is one way of logically analysing complex systems that have multiplicity of players and interactions. The approach breaks systems down into key players and considers the ways in which these key players interact (especially in the explicit and implicit 'contracts' between the players). Applied to arts policy, the approach identifies the critical points in the arts support web, and systematically analyses the rules, incentives and interactions between these critical points. The approach has been applied to arts councils by Rushton (Rushton, 2002a and b). Rushton explores the interrelationships between:

- citizen and legislator
- legislator and the executive
- executive and arts council
- arts council and peer review panel
- peer review panel and artist

Domain models

Domain models are common in cultural policy. Given the multi-dimensional nature of culture, and the complexities and differences of opinion about definitions, many simply define culture as a list of cultural or artistic 'domains', such as 'music', 'visual arts', 'dance' and so on. This approach, though basic, has the benefit of avoiding the need to define fundamental principles about what distinguishes certain activities and phenomena as cultural. The approach is common in the cultural statistics frameworks adopted by statistical agencies, where it has been developed to a very detailed level.

Everitt (1999; 44) argues that cultural policy should be governed 'by objectives and not by classes of activity, or sectors of administration, or even zones of policy'. Nevertheless, domain modelling of cultural policy can be a useful way to 'map' the many different areas of government activity that are cultural or have cultural aspects. Examples of domain models in the literature can be found in Wyszomirski (2003), Kleberg (2000), Throsby (2006), Wiesand and Söndermann (2005), and Hewison (1998). Domain models of cultural policy tend to have three characteristics:

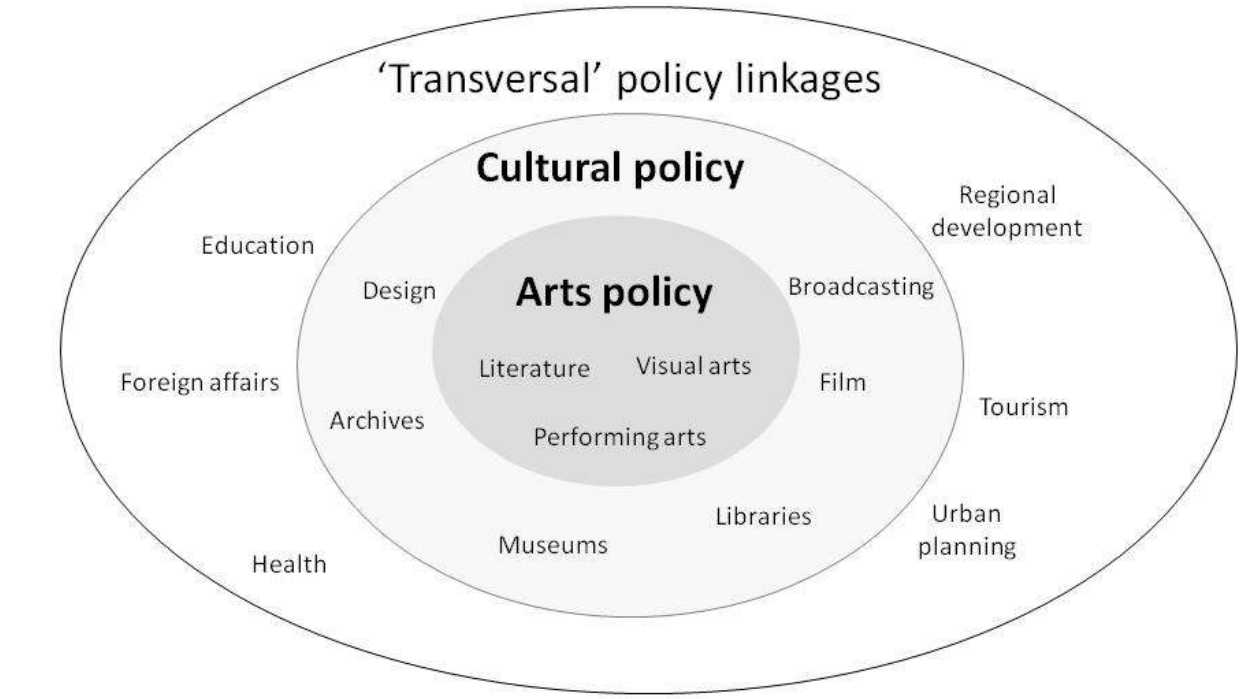
1) Internally multidimensional: culture is made up of a number of discrete domains such as art forms (as Everitt, 1999; 13, says, 'culture is a house with many rooms in it');

2) Hierarchical: some cultural domains are considered to be more 'core' than others. A common way of representing this is through concentric circles, with domains placed closer to the epicentre considered more 'core' (see in particular Throsby, 2006 and 2002); and

3) Externally connected, or 'transversal': cultural policy is linked to other public policy domains.

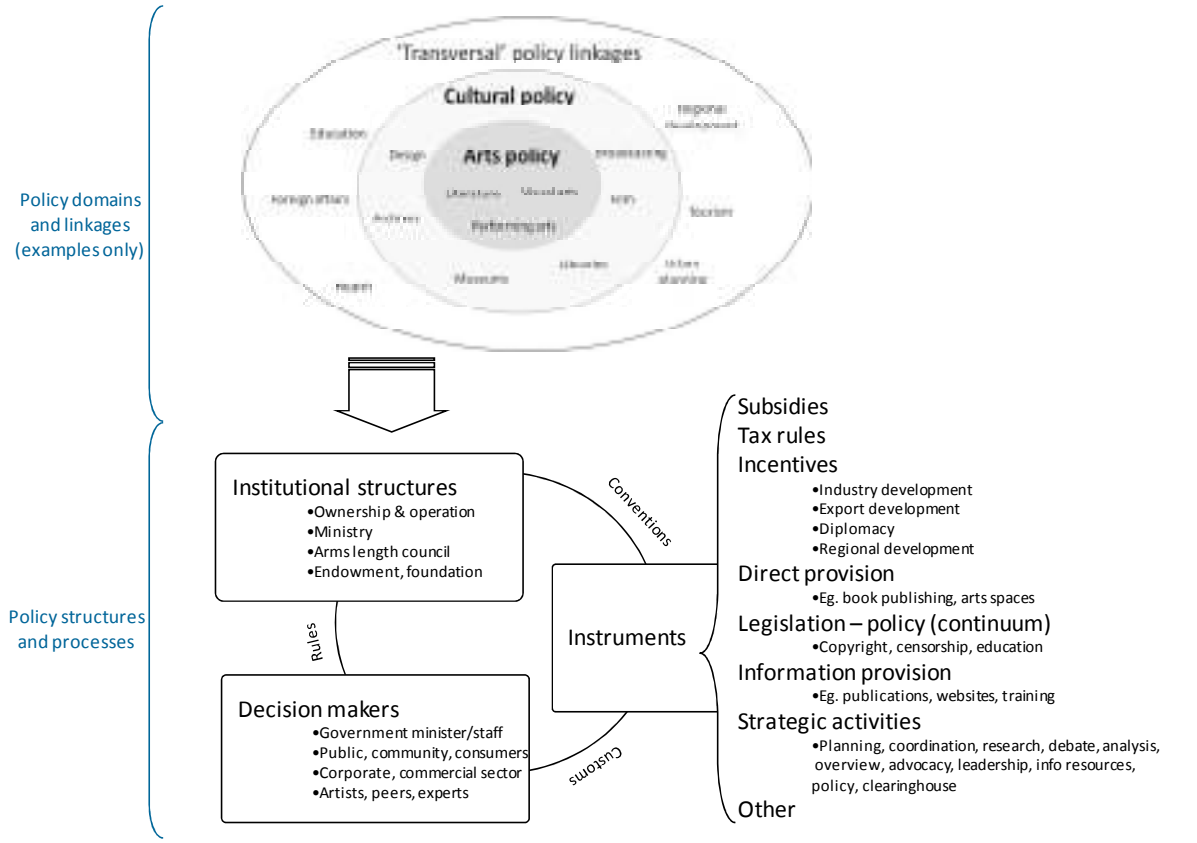
An example of a domain model is in figure 2.4. The choice of domains is for illustrative purposes only.

Figure 2.4: Policy domains model with examples



Source: IFACCA

Appendix 3: IFACCA arts policy model



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