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The NAAE supports the review of the VET FEE-HELP rules, and understands the need to weed out those corrupting the system and those private providers delivering sub-standard courses in line with Australian Quality Framework (AQF) that applies to all post-compulsory education. However, we have major concerns about the methodology used to identify courses that will no longer qualify for government assistance, and take this opportunity to provide information that may not have been available earlier.

NAAE noted firstly that the department must take account of poorer SES students who may use VET courses as a gateway to university study. If reputable RTOs offering arts courses are eliminated, these opportunities will immediately disadvantage some students, particularly those from regional and remote schools where the arts have been a major factor in eliminating poor attendance records, and where career pathways in the arts are identified.

NAAE also questioned why some previously eliminated providers are already back on the list, and yet the larger reputable TAFEs and arts training institutions are not. NAAE would like to know what criteria were used to make these decisions.

In response to a question about whether there was another sector like the Arts, NAAE noted that the arts industry was unique in the ways in which it trained and employed artists.

NAAE makes the following recommendations about the methodology used to define eligible courses:

- Using methodology that requires two States to approve courses does not acknowledge that arts training, education, and – most importantly, employment – is recognised by students as being a national and international industry, especially regarding students who travel interstate and overseas to study and work. While revising this metric would help, NAAE notes that it would only be a first step.

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- Recommendation 1: That this metric be abandoned in favour of a comprehensive review of the ways in which the needs of the arts industry are being met by arts training and education institutions in Australia. Some of our most prestigious arts training institutions do not operate beyond one State.
- Eliminating courses rather than properly researching rogue RTOs and closing them down has had serious unintended consequences for arts education and training, one of Australia's major industry employers. Culturally valuable courses that contribute to Australia's strong employment record in the arts have been eliminated, destroying forward planning for students and for our internationally recognised institutions such as NIDA, the Australian Ballet School, WAAPA, NICA etc.
 - Recommendation 2: That the government reviews RTOs, rather than courses, that legitimately and authentically train artists for employment in the creative and cultural industries. We suggest using the following criteria for assessing the ability of RTOs to deliver high quality and relevant courses:
 - Review quality of actual course content and structure assessed against national training packages;
 - Gather detailed information about the nature and quality of course delivery measured against course description/outline (possibly via student questionnaire);
 - Check assignment assessment criteria and processes used by training providers and their reporting of results at regular intervals throughout the course;
 - Track student attendance rolls at lectures/seminars/studios/ excursions etc.;
 - Measure numbers of students who graduate against numbers enrolled;
 - Survey graduate student professional income generating activity after 3-5 years, both within and beyond the fields for which they were trained (see recommendation 4);
 - Take account of reputation of training provider with peer training institutions.
- Caps: Arts courses are labour/studio intensive and not deliverable online, with some taking five years in mentored learning. Even the highest cap \$15,000 is completely inadequate.
 - Recommendation 3: That an economic study be made of the actual cost of delivering a diploma or advanced diploma in the arts in order to revise the fee caps payable in the creative industries.

- Data gathering – look beyond the Australian Bureau of Statistics (which has had severe cuts), and include David Throsby’s longitudinal research, Stuart Cunningham (QUT) and CHASS research. There needs to be solid data and methodology for ministerial recommendations. There are also problems with using the Global Innovation index.

- Recommendation 4: Encourage Deloitte to consult peak bodies, to look beyond Victoria and NSW to other States and Territories and to take account of research by Bridgstock and Cunningham (2016) [*Creative labour and graduate outcomes: Implications for higher education and cultural policy*](#); Bridgstock (2014) [*You want fries with that? Creative careers are still out there, for now*](#) (excerpts below); and David Throsby (2001) [*Economics and Culture*](#).

‘It is often argued that creative arts degrees fail to deliver adequate employment prospects for students, and that creative graduates end up chronically underemployed, or finding work outside creative fields entirely. Concerns around the oversupply of creative arts graduates from education and training are accompanied by worries that once in the workforce, graduates will be unable to sustain careers in their preferred creative occupations. Then there is the creative economy policy and research literature that emphasises the growth of the creative workforce and the importance of creative work and workers to innovation and economic growth in general. In this article, we engage with these debates by drawing upon research from analyses of national Census data, and via granular empirical survey research into Australian creative arts graduates’ initial career trajectories. In so doing, we aim to paint a more nuanced picture of graduate outcomes, the significance of creative skills and by extension creative education and training, and the various kinds of value that creative graduates add through their work.’

‘Creative Trident mapping reveals that in a number of economies the creative workforce is growing at a faster rate than the general economy, and that on average the creative workforce earns salaries above national averages.’

Other useful research about early career artists’ employment trajectories has been published by the Australia Council for the Arts (see [*Longitudinal Study of Early Career Artists*](#)).

- ‘Employment’ has been too narrowly defined by the department as paid work, and does not take account of the diverse roles of arts entrepreneurs who may be self-employed and have portfolio careers, including international work.
 - Recommendation 5: The scope and scale of the arts and cultural industries need to be taken into account, including case studies (see recommendation 4, above).
- Identifying eligible courses by prioritising STEM (+ agriculture) is illogical and an inadequate measure of course value. If STEAM were

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considered, the arts would be seen in context. Arts miss out by not being part of the conversation (i.e. the assumption is made that STEM studies + agriculture will get you a job, whereas the latest employment figures show that [jobs in agricultural industries are actually falling](#)).

STEM needs arts input, e.g. design thinking, problem solving, engagement and motivation, embodied engagement, experiential sensory engagement.

- Recommendation 6: That there is recognition of the contribution arts learning processes bring to STEM education, and include STEAM as an important criterion in deciding the value of VET courses to the economy.
- Continuing STEM rhetoric ignores the latest research that shows that arts learning processes contribute to higher levels of innovative and creative thinking in all industries. Instead, STEM rhetoric is shaping resourcing in schools, and parent/principal expectations of student outcomes.
 - Recommendation 7: That NAAE's STEAM position paper, and its submission into the Reps inquiry into [Innovation and Creativity in Workplace](#) (particularly the report's Recommendation 10), and submissions from NAVA & AMPAG be reviewed and acknowledged in future considerations.
- Employment in the 21st Century: It is important to imagine the future and the changing nature of work – this is the strongest argument for the arts. An [Oxford study](#) identified that 47% of workers will be replaced by 2050, but this is less likely if they work in the creative industries, and [“30,000 people are employed in the dance sector in the UK, although only 2,500 are performers”](#).
 - Recommendation 8: That there is consideration and acknowledgement of research into future work opportunities and the changing nature of employment that strongly support the value of arts courses.

Conclusion

Given the evidence presented in this submission, NAAE wants to see student loans restored for legitimate arts courses. As indicated at our meeting, we are keen to be further consulted, and look forward to ongoing discussion.