

Shadow Implementation Audit

National Cultural Policy — *Revive: a place for every story, a story for every place*

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Abstract

This paper presents an independent shadow implementation audit of Australia's National Cultural Policy, *Revive: a place for every story, a story for every place*. As Australia's national cultural policy, *Revive* is expected to give effect to the Commonwealth's stated commitments to cultural sustainability and to Australia's international obligations under the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)*, including Articles 11–15 relating to identification, safeguarding measures, inventories, transmission, and practitioner participation, **which recognise that intangible cultural heritage is sustained through associated material practices, objects, and conditions of production.**

The audit assesses whether *Revive* has implemented the workforce, provenance, and safeguarding infrastructure required to meet both its stated policy objectives and these international safeguarding obligations. Using a repeatable infrastructure test applied across eight criteria, the audit examines policy implementation against recognised requirements for institutional, administrative, and workforce-based safeguarding.

The audit finds that while *Revive* articulates strong values and investment intent, it does not establish the national systems required to operationalise safeguarding obligations under Articles 11–13 of the Convention, nor to deliver durable workforce sustainability and cultural continuity outcomes. The findings identify a structural implementation gap between policy ambition and the institutional, administrative, and workforce

mechanisms necessary to meet Australia's national and international cultural heritage responsibilities.

1. Audit Objective

The objective of this shadow implementation audit is to assess whether Australia's National Cultural Policy, *Revive: a place for every story, a story for every place*, has implemented the institutional, administrative, and workforce infrastructure required to give effect to its stated policy commitments and to Australia's international obligations under the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)*.

As Australia's national cultural policy, *Revive* is expected to operate not only as a statement of intent, but as a delivery framework capable of operationalising safeguarding obligations relating to the identification of cultural practitioners, the continuity and transmission of cultural practice, the protection of provenance and authorship, and the establishment of appropriate institutional and administrative measures, as contemplated under Articles 11–15 of the Convention.

Accordingly, this audit tests *Revive* on an **implementation basis**, examining whether the policy has established nationally coherent and durable mechanisms for:

- cultural workforce standards and recognition
- certification, accreditation, and career continuity
- provenance and authorship verification
- safeguarding systems aligned with international obligations
- accountability for delivery and outcomes

The audit does not assess the artistic merit of funded activities, the adequacy of funding allocations, or individual program performance. Its focus is on whether the structural

conditions necessary for safeguarding, workforce sustainability, and cultural continuity have been implemented at a national level.

2. Audit Scope

This shadow implementation audit examines the structural and systemic implementation of Australia's National Cultural Policy, *Revive: a place for every story, a story for every place*, in light of its stated objectives and Australia's international obligations under the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)*.

2.1 In Scope

The audit assesses whether *Revive* has established nationally coherent, durable, and accountable infrastructure necessary to operationalise safeguarding and workforce sustainability obligations. Specifically, the audit examines:

- the existence and implementation of institutional and administrative mechanisms supporting cultural work
- national frameworks for workforce recognition, certification, and continuity
- systems for provenance and authorship verification associated with cultural practice
- safeguarding mechanisms aligned with *Articles 11–15 of the UNESCO Convention*, including identification, documentation, transmission, and continuity of practice
- accountability and delivery architecture, including clarity of responsibility, authority, and outcome measurement

In line with the Convention's definition of intangible cultural heritage, the audit recognises that safeguarding obligations extend to the material conditions under which cultural practices are realised, including associated objects, tools, materials, and spaces, where these are integral to the continuity of practice.

2.2 Out of Scope

To maintain analytical clarity and avoid conflation of structural and programmatic issues, the audit does **not** assess:

- the artistic or cultural merit of funded works or activities
- the adequacy, distribution, or effectiveness of individual funding programs or grants
- operational performance of specific agencies, organisations, or initiatives
- stakeholder satisfaction, consultation quality, or engagement processes
- general labour market or social policy measures (including childcare, income support, or workforce participation initiatives) except where such measures are cited as substitutes for sector-specific workforce or safeguarding infrastructure

These matters, while relevant to broader cultural and social policy debates, fall outside the audit's focus on infrastructure-level implementation.

2.3 Analytical Boundary

The audit is confined to assessing whether *Revive*, as Australia's national cultural policy, functions as an implementation framework **capable** of delivering durable safeguarding, workforce sustainability, and cultural continuity outcomes.

Where *Revive* references advisory resources, surveys, mapping exercises, exploratory frameworks, or future consultations, these are considered within scope only insofar as they relate to, or substitute for, the absence of institutional and administrative infrastructure.

The audit does not speculate on future policy directions beyond the lifespan of *Revive*, except to identify structural gaps relevant to the development of the next National Cultural Policy.

2.4 Basis of Assessment

The audit's scope is defined by:

- the published *Revive* policy and associated implementation materials
- Australia's obligations under the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)*
- established principles of public-sector performance and implementation auditing

This scope ensures that findings relate directly to policy delivery capacity, rather than to intent, aspiration, or activity.

3. Policy and Legal Context

3.1 The National Cultural Policy (*Revive*)

Australia's National Cultural Policy, *Revive: a place for every story, a story for every place*, was released in January 2023 as the Commonwealth's primary framework for arts, culture, and heritage. As the national cultural policy, *Revive* functions as the principal reference point through which government articulates its approach to cultural sustainability, workforce development, safeguarding of heritage, and international cultural engagement.

Revive is structured around five pillars—First Nations First; A Place for Every Story; Centrality of the Artist; Strong Cultural Infrastructure; and Engaging the Audience—and

is supported by guiding principles relating to workforce sustainability, fair remuneration, safe and inclusive workplaces, and the preservation of cultural memory.

The policy positions arts, culture, and heritage as central to Australia's future and recognises cultural practitioners as essential contributors to national life. In doing so, *Revive* implicitly assumes responsibility not only for funding activity and promoting participation, but for establishing the conditions under which cultural practice can be sustained, transmitted, and safeguarded over time.

This audit assesses *Revive* on that basis: as an implementation framework, not solely a statement of intent.

3.2 Australia's Obligations under the UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage

Australia is a State Party to the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)*. Ratification of the Convention commits Australia to implementing safeguarding measures through institutional, administrative, and legal mechanisms, not solely through promotion, funding, or visibility initiatives.

The Convention establishes a clear set of obligations relevant to national cultural policy, particularly Articles 11–15:

- **Article 11** requires States Parties to take necessary measures to ensure the safeguarding of intangible cultural heritage present in their territory, including the identification and definition of such heritage with the participation of communities and practitioners.
- **Article 12** requires the establishment and maintenance of inventories to support identification, documentation, and continuity.
- **Article 13** requires States to adopt appropriate legal, technical, administrative, and institutional measures to ensure safeguarding, including the establishment of competent bodies.

- **Article 14** addresses education, training, and transmission, including the strengthening of capacities of practitioners and communities.
- **Article 15** requires the widest possible participation of communities, groups, and practitioners in safeguarding and management.

Collectively, these provisions establish that safeguarding is not limited to programmatic activity or cultural promotion. It requires durable systems capable of recognising practitioners, supporting continuity of practice, protecting provenance and authorship, and ensuring accountability for delivery.

As Australia's national cultural policy, *Revive* is expected to give effect to these obligations at a policy implementation level. This audit tests whether such effect has been achieved.

3.3 Intangible Cultural Heritage and the Material Conditions of Practice

Although the Convention is titled the *Safeguarding of the Intangible Cultural Heritage*, it explicitly recognises that intangible cultural heritage is inseparable from the material conditions under which it is practised and transmitted.

The Convention defines intangible cultural heritage as encompassing not only practices, representations, expressions, knowledge, and skills, but also the instruments, objects, artefacts, and cultural spaces associated therewith, where these are integral to the continuity of practice.

Accordingly, safeguarding obligations extend beyond symbolic recognition or audience engagement to include the economic, institutional, and material conditions that enable cultural practices to be sustained. Where practitioners lack recognised status, secure conditions of practice, or protection of provenance and authorship, the continuity of intangible heritage is undermined regardless of promotional activity.

This audit therefore treats workforce infrastructure, provenance systems, and institutional recognition as safeguarding mechanisms, rather than as ancillary market or industry considerations.

3.4 Alignment with Australia's Sustainable Development Commitments

In addition to its obligations under the UNESCO Convention, Australia has committed to the United Nations *Sustainable Development Goals* as part of its broader international policy framework. While the *Sustainable Development Goals (SDGs)* are non-binding, they are formally adopted and routinely referenced across Commonwealth policy domains.

The objectives articulated in *Revive*—including workforce sustainability, cultural participation, and the preservation of cultural knowledge—align most directly with:

- **SDG 8: Decent Work and Economic Growth**, particularly targets relating to productive employment, decent work, and sustainable livelihoods.
- **SDG 10: Reduced Inequalities**, including recognition of structural barriers affecting participation and economic security.
- **SDG 11: Sustainable Cities and Communities**, which includes safeguarding cultural and natural heritage.
- **SDG 16: Peace, Justice and Strong Institutions**, particularly in relation to accountable institutions and effective policy implementation.

These commitments reinforce, rather than replace, Australia's UNESCO safeguarding obligations. Together, they establish an expectation that national cultural policy will move beyond activity-based interventions toward institutional systems capable of sustaining cultural work, protecting practitioners, and ensuring continuity of cultural practice.

This audit considers SDG alignment as a supporting policy context, while treating the UNESCO Convention as the primary framework against which safeguarding and workforce infrastructure are assessed.

4. Audit Criteria

This audit assesses the implementation of *Revive* against eight infrastructure criteria derived from:

- the stated objectives of Australia's National Cultural Policy
- Australia's obligations under the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)*, particularly Articles 11–15
- accepted principles of public-sector workforce sustainability and safeguarding

Each criterion represents a foundational component of cultural workforce and safeguarding infrastructure. Together, they form the minimum conditions required for a national cultural policy to operationalise safeguarding, workforce sustainability, and cultural continuity.

The criteria are defined below to ensure transparency, consistency, and repeatability of assessment.

4.1 National Standards of Cultural Practice

Definition

National standards of cultural practice are formally recognised benchmarks that define minimum expectations for professional conduct, skill, practice, and ethical responsibility across cultural domains.

Relevance

Standards provide the foundation for:

- workforce recognition
- quality assurance
- safeguarding of practice
- downstream mechanisms such as certification, provenance verification, and accountability

In the absence of nationally recognised standards, cultural practice remains fragmented, informal, and difficult to safeguard.

4.2 Certification and Accreditation Pathways

Definition

Certification and accreditation pathways are formal systems that recognise practitioners' skills, knowledge, and legitimacy, and provide structured progression across career stages.

Relevance

Certification enables:

- recognition of practitioners as rights-holders
- continuity and transmission of cultural knowledge
- workforce stability and retention
- alignment with safeguarding obligations under Articles 11, 14, and 15 of the Convention

Certification is distinct from training, mapping, or guidance; it confers recognised status.

4.3 Provenance Verification and Authorship Protection

Definition

Provenance verification systems establish mechanisms to identify, authenticate, and protect the origin, authorship, and cultural legitimacy of cultural work.

Relevance

Provenance systems:

- protect cultural integrity
- support safeguarding of intangible heritage embodied in material outputs
- reduce misattribution and exploitation
- underpin public trust and international cultural exchange

Provenance protection is a safeguarding mechanism, not solely a market or intellectual property function.

4.4 Workforce Classification and Data Integration

Definition

Workforce classification and data integration refer to nationally coherent systems for identifying, categorising, and analysing the cultural workforce for policy, planning, and accountability purposes.

Relevance

Effective classification enables:

- evidence-based policy development
- monitoring of workforce sustainability and attrition
- alignment of safeguarding and workforce measures
- visibility of otherwise informal or precarious cultural labour

Without consistent classification, workforce risks remain poorly measured and addressed.

4.5 Procurement and Commissioning Mechanisms Supporting Verified Practice

Definition

Procurement and commissioning mechanisms are policy and funding frameworks that preferentially support verified, recognised, and safeguarded cultural practice.

Relevance

Such mechanisms:

- reinforce standards and certification
- incentivise compliance with safeguarding principles
- align public investment with workforce sustainability outcomes

Absent these mechanisms, public funding lacks structural leverage to support safeguarding and continuity.

4.6 UNESCO-Aligned Safeguarding Mechanisms

Definition

Safeguarding mechanisms are institutional and administrative systems that support the identification, documentation, transmission, and continuity of cultural practice, consistent with UNESCO ICH obligations.

Relevance

Safeguarding requires:

- recognition of practitioners and communities
- continuity of practice across generations

- institutional responsibility for delivery

Programmatic activity alone does not constitute safeguarding under Articles 11–13 of the Convention.

4.7 Mid-Career Retention and Continuity Mechanisms

Definition

Mid-career retention mechanisms are structural supports designed to sustain practitioners beyond early career stages and prevent loss of skills, knowledge, and cultural continuity.

Relevance

Mid-career attrition represents a critical risk to:

- safeguarding of practice
- transmission of knowledge
- long-term workforce viability

Retention mechanisms are essential to maintaining the living continuity of intangible cultural heritage.

4.8 Accountability and Delivery Architecture

Definition

Accountability and delivery architecture refers to the assignment of clear responsibility, authority, timelines, and performance measures for implementing workforce and safeguarding infrastructure.

Relevance

Effective accountability ensures:

- safeguarding obligations are operationalised
- responsibilities are not displaced across programs or portfolios
- outcomes can be measured and sustained

Diffuse or unclear accountability undermines implementation regardless of policy intent.

4.9 Application of Criteria

Each criterion is assessed using the audit methodology set out in Section 5, applying consistent tests of definition, implementation, operational durability, and accountability.

The criteria are treated as interdependent components of a single system. Absence or weakness in one criterion affects the effectiveness of others and contributes to systemic implementation risk.

5. Audit Methodology

5.1 Methodological Approach

This shadow implementation audit applies a repeatable, criteria-based infrastructure test to assess whether Australia's National Cultural Policy, *Revive*, has operationalised the institutional, administrative, and workforce mechanisms required to meet its stated objectives and Australia's safeguarding obligations under the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)*.

The methodology is designed to test implementation capacity, rather than intent, activity, or expenditure. It examines whether durable systems exist that are capable of delivering safeguarding, workforce sustainability, provenance protection, and cultural continuity at a national level.

The methodology reflects established principles of public-sector performance auditing, adapted for use in an independent shadow audit context.

5.2 Unit of Assessment

The unit of assessment is the *Revive* policy framework as a national implementation instrument, including:

- the published policy document
- stated pillars, principles, and commitments
- publicly described implementation mechanisms and structures

Individual programs, grants, surveys, or advisory initiatives are considered **only insofar as they demonstrate or substitute for the existence of institutional or administrative infrastructure.**

5.3 Infrastructure Test Applied to Each Criterion

Each audit criterion (Section 4) is assessed using the same four-part test. This ensures consistency, transparency, and repeatability across findings.

5.3.1 Definition Test

This test examines whether *Revive* explicitly defines the relevant mechanism at a national, structural level.

The test asks:

- Is the mechanism defined as a system rather than an aspiration?
- Is its purpose, scope, and function articulated in policy terms?
- Is it framed as a national responsibility rather than a discretionary activity?

Failure at the definition stage indicates an absence of policy intent to implement the mechanism structurally.

5.3.2 Implementation Test

This test examines whether the defined mechanism has been implemented through an authoritative national framework.

The test asks:

- Has a national body, framework, or system been established?
- Does the mechanism operate beyond individual programs or pilot initiatives?
- Is implementation formalised rather than voluntary or advisory?

Activities limited to guidance, consultation, mapping, or exploration do not satisfy this test.

5.3.3 Operational Durability Test

This test assesses whether the mechanism is operational, durable, and capable of ongoing delivery.

The test asks:

- Is the mechanism designed to persist beyond the lifespan of individual programs or funding rounds?
- Does it operate independently of discretionary or short-term initiatives?
- Can it reasonably be expected to support continuity of practice and safeguarding over time?

Mechanisms that rely on repeated re-authorisation, ad hoc funding, or individual participation are assessed as lacking durability.

5.3.4 Accountability Test

This test examines whether clear responsibility and authority for the mechanism have been assigned.

The test asks:

- Is a specific entity responsible for delivery and oversight?

- Are roles, responsibilities, and outcomes clearly articulated?
- Is there a basis for monitoring, evaluation, or review?

Where responsibility is diffuse, shared informally, or displaced across programs and portfolios, the mechanism is assessed as lacking accountability.

5.4 Assessment Scale

Each criterion is assessed using a three-point scale:

- **Exists**
A nationally implemented, authoritative, durable, and accountable mechanism is in place.
- **Partial**
Some activity exists, but the mechanism lacks national scope, formal authority, operational durability, or clear accountability.
- **Absent**
No identifiable mechanism exists that satisfies the definition, implementation, durability, and accountability tests.

This scale is intentionally conservative and avoids gradations that would obscure structural absence.

5.5 Evidence Base

Assessments are based on:

- the published *Revive* policy and associated official materials
- publicly stated implementation mechanisms and institutional arrangements
- Australia's obligations under the *UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)*

- accepted principles of public-sector implementation and performance auditing

Where government responses cite advisory resources, surveys, mapping exercises, exploratory frameworks, or general social policy measures, these are considered evidence of implementation approach, not of infrastructure, unless they meet the criteria set out above.

5.6 Analytical Consistency and Limitations

The methodology applies the same tests consistently across all criteria. Findings reflect structural capacity, not the quality or intent of individual initiatives.

As a shadow audit, this analysis does not rely on internal government data or statutory audit powers. Instead, it assesses implementation based on publicly available policy commitments and delivery structures, consistent with accepted practice in independent policy evaluation.

The methodology is designed to be:

- transparent
 - repeatable
 - capable of independent verification
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5.7 Relationship to Audit Findings

The methodology set out in this section is applied systematically in Section 6: Detailed Findings, where each criterion is assessed against the same tests and scale.

Cross-cutting patterns emerging from the application of this methodology are addressed in Section 7: Cross-Cutting Analysis.

6. Detailed Findings

6.1 National Standards of Cultural Practice

Assessment: Absent

The audit finds that *Revive* does not establish nationally recognised standards of cultural practice applicable across cultural domains. While the policy articulates values relating to fair remuneration, safe workplaces, and professional recognition, it does not define enforceable or authoritative benchmarks that constitute national standards of practice.

No framework is identified within *Revive* that specifies minimum professional, ethical, or practice standards capable of supporting safeguarding, workforce recognition, or quality assurance at a national level. In the absence of such standards, downstream mechanisms—including certification, provenance verification, and accountability—lack a common reference point.

Under the methodology's definition and implementation tests, national standards of practice are therefore assessed as absent.

6.2 Certification and Accreditation Pathways

Assessment: Absent

The audit finds no evidence that *Revive* establishes certification or accreditation pathways that formally recognise cultural practitioners or support structured career progression.

While the policy references skills development and vocational pathways in general terms, it does not implement nationally authorised certification mechanisms that confer recognised status on practitioners or validate cultural knowledge, skills, or continuity of

practice. No accreditation authority, credentialing framework, or recognition system is established or mandated under the policy.

As a result, practitioners remain reliant on informal recognition, fragmented qualifications, or program-based participation rather than nationally coherent certification. This does not satisfy the Convention's emphasis on practitioner recognition and transmission under Articles 11, 14, and 15.

Certification and accreditation pathways are therefore assessed as absent.

6.3 Provenance Verification and Authorship Protection

Assessment: Absent

The audit finds that *Revive* does not implement systems for verifying provenance, protecting authorship, or distinguishing culturally legitimate practice from unverified or misattributed activity.

Although the policy recognises the importance of Australian stories and cultural integrity, it does not establish mechanisms for authentication, inspection, mark protection, or provenance verification. No national framework is provided to protect origin, authorship, or cultural legitimacy, particularly where intangible cultural heritage is embodied in material outputs.

In the absence of such systems, risks to cultural integrity, practitioner recognition, market confidence, and international cultural exchange remain unmitigated. Provenance protection, as a safeguarding mechanism rather than a market function, is therefore not operationalised.

This criterion is assessed as absent.

6.4 Workforce Classification and Data Integration

Assessment: Partial

The audit finds that *Revive* partially addresses workforce classification and data integration through recognition of workforce sustainability as a policy concern. However, it does not establish a nationally coherent system for classifying, tracking, and integrating data on the cultural workforce.

While references are made to workforce participation and career pathways, no authoritative classification framework or integrated data architecture is implemented to support evidence-based policy planning, monitoring of attrition, or safeguarding analysis. Workforce data remains fragmented across programs and portfolios.

As a result, workforce risks are acknowledged but not structurally measured or addressed. This criterion is therefore assessed as partial.

6.5 Procurement and Commissioning Mechanisms Supporting Verified Practice

Assessment: Absent

The audit finds that *Revive* does not implement procurement or commissioning mechanisms that preferentially support verified, recognised, or safeguarded cultural practice.

Public funding and commissioning under the policy are not structurally linked to standards, certification, provenance verification, or safeguarding compliance. No procurement framework is established to align public investment with workforce sustainability or safeguarding outcomes.

In the absence of such mechanisms, public funding lacks leverage to reinforce standards, incentivise recognised practice, or protect cultural continuity. This criterion is assessed as absent.

6.6 UNESCO-Aligned Safeguarding Mechanisms

Assessment: Partial

The audit finds that *Revive* partially aligns with UNESCO safeguarding concepts through its emphasis on heritage, preservation, and participation. However, it does not implement safeguarding mechanisms consistent with the institutional and administrative requirements of Articles 11–13 of the Convention.

While the policy references preservation and transmission in programmatic terms, it does not establish systems for the identification of practitioners, continuity of practice, or assignment of institutional responsibility for safeguarding. Safeguarding is treated as an outcome of activity rather than as a structural function requiring dedicated mechanisms.

Accordingly, alignment with UNESCO safeguarding obligations is partial and remains largely aspirational.

6.7 Mid-Career Retention and Continuity Mechanisms

Assessment: Absent

The audit finds that *Revive* does not implement mechanisms specifically designed to support mid-career practitioners or to mitigate loss of skills and knowledge at critical career stages.

Although early-career development and participation are referenced, no structural supports are established to sustain practitioners beyond project-based funding cycles or

to ensure continuity of practice over time. Mid-career attrition is not addressed as a safeguarding risk.

In the absence of retention mechanisms, cultural knowledge and practice remain vulnerable to discontinuity. This criterion is assessed as absent.

6.8 Accountability and Delivery Architecture

Assessment: Absent

The audit finds that *Revive* lacks clear accountability and delivery architecture for implementing workforce and safeguarding infrastructure.

Responsibility for workforce sustainability, safeguarding, and continuity is diffuse across multiple agencies, initiatives, and portfolios. No single accountable body is identified, no delivery timelines are defined, and no measurable infrastructure outcomes are specified.

As a result, implementation relies on dispersed activity rather than coordinated delivery. The absence of clear authority, responsibility, and accountability undermines the policy's capacity to operationalise its stated commitments.

This criterion is assessed as absent.

Summary of Findings

Across the eight criteria, the audit finds that *Revive* articulates strong values and intent but does not implement the institutional, administrative, and workforce infrastructure required to operationalise safeguarding obligations or ensure durable workforce sustainability.

These findings form the basis for the cross-cutting analysis presented in Section 7.

7. Cross-Cutting Analysis

This document is offered as a systems analysis intended to inform philanthropic, policy, and capacity-building conversations aligned with the *UNESCO Convention and with emerging global priorities around care, gender, health, and sustainable development*.

It does not constitute a funding request or program proposal. It is an invitation to recognise and address a structural gap that has become both visible and costly.

The detailed findings in Section 6 identify consistent weaknesses across multiple infrastructure criteria. When assessed collectively, these findings reveal a systemic implementation pattern rather than isolated omissions.

Across standards, certification, provenance, safeguarding, retention, and accountability, *Revive* articulates policy intent but does not implement the institutional and administrative mechanisms required to operationalise that intent. Where structural infrastructure is absent, implementation responses are instead framed through advisory, descriptive, or social policy measures.

This pattern has implications for how workforce sustainability and safeguarding are addressed in practice and how responsibility for delivery is displaced across programs and portfolios.

7.1 Substitution of Advisory and Social Measures for Workforce Infrastructure

A consistent cross-cutting pattern identified by this audit is the **substitution of advisory, descriptive, and general social measures for sector-specific workforce and safeguarding infrastructure**.

In response to concerns regarding workforce sustainability, safeguarding, and cultural continuity, official implementation materials and correspondence rely on the following measures:

- **Creative Workplaces** — presented as an advisory resource hub providing information, referrals, and guidance
- **National survey activity** — used to collect data on workforce experiences and conditions
- **SaCSA pathway mapping** — descriptive mapping of career pathways without credentialing or standards
- **Exploration of vocational qualification frameworks** — non-binding, exploratory policy work without implementation authority
- **Childcare and related participation measures** — general labour market supports aimed at workforce participation

These measures appear across multiple implementation domains and are cited as evidence of action under *Revive*. However, when assessed against the audit criteria and methodology, they do not constitute institutional or administrative infrastructure.

None of these measures constitute national cultural workforce infrastructure as required for safeguarding, certification, provenance protection, or continuity of practice.

They do not establish standards, confer recognised status, protect authorship or provenance, ensure continuity of practice, or assign accountable responsibility for delivery. Rather, they provide support, information, or future options in the absence of implemented systems.

7.2 Systemic Implications

The reliance on advisory and social measures in place of infrastructure has several systemic implications:

- Workforce risks are acknowledged but not structurally mitigated
- Safeguarding obligations are addressed programmatically rather than institutionally
- Responsibility for delivery is diffuse, reducing accountability
- Cultural continuity depends on individual resilience rather than systemic support

This pattern explains why multiple criteria are assessed as absent or partial despite strong policy language. The issue is not one of intent or effort, but of implementation architecture.

7.3 Relationship to Policy Obligations

As established in the Policy and Legal Context, safeguarding under the *UNESCO Convention* requires institutional, administrative, and legal measures capable of sustaining cultural practice over time. General labour participation measures and advisory resources may support individuals, but they do not satisfy these obligations.

The substitution identified in this section therefore represents a structural gap between policy ambition and delivery capacity, consistent with the findings set out in Section 6.

Cross-Cutting Finding

Taken together, the findings demonstrate that *Revive* operates primarily as a programmatic and promotional framework rather than as a national implementation system for safeguarding, workforce sustainability, and cultural continuity.

This cross-cutting analysis informs the conclusions and recommendations that follow.

8. Conclusion

This shadow implementation audit set out to assess whether Australia's National Cultural Policy, *Revive: a place for every story, a story for every place*, has implemented the institutional, administrative, and workforce infrastructure required to give effect to its stated objectives and to Australia's international obligations under the UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003).

Based on the application of a repeatable infrastructure test across eight criteria, the audit concludes that *Revive* does **not** establish the national systems required to operationalise safeguarding, workforce sustainability, provenance protection, or cultural continuity. While the policy articulates strong values, aspirations, and investment intent, it functions primarily as a programmatic and promotional framework rather than as an implementation architecture.

Across standards of practice, certification and accreditation, provenance verification, safeguarding mechanisms, mid-career retention, and accountability, the audit finds that required infrastructure is absent. Where workforce and safeguarding risks are acknowledged, responses remain descriptive, advisory, exploratory, or deferred, rather than implemented through durable institutional mechanisms. Partial alignment is observed in areas relating to workforce recognition and safeguarding language; however, this alignment is not translated into operational systems capable of meeting policy or treaty obligations.

As Australia's national cultural policy, *Revive* is expected to give effect to safeguarding obligations under Articles 11–15 of the UNESCO Convention, including the identification of practitioners, continuity of practice, transmission of cultural knowledge, and the establishment of appropriate institutional and administrative measures. The audit finds that these obligations are not operationalised at a national level within the policy's implementation framework.

Accordingly, the audit demonstrates a structural implementation gap between policy ambition and delivery capacity. This gap is systemic rather than incidental and reflects the absence of nationally coherent, accountable infrastructure required to sustain cultural work, safeguard intangible cultural heritage, and ensure long-term workforce continuity.

9. High-Level Recommendations

In light of the findings and conclusions of this shadow implementation audit, the following high-level recommendations are made to address the structural implementation gap identified in Australia's National Cultural Policy, *Revive*.

These recommendations are framed to support durable workforce sustainability, safeguarding of cultural practice, and compliance with Australia's national and international cultural heritage obligations.

9.1 Establish a National Cultural Workforce Standards Framework

It is recommended that the Commonwealth establish nationally recognised standards of cultural practice that define minimum professional, ethical, and safeguarding benchmarks across cultural domains.

Such standards should:

- provide a foundation for practitioner recognition and workforce legitimacy
- support safeguarding and continuity of practice
- enable downstream mechanisms including certification, provenance verification, and procurement alignment

Without national standards, cultural practice remains fragmented and cannot be structurally safeguarded.

9.2 Implement National Certification and Accreditation Pathways

It is recommended that nationally authorised certification and accreditation pathways be established to formally recognise cultural practitioners and support structured career progression.

These pathways should:

- recognise embodied knowledge, skills, and cultural authority
- support intergenerational transmission and continuity of practice
- align with safeguarding obligations relating to practitioner participation and recognition

Certification mechanisms should be institutional, not programmatic, and operate independently of discretionary funding cycles.

9.3 Develop Provenance Verification and Authorship Protection Systems

It is recommended that national systems be implemented to verify provenance, protect authorship, and authenticate culturally legitimate practice.

Such systems should:

- distinguish verified practice from unregulated or misattributed activity
- protect cultural integrity and practitioner rights
- support domestic and international cultural exchange

Provenance verification should be treated as a safeguarding mechanism rather than solely a market or intellectual property function.

9.4 Establish a National Cultural Workforce Classification and Data Framework

It is recommended that a nationally coherent workforce classification and data integration framework be implemented to support evidence-based policy, safeguarding analysis, and workforce sustainability planning.

This framework should:

- identify and categorise cultural practitioners consistently
- enable monitoring of workforce continuity and attrition
- inform future policy and safeguarding measures

Fragmented or descriptive data collection is insufficient to address structural workforce risk.

9.5 Align Procurement and Commissioning with Verified Practice

It is recommended that public procurement and commissioning frameworks be aligned with standards, certification, and provenance verification to reinforce safeguarding and workforce sustainability objectives.

Such alignment would:

- incentivise recognised and safeguarded practice
- ensure public investment supports continuity and quality
- embed safeguarding principles into funding and commissioning decisions

Absent such mechanisms, public funding lacks structural leverage.

9.6 Implement UNESCO-Aligned Safeguarding Infrastructure

It is recommended that institutional and administrative safeguarding mechanisms be established in line with Articles 11–15 of the UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage.

These mechanisms should:

- support identification of practitioners and practices
- enable continuity and transmission of cultural knowledge
- assign clear institutional responsibility for safeguarding delivery

Safeguarding should be operationalised as infrastructure, not treated as an outcome of activity alone.

9.7 Introduce Structural Mid-Career Retention Mechanisms

It is recommended that structural mechanisms be implemented to support mid-career practitioners and mitigate loss of skills, knowledge, and cultural continuity.

Such mechanisms should:

- address attrition beyond early career stages
- support sustained practice over time
- recognise mid-career retention as a safeguarding issue

Without retention mechanisms, continuity of practice remains vulnerable.

9.8 Clarify Accountability and Delivery Architecture

It is recommended that clear accountability and delivery architecture be established for cultural workforce and safeguarding infrastructure.

This should include:

- designation of responsible entities
- defined authority and responsibility
- measurable infrastructure outcomes

Diffuse responsibility undermines implementation regardless of policy intent.

9.9 Inform the Next National Cultural Policy Cycle

It is recommended that the findings of this audit be used to inform the development of the next National Cultural Policy, ensuring that future frameworks move beyond programmatic activity toward durable institutional implementation.

Addressing the structural gaps identified in this audit is necessary to ensure that future policy cycles deliver safeguarding, workforce sustainability, and cultural continuity outcomes.

10. Status of the Document / Use Notes

10.1 Status of the Document

This document is an *independent shadow implementation audit* of Australia's National Cultural Policy, *Revive: a place for every story, a story for every place*. It has been prepared by the Creative Women's Association (CWA) as an external, evidence-based assessment of policy implementation capacity.

The audit does not carry statutory authority and does not represent a formal government audit or legal determination. It is intended to provide a structured, transparent, and repeatable analysis of policy implementation against publicly stated commitments and international obligations.

10.2 Purpose and Intended Use

This audit is intended to:

- inform parliamentary scrutiny, including Senate Estimates and committee processes
- support policy development and review within Commonwealth and state agencies

- contribute to sector-wide understanding of cultural workforce and safeguarding infrastructure
- assist in the development of future national cultural policy frameworks
- provide a referenceable analysis for academic, policy, and sector commentary

The document is designed to be read independently or alongside *Revive* and associated implementation materials.

10.3 Basis of Authority

The authority of this audit derives from:

- the use of publicly available policy documents and official correspondence
- transparent articulation of audit criteria and methodology
- alignment with Australia's obligations under the UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage (2003)
- application of established public-sector performance audit principles

Findings are based on documentary analysis rather than internal government data or privileged access.

10.4 Limitations

As an independent shadow audit, this document:

- does not assess confidential or unpublished government material
- does not substitute for statutory audit or legal advice
- does not evaluate individual programs, grants, or funding decisions
- does not attribute intent or motivation to policy actors

The audit assesses structural implementation capacity, not effort, goodwill, or policy ambition.

10.5 Citation and Reference

This document may be cited or referenced in full or in part, provided that attribution is made to the Creative Women's Association and the document title is clearly identified.

Suggested citation format:

Creative Women's Association (2026). Shadow Implementation Audit of Australia's National Cultural Policy: Revive.

Where excerpts are used, care should be taken to preserve contextual accuracy.

10.6 Updates and Revisions

This audit reflects the status of *Revive* and associated implementation material at the time of writing. Should significant new policy instruments, institutional mechanisms, or legislative measures be introduced, an updated assessment may be required.