Stakeholder Review of the Broadcasting Authority of Ireland's Gender Action Plan, and input to the development of a BAI Equality, Diversity and Inclusion Strategy

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1 Executive Summary

This stakeholder review was intended primarily to provide an assessment of the success of the Broadcasting Authority of Ireland's ("BAI") Gender Action Plan ("GAP"). It is both "backward looking" in the review of the actions under the GAP, while also "forward-looking" in terms of recommendations for the future. The BAI also requested that the consultation should ideally provide feedback that would contribute to the development of an Equality, Diversity and Inclusion (EDI) strategy for the BAI. Stakeholder interviews were held with individuals representing 27 organisations and hence this report provides an extensive and comprehensive overview of the current thinking and approaches of the industry on all of these issues.

It is important to place the stakeholder review in the context of a range of developments regarding gender and diversity policy in Irish media industries, and at the international level. Policy developments need to be understood in the context of international and national obligations regarding media legislation, human rights, gender equality, non-discrimination and the rights of minority groups, and those of people with disabilities. The specific remits, strategies and schemes of the BAI, which illustrate the importance of diversity as a core principle in the work of the Authority, are outlined in chapter four. This review is also contextualised in relation to the ongoing and significant changes in the legislative and regulatory framework for the Irish audiovisual sector, and the various challenges for the audiovisual sector in terms of sustainability (chapter three).

Chapter five deals with the Gender Action Plan (GAP) and its four pillars: data collection, research, encouraging the development of gender initiatives, and enhancing accountability processes. The gathering of data in the context of the Sound & Vision scheme applications and on finalised projects has been highly praised by stakeholders. This has provided transparency of the funding scheme, allowed for an assessment of the success of the initiative and encouraged better collaboration between women in the audiovisual creative professions. It has also raised awareness and encouraged discussions around these issues.

The collection and publishing of data from broadcasters has not, so far, been successful. There are strong calls from a variety of stakeholders for improvement in the gathering of this data. An understanding of the current situation in the sector is vital to the development of future policies and strategies. Data also helps in evaluating the success over time of such strategies. From the BAI perspective the approach of using the broadcaster returns has proved to be more complex than expected. The returns are designed to address compliance and performance of the licence holders, and so the nature of the return forms is an issue to be further discussed internally. Currently, the BAI are not adequately resourced in terms of budgets and time to develop a comprehensive data collection framework.

However, it can be assumed that all broadcasting organisations have data on the gender breakdown of their staff - also with regard to managerial roles - and hence it should be possible to access this data.

Future success in this area may be achieved via encouraging a voluntary approach of broadcasters to return this data as part of the broadcaster returns or via other regulatory mechanisms. Alternatively, there are calls from a range of civil society activists (particularly those supporting women working in the audiovisual media sector) for increasing obligations on broadcasters via licensing conditions to provide data on their workforce. In relation to the broader question of increasing diversity, many broadcasters may be stuck in a bind, as their workforces are relatively fixed, and without major staff turn-over. The need for finances and resources are frequently discussed in reference to the opportunities to further open the industry.

Discussions on the collection of data on the workforce of the audiovisual sectors in Ireland represent a major element of the feedback in this review – in relation to both data on gender equality in the sector and also any future decisions to collect data on broader characteristics of diversity in the sectors. According to stakeholders there needs to be a cross-industry approach to establish and define the parameters of a data collection framework. Reference is made to various systems in the UK (outlined in chapter 5), while at the same time stakeholders caution that the Irish context (at least in terms of diversity) is quite different to the UK. There is a sense that there is a need for more thinking and reflection on what data should be gathered, by whom, and for which purpose, and also regarding the overall design and management of a framework.

Concerning the research activities of the BAI in the context of the GAP, there is very positive feedback from all stakeholders regarding the two recent research reports that were funded by the BAI. The BAI also committed to the organisation or participation in debates with a view to improving policy and legislation in this area, and from the references from a broad range of stakeholders to the BAI contribution to events, discussions and consultations this commitment has been achieved.

One of the reports (co-authored by DCU and RTÉ) is considered to be a very good example of the BAI commitment to seeking partnerships with other bodies alongside standalone research. For many, the research exercises are key, as it is important to contextualise data and provide snapshots of the experience in the industries – *"not everything can be measured in hard numbers"*.

Many of the stakeholders stated that far more research is needed in the area: in relation to on-screen representation, stereotypes and the framing of women's issues. This is discussed in detail in chapter five. There was also considerable discussion on the need to support quality journalism, and also to examine whether there is a need to strengthen BAI codes such as those relating to fairness, objectivity and impartiality and to programme standards. Several stakeholders expressed concern regarding the nature of rhetoric in some sectors of the media where there is often a tendency towards provocation regarding discussions on particular groups in society. These concerns were also reiterated by stakeholders representing a range of under-represented groups in the context of questions regarding inclusion and diversity. Relevant BAI codes are discussed in more detail in chapter six.

The focus of future research should also turn to the engagement on air of women as journalists, experts and commentators. Several stakeholders also stressed a need to consider research into diversity on air in general. Suggestions were made as to how such diversity could be measured using artificial intelligence, algorithms and other technological tools. The resources available at the BAI for research are currently very limited and need to cover the broad range of areas for which the regulator is responsible. Hence, much more funding is required in order to increase the levels of research in the area. The engagement of other funding bodies, research institutes, universities and foundations in this area of research would be a positive development.

The encouragement of the development of gender initiatives by the BAI, including the use of creative opportunities from Sound & Vision, in addressing gender have also received wide praise. The specific funding round on "women's stories" and use of other areas of the Sound & Vision funding to promote female creatives and female stories were considered to be very important contributions to promoting female talent, and these should be continued. Some sectors of the industry do not fully understand the aims of such funding and further communication on the schemes may be required. The aims could be summarised as : increasing gender equality; encouraging a change in thinking in the industry; building on the talent that they believe is absent; and providing new stories and perspectives.

From the feedback of stakeholders, it is apparent that the BAI has made a very positive and real contribution to encouraging the development of gender initiatives in the industry. Specific mention was made of the X-Pollinator project, the Women on Air initiative, and support for workshops, training and networking initiatives. The BAI have utilised a range of their funding tools (outlined in chapter 4) to advance these activities under the GAP, including the Sectoral Learning and Development funding, Network funding, and sponsorship schemes.

Regarding the future, many stakeholders believe that more should be done and that progress is slow regarding the improvement of gender equality in the sector. An important issue that was touched on concerned the need to promote more inclusive workplaces, which is the current focus of Ofcom in the UK - to focus on inclusion in terms of development, promotion and retention of staff. Barriers for mid-career professionals were also emphasised along with the tendency of producers to rely always on the same creative teams. The Sound & Vision funding was very helpful in changing attitudes on this. Suggestions for improvement included encouraging broadcasters to develop mentorship schemes for women directors/ writers and other crew members, and inviting women writers/ directors to contribute as guests to seasons or episodes in successful TV Drama series. This could be ensured via conditions linked to funding or via tax incentives for broadcasting or film sectors, or also facilitated via the content commissioning of broadcasters.

With regard to enhancing accountability processes, there is a strong awareness of the Gender Action Plan among stakeholders, particularly the audiovisual production sector and the various industry women's groups and specific initiatives. Some stakeholders (broadcasters) were less aware of the GAP

– or more aware of certain aspects rather than others. This awareness is often dependent on direct engagement with specific elements (Sound & Vision, Women on Air, data collection, conferences and workshops, research etc). The BAI have been very proactive is raising awareness via PR, communication and dissemination of results. Still there are suggestions that even more awareness is needed throughout the industry.

The publishing and evaluation of initiatives has been achieved via the GAP Review of 2020 and the publication of details of the GAP projects in the BAI Annual Reports. The current review includes this broad stakeholder feedback exercise as part of the evaluation process. Several stakeholders took a broader perspective on the nature of accountability processes stating that all relevant state actors, state funding bodies and broadcasters should be more accountable. Overall, there is widespread agreement that the GAP has achieved the majority of its aims. For some stakeholders, there is a strong sense that a future iteration of the GAP should be tighter, stronger and more specific, in order to achieve more structural change.

In conversations with the Department of Media, it was emphasised that the issues of gender equality, diversity and inclusion are key for the Minister. They understand that all change is not possible under the current BAI remit, but they welcome the development of a strategy on Diversity and Inclusion and note this is very urgent for the Department and should be developed as soon as possible.

Stakeholders provided a considerable amount of input into the way in which diversity and inclusion could or should be defined and understood in the Irish context. The discussions regarding the development of a BAI equality, diversity and inclusion strategy also had a strong focus on data collection and research (as noted above). Data collection in this area is much more complex and raises issues of privacy.

As already noted, the Irish context for these issues is quite different from that of the UK. However, it could be assumed that there should already be gender equality in the sector, and that (according to representative organisations) members of the LGBT community would make up 8-10% of any workforce, and that workforces would include around 6% of people with disabilities. Currently, there is no available data with which to assess whether or not the sector is representative in this way.

With regard to the diversity in ethnic origin of the Irish population, this represents a relatively new phenomenon. No doubt any measurement of ethnic diversity in the media sectors, as they currently stand, would not return any significant results. Hence, to a large extent, stakeholders see workforce diversity as an area for future development in relation to skills, training, internships etc. as the more diverse generation is emerging from school and university. Another aspect of diversity that has been highlighted by the majority of stakeholders is that of promoting people from disadvantaged socio-economic backgrounds – an area that would be particularly difficult to measure within a workforce but may be addressed via focused projects and initiatives. As several stakeholders emphasise, it is important to bear in mind that data gathering, alone, does not ensure progress in the areas of Equality, Diversity and Inclusion in the media sector. A mix of qualitative and quantitative measures is required.

From the discussions with representative groups, a key area is the representation of their groups in the media. Aspects of this are addressed above in relation to the framing of issues and the problems of negative stereotyping. This is discussed in great detail in chapter six. Representation in the media has several strands: firstly, how people from various groups are represented in the media and how their issues are framed; secondly, how people from various groups can also become contributors to various debates and discussions not necessarily related to their characteristics of, for example, being LGBT or a person with disabilities, or a person of Polish origin (a diversity on air approach); and thirdly, the extent to which people from under-represented groups become mainstreamed as characters in drama, fiction and entertainment.

For the purpose of achieving the above aims, all the representative groups highlighted the importance of engagement by the media and audiovisual sectors with their groups. This needs to happen on both formal and structural levels, as well as on the level of informal engagement with individuals. In addition, most representative groups were in favour of adapting many of the tools of the GAP, regarding funding of content, promotion of initiatives, gathering data on creative crews, to include diversity. This indicates that the approach of the GAP has been successful and that the various tools could be deployed in relation to other areas of diversity. In conversation with the BAI it was emphasised that inclusion and diversity are already core principles in the implementation of the Sound & Vision funding scheme. The scheme can also be enhanced and adapted to any strategic objectives of the BAI in order to address gaps in the market and/or to better serve audiences. One approach in the development of an overall EDI strategy could therefore be to broaden the nature of the current GAP.

The stakeholders (particularly from the media industry) provided a significant amount of feedback regarding their perspectives on these issues, on their current actions, initiatives and projects. Strategies regarding equality, diversity and inclusion have both internal and external dimensions. They can also relate to either on-screen (or on-air) and off-screen (or off-air) diversity. It should be noted that these strategies include the aim to promote increased gender participation, alongside broader diversity.

Internally, the organisations can focus on work culture, recruitment, career development, balance of gender representation in boards, management, editorial, content and commissioning structures – and also work on mainstreaming diversity and inclusion across these areas. Internal control can also relate to what and who appears on-screen with regard to journalists, experts, contributors and the commissioning and development of content. An interesting observation was that diversity on-screen can happen quickly, but diversity off-screen will develop more slowly.

Externally, the various organisations can play a role via a range of initiatives and projects that the sector is implementing or would like to implement – particularly in relation to development of training, provision of internships and apprenticeships (these can contribute directly to the development of expertise in the industry). Some stakeholders have talked about the impact that they can have externally via what they are presenting on-screen – the ways in which they can address issues via programming, the ways that

they can increase the diversity of experts, and the extent to which via drama, entertainment and fiction they are helping to mainstream the diverse nature of society. An interesting comment in this regard was the need to find a balance between the energy and resources that were focused internally, and those that were focused externally in order to make the greatest impact.

Chapter 6 makes reference to a broad range of actions and initiatives that are being taken by industry actors, of which there appear to be more and more every day. This is also perhaps a consequence of the current levels of discussion on these issues in the Irish media sector. The BAI is contributing in a very influential way to these discussions. Part of this contribution is this stakeholder review which indicates to the industry that some guidance, strategies or requirements may emerge in the near future.

It was suggested by several stakeholders that not every actor in the sector can address every aspect of promoting diversity and inclusion. The idea of mapping the range of initiatives in place and understanding which actions are aimed at achieving which goals was considered useful by many stakeholders. There are potentially different tracks of change that should be considered in a way that allows for contributions from all the sector. It is recommended that Screen Ireland and the BAI work together and develop a joint approach, particularly regarding the creative industries.

Some interesting conclusions are the agreement on the need for collaboration and the understanding that different actors may have different areas where they can best contribute. It was also recommended that some type of stakeholder forum be established to discuss what is practical for the media and what is of practical use to the representative organisations, as *"the needs and expectations of various groups need to be married with the thinking and approaches of the industry"*.

Another important point that was emphasised by most stakeholders was the fact that change will not happen overnight. Any potential changes in legislation in the media sector will take time. In addition, the anticipated impact of the forthcoming recommendations of the Future of Media Commission regarding supporting the sustainability of the media sector will take time to filter through. Future financial sustainability will also have an impact on the extent to which the media and film sectors can be opened up and expanded – and hence have a positive impact on increasing diversity and inclusion in the industry.

Much of the work regarding the development of internal strategies and processes is already underway. Short term actions and pilot projects are recognised by many as examples of immediate steps that can be taken. The review provides an overview of the types of actions that could be taken both internally and externally – based on suggestions, other examples and actual initiatives being launched in the sector. These relate to the promotion of equality and diversity both on-screen and off-screen. Actions, initiatives and strategies will also need to be considered from the perspective of short-, mid- and long-term goals and they are outlined at the end of chapter six.

2   Note on methodology and interviews

Semi-structured online interviews were carried out with 42 individuals representing 27 organisations between August and October 2021. The table below indicates the organisations that were represented in the interviews. A complete detailed list of interviewees, their organisations, and the main remit of these organisations is outlined under Annex 1. The author would like to take this opportunity to thank all the individuals and organisations for giving of their time and energy to contribute to this report.

Each interview was preceded by research on the organisation that the interviewee represented: research of websites, policy documents, and the submissions of various organisations to policy consultations including that of the Future of Media Commission. This was followed by additional research in order to access deeper information on a range of projects, initiatives, schemes, reports, policies, or press articles mentioned by the stakeholders, in order to provide further elaboration.

Organisations interviewed for the stakeholder review	
Broadcasters and broadcaster associations	Community TV Association/ CRAOL, Independent Broadcasters of Ireland (IBI), RTÉ , TG4, Virgin Media Television (VMTV)
Production and creative industry representative groups and guilds	Animation Ireland, Screen Directors Guild of Ireland (SDGI)**,** Screen Producers Ireland (SPI), Writers Guild of Ireland (WGI)
Representative groups, advocacy groups, and rights groups	Equality Expert Group (EEG), Irish Traveller Movement (ITM), LGBT Ireland, National Disability Authority (NDA), National Women's Council of Ireland (NWCI), Women in Film and Television (WFTI)
Funding bodies, training and skills	Fís Éireann/ Screen Ireland, Screen Skills Ireland, Learning Waves
Government and regulatory	Broadcasting Authority of Ireland (BAI), Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGM), OFCOM (UK communications regulator)
Projects and initiatives	Project Open Opportunity, #Whynother?, X-Pollinator
Academics	from Dublin City University (DCU), National University of Ireland Maynooth (NUIM), University of Limerick (UL)

Table 1: Organisations participating in the stakeholder review

The organisations and groups included in the process are a broad representation of the stakeholders involved with the BAI, and also the relevant civil society groups in Ireland. The BAI was also included as a stakeholder. Given the nature of the stakeholders, many wear several hats: heading a radio station or production company, working as a broadcaster, or journalist, or director or academic while also chairing an industry group or NGO; managing a company while also engaged in running projects and initiatives in a voluntary capacity. It was natural that people would speak on behalf of their organisations but also cite examples from their daily work. Where possible, distinctions were made between the two. In several cases, more than one representative from an organisation or group attended the interview, hence sometimes only the organisation or group is indicated as a source. For the most part the discussions are paraphrased but there are also direct quotes from the stakeholders provided throughout the report.

3   Introduction and context

The purpose of this research was to provide a stakeholder review of the Broadcasting Authority of Ireland's (BAI) Gender Action Plan (GAP). The GAP emerged alongside a range of developments regarding gender and diversity policy in Irish media industries (from 2015). Women in Film and Television Ireland (WFTI) was launched in 2015, with the aim of promoting greater representation of women on and off screen. Screen Ireland (formerly the Irish Film Board) launched its Gender Equality Six Point Plan in December 2015 in order to address gender inequality in Irish film. On the international level, the European Women's Audiovisual Network (EWA) was launched in 2013. The EWA produced research showing that although 44% of film school graduates in Europe are women, only 16% of public funding goes to films directed by women, raising questions about the levels of inequality in the film industry.

A significant development at the European level in 2017 was the *Recommendation of the Council of Europe Committee of Ministers to member states on gender equality in the audio-visual sector*, which provided a strong impetus for action in the field. This was followed by the *European Parliament Resolution of 17 April 2018 on gender equality in the media sector in the EU.* These European standards are referred to in the review, and also outlined in more detail in chapter seven.

In 2011, the BAI provided support to the launch of the not-for-profit organisation Women on Air – promoting greater gender balance on the airwaves in Ireland, and providing media training and mentoring for women. The development of the GAP in 2018 represented the growing BAI commitment to promoting gender equality in the Irish audio-visual sector. While the aim of achieving gender equality remains high on national and international agendas,[1] the broader issue of diversity and inclusion in the media sector is now also key. In 2014, the European Platform of Regulatory Authorities (EPRA) addressed this at a Plenary meeting, where the BAI presented the way in which the aim of achieving diversity is reflected in the remits, strategies, policies and activities of the Authority (outlined in more detail in chapter four). Achieving greater diversity in broadcasting became a central thematic in the work of the EPRA in 2018.[2]

Policy developments in these areas should be understood in the context of international and national obligations regarding human rights, gender equality, non-discrimination and the rights of minority groups, and those of people with disabilities. This includes significant developments in relation to the rights of people with disabilities, employment equality, and also several national strategies in the areas of, for example, gender equality and anti-racism. This framework is outlined in detail in chapter seven, with a particular focus on the role of the media. The revised Audiovisual

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[1] European Regulators Group for Audiovisual Media Services - ERGA (2021): *Study on Industry-led Good Practices related to Gender Diversity in the European Audiovisual Sector - Report with recommendations.*
[2] European Platform of Regulatory Authorities - EPRA (2018): *Achieving greater diversity in broadcasting - special focus on gender; benefits and best practice approaches.*

Media Services Directive stresses the role of national regulatory authorities in promoting the objectives of the Directive such as media pluralism, cultural and linguistic diversity, consumer protection, accessibility, non-discrimination, the proper functioning of the internal market and the promotion of fair competition.

Given the developments outlined above, it was deemed appropriate for the BAI to look at these matters more holistically. In the context of "looking back" at the achievements of the GAP and "looking forward" at what can be done in the future regarding the promotion of gender equality, it was considered logical that the discussions with stakeholders should also address diversity and inclusion strategies in order to get feedback from a broad range of stakeholders on these issues.

This review also needs to be placed in the context of several major changes in the legislative and regulatory framework for the Irish audiovisual sector, and in the financial challenges for the sector. These developments were frequently referenced in the discussions with stakeholders. In January 2020, the Online Safety and Media Regulation Bill was introduced by the government (updated January 2022). The Bill proposes to establish a new Media Commission, which will replace and incorporate the existing Broadcasting Authority of Ireland. The Bill will transpose the revised Audiovisual Media Services Directive (AVMSD), levelling the regulatory playing field between video-on-demand audiovisual media services (VOD) and traditional (linear) broadcasting. Video-sharing-platforms (VSPs) are now included in the scope of the Directive covering protection of minors, protection of the public from illegal content, and regulating audiovisual commercial communications on these platforms. The Bill also provides for the appointment of a Media Commission with several Commissioners, including an Online Safety Commissioner whose role would be to oversee the new regulatory framework for online safety. The BAI structures and remits will therefore disappear in the near future, although it is likely that the regulatory structure and remit will expand through the establishment of the Media Commission.

In parallel, the Department of the Taoiseach established the Future of Media Commission (FOMC) in September 2020 to examine the future of the media in Ireland: concerning the public service broadcasters, commercial broadcasters, print and online media platforms. The FOMC has carried out extensive consultations, interviews and online discussions to address key thematic areas relevant to the future of media in Ireland. The work of the FOMC was referenced by a majority of the stakeholders as being highly significant as regards the future development of media policy and the securing of financial sustainability for the sector. Regarding sustainability, it is important to consider the rapidly changing media landscape, including the impact of global players and online platforms on the viability and financial sustainability of national media ecosystems. The problem of harmful content on online media, or social networks, and of groups that are funding hate speech and dis-information throughout Europe and the threats that this presents for democracy, social cohesion, tolerance and human rights were also discussed by stakeholders in the context of this review.

4　The BAI and the promotion of diversity in the Irish media sector

Diversity is central to the remits, strategies and activities of the Broadcasting Authority of Ireland. This is reflected in the overall statutory objectives of the BAI, in the policies for media plurality and media ownership and control, in the BAI's Broadcasting Services Strategy and the licensing strategies, in the funding of programming, and in the support to development of the sector. The following is intended to provide a brief overview of these relevant objectives, aims and strategies.

4.1 Broad objectives and strategies

The statutory objectives of the BAI include ensuring: *"that the number and categories of broadcasting services made available in the State by virtue of this Act best serve the needs of the people of the island of Ireland, bearing in mind their languages and traditions and their religious, ethical and cultural diversity,…. and stimulating: the provision of high quality, diverse and innovative programming by commercial, community and public service broadcasters and independent producers,…"* (from Article 25 of the 2009 Broadcasting Act).

In the context of the BAI Media Plurality Policy,[3] there is a dual concept of diversity including that of content: *"Diversity of Content means the extent to which the broad diversity of views (including diversity of views on news and current affairs and diversity of cultural interests prevalent in Irish society) is reflected through the activities of media businesses in the State, including their editorial ethos, content and sources."*

The policy aims include: *"Encouraging and facilitating a plurality of high quality media outlets and their ownership; Fostering a media landscape that is representative of, and accessible to, the diversity of Irish society; Increasing the production, availability and prominence of culturally relevant audio-visual content for Irish audiences, including quality programming in the Irish Language; and Facilitating a mix of trusted and credible voices, opinions and sources of news and current affairs in audio-visual media which enhances active citizenship in Ireland, democratic debate and which supports the integrity of the democratic process".*

The **Broadcasting Services Strategy** (BSS) provides the framework for licensing plans and activities by the BAI – and thereby supports the objective of having a broad number and diverse categories of broadcasting services (as outlined above). The BSS also aims to: *facilitate the long-term sustainability of the independent broadcasting sector, to support and foster plurality and diversity of content for Irish audiences including in the Irish language, and to support innovation and development, now and in the future.* The BSS also emphasises that: *the Authority's licensing activities will aim to achieve the objectives of fostering a media landscape that is representative*

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[3] BAI Media Plurality Policy: https://www.bai.ie/download/128743/

of, and accessible to, the diversity of Irish society, that facilitates pluralism, and offers a wide variety of quality content to viewers and listeners, including in the Irish language. [4]

The **BAI licensing strategy** is key to ensuring that the broadcasting services best serve the needs of audiences: *The BAI will endeavour to ensure that viewers and listeners in Ireland have access to a diverse range of services, programming and perspectives that meets their needs and reflects their diversity. It will actively encourage and support Irish broadcasters in realising this objective.*[5]

The **BAI Statement of Strategy 2021-2023** published in January 2021 has five strategic themes. The first is "Promoting Plurality and Diversity". Within this is the strategic objective *3: 'Foster a media landscape that is representative of, and accessible to, the diversity of Irish society. The expected outcome is that: Irish audio and audiovisual media are more diverse in terms of content, those involved in its production and in on air presentation'.*

Key performance indicator: *Develop and pilot a comprehensive Data Collection Framework by the end of the Strategy period with a view to providing transparent and accurate data on diversity on an ongoing basis; BAI initiatives under its Gender Action Plan result in quantifiable increases in female representation on and off air over the Strategy period.* (**Statement of Strategy 2021-2023)**

4.2 Sustainability, inclusion and social benefit

With regard to the internal development of the BAI in relation to gender equality, diversity and inclusion, the BAI have engaged with the Irish Centre for Diversity, with the aim of obtaining the Equality, Diversity and Inclusion (EDI) mark, which is a certification for Irish businesses.[6] An important internal obligation is the Public Sector Equality and Human Rights Duty[7] regarding the promotion of equality, prevention of discrimination, and protection of the human rights of employees, customers, service users and everyone affected by policies and plans. At the BAI this is being addressed in the areas of human resources and compliance (Interview BAI) and the Action Plan in this area was published in November 2021.[8]

Sustainability Network

The BAI have recognised the need to incorporate the UN Sustainable Development Goals[9] in their work. The Broadcasting Sustainability Network, was launched in 2019 as a voluntary sector-wide sustainability network for Irish broadcasters and representatives of their supply chains. The Broadcasting Sector Sustainability Roadmap was co-created by members of the network with the BAI, and focuses on three dimensions of sustainability: environment (green), social (inclusive) and economic (resilient). The element of inclusivity has relevance for the Gender Action Plan and for

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[4] BAI (2018): Broadcasting Services Strategy https://www.bai.ie/en/download/133341/
[5] BAI Licensing website
[6] Irish Centre for Diversity: https://irishcentrefordiversity.ie/
[7] Public Sector Duty: https://www.ihrec.ie/our-work/public-sector-duty/
[8] Public Sector Human Rights and Equality: BAI Action Plan 2021-2022 https://www.bai.ie/en/download/136597/
[9] UN Sustainable Development Goals: https://sdgs.un.org/goals

diversity and inclusion goals. In fact the GAP is referenced as a source of information in the document. The key Sustainable Development Goals (SDGs) linked to the dimension of "inclusive" are: SDG4 - Quality Education, SDG5 - Gender Equality, SDG10 - Reduced Inequalities, and SDG16 - Peace, Justice and Strong Institutions. Within the "inclusive dimension" of sustainability, the focus is on the following:

Inclusive workplace: create a workplace culture of respect and equality that values individuals and embraces the ability of all; Inclusive programming: give increasing coverage and focus to societal issues that promote positive social change; Inclusive and safe access: ensure content is accessible, safeguard children, and protect people's privacy.[10]

Community Media and Social Benefit

A further relevant policy of the BAI concerns the obligation of Community Media to deliver a social benefit. This concept of social benefit was developed with the BAI, the community media sector and a broad range of activists. A consultation was carried out in order to create a toolkit of how to ensure the delivery of social benefit to communities served by community broadcasters. Six types of social benefit were identified as being relevant to the work of community media. It is apparent that several of these benefits have a direct relationship with the concepts of inclusion and diversity. The beneficial outcomes are defined as:

Individuals, especially minorities and those marginalised, are growing in confidence and creativity and/ or reinforcing a sense of belonging, directly from engaging with the Station; Individuals are enhancing their employment prospects, through gaining skills and confidence reinforcing community identify; Community members are informed and aware of what is happening around their community; Community members are responding more effectively to issues - local to global - because they have access to diverse viewpoints and to more and better information; Collective actors (CBOs, NGOs etc.) are facilitated, and reinforced in their capacity to achieve their goals; The community sense of identity and cohesiveness is enhanced through interaction and collective action.[11]

4.3 Funding: programming, research and sector development

The Sound & Vision funding scheme has the following objectives: *Develop high quality programmes based on Irish culture, heritage and experience; Develop these programmes in the Irish language; Increase the availability of programmes referred to above to audiences in the State; Represent the diversity of Irish culture and heritage; Record oral Irish heritage and aspects of Irish heritage which are disappearing, under threat, or have not been previously recorded, and; Develop local and community broadcasting.*

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[10] The Broadcasting Sector Sustainability Roadmap
[11] Nexus Research Cooperative (April 2020): *Community Radio - Delivering Social Benefit*.

Funds can be made available to support new television or sound broadcasting programmes including feature films, animation and drama on the following themes: Irish culture, heritage and experience, history, historical buildings, the natural environment, folk, rural and vernacular heritage, traditional and contemporary arts, the Irish language, and the Irish experience in European and international contexts. Funds can also be used for programmes aimed at improving adult or media literacy, or raising public awareness and understanding of global issues impacting on the State and countries other than the State, programming in the Irish language, and archiving of programme material produced in the State.

Funds for ancillary measures (where necessary to support the scheme) can be introduced. Examples of ancillary measures include funds for equipment or for training and development (Interview BAI). According to the Broadcasting Act, the scheme allows for the possibility for the Minister to direct the Authority to prepare and submit to him or her a scheme relating to any of these themes. A recent example of this was the Sound & Vision Covid-19 funding for raising public awareness. The Broadcasting Act also allows the BAI to attach particular terms or conditions to any particular funding under a scheme such as it considers appropriate in the circumstances.[12]

The Sound & Vision scheme has become more integrated into the strategic work of the BAI, and the promotion of diversity in programming and content is one of the core aims of the fund. A large number of projects have been funded that address themes and stories relevant to diverse groups and communities in Ireland (interview BAI).

The **Media Research Funding Scheme** of the BAI provides funding to academics to conduct media related research on topical issues pertaining to the broadcasting industry. The aims are to: *develop and maintain links between the BAI, third level institutions and the broadcasting sector; drive quality research initiatives to provide a strong evidence base to the regulatory environment of the BAI's work; provide research that will facilitate the BAI in meeting the needs of viewers and listeners in Ireland.*

The fund is used to explore issues related to the broad regulatory remit and industry development objectives of the BAI, and was used in the context of the GAP to fund relevant research.

Under the **Sectoral Learning and Development funding** (as outlined on the BAI website): the BAI allocates funding to a range of industry networks to support learning and development activities. Additional funding is also offered to support schemes for community broadcasters and temporary services, and initiatives for Irish language, gender, and other diversity projects. Network funding is allocated to a large range of organisations in the sector, while the BAI Sponsorship Scheme provides sponsorship funding to media-related events and activities.

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[12] Broadcasting Act 2009, Article 154

5 Stakeholder feedback on the Gender Action Plan (GAP)

The BAI framed their approach with reference to the Council of Europe *Recommendation of the Committee of Ministers to member states on gender equality in the audio-visual sector* (see more detail on the Recommendation in chapter seven). The Recommendation invites member states to: review their legislation and policies; collect, monitor and publish data; support research; encourage the ongoing development of media literacy; and enhance accountability processes. Presumably as the BAI already do extensive work in the area of media literacy, they instead focused on encouraging the development of gender initiatives.

5.1 Pillar 1: Data collection and publication

The BAI committed to collecting and publishing the data collected on gender equality in order to provide transparent and accurate data on: the number of women involved in the sector; the roles these women have; the pay structures within the sector; and whether there exists adequate gender balance in decision-making positions in the industry.

Sound & Vision Data Collection

The Sound & Vision application form was amended to enable the collection of gender data on the creative roles of Producer, Director and Writer (since Round 30 in September 2017). This information is then used as a criterion as part of the BAI's strategic assessment process – providing a weighting of the gender breakdown in proposals. In addition, on completion of projects, the beneficiaries were required to report on the gender of the key creative roles (those above plus editor, director of photography, etc. collected since Round 32 in September 2018).

The 2020 Review of the GAP[13] provided data on the gender break-down of the key creatives, with more data available via the Baionline.ie portal (used for the broadcasting funding schemes). This has allowed the BAI to assess the success of the initiative. In this sense the BAI have fulfilled their commitment to the publication of this data.

This requirement to include information on the gender of the people in key creative roles has been considered by many stakeholders to be very useful (Katie Holly, X-Pollinator; Zbyszek Zalinski, RTÉ), with the provision of additional points for extra crew members also being very important - *"It has made people in the sector think about it more and this is a simple move that can make a real difference"* (Jennifer Davidson, Writers Guild of Ireland - WGI).

According to feedback from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGM), this weighting of the gender breakdown in proposals is a very important initiative under the Sound & Vision scheme, which has led to significant results. They stress that it is important to

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[13] Review of the BAI's Gender Action Plan Activities 2018 & 2019 and Proposed Activities for 2020.

keep this gender approach in all funding schemes and to keep the weighting as a priority (Brian O'Loughlin and Hannah Graham, DTCAGM).

Data collection relevant to broadcasters

A second aim was to gather industry data via Broadcaster Returns information for licensed commercial stations, including a gender breakdown of managerial and non-managerial roles within a station, along with salary brackets. The collection of data was highlighted in the recent research commissioned by the BAI[14] as being key to understanding where an organisation is, and how to strategize and plan where change can be introduced (according to the main broadcasting organisations and a range of representatives from production companies). From the perspective of the Department (DTCAGSM) the Broadcaster Returns data should ideally be publishable.

However to date, there has not been a consistent data collection and publication of this data. In discussions with the BAI, it was explained that the Broadcaster Returns fall under the area of compliance and there have been many iterations of the nature of broadcaster compliance forms. Currently these forms are divided between issues of compliance (adherence to licence obligations, regulations and codes) and of performance (including financial performance data, which is not for publication). Recently, the focus on the broadcaster returns was on the situation of broadcasters in the context of the COVID 19 pandemic, regarding finances and employment (Interview BAI).

There was a scoping exercise on data regarding workforces between 2015 and 2018. This data collection - including gender breakdowns - was based on self-reporting of the licensed services. It was not possible to do any auditing or checking of this due to lack of resources and there were large quantities of data involved. There could be a potential to develop this in the future, but currently the BAI do not have the resources (in terms of budgets, time and staff) to manage this internally (Interview BAI).

In the course of the interviews with broadcasters, TG4 presented their staff data which showed a balanced gender breakdown across departments, boards and management. Certain departments are more female-dominated (finance, legal and commissioning), while others are more male-dominated (creative and technical). The data also addresses age breakdowns in order for the organisation to assess where skills are needed – *"this provides an opportunity for growth – and for introducing more diversity"* (Alan Esslemont and Trevor Ó Clochartaigh, TG4).

RTÉ's 2020 Annual Report indicated a global gender balance across the organisation, within the RTÉ board and the Executive Board. Further breakdowns of managerial roles are not available on the website or annual reports. RTÉ's work on data gathering was stalled due to the challenges of

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[14] Auditing Gender and Diversity Change in Irish Media Sectors

the COVID pandemic. RTÉ has implemented the 50:50 project,[15] where data is collected in various departments at programme level (Zbyszek Zalinski, RTÉ).

Virgin Media TV stated that the gathering of this data is a key part of the business management and that gender, diversity and inclusion are core values of the company. They are establishing a key set of objectives across the organisation and their goals are aligned with the BAI as regards these core principles (Paul Farrell, Virgin Media TV - VMTV).

Regarding Community broadcasters, the GAP references a licensing (and contractual) requirement that a community broadcasters must be representative of the community it serves. Community broadcasters and those interested in acquiring a community broadcasting licence must achieve a 40/60 gender breakdown within their boards. In discussions with Community Media, it was noted this was a challenge for some of the community media and involved much persuasion of women volunteers to join the boards. They are developing interest in the boards by encouraging more women to attend meetings in order to see and understand what happens there. They highlighted the broader issue of the positive work culture for women in the Community media sector where almost half of the stations (9 of 21) are managed by women. (Jack Byrne, Craol/Community Television Association).

As concerns gender parity in other organisations, the Board of Independent Broadcasters of Ireland has a gender balance (John Purcell, IBI) and there are many women working as news editors and producers throughout the sector (Teresa Hanratty, Learning Waves). Animation Ireland noted that women make up 43% of the work-force across the animation industry but are, however, under-represented in the positions of directors of companies, and heads of departments (Ronan McCabe, Animation Ireland - ANI).

The Equality Expert Group (EEG) placed a strong emphasis on the importance of data – *"tracking, monitoring and reporting gender"* - citing the maxim *"what gets measured gets managed",* a sentiment also echoed by the Screen Directors Guild of Ireland, who strongly welcomed the approach of the BAI in relation to data collection (Birch Hamilton, SDGI). *"There needs to be a commitment to a regular gathering of data – with a cross-sector approach"* (Orla O'Connor, National Women's Council of Ireland - NWCI).

> **"What gets measured, gets managed"**
> **Equality Expert Group**

For the Screen Directors Guild of Ireland, data collection is really important and should also reflect the success of women stories - in terms of feedback, audiences and awards (SDGI). From the perspective of the #Whynother project *"data is everything and the impression is that the data-gathering process of the BAI is not very strong, but at the same time it is understood that there are financial and human resource issues that influence this"* (Linda

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[15] The BBC 50:50 project is discussed in more detail below (under 5.2)

Coogan-Byrne, #Whynother). The Equality Expert Group also noted that RTÉ have obligations to do this as a public company, while the private sector should be required to do this via regulation by making it mandatory (EEG). According to the Women in Film and Television Ireland: *"it is time to take the leap from a request to broadcasters – to an insistence".* They believe the approach is too soft, and there is not full accountability from the broadcasters (Susan Liddy, Women in Film and Television Ireland - WFTI).

Representatives from the government Department (DTCAGM) indicated that: *"these issues are a top priority for the Minister, and the department acknowledges the work done by the BAI despite the limited resources available".* They stated that data collection needs to operate in the GDPR context and that it is important to encourage a voluntary basis approach, alongside a legislative approach and to try to get the best approach from both, They also noted that further research on European best approaches would be useful in order to develop this process (DTACGSM).

Achievement of aims under pillar 1 – data collection and publication
Commitment: the BAI committed to collecting and publishing the data collected on gender equality in order to provide transparent and accurate data on: the number of women involved in the sector; the roles these women have; the pay structures within the sector; and whether there exists adequate gender balance in decision-making positions in the industry.

The gathering and publishing of data under the Sound & Vision scheme applications and on finalised projects has been highly praised by stakeholders. This has provided transparency of the funding scheme, encouraged better collaboration with female creative professionals, providing more opportunities for female professions.

The process of data collection has also raised awareness and encouraged discussions on the issues – *"people in the sector think about it more and this is a simple move that can make a real difference".*
This data collection has also allowed for an assessment of the success of the initiative – measured by the increase in female creatives engaged in projects funded via the Sound & Vision Scheme.
The BAI was very successful in achieving its commitment to provide data on the Sound & Vision scheme.

In relation to the licensing obligation that Community broadcasters and those interested in a community broadcasting licence must achieve a 40/60 gender breakdown within their boards. While all Community broadcasters have to abide with this obligation at contracting stage, there is no data immediately available to assess compliance at later stages of the licencing process. From the perspective of Community Media, this has presented a challenge, and has required efforts to encourage women to join boards. They emphasise the qualitative working experience of women, and the high number of female station managers.

Data on the gender breakdown of managerial and non-managerial roles within broadcasters, along with salary brackets work-force in broadcasters has proved to be more difficult to gather. The aim of the GAP to provide transparent and accurate data on this aspect of the industry has not been fully achieved.
According to the BAI, the approach of using the broadcaster returns is complex as these returns are designed to address compliance and performance of the licence holders. The nature of the return forms needs to be further discussed. In addition, the BAI do not currently have the resources to manage a data framework internally.

The collection and publishing of data from broadcasters has not, so far, been successful. There are strong calls from a variety of stakeholders for improvement in the gathering of this data.

Table 2: Achievement of aims under pillar 1- data collection and publication

5.2 Discussions and further proposals on data collection

It is important to note that many of the comments of stakeholders with regard to the collection of data were already considering this issue in broader terms, and including the challenges of collecting data on a range of characteristics of the workforce.

For some, a major issue with regard to the gathering of data is the lack of a consistent standardised questionnaire that could be used in different sectors of the audiovisual industry for the purpose of mapping (X-Pollinator): *"Ideally, there should be one anonymous questionnaire and the development of a template for the industry could be something that the BAI would take a lead on".* As an example, Blinder Films (Katie Holly's production company) request their crew members to complete a diversity, inclusion and gender questionnaire at the end of each production – as a voluntary and anonymous approach. The Writers Guild of Ireland also wondered to what extent it is possible to standardise data collection, for example where both Screen Ireland and the BAI are funding television content (WGI). At the outset, it is important to note that any potential data collection will address different structures: broadcaster workforces and production crews. The examples from the UK outlined below show that different data collection projects are covering distinct areas of the sector.

> **"Not everything can be measured in hard numbers – it is also important to understand what is behind the numbers and provide "insights" on what is happening in the sector"**
> **Anne O Brien, NUIM.**

Discussions on the importance of data collection also focused on the need to contextualise the data (Anne O'Brien, NUIM; Zbyszek Zalinski, RTÉ; John Purcell, Independent Broadcasters of Ireland - IBI). It has been stressed that: *"numbers cannot tell you everything about diversity and quantitative measures can be superficial - data needs context, nuance and design of research. In this sense, it is important to learn from other jurisdictions"* (RTÉ). *"Not everything can be measured in hard numbers – it is also important to understand what is behind the numbers and provide "insights" on what is happening in the sector"* (Anne O Brien, NUIM).

It is also broadly recognised that data collection requires major resources. *"Gathering data is good as a base-line to understand the situation and anonymised reporting is good. However, spending a lot of time and resources on data-gathering may divert resources from other actions"* (Anne O' Brien NUIM). There were several stakeholders who recommended enhancing data collection related to "on-air" diversity by using technology, algorithmic tools, artificial intelligence and data scraping (this is discussed in more detail below with regard to research under pillar 2).

Other systems of data collection

Since the launch of their Gender Equality Six Point Plan in 2015, Screen Ireland has gathered and published gender statistics on their funding and gender role allocations, as part of the overall focus

on funding, statistics, female directed projects.[16] *"Screen Ireland introduced a range of initiatives addressing funding, statistics, female directed projects, and they are seeing the benefits of this in the industry. The organisation is currently developing a back of house computer system which will improve the storage and retrieval of information, and help to provide better data from 2022".* (Lesley McKimm, Screen Ireland).

Many stakeholders referenced the various data collection approaches in the UK. It is of interest to note that these methods cover distinct areas: Ofcom (the UK regulator) focuses on workforce data in the broadcasting sector; the Diamond project gathers data on diversity on the programmes commissioned by the major broadcasters; the BBC 50:50 project involves an internal monitoring across content of on screen representation. The British Film Institute (BFI) introduced Diversity Standards in 2016, requiring film productions to include underrepresented groups in a range of film roles and positions. The BFI produces regular reports and data on the progress of the standards.[17]

The Ofcom (Office of Communications) has a duty under the legislation[18] to promote *equality of opportunity* in relation to employment in the broadcasting sector. They ask broadcasters to provide information about their equal opportunities policies and the make-up of their workforce. The main focus of the research is on workforce diversity within the broadcasting sector with a focus on broadcasters with 20+ employees. The licensing conditions require broadcasters to submit data on the workforce regarding gender, race and disability (Interview with Cathy Taylor, Ofcom). Other characteristics are gathered on a voluntary basis, such as data on socio-economic background and sexual orientation. According to feedback from Ofcom, the gathering of a male/female breakdown of staff is not difficult but other characteristics are more complicated. The BBC has additional requirements under the BBC Charter.[19] Community media is not part of the Ofcom data collection, as usually these organisations consist of less than 20 people and already focus on diversity with the provision of training and outreach schemes etc.

The approach is to monitor "equality of opportunity" and this incorporates gender: male/ female, disability and racial background. In October, Ofcom published its latest report with a 5 year review since the launch of this initiative.[20] Ofcom did not set quotas or targets, as they believe that the reality is deeper than the numbers. However, they do use bench-marking of the data against the UK population data (Interview Ofcom).

The BBC established the "50:50 The Equality Project" in 2017 to increase the representation of women in journalism, news and current affairs (it has since expanded to include a broader range of content genres). From 2021, the production and editorial teams were asked to use the same

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[16] See the 2020 Statistics Report https://www.screenireland.ie/images/uploads/general/Statistics_2020_2.pdf
[17] BFI reports and data: https://www.bfi.org.uk/inclusion-film-industry/diversity-inclusion-how-were-doing
[18] Duty (27): Training and equality of opportunity. Communications Act 2003
[19] Overall, the BBC should reflect the diversity of the United Kingdom in its output and services and organisation
[20] Ofcom (2021): Five-year review: Diversity and equal opportunities in UK broadcasting.

methods to increase representation related to people with disabilities and those from different ethnic groups.[21] The 50:50 project is now global with a broad range of media organisations, companies and universities engaged in the project. As noted above, RTÉ is collecting data at programme level in a range of departments via the 50:50 project.

Several stakeholders also mentioned the Diamond project in the UK, run by the Creative Diversity Network (CDN), which was established to *"enable the UK Broadcasting industry to increase diversity and inspire inclusion."*[22] Diamond is an online system providing broadcasters with consistent diversity data on programmes that they commission. It addresses two questions: whether the workforce on UK productions, both on and off-screen, reflect the diversity of the UK population; and whether audiences are seeing themselves reflected on screen. The staff of the channels and the crews of the production companies are requested to fill in anonymous forms every two years.

A couple of stakeholders noted that while the Diamond project was providing transparency of the sector in the UK, there had been some problems for the industry concerning the way in which the data was presented - it was not made on a programme basis, but rather on a global basis and according to the industry it needed to be more transparent (RTÉ, Eileen Culloty DCU).

Zbyszek Zalinski (RTÉ) emphasised the importance that any approach in Ireland learns from the successes, mistakes and challenges of others. In his opinion: *"it is important to develop our own alternative to Diamond. A pan-industry effort is useful, but we are not as close to a solution as we think. Developing a pan-industry approach to data collection in Ireland raises several questions: Who will fund this? Who will implement and govern the system? What will be the nature of the scientific and academic standards and governance? What time-frames will be introduced for achieving objectives? What will be the terms of reference for the system and how will this feed into the development of policy?"* (RTÉ).

In conclusion, there are still very strong calls from people working in the sector, and from equality advocates, for more comprehensive data-gathering. There is a distinction between those who suggest the need for base-line data, and those who advocate for continuous monitoring of the situation. The opinion was also put forward that spending a lot of time and resources on data-gathering may divert resources from other actions. More examination of the approaches in other countries is needed. There are also calls to increase the obligations on broadcasters to provide this data. Stakeholders frequently note that the UK is not always the best example to look to given the different history, experience, nature of diversity, and also the size of the market and resources. It is useful to note, however, that there are a range of types of data being gathered in the UK:

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[21] BBC 50:50 The Equality Project: https://www.bbc.co.uk/5050/
[22] Creative Diversity Network - CDN is an industry body working to improve diversity on- and off-screen and funded by the UK's major broadcasters.: https://creativediversitynetwork.com/

workforce data; data on commissioned programmes; data in relation to content funding; and also data relating to on-air diversity in programming.

This further underlines the need for more thinking and reflection on what data should be gathered and for which purpose. It is generally accepted that some form of data collection framework needs to be established – and that this requires a lot more thinking in relation to its potential design and management. There is also a strong consensus of the need for a cross-sector collaboration in this process. These comments and findings are relevant also to the broader issue of collecting data relevant to gender equality, and diversity and inclusion across the entire media sector. The issue of data collection in relation to diverse groups in society are addressed in more detail in chapter 6.

Recommendations on future data collection		
Actions	**Suggested approach**	**Potential partnerships**
Data collection under Sound & Vision	- The BAI should continue to collect data on the production teams related to Sound & Vision applications and projects	BAI/ Sound & Vision applicants
Development of a data collection framework – Industry workforce	- This needs a cross industry approach to establish and define the parameters of such a framework. It should be decided whether there is one framework for broadcasters, or a cross-sector framework - It should be considered which characteristics of the work-force should be included (for diversity) - External consultancy to develop the parameters should include a review of best practice in other states, current data collection in Ireland while also shaping a framework relevant to the specifics of the Irish sector. - This needs funding and support from the key actors including government - Consider the completion of anonymous voluntary questionnaires for all audiovisual productions	Screen Ireland/ BAI / Government department / broadcasters/ IBI/ CRAOL/ Community TV/ SDGI/ SPI/ WGI Cross industry collaboration
Ensuring the availability of data on workforce in the broadcasting sector	- This can possibly be achieved via encouraging a voluntary approach of broadcasters to return this data as part of the broadcaster returns - Alternatively it can be achieved by Increasing obligations on broadcasters via licensing conditions to provide data on their workforce. - A standardised questionnaire is needed, and appropriate resources need to process the data.	Broadcasters / BAI / RTÉ/ Virgin Media TV/ IBI/ CRAOL/ Community TV
Implementation of a data collection framework	- Implementation requires large resources: Either the Media Commission is developed in the future order to accommodate this;. OR funding/ resources will be needed by the BAI – or an external body to develop and implement this	BAI/ External organisation / Government
Data on on-air diversity	- Encouraging more broadcasters to implement a 50:50 type approach to on-air diversity - Encouraging the use of new technologies to track on air diversity – and accommodate projects such as 50:50. There needs to be funding to support and develop such research	Broadcasters/ universities/ BAI

Table 3: Recommendations for future data collection

5.3 Pillar 2: Research

The second pillar of the GAP is the commitment of the BAI to support and undertake specific gender research in the audio-visual sector. The aim of this (in line with the Council of Europe Recommendation) is to promote research on gender equality in the audio-visual sector: relating to equality of access for women to the industry, including leadership roles, representation of women on-screen and on-air, obstacles to participation and general working conditions.

Two major reports were published in 2021 that addressed these issues: the *Auditing Gender and Diversity Change in Media Sectors* report; and the report *RTÉ and COVID-19 – Diversity and Inclusion and meeting public needs*. These reports were funded via the Media Research Funding Scheme of the BAI (see chapter 4). Feedback from the government Department (DTCAGM) staff revealed that the research was considered to be a very important aspect of the GAP with the two independent studies providing *"a very important contribution to the evidence base".*

From the perspective of RTÉ, as a research partner in the second report, the collaboration between the BAI, DCU and RTÉ was described as excellent and it was the important support of the BAI that made the research possible. It represented the first time that RTÉ was directly engaged in such an exercise. *"These types of research are crucial to understanding the situation and exploring the issues, and further collaboration in this space would be very welcome"* (RTÉ).

Achievement of aims under pillar 2- Research
Commitment: The BAI committed to supporting and undertaking specific gender research in the audio-visual sector.
There was very positive feedback from all stakeholders regarding the two research reports that funded by the BAI in relation to gender, diversity and inclusion issues. *Research was a very important aspect of the GAP with the two independent studies providing a very important contribution to the evidence base.*
The resources available at the BAI for research are very limited and need to cover the broad range of areas for which the regulator is responsible. Hence, much more funding is required in order to increase the levels of research in the area.

The BAI also committed to seeking partnerships with other bodies alongside standalone research.
The report that was researched and co-authored by DCU and RTÉ is a very good example of this.

The BAI also committed to the organisation or participation in debates with a view to improving policy and legislation in this area.
The achievement of this aim is confirmed by references from a broad range of stakeholders to the BAI contribution to events, discussions and consultations. The BAI contribution to debates and conferences has also contributed to raising awareness of the GAP.

Table 4: Achievement of aims under pillar 2 - Research

The BAI has also committed to the organisation or participation in debates with a view to improving policy and legislation in this area. From the 2020 Review of the GAP, it was clear that the BAI has participated in wide variety of stakeholder events, conferences, and training workshops both at a national and European level. The achievement of this aim is further confirmed by references from a broad range of stakeholders to more recent events, discussions and consultations.

5.3.1 Recommendations for future research on gender equality in the media

The National Women's Council of Ireland (NWCI) strongly feels that much more research is needed in this area – specifically the monitoring of content. They believe there should be annual reporting of the monitoring of representation of women and the BAI should have a monitoring and accountability role in this area. They understand that this would certainly require much more capacity within the organisation. Reference was made to the report on radio that the NWCI carried out with DCU and with the support of the BAI, where only a snapshot was possible. For future research proposals, the NWCI believes that examining the experiences of Traveller women's interactions with the media would be useful.

> *"An updated strategy will need to include on-screen representation and address represented stereotypes, while monitoring on some level and a lot more research will be required"* **Department (DTCAGM)**

According to the Department (DTCAGM): *"an updated strategy may need to include on-screen representation and address represented stereotypes, while monitoring on some level and a lot more research may be required".* The BAI currently has limited resources to commission research and needs to spread those resources over a broad range of policy issues (interview BAI). It is well understood by most stakeholders that the BAI has limited resources.

The issue of most concern for the NWCI is the overall representation of women, and the framing of "women's' issues" in the media – in particular with regard to discussions on the issue of violence against women. Representation of women in the media was also identified as very important by several other stakeholders (X-Pollinator, Anne O'Brien DCU, Screen Ireland, ..). It is suggested that a broader engagement with other research funding bodies and institutions is needed in order to address the research needs. Ideally a range of funders, institutes, academics and broadcasters would engage in research in this area – also complementing the research remit of the BAI.

Framing of issues and promoting a culture of tolerance and fairness in the media

A major concern is the way in which women's issues were represented in the media. It was noted that here has been a lot of discussion in civil society on the subject of violence against women, linked to the government preparation of a *National Strategy on Violence Against Women*. Examples were provided of media coverage of rape cases and "victim blaming", which can have a very negative impact on the people involved (NWCI). This discussion aligned with several comments regarding the nature of rhetoric in some sectors of the media. *"There is a need to change the nature of broadcasting with the tendency towards provocation, bear baiting and antagonism, and the BAI should provide leadership on this but to do so they also need resources"* (Anne O'Brien, NUIM).

Positive examples with regard to language and approaches included the RTÉ standards for court reporting. *"In general, the radio sector should also have a higher standard and be aware of the impact of their reporting"* (NWCI). It was noted that the National Union of Journalists (NUJ) have

developed guidelines on the reporting of these issues. It was emphasised that the media have the potential to have a positive impact but there is a need to change the way in which issues are reported (NWCI). The concept of "solutions journalism" was referenced by the Community Media

> **"Currently, the NWCI find it hard to get female ethnic community members to speak out on issues – they have had such negative expriences of being in the media".**
> **National Women's Council of Ireland**

representatives as an approach that tries to move from a focus on problems, to looking for solutions (CRAOL/ CTA). There were a number of cited examples provided of people (particularly women) from various groups who felt they had been "burned" by their experiences of dealing with the media, which

often makes it harder to find spokes-people to speak on relevant issues (NWCI, LGBTI, Irish Traveller Movement).

The Equality Expert Group stressed the importance of quality journalism from the traditional media sectors in the light of findings of European Parliament research investigating the groups that are funding hate speech and dis-information throughout Europe promoting anti-gender, anti-LGBT and anti-women rhetoric.[23] *"The traditional media has an important role to play in counteracting the hate speech, negativity and dis-information being propagated via other channels"* (EEG).

Women on air

From the discussions with stakeholders, one of the key issues with regard to women on air concerns the lack of inclusion of women in debates and discussions on political and economic

affairs and general news debates in the media (Equality Expert Group, #Whynother, NWCI, …). Research from 2015 on women's voices on radio indicated an average 70/30 male to female

> **"Regarding the role of women on screen – there appears to be some impression that only men are experts".**
> **Equality Expert Group**

percentage breakdown (on the three main stations reviewed) in discussions of politics, economics, arts and entertainment.[24] The NWCI stressed the importance of having clear definitions of genres, and the need to take account of broadcast times in the schedule when looking at female participation on air.

The recent study carried out by DCU in collaboration with RTÉ, and funded by the BAI, looked at the diversity of voices in a range of RTÉ programming during the COVID crisis.[25] The findings of the study (with regard to RTÉ) did not fully support the outside assessment that women were being side-lined in the discussions on COVID. It was noted that there was one extreme example involving a discussion panel that consisted of eight men. *"An important factor was the fact that men were occupying most of the important roles in relation to the response to the COVID-19 pandemic – in*

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[23] See for example: https://www.opendemocracy.net/en/5050/eu-dark-money-targeting-womens-rights/
24 NWCI/ DCU (2015): *Hearing Women's Voices? - Exploring women's underrepresentation in current affairs radio programming at peak listening times in Ireland.*
[25] *RTÉ and COVID-19 – Diversity and Inclusion and meeting public needs.*

terms of government officials and senior medical experts. Hence it was a challenge for the media to have more equality in terms of spokespeople and experts" (Eileen Culloty, DCU).

Another area mentioned in the context of representation is sport, whereby the Department of Justice and Equality's *National Strategy for Women and Girls* had, as a key aim, the promotion of greater visibility of women's sport in broadcast media. The coverage of female sports, and inclusion of female analysts and commentators has long been a focus TG4. RTÉ has also focused on this recently via the 20/20 project in sports (Interview TG4).

Facilitating research

There were several stakeholders who recommended developing research into diversity on air by using technology, algorithmic tools, artificial intelligence (AI) and data scraping. The Equality Expert Group mentioned the algorithmic tools being used by the Financial Times to assess the gender diversity of their own publications online.[26] A further example of this is the AI software used by the French regulator (Conseil Supérieur de l'Audiovisuel - CSA) in a study used to measure the equal treatment of women on-screen and on-air using voice recognition.[27] TG4 proposed exploring the best practice in technology including artificial intelligence which can be used to measure on screen diversity, for example to recognise names and faces.

This was echoed by Eileen Culloty (DCU) who explained that automated systems can be developed in order to scrape data from broadcaster websites on the contributors and guest appearances on programmes – to potentially gather gender breakdown and other characteristics. *"Researchers could then work with this data and the resulting studies would increase awareness among people working in media. The results could influence how media professionals approach diversity and it could have a huge impact".*

In conclusion, it is clear that there is a need for much more research in the area, and a need for more cooperation between academics, experts, NGOs, and the audiovisual industry to achieve this. The resources available at the BAI for research are limited and cover a broad range of areas. Ideally, a range of institutes, funding bodies, universities and the industry should cooperate on this.

Stakeholders have highlighted the need for research in the following areas: the representation and portrayal of women and women's issues in the media; diversity on air and the extent to which women (or other groups) are included in programming (focused on news, current affairs, debate programmes); the experience of various groups in their interactions with the media (for example Traveller women's groups; and the experiences of women working in the media sector.

Another issue that was widely discussed was the need to address the nature of media coverage (in some sectors) with the tendency towards provocation, leading to polarised and confrontational

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[26] JanetBot: Analysing gender diversity on the FT homepage: https://labs.ft.com/product/2018/11/07/janetbot.html
[27] Presentation by Sébastien Lécou, CSA (FR) for the EPRA Plenary Session 2: "Artificial Intelligence & Machine Learning" on 25 October 2019 in Athens (members only).

debates. It may be useful to examine these issues in the context of future updates of BAI codes on programming, and on fairness and impartiality. A broader approach would require cooperation with other organisations such as the national Union of Journalists (NUJ).

Recommendations on future research		
Actions	**Approach**	**Potential partnerships**
Increasing the levels of research	- Need for a much greater allocation of funding to the BAI to support research in this area	Government department/ BAI
Broader engagement in research	- Continue the BAI commitment to seek partnerships with other bodies alongside their standalone research. - Identifying other research funding bodies and institutions in order to address the research needs.	Ideally a range of funders, institutes, academics, consultants and broadcasters
Engagement with interest groups and academics to assess research needs	- Media research funding calls - Other fora of discussion on these issues	University departments, interest groups
Encourage the use of new technologies to contribute to research	- Encourage cooperation between experts to use artificial intelligence, algorithmic tools, and other technological solutions for monitoring and measuring diversity in audiovisual content.	BAI/ University media and computer science specialists/ broadcasters/ interest groups
Promote inclusive and responsible media coverage and representation of various communities and groups	- Enhance research on representation and stereotypes - Discuss with relevant partners ways in which to strengthen obligations and standards in order to reduce provocative, polarising and damaging media coverage	Universities and representative groups BAI/ NUJ/ broadcasters

Table 5: Recommendations for future research

5.4 Pillar 3: Encouraging the development of gender initiatives

The GAP includes a commitment to continue to deliver training and development initiatives, which enable women to increase their representation in the media. According to Screen Skills Ireland , *"the BAI has done great work in funding various stakeholders"* (Gareth Lee, Screen Skills Ireland). *"For training and support, the BAI involvement was vital for getting training for writers"* (e.g. the workshop *Adding to your Writer's Toolbox*) (Writers' Guild of Ireland). *"Regarding recruitment and discovering new talent, mentorship is very important and this has been helped by BAI funding"* (Screen Directors Guild of Ireland).

Focus on the creative opportunities from Sound & Vision

In the context of the development of gender initiatives, one of the approaches was a focus on the creative opportunities from Sound & Vision for addressing gender balance issues both on- and off-screen. The information on gender breakdown in proposals is used as a criterion in the application assessment process. Funding was also directed towards supporting creative initiatives.

"Women's Stories"

For Round 33 of the Sound & Vision Scheme, launched in September 2019, the BAI introduced a new initiative which put a particular focus on projects telling women's stories and it included an additional strategic criterion at assessment phase in order to encourage such applications. According to stakeholders, a significant initiative of the GAP was the specific round on applications for "women's stories", which was very much welcomed by the industry (X-Pollinator), a very good example of the work of the BAI GAP (Anne O' Brien, NUIM), and a great way of opening up opportunities (Learning Waves). *"In terms of the broader response to this specific call, and also the similar strategies of Screen Ireland there was at first a resistance in the industry where certain actors felt threatened, but there has been a shift in thinking. The impact on audience appetites are helping in this regard, as female works tend to be very successful"* (X-Pollinator).

According to Screen Producers Ireland: *"the scheme was a good idea and laudable but the roll-out of this call was a bit problematic as there was not much time to prepare as companies take months to prepare applications for the Sound & Vision funding scheme. With the introduction of this ring-fencing some people had problems to meet the criteria and held back from applying"* (Susan Kirby and Anthony Muldoon, SPI). From the perspective of the BAI, for all Sound & Vision funding rounds there is a six-month advance indication of the nature of special focus of each round. The approach did not involve a ring-fencing of funds but rather an encouragement for applications addressing women's stories (Interview BAI).

Many producers believed that there was an expectation that many female creatives were available when no structures had been put in place to develop this talent to that level. They also claimed that the requirement for a female Irish language director for the Cine 4 funding scheme was challenging as there are not enough Irish language female directors to meet the criteria (SPI).

Providing a different perspective, the Screen Directors Guild of Ireland explained that the reason why producers and writers are closer to the work of the BAI is that it is often only at a later stage that a director is brought into a project. A director, or a range of potential directors might be included

> **"In order to become a master – you only get better by actually directing". Birch Hamilton, Screen Directors Guild of Ireland**

in the application. *"For the initial funding – producers often list potential directors. In this way, the power lies with producers, many of whom claim that for some Sound & Vision projects (and also RTÉ commissions) that they cannot get female directors. They focus on the top two or three female names and say they were not available. Unfortunately, they are not always open to taking risks with younger directors"* (SDGI). The SDGI has regularly organised speed networking events between female producers and directors in order to improve connections.

From the BAI perspective, the Sound & Vision scheme is connected to the overall strategic aims of the BAI and focuses on gaps in the market. There is a need to optimise public interest outcomes from a fund that comes from the licence fee to serve audiences. In this instance the aim was also the promotion of the female narrative through the funding. Recent funding rounds have also added a criteria for projects focused on the thematic of music.[28] *"At the same time the implementation of the fund seeks to find a balance between providing a broad support for the creative sector, and addressing any gaps that may exist in the market"* (Interview BAI). From the perspective of the SPI there needs to be more clarity with regard to the aims of the initiatives. Hence there is a sense that some actors did not fully understand the aims of the funds. From discussions with stakeholders, they see the aims as: increasing gender equality in the sector; encouraging a change in thinking; building on the talent available; and providing new stories and perspectives.

TG4 were pleased with the gender approach to the Cine 4 funding requiring the engagement of more female directors and writers. As they noted: *"quotas linked to public money can address weaknesses in the system"* (TG4). This sentiment is echoed by the Writers Guild of Ireland – *"with public money you can make the rules and impose quotas to ensure the media are reflecting who we are as a society today"* (WGI).

> **"Quotas linked to public money can address weaknesses in the system". Alan Esselmont, TG4,**

For Community Media, the funding under the Sound & Vision Scheme is vital for achieving the aims of their Social Benefit roles (as outlined in chapter 4). They appreciate the fact that the BAI have simplified the applications, and also ring-fenced some funding for community media – in line with the social benefit requirement. There is some concern that the overall funds are reducing. CRAOL has supported female volunteers in their applications for the "women writing drama" fund, and one of these projects - *Petals* - won the Celtic media festival award (CRAOL).

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[28] Initiatives relating to the music completed under the Sound & Vision Scheme: a local hero musician competition, and a live music sector funding round.

According to the BAI, the funding for community media, and the example of introducing specific funding in the context of COVID-19 are both key elements of the overall aims of the Sound & Vision scheme. *"These aims try to balance the achievement of certain outcomes in terms of content, with actions that can benefit different parts of the sector"* (interview BAI).

Delivering training and development initiatives

"The X-Pollinator project (cross-pollinator)"

X-Pollinator is one of the industry initiatives that is supported by both Screen Skills and the BAI. According to Katie Holly (Project Manager): *"the BAI has been very engaged with the work on gender equality in the industry. The activities include tangible steps, measures and controls".* The third round of X-Pollinator was launched in August 2021. The first involved 140 female participants and created a very engaged community and allowed for networking between different types of professionals. A significant range of work and collaboration has emerged from this.

The second **X-Pollinator incubator** involved the development of treatment ideas with money for development and a mentoring system. Out of six ideas, four have managed to find additional funding for further development. The third phase is **X-Pollinator elevator**, and the aim is to go beyond just the issue of gender and seek the next generation of emerging talent. The idea is to incorporate up to 20 projects/ participants and this time ensure a coverage of a range of groups: from the regions, different classes, sexual orientation, race and disability.

The X-Pollinator project has been described as a great initiative for enhancing networking (SDGI, Anne O' Brien - NUIM, RTÉ, WGI, Screen Ireland), and the development of the 2nd and 3rd rounds of this project have been described as very innovative (Screen Skills Ireland).

Women on Air

Women on Air was developed in 2011 as *"a community of like-minded women and men who want to hear and see more women on the airwaves"*.[29] The organisation engages in several initiatives to support more women participating in broadcast media opportunities: via networking events with guest speakers; and high-level intensive weekend media training to enhance on-air skills. The women-on-air media database was launched in January 2021 as a *"contact list for media, of women who are ready, willing and able to participate in broadcast media opportunities"*.

The establishment of such a database is one of the recommended actions of the *Beijing Declaration and Platform for Action*: to "facilitate the compilation of a directory of women media experts." This was also included in the European Parliament resolution on gender equality in the media sector. Similar databases have been developed in Belgium, France and by the BBC, while a media diversity database was developed in Australia.[30]

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[29] Women on Air: https://womenonair.ie/about-us/
[30] Media Diversity Australia: https://www.mediadiversityaustralia.org/about/

The BAI has funded Women on Air to deliver mentorship and media training and to further develop the database. It is not yet clear whether the database is having an impact on the choice of experts in news rooms, current affairs and talk shows. It was suggested that due to the culture and speed of news production, people may not take the time to properly use these databases (Eileen Culloty, DCU). *"Programme producers on one broadcaster do not necessarily wish to use the same people as other programmes on other broadcasters and connections can be better than databases, but it is important to engage with these initiatives and see where we can help them"* (RTÉ). From the perspective of the Independent Radio sector (IBI/ Learning Waves), *" more work needs to be done to build the confidence of potential female experts, as producers find that male experts are often more quickly prepared to contribute to programmes"*. However, it is still too early to assess the impact as the database has been in existence for less than one year.

Achievement of aims under pillar 3: Encouraging the development of gender initiatives
Commitment to focus on the creative opportunities from Sound & Vision, in addressing gender balance issues both on- and off-screen.
The specific funding round on "women's Stories" and other use of the Sound & Vision funding to promote female creatives and female stories where highly praised by the industry is making a very important contribution to promoting female talent and should be continued.

There is a need to bridge the gap between the perspective of some producers that there is not enough female talent to fulfil criteria – with the perspective of female writers and directors that there is talent but that there are too many barriers and not enough willingness on the part of some producers to explore the alternatives. It is apparent that networking is a useful tool in this process, and probably also the perspectives will change over time. Some sectors of the industry do not fully understand the aims of such funding: increasing gender equality; encouraging a change in thinking; building on the available talent; and providing new stories and perspectives.

Commitment to continue working on delivering training and development initiatives which enable women to increase their representation in the media.
From the feedback of stakeholders, it is apparent that the BAI has made a very positive and real contribution to encouraging the development of gender initiatives in the industry. Specific mention was made of the X-Pollinator project, the Women on Air initiative, and support for workshops, training and networking initiatives.

The BAI have utilised a range of their funding tools (outlined in chapter 4) to advance these activities under the GAP, including the Sectoral Learning and Development funding, Network funding, and sponsorship schemes.

Table 6: Achievement of aims under pillar 3 of the GAP – encouraging development of gender initiatives

Recommendations for future initiatives

Obstacles and barriers to the advancement of women in the sector were frequently discussed by the stakeholders in the context of this review. The feedback on encouragement, sponsorship and promotion of the BAI of the range of gender initiatives to enhance this has for the most part been very positive. It is useful in this context to include the comments and perspectives of the stakeholders regarding obstacles and also any proposals for addressing these.

The Council of Europe *Recommendation on gender equality in the European audiovisual sector* cited research carried out by the European Women's Audiovisual Network,[31] which identified several barriers that prevent women from working in the industry on equal terms with men. These can be considered at three levels: relating to a lack of awareness, and/or an overall conscious or unconscious gender bias in the industry; a lack of equality of opportunity in the production/ creative industry; and a lack of equality of opportunity and decision-making power in organisations.

Some of these obstacles have also been highlighted by stakeholders with reference to the Irish media industry. According to the Writers Guild: *"there are three important questions that are relevant to female access to the production sector: who works? who has power? and whose stories get told?"* It was explained that in the UK and the USA writers often become executive producers and have more power and more decision-making possibility while in Ireland much of the work is about connections and networks (WGI).

There is concern that the process of overcoming these barriers is not progressing quickly enough. *"Currently there is too much reliance on voluntary agencies' actions that are not resourced. The process needs targets, leadership and willpower in order to reset the culture"* (EEG). The impression of the #whynother initiative is that the Irish industry (specifically radio) is often reluctant

> *"There are three important questions that are relevant to female access to the production sector: who works? who has power? and whose stories get told?".*
> **Writers Guild Ireland**

to engage in these issues. *"The regulator needs more binding powers in order to improve women's representation and this would require changes to the legislation – which will be slow"* (interview #Whynother).

For the Women in Film and Television network, they question whether the current approach is adequate to create tangible and lasting change. *"It would be sad to lose the current momentum, when it is possible to go much further. The overall impression of the WFTI organisation is that the BAI has been very engaged in this area, however, there is a sense that any future version of the GAP needs to be tighter, stronger and more specific"* (Susan Liddy, WFTI). According to the NWCI, *"the approach of the BAI to the funding and training grants is very positive but there needs to be a more structural change"* (NWCI).

Inclusive workplaces and equality of opportunity

The Broadcasting Sustainability Roadmap (see chapter 4) defined the inclusive dimension of sustainability as involving an inclusive workplace: "*encouraging the industry to create a workplace culture of respect and equality that values individuals and embraces the ability of all*".

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[31] European Women's Audiovisual Network: *Where are the women directors in European films? Gender equality report on female directors (2006-2013)* https://www.ewawomen.com/research/

This was also emphasised in the discussions with Ofcom, where after five years of work in the area, there is a switch from thinking about diversity to focusing on inclusion - and the equality of opportunity within the organisations. An example was provided regarding the overall gender balance in the UK, which over the last five years has been good, but the levels for senior management are lower, and many women have recently left media jobs. *"Inclusion for Ofcom is now the focus on development, promotion and retention of staff"* (Cathy Taylor, Ofcom).

"Some things have moved forward for writers/ directors and producers but not much has improved for other crew members – such as Director of Photography professionals. A range of people are trying to move up and they cannot, as producers keep going back to the same few people (WFTI).

Women writers also face obstacles in mid-career development. While there is a focus on supporting new talent, it needs to be borne in mind that women in their mid-careers often face a glass ceiling: *"They may have worked in dramas or soaps but are not getting the chance to move up and write for features. Mid-career also is the time where women have child care and caring responsibilities, hence there are many obstacles in the industry for mothers"* (WGI). *"There is an extent to which there needs to be a reinvention of the nature of work in the sector - flexible hours and working from home"* (Anne O' Brien, NUIM). *"Journalism presents particular challenges for women. There is little possibility of flexible work and at the same time major difficulties with regard to access to full time contracts, or promotions"* (Equality Expert Group).

As was noted earlier, many producers have claimed they cannot get women directors (SPI), while others believe that producers are not always open to taking risks with younger directors (SDGI). Feedback from the interviews, suggest that women directors are frequently told that they cannot develop a particular project as there is no market. At the same time, the success of many recent TV series and films show that audiovisual works where protagonists are women, and those with stories focused on women, are very popular. *"It is important to question who chooses directors, and what they are saying about the markets when they claim that certain projects led by women will not be successful"* (SDGI).

Media organisations are aware of the BAI GAP and also aware of the need for a gender equality and diversity and inclusion policies. *"An important aspect of this is the realisation of the importance of diversity as a business case, as well as a growing social justice approach"* (Anne O'Brien). The Equality Expert Group emphasised that: *"the media have the opportunity to satisfy and increase audiences – to broaden their base, broaden their audiences and be relevant".* The EEG suggested that it may be useful to consider that commercial radio and TV tax incentives could also be introduced to innovate change in those sectors (EEG).

Proposals to enhance the Sound & Vision funding included having development funding (WGI), and increasing experience for writers and directors via mentorships – with concrete placements and shadowing of experienced directors and writers (WGI, SDGI). *"In this context an RTÉ*

mentorship would be very useful for women directors" (SDGI). *"The possibility to contribute (as writers or directors) to seasons of successful TV dramas would also be very useful"* (WGI).

Screen Ireland has created some bonuses for talent uplift, similar to the Swedish Film institute that awards bonuses. This is a reaction to the fact that projects led by women often have lower budgets, and this could be an added element of the Sound & Vision funding (X-Pollinator). The SDGI also suggested that where projects are rewarded for the inclusion of female key creatives, that there should be a weighting on directors and writers as not all roles are equal, with regard to providing a female perspective or lens (SDGI).

Mapping initiatives and encouraging best practice

Following discussions with Ofcom it was clarified that the UK regulator has no statutory role in promoting initiatives to develop equality, inclusion and diversity, but they do gather qualitative data on what the broadcasters have done. *"This is part of the reporting process of broadcasters. This process has been useful to pinpoint successful approaches and serves to encourage people to evaluate their initiatives - where do you focus, what was a success, what did not work, etc"* (Ofcom). This gathering of information on what broadcasters are doing in the area of promoting and developing equality, inclusion and diversity may be a useful approach for the BAI.

Recommendations on future gender initiatives		
Actions	**Approach**	**Potential partnerships**
Continuing activities via Sound & Vision funding	- Further funding rounds focused on women creatives or narratives relating to women's stories	BAI
Promoting inclusive workplaces	- For broadcasters, as part of their broadcaster reporting to indicate "inclusion" in terms of development, promotion and retention of staff	BAI / broadcasters
Improving the status of women on air	- Encouraging use of the Women on Air database	Women on Air / BAI / broadcasters
Developing mentorship schemes	- Encouraging broadcasters (e.g. RTÉ) to develop mentorship schemes for women directors/ writers. - This could also be applied to other crew members - This could be facilitated via the content commissioning of the broadcasters	Broadcasters / BAI/ Learning Waves/ Screen Skills
Encouraging mentorships and contributing writers / directors on TV series	- The provision of mentorships or the engagement of additional women writers/ directors in TV Drama series could be ensured via conditions on funding. Or via tax incentives for broadcasting or film sectors	BAI/ Screen Ireland
Mapping initiatives throughout the industry	- Gathering of information on broadcaster and production sector initiatives to promote equality, inclusion and diversity	BAI/ Screen Ireland / Screen Skills / Learning Waves/ Guilds/ Broadcasters

Table 7: Recommendations for future gender initiatives

5.5 Pillar 4: Enhancing accountability processes

Under the fourth pillar, the BAI commits to enhancing accountability of their actions under the GAP. This is achieved via (in summary): the publication of a BAI Gender Action Plan, and regular reporting, publication and monitoring of initiatives and actions undertaken to promote gender equality; and the promotion, publishing and evaluation of initiatives; seeking partnership opportunities with key players such as other public bodies, other funders, broadcasters and other representative bodies in order to further enhance accountability across the industry; assessments of the implementation and effectiveness of the Gender Action Plan within Annual Reports.

Regarding the publication of the GAP and the promotion and publication of initiatives and actions, a significant number of stakeholders had high levels of awareness of the GAP, its initiatives and its actions (SDGI, SPI, Screen Ireland, Screen Skills Ireland, WGI, X-Pollinator, WIFT).

Some of the stakeholders noted that they were not so well aware of the actions being taken by the BAI under the GAP. As a range of interviews were conducted with representative organisations and statutory bodies working with diverse and under-represented communities across a broad range of rights and equality issues (such as LGBTI, the Irish Traveller Movement, and the National Disability Authority), this was not so surprising.

The BAI, through engagement in conferences, workshops and training programmes have disseminated the results of these initiatives. An example was provided where the Sound & Vision application data was presented during a journalism graduate training programme of the independent radio sector, and the data was considered to be very interesting and valuable (Learning Waves).

From the perspective of RTÉ, there was strong awareness of the Women on Air database, the Sound & Vision funding scheme, and the research projects. There was less knowledge of the data and statistics collected by the BAI via the Sound & Vision scheme outlining the key roles on production etc. This information was noted for the first time when reading the 2020 review of the GAP. Virgin Media TV stated that they have not been so aware of programmes and initiatives carried out by the BAI and it would be useful to find a way to better engage with these initiatives.

It was suggested that there should be even more communication activity with regard to these initiatives. *"The report (2020 review) was very clear, but perhaps needed further communication beyond the press release. With regard to the study completed with DCU and RTÉ, this did have a great follow-up in the press with several newspaper articles picking up on the report. RTÉ recognises the important work that the regulator is carrying out in bridging the gap between the regulator and the public, and educating communities about their work"* (RTÉ).

Several interviewees took a broader perspective on the nature of accountability processes with regard to the promotion of equality, diversity and inclusion. According to the Equality Experts

Group, *"there needs to be accountability and visibility in these fields from all relevant state actors and state funding bodies"* (EEG). *"While it is recognised that everything cannot be changed overnight, there is a strong need for more transparency and accountability from the broadcasting and production sectors on these issues"* (WFTI). As regards recommendations in this area, the only question raised was the extent to which the broader industry was also enhancing their accountability in the context of the GAP.

> *"The overall impression is that the BAI has been very engaged in this area, however, there is a sense that any future version of the GAP needs to be tighter, stronger and more specific" (WFTI)*

Achievement of aims under pillar 4 - enhancing accountability processes

Commitments:

publication of a BAI Gender Action Plan, and regular reporting, publication and monitoring of initiatives and actions;

the promotion, publishing and evaluation of initiatives;

seeking partnership opportunities with key players in order to further enhance accountability across the industry;

assessments of the implementation and effectiveness of the Gender Action Plan within Annual Reports.

There is a strong awareness of the Gender Action Plan among stakeholders, particularly the audiovisual production sector and the various industry women's groups and specific initiatives. Some stakeholders (broadcasters) were less aware of the GAP – or more aware of certain aspects rather than others. This awareness is often dependent on direct engagement with specific elements (Sound & Vision, Women on Air, data collection, conferences and workshops, research etc).

The BAI have been very proactive is raising awareness via PR, communication and dissemination of results. Still there are suggestions that even more awareness is needed throughout the industry.

The publishing and evaluation of initiatives has been achieved via the GAP Review of 2020 ,and through the publication of details of the GAP projects in the BAI Annual Reports. In addition. The current review includes this broad stakeholder feedback exercise as part of the evaluation process.

Several stakeholders took a broader perspective on the nature of accountability processes stating that all relevant state actors, state funding bodies and broadcasters should be more accountable. This relates in a sense to the BAI commitment to seeking partnership opportunities with key players in order to further enhance accountability across the industry.

Table 8: Achievement of aims under pillar 4 of the GAP – enhancing accountability processes

6 Stakeholder views on Diversity and Inclusion

6.1 Defining diversity

In what way can we define the concept of diversity in Ireland? The need for a clearer and more precise understanding of the concepts of diversity and inclusion was mentioned by many of the stakeholders (Screen Skills Ireland, Screen Producers Ireland, Virgin Media TV, Screen Ireland). *"Such definitions and understandings of diversity and inclusion should represent a whole industry approach and be genuinely embedded in strategies"* (Screen Producers Ireland).

Several respondents to the stakeholder review referred to the nine grounds of discrimination listed under the Equal Status Acts, 2000-2018, which prohibits discrimination in the provision of goods and services, accommodation and education (see chapter 7). The nine grounds are gender, marital

> *"Definitions and understandings of diversity and inclusion should represent a whole industry approach and be genuinely embedded in strategies"*
> *Screen Producers Ireland*

status, family status, age, disability, sexual orientation, race, religion, and membership of the Traveller community. It is clear therefore that a more diverse media which reflects modern Irish society should include groups related to these grounds. It is also important to consider the current review of the acts in relation to gender, and disability and the potential

addition of the ground of socio-economic discrimination (see more detail in chapter 7).

In the *Auditing Gender and Diversity Change in Irish Media Sectors* report, several interviewees highlighted socio-economic background as being a barrier to access to the media industries. The report also indicated that the *BBC Diversity Commissioning Code of Practice* includes socio-economic background as an area in its focus on diversity. The Irish audiovisual sectors were frequently referred to as being "white and middle class networks." The aspect of socio-economic diversity is a key issue for a range of stakeholders (RTÉ, Screen Ireland, Virgin Media TV, Screen Directors Guild Ireland, Screen Producers Ireland, Irish Travellers Movement, Animation Ireland, Women in Film and Television …). However, providing a measurement of socio-economic diversity would be quite a challenge. In the UK, certain questions are used which may have much less relevance in an Irish context – such as *"Did you attend a public or a private school?"* (Ofcom interview). The aim of opening up the sector to more people from diverse socio-economic backgrounds is discussed further below.

Socio-economic disadvantage will often be the reality for many other under-represented groups such as minority ethnic groups and the Irish Travelling Community, and may also impact people with disabilities and other marginalised groups.

The RTÉ/ DCU report highlighted the perspectives of several key RTÉ decision-makers in terms of definitions of diversity: *"class was identified as a foundational and cross-cutting category that*

shapes social inequality. A number of interviewees also argued for a definition that includes diversity of perspectives." [32]

Regional diversity has been cited as another key issue. According to TG4, regional diversity is a key aspect of their work. Regionalism and localism are also key elements of the work of much of the radio and community media sectors (Craol/ CTA and IBI). Connecting with regions or producing content in the regions is increasingly tied into production funding (for example in the tax incentive 481), and the work of Screen Ireland and Screen Skills Ireland (for example via crew development hubs, further discussed below).

The key RTÉ decision-makers interviewed in the DCU/ RTÉ research report (mentioned above) described the importance of diversity and inclusion in three ways: *RTÉ's duty to reflect the changing nature of Irish society; a practical need to engage younger and more diverse audiences; and a responsibility to champion diversity in Irish society.*[33]

6.2 Understanding inclusion

It is useful to consider "inclusion" in several ways. The media and audiovisual sector represents a specific industry – not only as employers – but also as a sector that entertains, informs, educates and has the power to positively influence public attitudes and perceptions. The Sustainability Roadmap of the BAI refers to inclusive workplaces: inclusive programming: and inclusive and safe access to content. These categories are also relevant to the discussions held with stakeholders.

Inclusive workplaces

Inclusive industries are frequently considered to be those which include a diverse range of people in the sector as employees. There should be a fair opportunity to access the necessary training, education, job opportunities, employment and promotion in these sectors, by engaging with and training youth, potential new talent from a diversity of backgrounds (all stakeholders), and other under-represented groups (CRAOL/ CTA), and by inviting them into the workplace to visit, observe, or take part via training (RTÉ), by organising talent days or open days (Project Open Opportunity), and by supporting internships, apprenticeships, mentorships, and specific programming schemes (all stakeholders).

As outlined above, the discussions with Ofcom highlighted that the important focus in their work is inclusion: on the development, promotion and retention of staff. This has been discussed in more detail above in relation to the GAP. Another key issue is ensuring workplaces are inclusive and promote tolerance. This can be achieved via awareness training (Edward Crean, National Diversity Authority – NDA; Paula Fagan, LGBTI; and Jacinta Brack, Irish Traveller Movement - ITM), by ensuring that there is zero tolerance for harassment or bullying (EEG), and by providing leadership

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[32] *RTÉ and COVID-19 – Diversity and Inclusion and meeting public needs.*
[33] *RTÉ and COVID-19 – Diversity and Inclusion and meeting public needs.*

via Diversity and Inclusion Leads, Champions or Committees (see further below). Some examples of such initiatives are being funded by the BAI under its Network Funding programme.

Inclusive content

Inclusion implies having a diverse range of people in the sector who can have an influence on content whether as creators, directors, writers or editors. This can lead to new stories and perspectives that reflect this diversity. An emphasis was also placed on the mainstreaming of diverse members of society within content as this can influence perceptions and attitudes of audiences (NDA, LGBTI, ITM). There is a need to include a diverse range of people in reporting, journalism and as experts on air in order to ensure that all voices have a fair chance of being part of debates that influence policy and the development of society (NDA, LGBTI). Stakeholders emphasised the need for an inclusive approach to journalism, reporting, language and content development. This includes engagement with particular groups and their communities via individuals or representative organisations (NDA, LGBTI, ITM).

Another important element of inclusion relates to how under-represented or marginalised communities are served by the media. The Community Media stakeholders placed an emphasis on this as being central to their purpose and reflecting their obligation of social benefit. Over the years, they have engaged with a broad number of marginalised and isolated communities including older people, people in Direct Provision, and former offenders - in the areas of outreach, training and programme production (CRAOL/ CTA).

> *"Many people have come closer to understanding what it means to be isolated following the COVID-19 lockdowns"*
> *National Disability Authority*

The Independent Radio Sector (IBI) also referred to the key role of radio in connecting with people. The possibility to avail of additional funds during the Covid-19 pandemic, via the Sound & Vision Covid-19 funds introduced to raise awareness via information programmes on radio, gave many radio stations an opportunity to contribute to the public good. The content produced included: regular medical slots; programmes focusing on older people; discussions on finance; and discussions on mental health (Interview, IBI).

Responsible media coverage and representation of various communities and groups

As discussed above (chapter five), there is a need for a responsible approach to media coverage and content (in some sectors) that ensures that representatives of communities and individuals are treated with respect (CRAOL, NWCI, LGBTI, ITM). This can be promoted via awareness training and also by guidance and standards in journalism and programmes (NDA, LGBTI, ITM). It was considered very important that the output of the media in their programming, and of the production sector in their content should contribute to the overall inclusion, acceptance and tolerance of the diverse members of society in Ireland (NDA, LGBTI, ITM). The issue of representation is discussed in more detail below.

Accessibility

Inclusion, from the perspective of the NDA, also relates to accessibility. *"The BAI work in this area is very important, and it is important that Irish Sign Language (ISL) signing is included"* (TG4). The NDA notes that much of the ISL programming tends to be marginalised in the schedules. *"A silver lining of the Covid-19 pandemic was that all Government public briefings included sign language and the practice has stayed in many areas"*. The NDA also emphasised the need for public bodies to include services such as Irish Sign Language in their communications, to address issues of web accessibility, and to ensure that diverse groups can participate in public consultations. This is an area that the BAI have taken on board, ensuring that, where possible, ISL and live captioning are now key elements of BAI online events (interview BAI).

6.3 Discussions on issues of representation

A range of stakeholders emphasised that representation, portrayal and the way in which the media deal with topics related to certain groups were key issues with regard to diversity and inclusion.

From the perspective of the LGBT community: *"things have moved on and the visibility and representation of people in the community is more positive. Great work has been done in TV drama on the normalisation of lesbian and gay characters (for example on Fair City)"* (LGBTI). According to the NDA, RTÉ disability programming was once very useful, when for example, there used to be a radio programme called "Hands On" but this has unfortunately disappeared. In their opinion, there is little mainstream engagement with issues of disability if it does not affect people directly.

According to the interview with LGBTI, a very challenging area is the representation of transgender people, where very little is positive. It was explained that there is a hugely problematic polarised debate in the UK which is seeping into the Irish media on this issue. An analysis by LGBTI of letters to the Irish Times found an overwhelmingly negative narrative on this

> *"News desks are becoming more professional and handling things better – it is in the talk show debates that things unravel"* LGBTI

issue being picked up by certain radio presenters leading to sensualisation, polarisation and a divisive narrative. *"News desks are becoming more professional and handling things better (particularly RTÉ news pieces). It is in the talk show debates that things unravel"* (LGBTI).

Broadcasters have addressed the fairness and balance requirements in the BAI code relating to fairness, objectivity and impartiality[34], often by using a self-regulatory 50/50 gender approach to debates on political issues. According to Paula Fagan, this may not always ensure a balanced approach to specific issues, for example in the context of debates surrounding the referendum on marriage equality. A 50% representation of women on panels does not always guarantee a fair

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[34] BAI: Code of Fairness, Objectivity & Impartiality

debate on certain issues and the media should consider how to ensure that the 50/50 approach is inclusive (LGBTI).

As noted earlier (chapter 5), there are many examples provided of people from various groups who feel they had been "burned" by their experiences of dealing with the media (NWCI, LGBTI, ITM). *"Several radio stations, and programmes, profile Traveller related stories through a negative narrative inciting listeners to comment and engage in debate and concerns have been raised with specific stations and programme producers to no avail"* (ITM).

It is worth reiterating the Equality Expert Group emphasis on the importance of quality journalism from the traditional media sectors in counteracting the hate speech, negativity and dis-information being propagated via other channels (in particular online) (EEG). In this context, it is notable that a current consultation on a *National Action Plan Against Racism* (see chapter 7) asks questions on how to tackle racism in new and more traditional forms of media, and what actions would help to make broadcast media and the press more representative of everyone living in Ireland.[35]

The BAI Code of Programme Standards addresses many of these issues under Principle 5: Respect for Persons and Groups in Society, which states: *The manner in which persons and groups in society are represented shall be appropriate and justifiable and shall not prejudice respect for human dignity. Robust debate is permissible as is the challenging of assumptions but programme material shall not stigmatise, support or condone discrimination or incite hatred against persons or groups in society in particular on the basis of age, gender, marital status, membership of the Traveller community, family status, sexual orientation, disability, race, nationality, ethnicity or religion.[36]*

According to feedback from the National Disability Authority, some of the common issues with representation of people with disabilities remain: *"people with disabilities are rarely visible in drama and often they are played by able-bodied people; documentaries continue to focus on the "victims" or the "superheroes" – as is the case with the Paralympics".* The NDA understands there is a historic context for this as the media are afraid to present people with disabilities in negative roles – *"there is an ingrained fear of offending and also a lack of knowledge regarding the issues"* (NDA). *"In the media there is some fear of doing or saying the wrong thing, and uncertainty about labelling or what label should be used, which may lead to a lack of inclusion of certain people. It may take another decade before these issues are resolved".* (Eileen Culloty, DCU). Several stakeholders noted that language and changing terminology can still be complex (Animation Ireland and TG4), and the representative groups also understand this to be the case (LGBTI, NDA).

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[35] Department of Children, Equality, Disability, Integration and Youth - National Anti- Racism Committee's Consultation on a National Action Plan Against Racism
[36] BAI Code of Programme Standards: https://www.bai.ie/en/download/128555/

Many organisations try to contribute to the improvement of representation. For example, LGBTI are launching a campaign with journalists – both from press and broadcasting - in order to: encourage responsible broadcasting; counter a lack of awareness; and address the lack of understanding of the issues. The NDA has developed language guidance and they promote mainstreaming of services.

The Animation industry has been identified as a creative area that can contribute to diversity and positive representations. Several innovative animation series have been created: *Pablo*, that features the main character who has autism; another – *Punky* - with a child with Down Syndrome voicing the animation character; and the Kavaleer project - *Adam Loves Adventures* - a pre-school adventure comedy series set in outer space - featuring a wheel chair user as

> *"Kids TV is often the best, and the most inclusive"* **LGBTI**

protagonist. This is part of mainstreaming diversity in the presentation of characters in animation series (interview with Ronan McCabe, Animation Ireland). McCabe also stressed that: *"in relation to creativity and story-telling, there are broader possibilities - it is not always necessary to write a script as recorded story-telling can be created and submitted for consideration"*.

6.4 Data collection and research on diversity

Work force data collection

Approaches to the assessment of the diversity of the workforce of the media organisations, should according to the Department (DTACGSM) operate in the GDPR context. In relation to the challenge of collecting data and issues of privacy, certain stakeholders were asked about the potential concerns regarding the privacy of people in under-represented groups responding to industry questionnaires. In discussions with the Irish Traveller Movement on the issue of privacy and self-identification, reference was made to the concept of a "unified ethnic identifier", which was used in the last two census counts in Ireland: *"This "unified ethnic identifier" should be applied in all schemes and action plans. For all public institutions, there is a duty to collect data and monitor in relation to strategies and policies".* (ITM). There was agreement that it is important to gather the data, while recognising that people may not always want to answer. Reference was made to the significant work carried out in the health sector dealing with this issue with the use of "blanket gender markers" (LGBTI).

One could conclude from these responses that the relevant representative organisations may hold some of the answers as to how to approach data collection on the diversity of work-forces – and should therefore be key players in the development of any data collection frameworks.

According to research from the Irish Human Rights and Equality Commission ("IHREC"): *"It is well documented that during the past two decades Ireland has become an increasingly diverse country. The 2016 Census indicates that the 535,475 non-Irish nationals living in Ireland originate from 200*

different nations."[37] Discussions with the National Disability Authority revealed that 13% of Irish people identify as having disabilities which may be acquired, are due to aging, or are from birth (NDA). In reference to equitable diverse and inclusive work environments in the Public Sector (as under the Public Sector Duty), this would include RTÉ or any organisation receiving government funding. Regarding employment, between 3 and 6% of employees in the public sector should be people with disabilities (NDA).

From the perspective of the LGBT community, *"if 8 -10% of the workforce is not LGBT then there is something not right or there is work to be done"* (LGBTI). According to the ITM, there are 50 000 members of the Travelling Community in Ireland, of which 60% are under 25. The ITM recognises that any potential quota system would need to examine these figures in relative terms (ITM). As noted earlier, there is currently no available data with which to assess whether or not the audiovisual sector is representative in these ways.

It is useful to reiterate some of the conclusions from the broad discussions on data collection that were outlined earlier (chapter 5). It is generally accepted that some form of data collection framework needs to be established – and that this requires a lot more thinking in relation to its potential design and management and the need for a cross-sector collaboration in this process.

Research on diversity

As with the promotion of gender equality in the sector, diversity and inclusion policies need to be informed by research. The National Disability Authority referenced a report carried out with the BAI in 2009 on representation of people with disabilities on Irish Broadcasting. This led to the establishment of a working group committee to prepare guidelines to improve portrayal. *"Although these guidelines were voluntary, they were still watered down - and the document became more of a statement of intent, which was never really implemented"* (NDA). This indicates how research can directly play into the development of policy, however from the perspective of the NDA the voluntary approach of the policy was not effective.

LGBTI have frequently used anonymous surveys with their members. However, they also believe that it is also useful to have more qualitative data – and not just numbers (LGBTI). It was stressed that the BAI should speak with under-represented groups (NDA, LGBTI, ITM). Proposals for future types of research included: research on mapping diversity in the sector, across commissions and independent companies, and all broadcasters; research on sectors most affected and seeking the view of underrepresented groups; research, across the broadcasting sector of minorities working within those sectors and also in a qualitative fashion in order to understand their experiences (ITM). Some other areas that could be the subject of research (as noted above in chapter 5) include: the

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[37] IHREC (March 2018): *Attitudes to Diversity in Ireland*
https://www.ihrec.ie/app/uploads/2018/03/Attitudes-to-diversity-in-Ireland.pdf

experiences of various groups in their interactions with the media – for example for Traveller women's groups (NWCI).

In discussions on facilitating research in relation to the GAP (see also chapter five), there were a range of stakeholders who recommended the use of technology to monitor on-screen diversity. Artificial Intelligence (AI), algorithms and automated data gathering systems can be used to measure on screen diversity, to recognise names and faces. (TG4, Eileen Culloty, Equality Expert Group). Both the DCU computer science department, and also the University of Limerick IT department have shown an interest on working on this kind of research. An emphasis was placed on the potential for studies based on this data to have a major impact on how media professionals address the issue of diversity (Eileen Culloty, DCU).

6.5 Funding of content

Regarding funding for productions, and having looked at the types of actions under the Gender Action Plan, several stakeholders referred to the issue of funding of content. In reference to the *Auditing Gender and Diversity* study, the information on the use of diversity standards stood out as being key for some stakeholders. *"These could be used in funding schemes and also by RTÉ who could apply diversity standards in relation to their commissioning of independent productions"* (ITM). *"The area of commissioning could be used to influence who gets employed by the independent companies, with for example requirements to include a paid internship role which, although not a sustainable position, provides an opportunity for experience"* (Anne O' Brien, NUIM).

According to Gareth Lee (Screen Skills Ireland) representation in the industry and on-screen can be addressed via regulation to a certain extent but he also believes that funding is very important. The British Film Institute's (BFI) Diversity Standards require film productions to include underrepresented groups in a range of film roles and positions.[38]

 "It is also important to try and learn from the good practice of other countries. There have been mixed reactions to the BFI approach but they are also further along in the work of D & I. If standards are introduced then there needs to be some recognition within co-productions that other countries may have different standards – there may need to be agreements to adhere to the local standards in the context of a project" (Screen Skills Ireland).

The National Disability Authority expressed support for the ring-fencing funds for certain types of programming. *"This could be a way of engaging and involving people with disabilities behind the scene in writing or producing in order to help shape the narrative. A similar approach could also*

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[38] British Film Institute (2019): BFI Diversity Standards Criteria https://core-cms.bfi.org.uk/media/89/download

be taken by Screen Ireland in their funding. The Sound & Vision incentivisation to promote gender equality could also be used in relation to diversity" (NDA).

There are also proposals that the Sound & Vision scheme directly replicate the approach taken for gender: *"the application form could be amended to enable the collection of ethnic data on the creative roles of Producer, Director and Writer; applicants for funding should outline the ethnicity and other diversity options of these three creative roles at application stage"* (ITM).

Several stakeholders also noted that the availability of qualified people from diverse backgrounds or from specific communities to work in the production sector may not yet be well developed. Hence, diversity requirements for key creative professionals may be difficult to fulfil. Attaching requirements in the form of training, apprenticeships or internships may be more appropriate in relation to certain groups.

The BAI explained that the Sound & Vision fund already addresses the issues of diversity and inclusion in the selection of projects – they look at content as well as who is working behind the screen. There are a range of programmes being funded that encapsulate the key aims of diversity and inclusion in terms of content and reflection of Irish society. The scheme could be further adjusted in terms of strategies and resources if this was decided by the Department. The scheme is open and responsive to any such changes. As noted earlier, the Sound & Vision is linked to the strategic aims of the BAI, and will therefore contribute to the promotion of equality, diversity and inclusion.

In this context, reference was also made to the proposals of Lenny Henry[39] to use a tax incentive (ITM). The idea of using tax incentives, particularly with regard to commercial media was also touched on by the Equality Expert Group: *"commercial radio and TV tax incentives could also be introduced to innovate change"* (EEG). From the perspective of Screen Skills Ireland, the 481 tax credit could also be used to increase diversity and bring new people into the industry. Katie Holly (Blinder Films) also referenced the tax incentive and screen skills tax credit, which could contribute to the areas of regular training, sustainability, and gender, diversity and inclusion, while the Screen Ireland funds could

> **"The government and BAI could manage a fund to cover environmental issues, diversity issues and address negative stereotypes. There should be proposals to address these issues, which just needs imagination and some financial resources" John Purcell, Independent Broadcasters of Ireland**

also add some of these diversity standards. The experience of the radio sector with regard to the Sound & Vision Covid-19 funding led to the suggestion that this should be an ongoing approach for programming and should be a model for the Department, and that such funding can come with

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[39] BBC News website, 6 November 2018: *Sir Lenny Henry calls for TV and film tax break to boost diversity* https://www.bbc.com/news/46101341

parameters and requirements. *"The government and BAI could manage a fund to cover environmental issues, diversity issues and address negative stereotypes. There should be proposals to address these issues and resources to do this, which just needs imagination and some financial resources"* (IBI).

An interesting question was raised by Screen Skills Ireland: *"is it worth having focused schemes on certain groups and communities – or is it better to develop mainstreaming. And how do you do this"* (Gareth Lee). From the discussions with stakeholders, it became clear that both approaches are necessary. On the one hand there is a need for groups and communities to have the opportunities to tell their stories, be involved in the creative area, and consulted in the development of stories and characters (NDA, LGBTI, ITM). On the other hand there is a desire to see mainstreaming of diverse characters in order to influence the overall acceptance and mainstreaming in society (drama, film and entertainment are useful genres for this). As noted above the NDA promote mainstreaming. In the discussions with Paula Fagan of LGBTI, she noted that the top of their wish-list is to normalise the inclusion in society of their community. From the perspective of the ITM, the greatest scope for future work from the BAI is in the reflection of diversity.

> **"From the perspective of the ITM, the greatest scope for future work from the BAI is in the reflection of diversity"**
> **Jacinta Brack, Irish Traveller Movement**
>
> **"For LGBTI, the top of their wish-list is to normalise the inclusion in society of their community".**
> **Paula Fagan, LGBTI**

In relation to Sound & Vision, Virgin Media TV are frequently engaged in these funds and usually with the production of a big drama and several smaller projects. They are considering other options in the future regarding the funding. *"The aim would be to collaborate more with smaller companies on smaller projects, which may contribute more to achieving the Sound & Vision goals. This would help to increase audience access to such content and support indigenous drama"* (VMTV).

Other potential initiatives

According to the National Disability Authority there were, in the past, ideas discussed with the BAI to develop an expert database – similar to the WOA database – more specifically for radio. *"This would open the possibility for people with disabilities, who are experts in a range of fields to contribute to public debate on issues aside from only those related to disability. There was also a guidance on appropriate language – that could be shared with people like screen producers – recognising that language can be very personal"* (NDA).

The idea of a Diversity on Air database was also suggested in discussions with the Irish Traveller Movement. For LGBTI, there was also agreement that this would be very useful and they also questioned whether there should be a consideration of the diversity of the women on air database.

The goal for their organisation would be having people from the LGBT community involved in media debates as experts in their own rights – and not just to discuss LGBT issues (LGBTI).

These discussions indicated that under-represented or minority groups need inclusion in the media sector not only for discussion of specific themes relevant to their specific communities, but also as potential experts in a broad range of issues under discussion in the media.

6.6 Internal actions in the industry to promote diversity and inclusion

According to one academic expert, and in reference to the research for the *Auditing Gender and Diversity Change* report, the awareness of the need for action in this area cuts across all areas of the industry. *"The message being that they want to do something – but they don't know what to do and in some cases they are afraid to do the wrong thing. There is certainly a sense that people are looking for guiding principles or some core tenets. There is an expectation that these would come from the BAI"* (Anne O' Brien, NUIM).

> **"Inclusion work is hard and it cannot happen overnight. It requires more nuance than people think and resources are key: people, money and technology. Representation on-screen can move more quickly – while representation off-screen will move more slowly"**
> **Zbyszek Zalinski RTÉ**

Diversity and inclusion plans, strategies and leadership

In the first instance, *"having an action plan shows a recognition that steps are needed"* (Eileen Culloty, DCU). RTÉ published its Diversity and Inclusion Policy in 2018. From discussions with TG4, they explained that their Board has approved a new diversity and inclusion policy, the aim being that this policy is not just about words – but "living the words" (TG4). Virgin Media Television operates under the Diversity and Inclusion policy of Liberty Global (VMTV).

Screen Producers Ireland is developing its own strategy regarding diversity, equality and inclusion. *"This will be reflected across the whole organisation, in its approach to membership as well as via work on these issues across the sector".* The SPI board has four committees including a recently created committee on Diversity, Equality and Inclusion, which is working on a strategy. They plan a survey among members to identify positive approaches and also common challenges.

In the UK, all the broadcasters have established diversity and inclusions leads, and there is now an industry round-table of these diversity leads. They exchange information and best practice, which has developed over the last 5 years. Dedicated Diversity and Inclusion (D and I) leads tend to be senior people working across the whole organisation. They are frequently working on both off-screen and on-screen approaches. *"This is a softer approach – encouraging evaluation and collaboration"* (Interview, Ofcom).

The RTÉ appointment of a D and I officer lead has been identified as a very good example, and it has been suggested that if this position existed in all the major organisations they could work together. *"Diversity and inclusion could be carved out as an area of collaboration rather than*

competition. A great example of such collaboration was the "shine a light" event, where events were covered across all broadcasters, and in all regions on TV and radio". (Eileen Culloty, DCU).

TG4 have created a Champions Forum within the organisation – with one representative from each department (15 people). They have three pillars of work in three working groups created to brain-

> **"Diversity and inclusion could be carved out as an area of collaboration rather than competition"**
> **Eileen Culloty (DCU)**

storm ideas and discuss what steps in 2022 are feasible and reasonable. One of the working groups focuses on staff and staffing , focusing on the question - *"how are we a mirror to society?"* The Community Media sector are also reviewing their approaches to equality and diversity. In CRAOL, they

plan to create "champions" in the organisation to champion different groups in society (CRAOL).

The commercial radio sector via Learning Waves have recently completed a survey of all CEOs of their member broadcasters to understand their perspectives on diversity and inclusion: what they are doing; their procedures, supports and barriers. The survey has also asked these CEOs to consider how they reflect the audience in their programming – in particular in relation to current affairs, contributors and experts (Learning Waves). This is in the context of their work with the Irish Centre for Diversity,[40] The process will involve developing a toolkit, identifying a D and I lead in each station and training them, organising a network of these people, creating structures, training and support, and trying to measure the impact of this (Learning Waves).

The BAI also recommend that other organisations enagage with projects such as those run by the Irish Centre for Diversity (or other similar organsations), with the aim of obtaining the Equality, Diversity and Inclusion (EDI) mark - a certification for Irish businesses. Internally, the BAI have also launched this procedure. Another approach to developing equality, diversity and inclusion is the so-called the "Equity Sequence", a system being used by Liberty Global (parent company of Virgin Media TV). The approach involves: *"a research-backed set of 5 equity-focused questions that can be applied to any key decision (product, process, event, content, system, program, etc.) to reduce bias and make it more inclusive and equitable".[41]*

Staff networks and internal training

Ofcom has also strongly encouraged the development of staff networks, which are employee resource groups. Ofcom encourages these groups to connect with similar networks in other organisations. *"These networks proved to be very useful during the Covid-19 pandemic for*

management to touch base with staff. They are also very useful in the development of D and I policy" (Ofcom). LGBTI is engaged in developing staff networks, and one was established in RTÉ in 2019

> **"***the important fundamental issue is to know your workforce and admit openly where you stand"***
> **Ofcom**

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[40] Irish Centre for Diversity : https://irishcentrefordiversity.ie/
[41] See: https://www.tidalequality.com/equity-sequence

just before the Covid-19 pandemic. *"The purpose of such networks is to provide networking, events, positive support, and celebrations within the workforce – promoting a very meaningful experience of inclusion"* (LGBTI).

Internal training such as diversity and inclusion education and awareness are being provided within many organisations (RTÉ, Virgin Media TV, TG4, CRAOL, IBI and Learning Waves). CRAOL have a specific training programme in current affairs for producers that includes diversity and awareness training with reference to terminology and language (CRAOL). In the context of discussing these internal initiatives, it is important to also refer back to earlier discussions regarding barriers to advancement for women in the audiovisual industry. It is important that stakeholders are also including relevant initiatives to address mid-career challenges alongside the search for new talent.

The discussions with Ofcom indicated that their focus is moving from the engagement with senior management to working with middle management and focusing on actual experience at work. Ofcom carry out brief interviews with CEOs to see where they are, what they are doing and to understand obstacles. Discussions focus on what is happening with regard to recruitment and commissioning: *"the important fundamental issue is to know your workforce and admit openly where you stand"* (Ofcom).

6.7 External actions: engagement with communities, projects, actions

As the section above focuses on the internal actions to integrate diversity and inclusion strategies in the workplace, this section focuses on external actions and approaches.

> **"There needs to be a balance between efforts put into the internal business and what the broader societal impact can be – to focus on where can we make an impact to achieve more diverse voices and views in drama, entertainment, news"**
> **Paul Farrell, Virgin Media TV**

The organisations representing various communities placed a strong emphasis on the need for more engagement between interest groups and the media sector. There needs to be mechanisms for the media to engage with the industry. *"For LGBTI the last dialogue was during the marriage equality debates 6 years ago. Only when there are problems or big issues will the media engage. It would be good to have a more proactive engagement in order to pre-empt some of the more damaging polarising rhetoric"* (LGBTI).

According to the NDA, the BAI is very open, and listens to their concerns. The NDA are aware that there are many issues that the BAI they have to deal with, and that other stakeholders have different perspectives. As noted above, for the National Disability Authority, there was more contact with broadcasters in the past regarding the working groups to establish voluntary guidelines. For them, such engagement is very good practice and needs to be more structured and more regular.

According to the Irish Traveller Movement, there could be more engagement from the public service broadcasters and the BAI with the Traveller community organisations. *"The BAI guiding*

principles, functions and codes do not go far enough or provide adequate protection for Travellers. Several radio stations, and programmes, have been negatively profiling Traveller communities. The complaints system is complex and the problems in certain media sectors prevail" (ITM). The BAI has (during Q3 2021 and since the interview with ITM) organised an online workshop with the Traveller Community and representatives regarding the complaints system (Interview BAI).

Another proposal that emerged from discussions is the establishment of Diversity Boards in certain organisations such as RTÉ, the BAI and the Press Council of Ireland. *"RTÉ should have a panel of under-represented organisations, which would also be consulted regarding content matters".* (ITM).

In discussions with RTÉ, an emphasis was also placed on the need for engagement in a less formal way. *"Networking events are important where we can invite people in from different communities and create new networks. RTÉ had a number of events bringing people in before pandemic – the "Diversitea" project. During the pandemic this involved logging into zoom, sharing stories and letting people meet each other. Here the focus is on voices rather than the top down approach. Only certain types of people tend to engage in structured and formal forums"* (RTÉ).

Another approach is the concept of "reverse mentorships" whereby a person representing a particular group spends time in a media or production environment. The aim is that the professionals also learn from individuals from groups and communities in the course of their daily work (Anne O' Brien, NUIM). This can also help members of dis-advantaged groups to understand of how content is made and how the media works (ITM).

It can be concluded from the discussions that the industry needs to engage with diverse groups in two ways – via a formal structured approach with representative organisations, and also using an informal bottom-up engagement with individuals.

6.7.1 Opening up the industry – opening up opportunities

According to Birch Hamilton, *"the understanding of diversity needs to start at school age - to increase the diversity of directors/ writers people should see at a young age what is possible"* (SDGI). Many of the broadcasters engage with transition year students (RTÉ, Learning Waves). It was suggested that a broader "open day" for the media to invite schools (not just transition years) for tours and perhaps the possibility to engage in production would be very useful. *"This would provide some inspiration for people who may then choose careers in the sector. A good example are the ITV open days all for schools where students come for the day and work with the news desk"* (Tommy Hamzat, Project Open Opportunity). Screen Ireland supports the Young Irish Film

Makers scheme, which enables eight young creative people (16-19yrs) to attend a five-day online film/animation training workshop with the National Youth Film & Animation School (NYFAS).[42]

For TG4, where the channel aspires to have staff that are all fluent Irish speakers, this does present a challenge in terms of ensuring a broader diversity in the workforce, but there is a sense that this will change with the next generation. There are Irish language schools that already have students from many different national backgrounds (an example of one school with children from 30 different national backgrounds was cited). *"This new generation will increase diversity"* (TG4).

From the perspective of a student looking to work in the area, and also considering the position of groups that are not normally found on or off screen due to socio-economic disadvantage and/or being a part of minority groups, getting access to the industry is very hard. There is a need for access to training and the opportunity to make connections in the industry. (Project Open Opportunity). *"It is rational that in order for the workforce, and for professionals and journalists to be more diverse there needs to be a supply of talent. The universities and courses need to be more diverse in the first place"* (Eileen Culloty DCU).

> **"In order to get into the Irish industry, there is a need for connections and for young people to gain work experience opportunities. In the short term, the following concrete approaches would be useful: access to training; and access to meet and greet events so that people can learn about what it is like to work in the industry".**
> **Tommy Hamzat, Project Open Opportunity**

Both academic experts expressed the view that students entering media, communications and journalism courses are more diverse than ever. *"Where previously one under-graduate may have been non-white Irish, this year there are 10 or 12 students"* (Eileen Culloty DCU). *"The student body at the faculty in Maynooth is quite diverse and companies need to resource these kinds of changes"* (Anne O'Brien, NUIM).

Training, career development and skills

The overall opening up of the sector (to more women professionals and also to a more diverse group of professionals) is being linked by many stakeholders to long term visions needed to ensure the availability of new skills and new talent to serve the sector. According to Virgin Media TV, there is a broad issue of a skills deficit with regard to technology and broadcasting and they frequently have to recruit internationally for staff. There is a

> *"Starting with skills, it is possible to innovate and open up opportunities. Use the funding as a carrot – and the skills as a stepping stone"*
> *Gareth Lee, Screen Skills Ireland*

lack of local talent, or graduates not so aware or interested in work in broadcasting technology and digital development. *"There needs to be a concerted approach between the Department of Media, Screen Ireland, Third Level Education and the BAI. There is a big opportunity to address skilling,*

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[42] National Youth Film and Animation School: https://yifm.com/bursary/

programmes and to retrain and reposition people across the entire broadcasting sector. Skills and technology – extrapolate into the process of digitisation – and women are underrepresented in these areas. There is a need to increase gender balance across the workforce in broadcasting technology" (VMTV).

The members of the Animation Ireland group (34 member studios) are very aware of the need to introduce strategies to improve the diversity of the audiovisual sector. They are also members of IBEC who help with various guidance for the industries. The members of Animation Ireland have no agreement or common policy on these issues. For them, Screen Ireland has been identified as a very important driver of diversity and inclusion in the production sector.

Animation Ireland have a focus on the development of skills, as the industry is constantly in need of skilled workers and companies tend to recruit internationally. They are now developing a Talent Development Academy for Animation with support from Screen Skills Ireland.[43] Animation Ireland, in partnership with Animation Skillnet and the Dublin Business Innovation Centre, was selected by Screen Ireland to manage the establishment of the Academy. This is at the first stage of development with a steering group having been formed to establish the Key Performance Indicators for the academy. The Steering group includes representatives from the wider industry, from regions, and from diverse backgrounds. *"In the context of the KPIs, diversity will be front and centre The talent development academy will focus on seven areas of diversity. These include working with Traveller groups, engaging various socio-economic groups and a focus on Transition Year students"* (Animation Ireland).

Screen Skills Ireland is the unit that works within Screen Ireland to provide continuous training and career development opportunities for professionals working in the screen sectors. All applicants for training funding now have to address diversity and inclusion across all activities and this includes all stakeholders, production companies, guilds and community groups. The organisation will provide support to community groups and empower others within particular communities (Screen Skills). Screen Ireland has recently launched a new strategic plan, *Building for a Creative Future 2024*. The Strategic Objective 2 is to *"invest in the talent and skills required for the future success of the industry through supporting capacity development, with diversity, equity and inclusion at its core"[44]* (Screen Ireland).

Screen Skills Ireland also placed emphasis on the new National Talent Academy for Crew Initiative[45] which has funding from Screen Ireland to develop and nurture new and diverse talent from across the country within crew roles. Crew Development Hubs are expected to have a local

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[43] Screen Ireland's Talent Academy for Animation: https://animationireland.com/screen-irelands-talent-development-academy-for-animation-will-be-led-by-animation-ireland/
[44] Screen Ireland's strategic plan, Building for a Creative Future 2024. https://www.screenireland.ie/strategy
[45] https://www.screenireland.ie/funding/development-loans/national-talent-development-academy-for-crew/

or regional presence whilst overall complementing each other in terms of the scale of their reach, ensuring an overall national approach to talent, crew and workforce development as part of the National Talent Academy for Crew.

TG4 has made an analysis of staff data and established where skills are needed and where they will be needed in the future. In the case of TG4 – the future skills will be needed in commissioning and technical areas: this provides an opportunity for growth – and for introducing more diversity. Regarding the technical area which is more male dominated – TG4 are facilitating women to attend relevant technical courses (TG4).

The Independent Radio sector, via Learning Waves runs a variety of training courses aimed at younger talent. These include the 360 Broadcast Bootcamp that gives graduates and those seeking employment in the industry the opportunity to gain skills in radio. They run a Journalism Graduate Programme supported by the Independent Commercial Radio Sector, the Broadcasting Authority of Ireland and Skillnet Ireland. Ten journalism graduates are placed in ten different radio stations for a period of five months. In addition, they have a Transition Year Media Week Programme that gives students the opportunity to get involved in the creation of content for broadcast on a radio station. This programme is funded by the Broadcasting Authority of Ireland through the Sound & Vision fund. They now plan to ensure that diversity and inclusion is ingrained in these training courses in the future (Learning Waves).

As noted above, in the context of the development of initiatives, the focus cannot only be on new talent, but must also address the advancement and development of mid-career professionals. Screen Ireland believes that the two agencies (the BAI and Screen Ireland) could work well together regarding data gathering. *"They could for example, establish a crew database to discover who is out there, and promote the availability of professionals to production companies. The database could include additional voluntary questions (with a possibility to opt-out) in order to include information on a range of diversity characteristics"* (Screen Ireland).

Recruitment, internships, apprenticeships and other projects
A major issue in the screen industry is that of recruitment. *"The stakeholders tend to always recruit in the same way from the same places, often via word of mouth and networking. This does not lead to more diversity"* (Katie Holly, X-Pollinator). *"Recruitment practices are problematic – job ads need to be phrased in a way to encourage more diverse applicants"* (Anne O' Brien, NUIM). A particular aspect of diversity that is prominent in the animation industry is neuro-diversity. The sector has taken advice regarding innovative ways in which to recruit, to carry out interviews etc. in order to be able to fairly recruit skilled people who may not be in a position to go through recruitment in the traditional manner (Animation Ireland).

Interesting examples include those of the animation company – Daily Madness Productions – who recently advertised two schemes: the first entitled "1st Credit Initiative" provides an opportunity for

a shadow director to follow experienced animation directors through projects and gain a "first credit". Since launching the FCI in Nov 2019, Daily Madness has provided opportunities for 25 first broadcast credits via this scheme, and 72% of these to women.[46] The second initiative is entitled the 2nd Act Internship, where they are looking for a script co-ordinator to work in a paid internship. The incentive targets people aged 35+ to provide an entry point to the industry. It is open to people who moved away from creative or never considered creative careers to be a viable option, and also open to parents or carers who have spent a significant time away from the workplace.[47]

As noted in the report *Auditing Gender and Diversity Change in Irish Media Sectors,* many of the broadcasters have a high staff retention. This is the case with RTÉ and also, according to the stakeholder interviews, with TG4 where staff stay for a long time. This is likely the case for most broadcasting organisations and current financial instability makes the expansion of staff difficult.

"The job market is precarious and applicants of diverse backgrounds have to believe that the industry is open to them before they would apply for these types of degrees and training. They have to see their faces on TV" (Eileen Culloty, DCU).

According to one expert, internships are not necessarily attracting these people and there has to be a lot of background work in order to attract them. It was stressed that these efforts are not necessarily something that can be quantified or measured (Eileen Culloty, DCU)

> *"With regard to the plans for internships and work placements, it is important to have paid work placements to allow people from lower socio-economic backgrounds to have access"*
> *Jacinta Brack, Irish Traveller Movement*

Many stakeholders agree for the need for paid internships. Another important area is that of internships for the socially disadvantaged, which could become an area of exploration in the context of the Talent Academy (Animation Ireland). *"There need to be real paid internships and work experiences. RTÉ did it for one year – but advertised only via Linked In, which was not the right way to reach the right public. Apprenticeships are also another way into the industry and a good example is the ITV journalism schemes in the UK"* (Project Open Opportunity).

RTÉ recently announced (October 2021) a Creative Futures Academy, which will host a weekend of intensive training at UCD. They want to engage people from communities that are traditionally under-represented within the Irish media. They have made five stipends available to cover travel and accommodation for those living outside the Dublin area.[48] "*It would be very useful if there was a pool of funding for broadcasters for internships, and apprenticeships. All stakeholders are hungry for talent, and for stories, new stories and new blood, and want to reach new audiences. Industry collaboration is important in this area"* (Interview, RTÉ).

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[46] See: https://www.linkedin.com/pulse/1st-credit-initiative-shadow-director-daily-madness-productions/
[47] See: https://www.linkedin.com/pulse/2nd-act-internship-script-coordinator-daily-madness-productions/
[48] RTÉ Creative Futures Academy https://about.rte.ie/2021/10/05/rte-creative-futures-13-14-november-2021/

The IBI noted that the Covid-19 funding allowed one producer to work with students at the Carlow Institute of Technology – the students developed these programmes with the station and with the help of Learning Waves. *"They were able to keep one student on a paid internship for 6 months, after which she moved on to work in the sector. Often with talented people, you train them and then they may move somewhere else and the seed money to develop talent is no longer there"*. Radio stations also try to focus on staff development (with the example of one producer doing a masters on media and environment in DCU).

> *"It would be very useful if there was a pool of funding for broadcasters for internships, and apprenticeships. All stakeholders are hungry for talent, and for stories, new stories and new blood, and want to reach new audiences. Industry collaboration is important in this area"*
> *Zbyszek Zalinski, RTÉ*

According to Virgin Media, there has (in the context of skills development strategies)[49] been a redefining of skills post leaving cert and apprenticeship programmes. Virgin Media also believes that there should be broadcasting apprenticeship programmes, which could include diversity elements. *"It is important that the industry comes together and finds creative ways to collaborate. There should be a more structured programme that will benefit all actors, guided by government the BAI and the education sector"* (Virgin Media).

Stakeholders emphasised that mentorship can also take place online – talking to students via ZOOM (Project Open Opportunity). This could be approached by having 25 professionals who dedicate 5 to 6 hours, where "they can be borrowed like a book" in order to provide mentoring for people on various aspects of entering the industry (RTÉ). An interesting example of this is the recent collaboration between Innovate Limerick through Film in Limerick and Gorm Media to launch a new diversity initiative to attract new workers to the film and TV industry. The initiative involves eight weekly online events, with the chance to meet with a range of experienced film crew who will talk about what they do on set and how to break into the industry.[50]

A range of initiatives of CRAOL have been supported by the Community Foundation for Ireland, and included engagement with older citizens including creating programmes and issuing certificates; *Supporting the voices of the marginalised* such as Traveller communities, LGBT, immigrants, former offenders; *Giving voice to the silent* working with direct provision centres. CRAOL keep data on participants, gender and diversity relating to all their projects, which is a

> **"Community media tends to do innovative things instinctively – the Social Benefit concept shows how media can be used differently. There needs to be a slow build and then a reach for a big bang."**
> **Jack Byrne, CRAOL/ Community TV**

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[49] See for example the work of Skillnet Ireland: https://www.skillnetireland.ie/about/future-skills-programme/
[50] A new scheme to support under-represented groups to work in Film & TV launched by Innovate Limerick https://www.limerick.ie/council/newsroom/news/new-scheme-support-under-represented-groups-work-film-tv-launched-innovate

good example for other stakeholders. This type of activity is one of the key aims of community media. *"Community media have created this public space and are a natural fit but there is always a need for more funding and resources"* (Jack Byrne and Soledad Galiano CRAOL).

In conversation with the Screen Directors Guild of Ireland, they expressed regret regarding the demise of Film Base, which was *"an excellent example, of a physical place that incorporated networking events, FÁS working schemes, and provided a wide outreach that was organic and diverse. It built a community and allowed for creativity and risk-taking"* (SDGI).

6.8 Conclusions - the slow build and the big bang

The stakeholders provided a significant amount of feedback regarding their perspectives on these issues, on their current actions, initiatives and projects. It is clear that a broad range of actions and initiatives are being taken by industry actors, more and more of which are emerging every day.

This is also perhaps a consequence of the current levels of discussion on these issues in the Irish media sector. The BAI is contributing in a very influential way to these discussions. Part of this contribution is this stakeholder review which indicates to the industry that some guidance, strategies or requirements may emerge in the near future. There were calls for guidance from BAI and from Screen Ireland on these issues (SPI, VMTV, Screen Skills Ireland, among others).

"Screen Ireland and the BAI need to have some agreement on these issues – they cover broadcasters and they cover the production sector. Working together and having a joint approach would be ideal" (Screen Skills Ireland). *"The BAI could provide some guiding principles and there are a myriad of potential initiatives. In the report from the UK Parliamentary committee for the Creative Industries, they emphasised the need to focus on what works – and take time to change"* (Anne O' Brien, NUIM).

With regard to engagement with the relevant groups and communities, it was emphasised earlier how important it is to engage in the development of any policies strategies and guidance – for the BAI and for the sector at large. This consultation has already provided a first indication of the needs and expectations of various groups, which are on some levels very similar – yet on other levels very different. The industry needs to engage with diverse groups in two ways - a formal structured approach with representative organisations, and also an informal bottom-up engagement with individuals.

"There is a need for some type of stakeholder forum to discuss what is practical for the media and what is of practical use to the representative organisations. This should bring people together to thrash out the ideas and ensure that the representatives from various communities know that they are being listened to" (Eileen Culloty DCU).

Each of these aspects of promoting diversity and inclusion brings its own challenges for the media sector. As can be inferred from the above, issues of representation of, and engagement with,

different groups are key for several organisations representing minority groups. It may be that not every stakeholder in the sector can address every aspect of these elements of inclusion. *"No one-size fits all – we need different actions for different areas"* (Lesley McKimm, Screen Ireland). The idea of mapping the range of initiatives in place and understanding which actions are aimed at achieving which goals was considered useful by many stakeholders.

"Enhancing diversity and inclusion will take a lot of development: there are many stakeholders and there needs to be flexibility in the system. There are potentially different tracks of change for D and I development and these should be considered in a way that allows for contributions from all the sector" (Screen Producers Ireland).

> **"What are the best impacts that can be made and what can each actor in the industry do, as this could be different for different sectors. It is important that different actors are not chasing the same initiatives at the risk that something important may be left behind"**
> **Paul Farrell, Virgin Media TV**

Another important point that was emphasised by most stakeholders was the fact that change will not happen overnight. Any potential changes in legislation in the media sector will take time. For many stakeholders, the potential recommendations of the Future of Media Commission regarding supporting the sustainability of the media sector are key. Future financial sustainability will also have an impact on the extent to which the media and film sectors can be opened up and expanded – and hence have a positive impact on increasing diversity and inclusion in the industry.

"It is important to recognise the complexity of this work – and focus on actions and achievable aims. This is hard work but immediate steps should be taken. What we could do is commit to small pilot projects and start immediately. Start with small things, take small ideas – try them for 6 months and see what works" (RTE).

Hence, the approach to these issues need to be considered in the short, long and medium terms. Much of the work regarding the development of internal strategies and processes is already underway. Short term actions and pilot projects are recognised by many as examples of immediate steps that can be taken. The table overleaf provides an overview of the broad range of recommendations emerging from the stakeholder consultation.

It is important to do the smaller things, explore possibilities and then expand. Collect data and provide the data to stakeholders. Start with the small wins and go for the big ones gradually" (Project Open Opportunity).

Recommendations regarding diversity and inclusion		
Actions	**Potential Approaches**	**Potential partnerships**
Internal actions of broadcasters		
Off-screen / off-air		
Equality, Diversity and inclusion plans, strategies and leadership	- Encourage (or oblige) broadcasters to develop equality, diversity and inclusion strategies - Communicate these policies internally and externally - Encourage the establishment of leadership via D&I leads, diversity champions, internal committees - and encourage the cross-collaboration of these D&I leads or champions between broadcasters - Encourage engagement with external organisations to achieve this and to gain D&I certifications - Promote the development of staff networks (resource groups) for communities in the workplace - Establish training and awareness courses	BAI/ broadcasters / IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/ Learning Waves
Data collection to understand the work-force	- Introduce a voluntary GDPR compliant audit of workforces - Liaise with representative organisations or networks and representative groups to see how this can be done - and develop questionnaire Refer to questionnaire examples mentioned in the production sector (X-Pollinator)	Broadcasters / BAI ITM/ NDA/ LGBTI/
Recruitment, internships, and career development	- Promote equality and equality of opportunity in the areas of career development and nurturing of new talent - Encourage and promote the rollout of paid work experiences, internships and other on-the-job skills development initiatives - Consider with Screen Ireland the potential to develop a production crew database	BAI/ broadcasters / IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/ Learning Waves Screen Ireland
Promoting inclusive and diverse workplaces	- For broadcasters, as part of their broadcaster reporting to indicate inclusion initiatives, e.g. in terms of recruitment, development, promotion and retention of staff - Ensuring policies to promote inclusive workplaces and address issues of bullying, harassment and sexual harassment	BAI/ broadcasters / IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/
Mapping initiatives throughout the industry	- Provide via broadcaster returns or other reporting mechanism a report on actions and initiatives to promote equality, inclusion and diversity	BAI / IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/
Introduction of diversity standards	- Encourage broadcasters to consider the introduction of diversity standards in relation to commissioned content of the broadcasters	BAI / broadcasters
On-Screen/ on-air		
Improve on-air representation	- The framing of issues and responsible media coverage of issues relevant to different groups - Cooperation with representative groups regarding language, guidelines etc.	NUJ/ BAI / IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/

	- The portrayal of members of different groups and communities on-air - Mainstreaming of members of different communities in content	
Participation	- Improving diversity on air through ensuring gender balance and diversity throughout programming strands - Developing a diversity on air database - Encourage the implementation of the 50:50 project[51] in broadcasters . The BBC 50:50 Equality Project aims to reach equality of representation of women on-air, and has been expanded to include fair representation of diverse groups on-air	IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/

External actions of broadcasters

Actions	Potential Approaches	Potential partnerships
Engagement with diverse communities	- Formally via the establishment of Diversity Fora/ Committees - Informally via the engagement with individuals or representative organisations	IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/
Opening the sector	- Open up to representative organisations, schools, universities: via open days etc. - Support training and development: workshops, academies, mentoring (including online) , internships, apprenticeships. - Development of outreach initiatives	IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/
Broad collaboration with the sector	- Collaboration between broadcasters, production sector and training institutes and academies to exchange experience and best practice, for example via the Diversity and Inclusion Leads or Champions	IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/
Mapping initiatives throughout the industry	- Provide via broadcaster returns or other reporting mechanisms a report on actions and initiatives to promote equality, inclusion and diversity - Explore the best way to gather and publish information on this mapping, whether on the websites of various associations, guilds and broadcasters or on one common platform	IBI/ CRAOL/ CTA/ TG4/ RTÉ/ Virgin Media/

Actions of the Broadcasting Authority of Ireland and other actors

Data- gathering and research

Actions	Potential Approaches	Potential partnerships
Data research framework	- Facilitate a discussion between stakeholders as to the need for data collection on workforces – and what the parameters should be	BAI
	- As mentioned in relation to data-gathering (on gender), the BAI must be resourced fully to manage any data research framework, or a separate organisation must be funded to so this, or the task should be out-sourced to an appropriate organisation	Department of Media
Establish what the expectations are for licensed services to provide data	- Voluntary or obligatory ? Directly to the BAI via broadcaster returns? - Or to another organisation via the BAI ?	Department of Media and BAI

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[51] The BBC 50:50 Equality Project https://www.bbc.co.uk/5050

Research	- Research on experiences in and with the media - Research on representation - Supporting research with technological solutions to measure diversity on air	
Funding of content		
Actions	**Potential Approaches**	**Potential partnerships**
Promoting D and I via S&V	- Increase funding of the Sound and Vision scheme - Develop the current approach to promoting diversity via the funding scheme - Establish a S&V funding strand for EDI initiatives on screen/on air, subject to S&V funding being increased/enhanced	Department of Media /BAI
	- Include more explicit requirements regarding diversity and inclusion in funding rounds - Explore the idea as to whether the BAI should also collect data (on diversity characteristics) on the production teams related to Sound & Vision applications and projects - Explore the feasibility of introducing diversity standards, and the extent to which they could be harmonised between S&V, Screen Ireland Funding, 481 tax incentive - Consider whether E, D and I standards relate to all funding OR whether "uplifts" or bonuses (in terms of finances) are attached to projects that fulfil criteria	BAI/ Screen Ireland
Broadcaster funding	- Encourage broadcasters to also introduce diversity standards in their commissioning of programming	
Supporting initiatives		
Actions	**Potential Approaches**	**Potential partnerships**
Support for industry to increase equality, diversity and inclusion	- Additional funding, or a fixed fund, or central fund for supporting paid internships, mentorships and shadowing on projects funded by public money	Department of Media
	- Use funding schemes to place obligations regarding paid mentoring, internships or shadowing - Or use tax incentives for broadcasting or film sectors to add these elements to productions	BAI/ Screen Ireland / Department of Media
Mapping initiatives throughout the industry	- Gathering of information on broadcaster and production sector initiatives to promote equality, inclusion and diversity - - Explore the best way to gather and publish information on this mapping, whether on the websites of various associations, guilds and broadcasters or on one common platform	BAI/ Screen Ireland / Screen Skills

Table 9: Recommendations regarding the promotion of diversity and inclusion in the media sectors

7 International and National legislative and policy framework

7.1 Equality, non-discrimination and diversity

The following outlines international human rights actions and policies, EU level legislation, regulation and policy, and Council of Europe standards relevant to gender equality, diversity and inclusion. A particular focus is placed in this section on obligations and recommendations with regard to the media sector. All human rights treaties have a non-discrimination clause[52] which prohibit discrimination on the grounds of a range of characteristics.

The Charter of Fundamental Rights of the European Union addresses non-discrimination under Article 21: Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited.

The revised Audiovisual Media Services Directive[53] includes a non-discrimination clause. The Directive also emphasises the role of national regulatory authorities in promoting the objectives of the Directive such as media pluralism, cultural and linguistic diversity, consumer protection, accessibility, non-discrimination, the proper functioning of the internal market and the promotion of fair competition (Article 30).

In Ireland, the Employment Equality Acts and Equal Status Acts ('the Acts') prohibit discrimination in the provision of goods and services, accommodation and education. They cover the nine grounds of gender, marital status, family status, age, disability, sexual orientation, race, religion, and membership of the Traveller community. These Acts are currently being reviewed via consultation, which will, among others, seek opinions on: *3) The scope of the current definitions of the nine equality grounds. This will include consideration of the gender ground, the disability ground and whether new grounds should be added, such as the ground of socio-economic discrimination.[54]*

In terms of employment and equality in the public sector (an issue raised several times in the context of the stakeholder review with regard to the public organisations), the Public Sector Equality and Human Rights Duty which originated in Section 42 of the Irish Human Rights and Equality Act 2014 states that: *"All public bodies in Ireland have responsibility to promote equality, prevent discrimination and protect the human rights of their employees, customers, service users*

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[52] The UN International Covenant on Economic, Social and Cultural Rights (ICESCR), the UN International Covenant on Civil and Political Rights, UN Convention on the Rights of Persons with Disabilities, European Convention on Human Rights, Charter of Fundamental Rights of the European Union
[53] DIRECTIVE (EU) 2018/1808 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32018L1808&from=EN
[54] Government consultation on the review of the Equality Acts https://www.gov.ie/en/consultation/066b6-review-of-the-equality-acts/

and everyone affected by their policies and plans."[55] From the perspective of the BAI, this is being addressed internally in the areas of human resources and compliance with the public sector duty (Interview BAI).

Gender equality

The International Covenant on Economic, Social and Cultural Rights (ICESCR) emphasises the equal right of men and women to the enjoyment of all economic, social and cultural rights (article 3); and equal pay for equal work (article 7).

The 1979 UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) defines discrimination against women as *"...any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field."*

The UNESCO adopted the Beijing Declaration and Platform for Action[56] in 1995 identified 12 key areas where urgent action was needed to ensure greater equality. Regarding the media, two key strategic objectives of the Declaration were to:

- *Increase the participation and access of women to expression and decision-making in and through the media and new technologies of communication*

- *Promote a balanced and non-stereotyped portrayal of women in the media*

Equality between women and men is addressed under Article 23 of the Charter of Fundamental Rights of the European Union:

Equality between women and men must be ensured in all areas, including employment, work and pay. The principle of equality shall not prevent the maintenance or adoption of measures providing for specific advantages in favour of the under-represented sex.

In 2018, the European Parliament adopted the *Resolution of 17 April 2018 on gender equality in the media sector in the EU.[57]* The European Parliament calls on the Member States to (among others) to:

- *fully implement the existing legislation addressing gender equality, and to encourage regulatory bodies to pay attention to the presence and advancement of women and to non-stereotypical media content;*

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[55] Public Sector Duty: https://www.ihrec.ie/our-work/public-sector-duty/
[56] UNESCO's Beijing Declaration and Platform for Action
[57] European Parliament Resolution of 17 April 2018 on gender equality in the media sector in the EU

- *carry out regular evaluations of the above-mentioned areas and to develop, if this has not yet been done, legislation focusing on non-stereotypical media content;*

- *make better use of existing resources in the media within their remit to perform their public service role while reflecting a more gender-balanced and democratic society;*

- *support and promote women's organisations which are active in the sphere of promoting gender equality in the media, including organisations which support women and girls who are victims of gender-based violence, intersectional discrimination or sexual harassment;*

- *implement action programmes which ensure women's involvement in the design and implementation of effective and efficient gender-sensitive policies and programmes within media organisations;*

- *develop programmes to improve women's skills in science, technology, engineering and mathematics (STEM) subjects that are important for careers in the media sector with a more technical focus, such as sound and audiovisual technicians; stresses the importance of vocational education and training in diversifying career choices and introducing women and men to non-traditional career opportunities to overcome horizontal and vertical exclusion.*

The *Recommendation of the Council of Europe Committee of Ministers to member states on gender equality in the audio-visual sector* from 2017 is a key European Standard in the area. The recommendation is addressed to the Member States of the Council of Europe, Member States to adopt policies to promote gender equality in the audiovisual sector as a fundamental principle of its activities and in those of its institutional organisations. It invites member states to: review their legislation and policies; collect, monitor and publish data; support research; encourage the ongoing development of media literacy; and enhance accountability processes.

Specifically it recommends a range of measures such as: encouraging European, national and regional film funds, public and commercial broadcasters and other key stakeholders in the audiovisual sector to monitor the situation with regards to gender equality; encouraging European supranational film and audiovisual funds, such as Eurimages and Creative Europe, as well as broadcasters and other key audiovisual sector stakeholders, to address gender equality issues in all their policies, measures and support programmes, such as training, production, distribution, festivals and media literacy initiatives; encouraging the relevant audiovisual sector organisations (including public and private financing bodies, sectoral employers, trade unions and professional organisations, training and education providers and industry professionals, as well as the relevant regulatory authorities) to prepare, or revise, regulatory and self-regulatory strategies, collective bargaining agreements and codes of conduct or other frameworks for implementation, taking into

account a gender equality perspective.[58] As outlined in chapter five, the BAI framed their approach to developing the GAP with reference to this Recommendation and the four pillars of the GAP are a reflection of this.

The Irish Department of Justice and Equality published a *National Strategy for Women and Girls[59]* in 2017, which had as its third objective to: Ensure the Visibility in Society of Women and Girls, and their Equal and Active Citizenship. The desired outcomes included (but were not limited to) the following: Positive gender norms promoted; Greater female participation in sport and physical activity; Greater visibility of women in the arts, as participants and in content. Actions to achieve these (directly relevant to the media sector) included the following:

- *Undertake measures to promote greater visibility of women's sport in broadcast media. Designate the Ladies Football and Camogie Finals as Events of Major Importance, to ensure they are available for free-to-air broadcasting.*

- *Continue to increase the visibility of women in arts and heritage, including as contributors, creators, curators, in governance and in content through the introduction of gender policies in our National Cultural Institutions, the Irish Film Board and the Arts Council.*

- *Continue to support the increasing visibility of female creative talent, in the film industry by implementing the Irish Film Board's Gender Equality Six Point Plan, and in the audiovisual sector.*

- *The Broadcasting Authority of Ireland (BAI) will, as part of the implementation of its Statement of Strategy 2017-19, take action to support increased representation of the diversity of Irish society in the broadcast media, with particular focus on gender equality.*

The rights of people with disabilities

The UN Convention on the Rights of Persons with Disabilities (CRPD) entered into force in May 2008. It covers a range of rights relevant to the media including (in summary): the overall right to equality and non-discrimination (Art 5); awareness-raising, combating stereotypes, and among others encouraging all organs of the media to portray persons with disabilities in a manner consistent with the purpose of the Convention (Art 8); accessibility, which includes access on equal basis to the physical environment, including information and communications (Art 9); freedom of expression and opinion, and access to information (Art 21); participation in cultural life, recreation, leisure and sport (Art 30), including the opportunity to develop and utilize their creative, artistic and intellectual potential, not only for their own benefit, but also for the enrichment of society.[60]

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[58] Recommendation of the Committee of Ministers to member states on gender equality in the audio-visual sector
[59] DOJE (2017): *National Strategy for Women and Girls 2017-2020: creating a better society for all.*
[60] UN Convention on the Rights of Persons with Disabilities

The Charter of Fundamental Rights of the European Union recognises and respects the right of persons with disabilities to benefit from measures designed to ensure their independence, social and occupational integration and participation in the life of the community (Article 26).[61] The revised Audiovisual Media Services Directive[62] includes a general non-discrimination clause, and also requires member states to ensure without undue delay, that services provided by media service providers under their jurisdiction are made continuously and progressively more accessible to persons with disabilities (article 7). The Directive also emphasises the role of national regulatory authorities in promoting its key objectives such as media pluralism, cultural and linguistic diversity, consumer protection, accessibility, non-discrimination, the proper functioning of the internal market and the promotion of fair competition (Article 30).

Diversity and rights of minorities

The International Covenant on Civil and Political Rights recognises the right of ethnic, religious or linguistic minorities to engage in their culture, practice their religion and use their language (Article 27). The UNESCO adopted a Universal Declaration on Cultural Diversity in 2001, where Article 6 focuses on cultural diversity:

While ensuring the free flow of ideas by word and image, care should be exercised so that all cultures can express themselves and make themselves known. Freedom of expression, media pluralism, multilingualism, equal access to art and to scientific and technological knowledge, including in digital form, and the possibility for all cultures to have access to the means of expression and dissemination are the guarantees of cultural diversity.[63]

Regarding underrepresented or minority groups, the Council of Europe Framework Convention for the Protection of National Minorities[64] states under article 12 that *"The Parties shall, where appropriate, take measures in the fields of education and research to foster knowledge of the culture, history, language and religion of their national minorities and of the majority."*

Article 6 has a particular focus on the promotion of tolerance, in that parties to the Convention should : encourage a spirit of tolerance and intercultural dialogue and take effective measures to promote mutual respect and understanding and co-operation among all persons living on their territory, irrespective of those persons' ethnic, cultural, linguistic or religious identity, in particular in the fields of education, culture and the media. Article 9 focuses on freedom of expression and the media: paragraph 1 deals with the right to freedom of expression of every person belonging to a national minority including freedom to hold opinions and to receive and impart information and ideas. Paragraphs 3 and 4 emphasise the need for special measures with the dual aim of

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[61] Charter of Fundamental Rights of the European Union
[62] DIRECTIVE (EU) 2018/1808 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32018L1808&from=EN
[63] UNESCO Universal Declaration on Cultural Diversity
[64] Council of Europe Framework Convention for the Protection of National Minorities

facilitating access to the media for persons belonging to national minorities, and promoting tolerance and cultural pluralism.

The Irish Department of Justice and Equality, in its *National Traveller and Roma Inclusion Strategy 2017-2021*, included anti-discrimination and equality as one of its "Strategic Themes, High Level Objectives and Actions". In this context, a strategic objective was to ensure that: *robust measures to address racism and hate speech in the mainstream media and public sphere should be adopted and implemented.* [65]

More recently (2021), the Department of Children, Equality, Disability, Integration and Youth via the National Anti- Racism Committee' launched a Consultation on a *National Action Plan Against Racism*. Of four key themes to be addressed in the consultation, the second addressed all forms of media and communications, including new technologies. This theme includes print and traditional media and broadcasting, as well as social media and new technologies. The questions in the consultation included the following:

- *What actions would you suggest to tackle racism in new and more traditional forms of media? What actions do you think would help to make broadcast media and the press more representative at all levels of everyone living in Ireland?*

- *What are the challenges posed by new technologies in terms of racism? Are there any opportunities offered by new technologies to strengthen the fight against racism? What actions should be taken by tech companies to help combat racism?*

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[65] Department of Justice and Equality: National Traveller and Roma Inclusion Strategy 2017-2021.

8 ANNEXE 1 Complete list of stakeholders interviewed August-October 2021

Organisation	Name	Role	Organisation description
Animation Ireland	Ronan McCabe	CEO	The trade association for the leading Irish animation studios.
Broadcasting Authority of Ireland	Deborah Molloy-Bergin Stephanie Comey Celene Craig Clare Diamond Brian Furey Declan McLoughlin, Anne O Brien Anne-Louise O'Donovan	BAI Staff	Irish Broadcasting regulator: (discussions held with staff from management, and those dealing with diversity, licensing compliance, the Sustainability Network, accessibility, Sound & Vision funding, etc.)
Community TV Association/ CRAOL Community Radio Forum of Ireland	Jack Byrne Soledad Galiana	Chair	The Community TV Association[66] represents the sector and is run on a voluntary basis by members. CRAOL is the representative, coordinating, lobbying, training and support group for Irish Community Radio.
Dublin City University	Eileen Culloty	Assistant Professor	Academic expert and researcher. Deputy Director of the Institute for Media, Democracy and Society.
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGM)	Brian O'Loughlin/ Hannah Graham	Principal Officer/ Administrative Officer	Government Department responsible for media
Equality Expert Group	Carol Miriam Hunt, Aine Kerr, Derbhail Mc Donald, Noelle O'Connell, Jillian van Turnhout, Margaret Ward	Members	A collective of experts drawn from a variety of fields, public and private, seeking to support equality and diversity in Irish social, economic and cultural life.
Independent Broadcasters of Ireland (IBI)	John Purcell	Chairperson	The representative body for Ireland's independent commercial radio broadcasters.
Irish Traveller Movement (ITM)	Jacinta Brack	PR / Advocacy	A partnership between Travellers and settled people committed to seeking full equality for Travellers in Irish society.
Learning Waves (IBI)	Teresa Hanratty	Network Manager	Industry led initiative that provides training for those working in the Independent Commercial Radio Sector in Ireland.
LGBT Ireland	Paula Fagan	Chief Executive	National support service for Lesbian, Gay, Bisexual, and Transgender people and their families and friends.
National Women's Council of Ireland (NWCI)	Orla O'Connor	Director	Leading national representative organisation for women and women's groups in Ireland.
National Disability Authority (NDA)	Edward Crean	Senior Policy / Public Affairs Advisor	Independent statutory body that provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities.
National University of Ireland Maynooth	Anne O'Brien	Associate Professor NUIM	Academic expert and researcher Head of Dept of Media Studies
OFCOM	Cathy Taylor		UK Communications Regulatory Authority
Project Open Opportunity	Tommy Hamzat	Student	Project to increase opportunities for under-represented communities to be engaged in media production and the media industries.

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[66] The Community TV Association stated that CRAOL would speak for them and represent their views

RTÉ	Zbyszek Zalinski	Diversity and Inclusion Lead	National Public Service Broadcaster
Screen Directors Guild of Ireland (SDGI)	Birch Hamilton	Director	The representative body for Directors involved in the Irish and international audiovisual industry
Fís Éireann/ Screen Ireland	Lesley Mc Kimm	Project Manager	The development agency for the Irish film, television and animation industry.
Screen Skills Ireland	Gareth Lee	Skills Development Manager	Skills development unit within Screen Ireland: provides continuing training and career development opportunities for professionals in the screen sectors.
Screen Producers Ireland (SPI)	Susan Kirby Anthony Muldoon	CEO	Organisation that promotes the growth and sustainability of a working environment conducive to a strong independent production sector.
TG4	Alan Esselmont Trevor Ó Clochartaigh	Director General Director of Operations/ HR	The National Irish Language Public Service Broadcaster.
Virgin Media TV	Paul Farrell	Managing Director	The top Irish commercial broadcaster offering three free-to-air channels
#Whynother?	Linda Coogan Byrne	Project Leader	Campaign and social movement that aims to amplify the voices of Women in the music, entertainment and arts industries.
Women in Film and Television (WFTI)	Susan Liddy	Chairperson and academic	Voluntary body promoting greater representation of women on screen and behind the camera.
Writers Guild of Ireland (WGI)	Jennifer Davidson	Chairperson	The representative body in Ireland for writers for the stage, screen, radio and digital media.
X-Pollinator	Katie Holly	Project Manager	Development and networking initiative to encourage collaborations, and to take positive action to address the gender imbalance in the Irish audiovisual industry.

Table 10: Detailed list of stakeholders interviewed and their organisations

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Discussions and consultations

Future of Media Commission:

Thematic Dialogue #2. The Challenges for Public Service Media and Public Services Content Providers in an evolving landscape. Thursday February 11th 2021, 3.30pm - 5.30pm
https://futureofmediacommission.ie/thematic-dialogues/thematic-dialogue-2/

Submissions to the Future of Media Commission consultation :
https://futureofmediacommission.ie/public-consultation-2/