

Gender, Equality, Diversity and Inclusion Strategy

for the Audio and Audiovisual
Media Sector*

2024 - 2027



Coimisiún
na Meán

*The Sector is defined as companies, other organisations and individuals involved in audiovisual and audio content production. This includes film, television, radio, audio, and animation production.



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Foreword

Introduction

An over-arching Gender, Equality, Diversity and Inclusion strategy for the audio and audiovisual media sector is long overdue and has been a priority for Coimisiún na Meán since its establishment. This Strategy was prioritised because of its importance to the development of a thriving, diverse and safe media landscape – a central tenet which underpins all of the work of Coimisiún na Meán. This Strategy is an important step towards ensuring that our audio and audiovisual sector is accessible, inclusive, diverse and representative of contemporary Ireland.

The Strategy, the first of its kind for the industry in Ireland is for organisations and individuals involved in audiovisual and audio content production, including film, television, radio, audio and animation production.

The drafting of this Strategy involved widespread consultation, both with those in the audio and audiovisual media services industry and with bodies working in the area of diversity and inclusion. It builds on the work of the former BAI, such as the achievements of the Gender Action Plan and Coimisiún na Meán would like to thank those who gave generously of their time and expertise throughout this process.

Next Steps

Coimisiún na Meán expects this Strategy to be implemented across the sector. It will not stand alone in An Coimisiún, but underpin the work done across its Media Development function and indeed, across the organisation.

It will be regularly reviewed, and further consultation will take place to ensure it has the resilience to capture further changes in Irish society and the evolution of media itself.

One of the recommendations of the Future of Media Commission was the development of Diversity Standards for the Irish media industry and this Gender, Equality, Diversity and Inclusion Strategy is an important step towards that development.

Our forthcoming GEDI Standards will be widely consulted on, will be fair and measured and will be informed by research overseen by the Coimisiún na Meán Research Division. In return, we want to see the Standards take effect and make a real difference.

Funding

This Strategy, and the forthcoming Standards will also be key criteria for Coimisiún na Meán's funding schemes. Already, the Sound and Vision funding scheme actively contributes to gender, equality, diversity and inclusion objectives, ensuring that a range of voices are represented and supported within the industry.

This implementation of GEDI initiatives in funding will continue as we develop Media Schemes, including platform neutral Journalism Schemes in the years ahead.

Coimisiún na Meán is responsible for regulating radio, television and audiovisual on-demand services established in Ireland. An Coimisiún shall have regard to the GEDI Strategy in carrying out its regulatory functions for these services and service providers.

Similarly, if a European Works Levy on Video-On-Demand providers is introduced to stimulate the production of European programming in Ireland, then, like our Broadcasting Fund, we would expect to see it linked to the implementation of the appropriate GEDI initiatives outlined in this Strategy.

Implementation

With regard to advancing GEDI in the media industry Coimisiún na Meán is also conscious of the recommendation of the Future of Media Commission which states:

Consideration will need to be given to the most appropriate mechanism for the delivery of this action, whether through primary legislation to enable Coimisiún na Meán to put in place binding regulatory obligations or through a voluntary initiative.

It is important that this new Strategy be given appropriate time to establish itself, and that the sector be given the opportunity to implement its recommendations, for the benefit of both industry and audiences. Should further legislation be needed to support this area then An Coimisiún will make the case for that legislation.

Oversight

A steering-group which includes individuals who are advocates for change in this area will help us as we navigate the path ahead. The steering-group will meet regularly, and report back to an annual GEDI forum and will be supported by An Coimisiún to ensure that what is promised is measured and delivered upon. I would like to thank the members of this group for committing their time to this important work.

Regular updates on the implementation of the Strategy will also be brought to the college of Commissioners in Coimisiún na Meán, developments in the industry as well as our own internal research will be reported on and a document mapping GEDI initiatives and actions in the industry will be updated annually. Coimisiún na Meán's new website will house information on Gender, Equality, Diversity and Inclusion including our research findings.

Conclusion

The FOMC heard calls for the need for diversity of representation in media content, and also of the need for greater accessibility within the areas of media commissioning and of production itself. Having an audio and audiovisual media sector that is both accessible and inclusive has important societal and public benefits, and can also be advantageous for media organisations as they seek to serve new and evolving audiences.

Constant support, monitoring and funding will be required to support this Strategy, and Coimisiún na Meán will not be found wanting in that regard.



Rónán Ó Domhnaill
Media Development
Commissioner

Introduction

Key objective: supporting the Irish audio and audiovisual media sector in planning, developing and delivering a range of strategic activities and initiatives according to best practice, with a view to fostering a media landscape that is representative of, and accessible to, the diversity of Irish society.

Developing and publishing a Gender, Equality, Diversity and Inclusion (GEDI) Strategy is part of a long-standing and ongoing engagement of Coimisiún na Meán in the promotion of gender, equality, diversity and inclusion in the sector and further activities will follow in 2025 and beyond. The Strategy has built on previous work such as the BAI Gender Action Plan (GAP), and the work carried out in the context of the 2021 “Stakeholder Review of the GAP,” and with reference to a range of research reports commissioned by the former BAI that examined various aspects of gender, equality, diversity and inclusion in the media sector.

Discussions took place during September-October 2023 with a range of key stakeholders, interest and representative groups, statutory authorities, GEDI experts, and other key actors in the area of development, funding and training in the wider cultural, creative and audiovisual sectors. Questionnaires were distributed to the audio and audiovisual media sector in order to map their current strategies, plans, policies and activities. In November 2023, a written consultation on the Pillars, Principles and Actions of the Draft Strategy was carried out which elicited additional input. Finally, a workshop was organised in January 2024 in

order for stakeholders to share perspectives, discuss proposed solutions and build a consensus on the Strategy.¹ The Strategy aims to reflect the range of actions and initiatives currently being undertaken in the sector, while also introducing new ideas or approaches where relevant. The feedback from a broad range of stakeholders – in particular the relevant interest groups, GEDI experts and other funding and development bodies in the area of media and culture – is also reflected in the document.

It is important to allow for different approaches for different actors dependent upon size and resources, and also on the remits, roles and obligations of the different types of media outlets in terms of contribution to the public interest. A key issue is the extent to which media organisations are mainstreaming GEDI objectives across their organisations, as emphasised by the Future of Media Commission. From the review of activities undertaken by the sector, it is clear that this is already the case – with many media developing approaches to internal workplace culture and employment while also developing strategies related to content. The Strategy partly takes a principles-based approach by outlining key strategic goals/principles, presenting a range of tools for achieving these goals, and including reporting by the audio and audiovisual media sector on actions taken and results achieved. Alongside the principles-based approach, the document references some obligations which may be linked to media legislation/regulation or codes directly within the remit of Coimisiún na Meán and others linked to legislation outside of that remit.

¹ For more details on this process, on the feedback of stakeholders and on the current activities in the audio and audiovisual media sector, see the related document “Developing the Gender, Equality, Diversity and Inclusion Strategy for the audio and audiovisual media sector - Stakeholder feedback and sector initiatives” Prepared by CommSol, January 2024.

Legal and Policy Framework

The Strategy is developed in the framework of rights, obligations and good practice outlined in international (United Nations) and European (Council of Europe, European Union) Treaties, Human Rights Treaties, Resolutions, Regulations and Recommendations that are relevant to gender, equality, to the rights of various minority and marginalised groups, and to the rights of people with disabilities. The Strategy is framed by the Irish legislative and policy framework, including Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'). These cover the nine grounds of anti-discrimination: gender, marital status, family status, age, disability, sexual orientation, race, religion, and membership of the Traveller community. Also relevant are the Public Sector Equality and Human Rights Duty (2014), the Disability Act (2005), the Gender Pay Gap Information Act (2021), the National Traveller and Roma Inclusion Strategy 2017-2021, the LGBT+ Inclusion Strategy 2019-2021, the National Action Plan Against Racism (2023) and the forthcoming Autism Innovation Strategy. The Strategy recognises that socio-economic disadvantage should also be a key factor of inclusion to be considered in the development and implementation of activities.

The specific remit of Coimisiún na Meán in this area is outlined in the Online Safety and Media Regulation Act 2022 (Section 7.2): "whereby in performing its functions the Commission shall endeavour to ensure..[].. c) that the broadcasting services and audiovisual on-demand media services available in the State are open, inclusive and pluralistic, and that the Commission's policies in relation to those services best serve the needs of the people of the island of Ireland, bearing in mind— (i) their languages and traditions; . []... (iii) their diversity, including religious, ethical, cultural, linguistic, socio-economic, and gender diversity; (iv) their levels of participation in those services and their levels of representation in programmes on those services, and (v) as regards people with disabilities, their requirements for accessibility to those services,"

The legislative framework emphasises that the allocation of licences should "allow for the establishment of a diversity of services in an area catering for a wide range of tastes including those of minority interests." (Broadcasting Act 2009 Section 65). In addition, in relation to granting licences for sound broadcasting contracts and for television programme service contracts, "the desirability of having a diversity of services in the area specified in the notice catering for a wide range of tastes including those of minority interests" is taken into consideration (Broadcasting Act 2009 Section 66).

The Online Safety and Media Regulation Act 2022 (Section 46N) also states that Coimisiún na Meán may develop media service codes which “provide for standards and practices to promote the following: (a) balanced gender representation of participants in news and current affairs programmes broadcast by broadcasters or made available by providers of audiovisual on-demand media services; (b) the broadcast in programmes broadcast on sound broadcasting services of music composed or performed by women.”

Regarding the standards and practices that promote the balance of gender representation in news and current affairs, this will be addressed in the forthcoming updated Coimisiún na Meán Code of Fairness, Objectivity and Impartiality in news and current affairs. Other relevant Codes include the forthcoming updated Code of Programme Standards, in relation to respect for persons and groups in society in the context of programming.

Coimisiún na Meán may, in the process of making rules for prominence of content on interactive guides, include programmes that (among others) “(e) relate to human rights, including equality, diversity and inclusion”. (Online Safety and Media Regulation Act 2022 (Section 128C). Regarding the prominence of European works, Coimisiún na Meán shall have regard to (among others) “a) the objective of cultural diversity”. In relation to the European works scheme (Online Safety and Media Regulation Act 2022 (Section 159F), funds may be provided for (among others) “(a) new audiovisual programmes relating to – (i) Irish culture, language, history, heritage, society and sport, (ii) the experiences of the people of the island of Ireland, including the experiences of people of Irish ancestry living abroad, (iii) environmental sustainability, biodiversity, and climate change, (iv) human rights, equality, diversity and inclusion,”

The Sound and Vision Scheme has already provided opportunities to enhance gender, equality, diversity and inclusion in the media sector. In addition, Coimisiún na Meán provides support and financing for various areas of sectoral development, training, networking and events which already take GEDI issues into consideration. The development of the Strategy is also informed by the recommendations of the Future of Media Commission (FOMC) in their Report and in the Department Implementation and Action Plan. It is proposed that the Strategy will be reviewed no later than 24 months after publication. It is also intended that the Strategy will underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

Definitions and Understanding of Terms

Gender equality in the workplace implies an equality of opportunity regarding recruitment, training, and promotion, and equality in terms of equal pay for equal work. Gender equality should be reflected in policies that provide balance on boards and in management. Gender equality requires also an adaption of internal policies to create a family friendly environment for all parents and carers.

Gender equality “on-air” implies a balance of voices, contributors, experts and presenters across the range of programming including news, information, entertainment and sport.

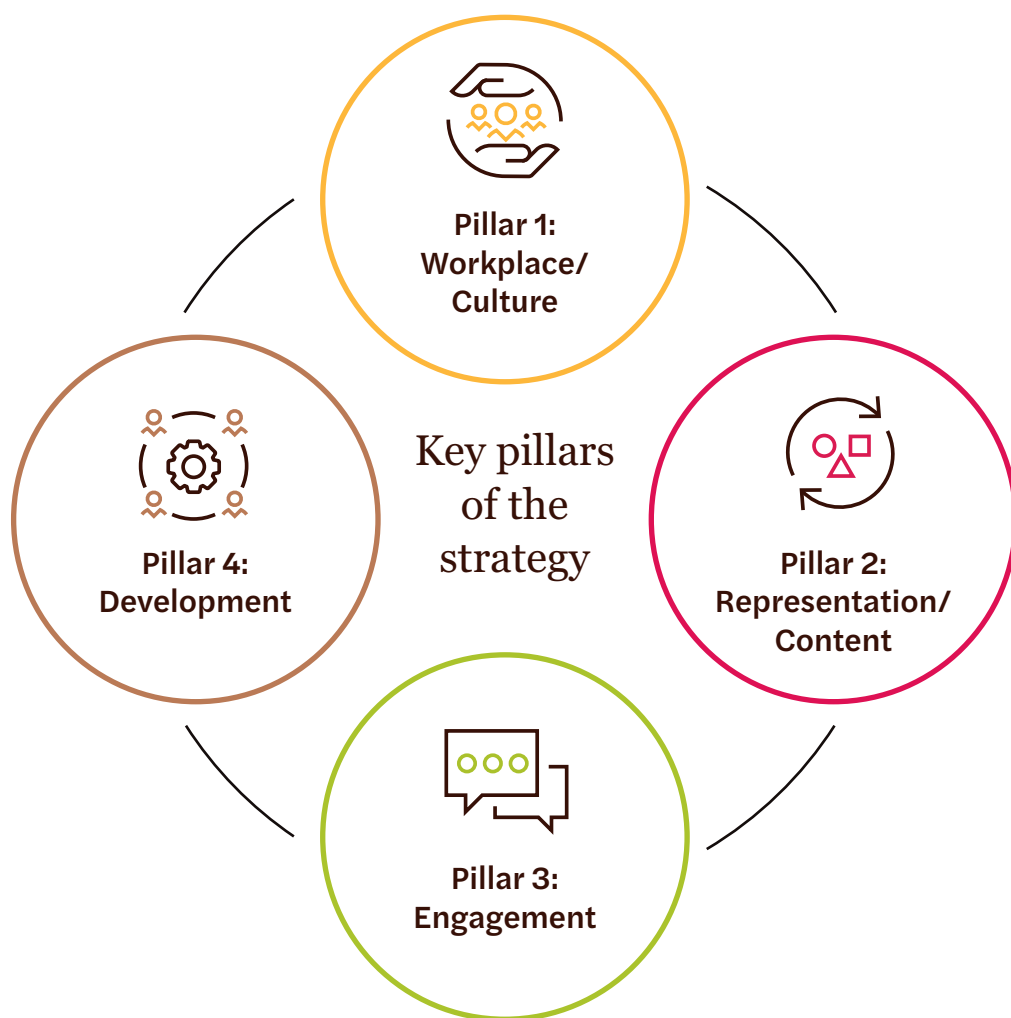
Diversity in the workplace implies that the workplace includes a fair representation of Irish society with reference to gender, marital status, family status, age, disability, sexual orientation, race, ethnicity and cultural background, religion, membership of the Traveller community, and socio-economic status.

Diversity “on-air” gives voice to the diverse nature of Irish society with reference to gender, marital status, family status, age, disability, sexual orientation, race, ethnicity and cultural background, religion, membership of the Traveller community, and socio-economic status.

Inclusion is an act, an active choice and a set of behaviours aimed at creating an environment where everyone feels like they belong, and that they can thrive. Inclusion in the Irish audio and audiovisual media sector relates to inclusive, safe, respectful workplaces, inclusive employment practices and inclusive content creation. Inclusion should cover employment, career and learning opportunities, content creation and participation in programming that serves to reflect the diverse nature of Irish society with reference to gender, marital status, family status, age, disability, sexual orientation, race, ethnicity and cultural background, religion, membership of the Traveller community, and socio-economic status.

Key Pillars of the Strategy

On the basis of the discussions and consultations with stakeholders and with a range of experts in the area of Gender, Equality, Diversity and Inclusion, and taking account of the ecosystem of the Irish audio and audiovisual media sector and the activities of the key stakeholders, the Strategy outlined below rests on four key interrelated Pillars. The graphic below outlines these Pillars: Workplace/ Culture, Representation/ Content, Engagement and Development.



The Pillars are not just inter-related but also mutually reinforcing. For example, it is difficult to increase the diversity in the sector without development, training and skills. A more diverse workforce should impact on content and representation. Engagement with different groups and communities should also have an impact on content and representation.

The following sections outline the Principles under each Pillar and a range of tools and approaches to be used by the audio and audiovisual media sector to achieve these goals. The Strategy recognises that the Irish audio and audiovisual media ecosystem is diverse in terms of the types of media outlets, their size and resources (from large private and public organisations to regional, local and community outlets), and regarding their specific roles, remits and expected contribution to the public interest. Various actors in the sector may need to approach the promotion of gender, equality, diversity and inclusion in different ways.

Some of these actions will be required of certain media outlets and/or associations of outlets as indicated. Some other actions are recommendations that should help audio and audiovisual media outlets to support the Principles. Examples of best practice are included in the tables based on the current actions of media outlets and the recommendations of stakeholders. Several actions will form the basis of a set of GEDI standards to be developed by Coimisiún na Meán as part of the ongoing work in this area. Given the fact that the Pillars are interrelated, some Principles and actions are repeated under various Pillars. The final section of this document – Implementation and Future Actions - provides timelines for achievement of actions to be taken by Coimisiún na Meán to support implementation of the Strategy, and timelines for actions to be taken by the sector.

Pillars, Principles, Tools and Actions



Pillar 1: Workplace/Culture



Key Principle:

Mainstreaming GEDI objectives across organisations² and the sector



Tools and actions related to Workplace/Culture

Responsible

Develop and publish GEDI policies, plans and strategies.

All audio/audiovisual media, media associations³

Appoint a GEDI Lead or other responsible manager.

RTÉ, TG4, Virgin Media TV, Radio Groups⁴

It is strongly encouraged to establish GEDI leadership in individual media outlets or media associations.⁵

Smaller media outlets/ companies

Ensure cooperation across departments (or associations of media outlets, or media groups).

All audio/audiovisual media

Best practice examples include internal GEDI committees, champions, collectives, association committees.

All audio/audiovisual media

Integrate GEDI principles/criteria in HR in relation to staff hiring, promotion and retention.

All audio/audiovisual media

Best practice examples in relation to HR include reviewing job advertising, recruitment, interview and assessment processes. Best practice includes providing training in GEDI issues (see below) for employees involved in recruitment, external recruitment agencies and interview panels.

All audio/audiovisual media

Assessment of make-up of workforce via voluntary internal anonymous surveys and including results in annual reports to Coimisiún na Meán.

RTÉ, TG4, Virgin Media TV, Radio Groups⁶

2 See Future of Media Commission Report, Recommendation 2-5 Diversity Boards and Leadership, page 54.

3 The majority of media outlets have already developed such policies (November 2023). Coimisiún na Meán will communicate with smaller media outlets and associations to see if further guidance in this area can be provided.

4 See Future of Media Commission, Department Implementation Strategy & Action Plan, Page 11.

5 For smaller media outlets – Community Media - leadership is more collaborative under the associations of community media. According to questionnaire feedback 15 member stations of the IBI already have GEDI leads (30/11/2023).

6 Radio Groups could include groups or networks of radio stations, for example Bauer Media Audio Ireland, Wireless Ireland.

Key Principle:

Ensuring a safe, positive, respectful, inclusive and welcoming work environment



Tools and actions related to Workplace/Culture	Responsible
Provide ongoing relevant training to staff that covers GEDI awareness, disability awareness, unconscious bias, anti-racism etc.	All audio/audiovisual media
Develop policies on anti-bullying/anti-harassment, and anti-racism, in line with relevant workplace legislation. Appoint specific contact points and trained staff members to deal with these issues.	All audio/audiovisual media
Best practice example on anti-bullying/anti-harassment/ anti-racism is where this applies also to external collaborations – for example requiring external producers to sign up to a company’s internal policy for their crew, or to show commitment to Safe to Create. ⁷	All audio/audiovisual media
Support strategies and collaborate with other industry actors to create a safe online environment for all journalists and media workers to combat online abuse. ⁸	Coimisiún na Meán with Media Engagement Group ⁹
Ensure physical accessibility of workplaces and services, and enhance accessibility of content. ¹⁰	All audio/audiovisual media
Best practice involves a Universal Design approach (physical and digital environments): infrastructure, products and services where needed by staff. ¹¹	All audio/audiovisual media
Best practice includes encouraging persons with disabilities to be Diversity Champions to drive the EDI agenda. Visibility may help other employees to feel comfortable sharing their disability status.	All audio/audiovisual media
Encourage the establishment of Employee Resource Groups (ERGs).	RTÉ, TG4, Virgin Media TV, Radio Groups

7 See details of the Safe to Create project: <https://www.safetocreate.ie/>. Also of interest are the proposals of FairPlé.

8 This is also related to the work of Coimisiún na Meán regarding the Online Safety Code and hate speech.

9 An Garda Síochána, together with the National Union of Journalists, and other media stakeholders, established a Media Engagement Group to discuss threats and violence against journalists and ensure a coordinated response.

10 Content accessibility under Accessibility Rules of Coimisiún na Meán, as per the Audiovisual Media Services Directive.

11 In line with the EU Accessibility Act.

Key Principle:**Breaking down barriers to advancement of women in the audio and audiovisual sector**

Tools and actions related to Workplace/Culture	Responsible
Publish Gender Pay Gap reports (where required by law) or carry out voluntary assessments (where not required by law) as a measurement of progress.	Over 250 employees Over 50 employees
Best Practice involves reviewing HR in relation to supporting parents, carers and people returning from maternity/paternity leave and other forms of support such as job sharing, and hybrid or remote working.	All audio/audiovisual media
Best practice includes leadership training and mentoring.	All audio/audiovisual media
Annual reporting on actions and initiatives to promote workplace gender equality.	All audio/audiovisual media
Annual reporting on Gender breakdowns of staff and of management.	RTÉ, TG4, Virgin Media TV, Radio Groups

Key Principle:**Breaking down barriers to access to the sector for minority and other potentially excluded groups**

Tools and actions related to Workplace/Culture	Responsible
Participate in, and support training and development via internships, and strategic mentorships. Support paid internships.	RTÉ, TG4, Virgin Media TV, Radio Groups, media associations
Best practice involves paid internships to ensure inclusion of people from disadvantaged socio-economic backgrounds and those living far from media hubs.	All audio/audiovisual media
Review the processes for engaging people in employment, internships and mentorships to make this more inclusive.	All audio/audiovisual media
Best practice includes introducing new forms of application processes such as via audio or video recordings.	All audio/audiovisual media
Annual reporting on actions and initiatives to promote diversity in the workplace.	All audio/audiovisual media



Pillar 2: Representation/Content



Key Principle:

Promoting diversity of content, voices, opinions and stories



Tools and actions related to Representation/Content

Responsible

Establish internal cross-department (or association) collaborative approaches such as internal boards, collectives, champions or association boards to enhance diversity of content.

All audio/audiovisual media

Best practice: internal working groups, or Champions, or association committees.

All audio/audiovisual media

Provide ongoing relevant awareness training regarding GEDI, disability awareness, unconscious bias, conscious inclusion, anti-racism, etc. with a specific focus on the media.

All audio/audiovisual media

Explore the potential to use internal tools to assess the balance of gender representation on the airwaves, and diversity on the airwaves following the model of the BBC 50/50 project¹² – or using other technologies to track on air diversity such as algorithmic tools.

Audio/audiovisual media or representative associations except community media

Coimisiún na Meán will assess the feasibility of developing alternative or complementary systems for measurement of gender, equality and diversity on air via pilot projects in collaboration with the research community.

Coimisiún na Meán with universities and stakeholders

¹² A voluntary, self-monitoring system used by editorial and production teams to monitor their content. BBC 50:50 project.

Key Principle:

Ensuring a gender balance of voices on the airwaves



Tools and actions related to Representation/Content	Responsible
Use of tools such as the “Women on Air” database to identify new experts and voices.	All audio/audiovisual media
Ensuring a gender balance in news and current affairs programming. ¹³	All audio/audiovisual media
Best practice includes ensuring that balance of opinions is maintained when ensuring gender balance in current affairs and political debate.	RTÉ, TG4, Virgin Media TV, Radio Groups
Promote women’s sports and increase the participation of women experts/commentators. ¹⁴ Promote the broadcast of music written or performed by women. ¹⁵	All audio/audiovisual media

13 To be addressed in the updated Code of Fairness, Objectivity & Impartiality in News and Current Affairs.

14 See the National Strategy for Women and Girls 2017-2020: creating a better society for all - Action 3.7 Undertake measures to promote greater visibility of women’s sport in broadcast media. Coimisiún na Meán, together with Sport Ireland will develop a Strategy for Sports Broadcasting which will include the issue of diversity.

15 Coimisiún na Meán will commission research in this area.

Key Principle:**Reflecting the diversity of Irish society across the range of programming genres¹⁶**

Tools and actions related to Representation/Content	Responsible
Explore the feasibility of developing and utilising a “Diversity on Air” database to increase awareness of new experts and voices.	Coimisiún na Meán and all sector
Improve the quality and diversity of Irish language media. ¹⁷	Coimisiún na Meán and all sector
Collaborating with other actors in the audio and audiovisual sector in the creation of content and content development.	All audio/audiovisual media
Internal tools such as the 50/50 project (see above) – or other algorithmic tools or research methodology of Coimisiún na Meán to measure progress.	All audio/audiovisual media except Community
Integrating GEDI in commissioning/content development.	RTÉ, TG4, Virgin Media TV
Development of GEDI Standards.	Coimisiún na Meán
Engaging with various communities and groups in relation to content development.	All audio/audiovisual media
Regarding applications for funding for programming themes that address specific groups or sections of society, Coimisiún na Meán will examine incorporating prior engagement with such groups in the development of concepts/stories as a criterion.	To be explored by Coimisiún na Meán
Celebrating and highlighting cultural events.	All audio/audiovisual media
Engagement with events: International Women’s Day, Pride Week, International Day for the Elimination of Racial Discrimination, International Traveller and Roma Day, Black History Month, International Day of Persons with Disabilities and other as relevant. ¹⁸	

16 See National Action Plan Against Racism – “Objective three: Being Seen and Taking Part: Enabling minority participation”.

17 The improvement of the quality and diversity of Irish language media will also be addressed in the forthcoming Coimisiún na Meán review of Irish language media.

18 See the [National LGBTI+ Inclusion Strategy 2019-2021](#) – Thematic Pillar “Visible and Included” - Action 1.4.

See [National Traveller and Roma Inclusion Strategy 2017 – 2021](#), “develop, preserve and promote cultural heritage”.

Key Principle:

Promoting an inclusive society, where diverse groups are treated with fairness and dignity.¹⁹ Fighting stereotypes, hate speech and denigration²⁰



Tools and actions related to Representation/Content	Responsible
Using guidelines and language guidelines provided by representative organisations, the NUJ, and other NGOs. ²¹	All audio/audiovisual media
Providing key Public Service Content such as public health information subtitled in languages that reflect the population of Ireland. ²²	RTÉ, TG4, Virgin Media TV
Mainstreaming diverse groups across programming genres.	All audio/audiovisual media
Best practice is that members of diverse groups or under-represented groups are also invited to participate in the media to discuss issues beyond their lived experience - as experts in other fields relevant to society as a whole.	All audio/audiovisual media
Best practice examples also include having a diversity of participants in entertainment shows, soap operas, quizzes, competitions, reality TV etc.	RTÉ, TG4, Virgin Media TV
Best practice includes avoiding stereotyping of characters in drama and entertainment.	All audio/audiovisual media
Introducing policies/codes of conduct for reporting on various groups, engagement (on air, interviews, vox-pops) with groups or representatives of groups/communities. ²³	All audio/audiovisual media
On-air presenters and hosts should be trained to deal with hateful and denigrating speech of guests or programme participants including on call-in shows. ²⁴	All audio/audiovisual media

19 See the National LGBTI+ Inclusion Strategy 2019-2021 – Thematic Pillar “Visible and Included” - Action 1.3.

20 Related to work of the Online Safety Commissioner in the development of the Online Safety Code. See the National Action Plan Against Racism– Action 3.3 – measures to eliminate the dissemination of hate speech online.

21 Several stakeholders explained that they had already developed such guidelines (NDA, LGBTI, etc). Further guidelines could be developed by relevant organisation on appropriate language and representation of Autistic people in media.

22 Future of Media Commission, Department Implementation Strategy & Action Plan page 12. To be examined in more detail by Coimisiún na Meán.

23 May be informed by Code of Programme Standards and the Code of Fairness, Objectivity and Impartiality in News and Current Affairs currently under review (January 2024). Also, in line with the National Action Plan Against Racism, Action 3.2 - Code of ethics for media practices on the representation in media of minority ethnic and racialized communities.

24 See also the forthcoming Code of Programme Standards (Principle 5 “Respect for Groups in Society”).



Pillar 3: Engagement



Key Principle:

Develop meaningful engagements with diverse and marginalised groups



Tools and actions related to Engagement

Formal and/or informal structures of engagement with under-represented groups.

Responsible

All audio/audiovisual media

Key Principle:

Collaborative engagement



Tools and actions related to Engagement

Develop and participate in a GEDI Forum within the sector to provide a platform for discussion, for engagement with different groups and communities and for the sharing of best practice examples and case studies.

Responsible

Coimisiún na Meán with stakeholders

Key Principle:

Deliver media content in an inclusive way



Tools and actions related to Engagement

Include the perspective of diverse groups in the development of content that relates to their communities.

Responsible

All audio/audiovisual media

Engage with the work of the “Women on Air” database.

Coimisiún na Meán with stakeholders

Explore the feasibility of developing and utilising a “Diversity on Air” database to increase awareness of new experts and voices.

Coimisiún na Meán and audio/audiovisual media

Coimisiún na Meán to explore ways to enhance the development, use and maintenance of such databases or other methods of data collection.

Coimisiún na Meán

Engage with various communities and groups in relation to content development.

All audio/audiovisual media

Key Principle:

Break down barriers to access to the sector and promoting equality of access to opportunities



Tools and actions related to Engagement	Responsible
Raise awareness of opportunities in the sector via outreach, conferences and networks.	Coimisiún na Meán with stakeholders
Support the development of new networks.	Coimisiún na Meán with stakeholders
Support and facilitate training, internships and mentorships.	All audio/audiovisual media
Best practice is to support paid internships. ²⁵	RTÉ, TG4, Virgin Media TV, IBI ²⁶
Engagement with higher education institutions, training institutes and schools and other outreach activities.	All audio/audiovisual media
Examples of best practice include visits, talks and open days, etc.	All audio/audiovisual media

²⁵ Paid internships may not be possible in the non-profit media sector.

²⁶ Independent Broadcasters of Ireland.



Pillar 4: Development



Key Principle:

Contribute to the development of the future work force



Tools and actions related to Development

Responsible

Internal assessment of future staff needs, for example in the area of technology, Irish language training and new media as a focus for future staff development and access to new and diverse and younger audiences.

RTÉ, TG4, Virgin Media TV, Radio Groups

Supporting and facilitating training, internships and mentorships.

All audio/audiovisual media

Best practice is to support paid internships.

RTÉ, TG4, Virgin Media TV, IBI

It is highly recommended to review the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive for example by allowing applications for internships over video/ podcast.

All audio/audiovisual media

Key Principle:

Develop paths to access and opportunity



Tools and actions related to Development

Responsible

Engagement with higher education institutes, training institutes and schools to raise awareness, and develop new networks.

All audio/audiovisual media

Examples of best practice include visits, talks and open days, etc.

All audio/audiovisual media

Key Principle:

Break down barriers to gender equality in advancement in the sector. Break down barriers to access to the sector and promoting equality of access to opportunities



Tools and actions related to Development

Responsible

Engagement with higher education institutes training institutes and schools to contribute to training, raise awareness, and develop new networks.

All audio/audiovisual media

Examples of best practice include Transition Year projects, student work placements, graduate programmes, internships and apprenticeships.

RTÉ, TG4, Virgin Media TV, IBI

Collaboration and cooperation with industry-wide skills, training and development and funding organisations to contribute to training, raise awareness and develop new networks.

All audio/audiovisual media

Key Principle:

Participation in the sharing of expertise and experiences across the sector



Tools and actions related to Development

Responsible

Participate in the proposed GEDI Forum within the sector to provide a platform for discussion, engagement and sharing of best practice.

Coimisiún na Meán with stakeholders

Implementation and Future Actions

What Coimisiún na Meán will do to facilitate the implementation of the Strategy:

Coimisiún na Meán will continue to support and facilitate the GEDI strategies and actions of the sector via the Sound and Vision funding Scheme (and future funding schemes), the sponsorship scheme and training, development and network funding.

Coimisiún na Meán will continue to collect and publish data collected on gender equality in the Sound and Vision funding Scheme.

Coimisiún na Meán will collect and publish information on gender and diversity collected via the Sectoral Development funding schemes and Sponsorship schemes.

Coimisiún na Meán will also continue current, and develop further, collaborations with other key actors in the sector such as Screen Ireland/Fís Éireann and the Arts Council in order to coordinate schemes and projects that have obvious overlap between all sectors of the broader audiovisual and cultural industry.

Coimisiún na Meán will collaborate in the development of the sector as regards skills training, learning and development with appropriate representative bodies. In this regard, Coimisiún na Meán will continue with its Sectoral Development programme.

Coimisiún na Meán will continue to support qualitative research on gender, equality, diversity and inclusion in the sector – reflecting contexts and lived experiences - and to support quantitative studies based on data collection (see further below). The work of the Research Unit within Coimisiún na Meán is vital in this regard, and the continued cooperation with the research community will also be key.

The GEDI Strategy will undergo review two years after publication. This provides an opportunity for the sector to discuss what works and what approaches are best practice, and allow for adaption or enhancement of the Strategy or where necessary the adjustment or development of relevant codes. For this period, KPIs will largely be qualitative. Following the establishment of data collection methods, quantitative KPIs could be introduced.

Next steps for Coimisiún na Meán

Coimisiún na Meán will continue its work on Gender, Equality, Diversity and Inclusion, including addressing further recommendations of the Future of Media Commission. This will involve the development of GEDI Standards for the Sector.²⁷ These standards will be based on the actions and recommended actions in the Strategy and will be developed by Coimisiún na Meán in consultation with key stakeholders.

Coimisiún na Meán and the audio and audiovisual media sector will aim to agree on an annual reporting of GEDI actions and their impact. This will be similar to the process used in developing the Strategy via questionnaires in order to gather qualitative information on policies, plans, projects and initiatives. In this context, the services could be asked to gather data and provide feedback on the impact of the GEDI strategies and plans.

Coimisiún na Meán will explore the potential for the audio and audiovisual media sector to deliver data on their workforces.

Coimisiún na Meán will commission research to provide information that will guide the proposed introduction of media service codes to provide standards and practices to promote the broadcast in programmes broadcast on sound broadcasting services of music composed or performed by women.

Coimisiún na Meán will conduct a feasibility study into future data collection, in coordination with the stakeholders. This will need to address the parameters of a data collection framework. This will include a review of best practice in other states, and be informed by data collection in Ireland such as the National Equality Data Strategy launched in 2022. Synergies with other actors in the sector collecting data, such as Screen Ireland/Fís Éireann, the Arts Council and also academic institutions will be explored in order to harmonise approaches to data-collection, questionnaires, anonymity and GDPR compliance. The collection of data focuses on two categories: data on workforce; and data on equality and diversity on-air. In the first case, Coimisiún na Meán will determine to what extent the audio and audiovisual media services can be asked to provide data on gender in the workforce, and data on diversity (via anonymous surveys) in the workplace. The purpose of gathering workforce data is to understand the current status of gender, equality, diversity and inclusion in order

²⁷ In line with the recommendation of the Future of Media Commission.

to track progress in the future.²⁸ With regard to the collection of data on equality and diversity on-air, the feasibility of collecting such data will be explored in consultation with key stakeholders.

Coimisiún na Meán will establish an annual Gender, Equality, Diversity and Inclusion Forum within the sector (comprising all key stakeholders). The role of such a GEDI Forum will include (among others): the provision of a platform for discussion and for engagement with different groups and communities; sharing best practice examples and case studies; contributing to the development of GEDI standards in relation to funding; contributing to the development of templates for carrying out anonymous staff diversity surveys across the industry.

Coimisiún na Meán will establish a Steering Committee for the GEDI Strategy which will allow for a regular review of the key actions in the Strategy.

²⁸ In the UK, the Ofcom has a specific remit under the legislation to promote EDI in the workforce. However, Ofcom has no legal remit to impose any quotas on the make-up of the workforce.

Table of Actions for Coimisiún na Meán

Action	Organisation	Proposed timeline	KPI
Launch of the GEDI Strategy	Coimisiún na Meán / Stakeholders	Q2 2024	Press Launch
Coimisiún na Meán will continue to support and facilitate the GEDI strategies and actions of the sector via funding schemes and other supports	Coimisiún na Meán	Ongoing	Ongoing
Incorporation of GEDI initiatives into the licensing process for broadcast services ²⁹	Coimisiún na Meán	Ongoing	Incorporation of GEDI initiatives into new sound broadcasting contracts
Annual publication of report mapping GEDI initiatives across the audio and audiovisual industry	Coimisiún na Meán	Q2 annually	Annual Publication of GEDI Mapping Document
Establishment of Steering Committee to track and evaluate progress of GEDI Strategy	Coimisiún na Meán/ Stakeholders	Q2 2024	Steering Committee to meet three times annually
Collaboration with relevant industry bodies on the collection of gender and diversity data as recommended by the Future of Media Commission Implementation Report ³⁰	Coimisiún na Meán with other bodies	Q4 2024	Regular updates to be shared via GEDI Forum Steering Committee
Commission research to inform the potential inclusion in media services codes of standards and practices related to women, music and sound broadcasting	Coimisiún na Meán and cooperation/ partnerships with Universities/ researchers	Q4 2024	Commencement of research, Coimisiún na Meán

29 In considering applications for broadcasting services, An Coimisiún has regard to an Applicant's programming strategies and initiatives in relation to equality, diversity and inclusion. Commitments to such are subsequently incorporated into a successful applicant's contractual conditions. Building on this aspect of the licensing process, An Coimisiún will seek to ensure the progression of strategies and initiatives, both on and off air, that align with the principles set out in its GEDI strategy.

30 Informed by the Future of Media Commission implementation report.

Action	Organisation	Proposed timeline	KPI
Coimisiún na Meán to establish Data Collection working group and report as appropriate	Coimisiún na Meán	Q1 2025	Regular reporting from steering group
Launch cooperation with public funding bodies on new pathways to access opportunities in the sector with a focus on GEDI	Coimisiún na Meán and others	Q3 2024	Reporting back to annual GEDI forum
Collaborate with relevant industry actors to create a safe online environment for all journalists and media workers to combat online abuse	Coimisiún na Meán with Media Engagement Group	Q3 2024	Attendance at scheduled meetings
Coimisiún na Meán will explore the establishment of a forum with educational institutes, stakeholders with lived experience of exclusion and media employers to identify how to create a diverse talent pipeline and identify skills gaps	Coimisiún na Meán, DFHERIS, universities and stakeholders	Q1 2025	Reporting back to annual GEDI forum
Exploratory work on the collection of data on workplace diversity	Coimisiún na Meán	Q4 2024	Exploratory work to commence in conjunction with Research and Data divisions of Coimisiún na Meán
Conduct feasibility study of a 'Diversity on Air' database and enhancement of 'Women on air' database	Coimisiún na Meán with industry/ Women on Air	Q4 2024	Research commenced
Establishment of annual GEDI Forum	Coimisiún na Meán / Stakeholders	Q1 2025	Annual meeting of Forum
Collection and publication of data from the Sound and Vision scheme	Coimisiún na Meán	Annual	Publication in Coimisiún na Meán annual report

Action	Organisation	Proposed timeline	KPI
Collection and publication of information on gender and diversity from Sectoral Development and Sponsorship schemes	Coimisiún na Meán	Q1 2025	Publication in Coimisiún na Meán annual report
³¹ Development of GEDI Standards for the Irish audio and audiovisual industry as recommended by the Future of Media Commission Implementation plan	Coimisiún na Meán/ Stakeholders	Q2 2025	Publication of GEDI Standards
Review of Irish Language Media	Coimisiún na Meán	Q4 2025	Publication of review
Establish internal Coimisiún na Meán cross functional working group to develop Accessibility Policy and Implementation plan	Coimisiún na Meán	H2 2024	Establishment of group

³¹ Extract from FOMC Implementation Report Recommendation 2-4.

Coimisiún na Meán to consider the most appropriate framework for implementing standards and how adherence can be monitored and reported on. Following Coimisiún na Meán's analysis, TCAGSM will consider if any legislative change is required.

Guidance for the Audio and Audiovisual Sector

As mentioned above, in the drafting of this Strategy, Coimisiún na Meán has engaged with a significant number of stakeholders to gather insights and inputs. The table below reflects outcomes of these engagements and aims to provide guidance and suggested actions for the audio and audiovisual sector in order to support the aims of the Strategy.

Coimisiún na Meán together with the audio and audiovisual media sector will deliver an annual report on GEDI actions undertaken by the sector and, where possible, measure and assess their impact.

The reports should include reference to the Guidance outlined below which lists a number of suggested actions, but also to the recommendations and best practice examples highlighted under each Pillar. Information on new and innovative approaches would also be very welcome in the reporting.

Action	Responsible organisation	Proposed timeline	KPI
Coimisiún na Meán and the audio and audiovisual media sector to agree on annual reporting of GEDI actions and their impact	Coimisiún na Meán and sector	Q4 2024	Provision of information in annual GEDI survey
Introduction of GEDI policies and /GEDI leads	All audio and audiovisual media and associations	Q3 2024	Provision of information in annual GEDI survey
Collaborative cooperation across departments or associations of media outlets, or media groups (via committees, champions etc)	All audio and audiovisual media and associations	Q3 2024	Provision of information in annual GEDI survey
Publish Gender Pay Gap reports (where required by law)	Over 250 employees	Q4 2024	Publication where required by law
	Over 50 employees	Q4 2025	
Annual reporting on actions and initiatives to promote workplace gender equality	All audio and audiovisual media (or associations)	Q4 2024	Provision of information in annual GEDI survey

Action	Responsible organisation	Proposed timeline	KPI
Develop policies on anti-bullying/ anti-harassment, and anti-racism, in line with relevant workplace legislation. Appoint specific contact points and trained staff members to deal with these issues	All audio and audiovisual media (or associations)	Q4 2024	Provision of information in annual GEDI survey
Establish internal cross-department (or association) collaborative approaches such as internal boards or association boards to enhance diversity of content (via committees, champions etc)	All audio and audiovisual media (or associations)	Q4 2024	Provision of information in annual GEDI survey
Provide ongoing relevant awareness training regarding GEDI, disability awareness, unconscious bias, conscious inclusion, anti-racism, etc. with a specific focus on the media	All audio and audiovisual media (or associations)	Q4 2024	Provision of information in annual GEDI survey
Ensuring gender balance in news and current affairs programming	All audio and audiovisual media	Q4 2024	Provision of information in annual GEDI survey
Using guidelines and language guidelines provided by representative organisations or developed by the National Union of Journalists or by NGOs	All audio and audiovisual media	Q4 2024	Provision of information in annual GEDI survey
Support and facilitate initiatives in training, mentorships and internships and integrate GEDI goals	All audio and audiovisual media	Q4 2024	Provision of information in annual GEDI survey
Engaging with higher education institutions, training institutes and schools and other outreach/ educational parties	RTÉ, TG4 Virgin Media TV, IBI/ Learning Waves	Q4 2024	Provision of information in annual GEDI survey

Action	Responsible organisation	Proposed timeline	KPI
Introducing policies/codes of conduct for reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups/ communities	All audio and audiovisual media	Q2 2025	Provision of information in annual GEDI survey Year 2
Training for on-air presenters and hosts to deal with hateful and denigrating speech of guests or programme participants including on call-in shows	All audio and audiovisual media	Q2 2025	Provision of information in annual GEDI survey Year 2
Assessment of make-up of workforce via voluntary internal anonymous surveys and including results in annual reports to Coimisiún na Meán	RTÉ, TG4, Radio Groups and Virgin Media TV	Q2 2025	Annual Reporting to Coimisiún na Meán Year 2
Ensuring physical accessibility of workplaces and services, and enhance accessibility of content	Audio and audiovisual media	Q2 2025	Annual Reporting to Coimisiún na Meán Year 2
Cooperating with pilot studies on Diversity Data	Audio and audiovisual media with Coimisiún na Meán	Q2 2025	Cooperation with pilot study when undertaken
Development of and participation in the annual GEDI Forum	Audio and audiovisual media with Coimisiún na Meán and other stakeholders	Q1 2025	Attendance at annual GEDI Forum, or membership of association in attendance (Craol, IBI, Learning Waves)
Engagement with groups and communities concerned with diversity of representation	Audio and audiovisual media with Coimisiún na Meán and other stakeholders	Q1 2025	Attendance at GEDI Forum, or membership of association in attendance (Craol, IBI, Learning Waves)

Action	Responsible organisation	Proposed timeline	KPI
Collaboration and cooperation with industry-wide skills, training and development and funding organisations to contribute to training, raise awareness and develop new networks	Audio and audiovisual media with Coimisiún na Meán and other stakeholders	Q3 2025	Provision of information in annual GEDI survey Year 2
Integrating GEDI in Commissioning/content development. Action related to Coimisiún na Meán GEDI Standards.	RTÉ, TG4, Virgin Media TV	Q4 2025	Provision of information in annual GEDI survey Year 2

Appendix

Organisations Represented at GEDI Workshop, January 2024

Adult and Continuing Education
University College Cork (ACE)

Animation Ireland

Bauer Media Audio Ireland

Conradh na Gaeilge

CRAOL

Cultural & Creative Industries Skillnet

Department of Tourism, Culture, Arts,
Gaeltacht, Sport and Media

DCU

Equality Expert Group

Harte Media

Independent Broadcasters of Ireland

Irish Traveller Movement

Learning Waves

Maynooth University

National Disability Authority

National Traveller Women's Forum

National Youth Council

NEAR FM

Pavee Point

Raidió Na Life

RTÉ

Screen Directors Guild of Ireland

Screen Ireland

Screen Producers Ireland

SDGI

TG4

Virgin Media

Why Not Her?

Women on Air

Writers Guild of Ireland

X-Pollinator

Coimisiún na Meán Gender, Equality, Diversity and Inclusion Strategy Consultations 2023

Animation Ireland

Arts Council

Bauer Media Audio Ireland

Coimisiún na Meán

Community TV Association

CRAOL

Cultural and Creative Industries Skillnet

Department of Tourism, Culture, Arts,
Gaeltacht, Sport and Media

Dublin City University

Equality Expert Group

Fís Éireann/Screen Ireland

GORM MEDIA

Independent Broadcasters of Ireland
(IBI)

Irish Human Rights and Equality
Commission

Irish Traveller Movement

LGBTI
Learning Waves
National Disability Authority (NDA)
National University of Ireland Maynooth
National Women's Council of Ireland
National Youth Council of Ireland
Pavee Point
Project Open Opportunity
RTÉ

Screen Directors Guild (SDGI)
Screen Producers Ireland (SPI)
Screen Skills Ireland
TG4
Virgin Media
Why Not Her?
Women in Film and Television
Writers Guild of Ireland
X-Pollinator

Review BAI Gender Action Plan and Input to Future EDI Strategy 2021

Organisations interviewed as part of GAP review 2021
Animation Ireland
Broadcasting Authority of Ireland
Community TV Association/
CRAOL
Dublin City University
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGSM)
Equality Expert Group
Independent Broadcasters of Ireland (IBI)
Learning Waves
Irish Traveller Movement
LGBTI
National Women's Council of Ireland

National Disability Authority (NDA)
Maynooth University
OFCOM
RTÉ
Fís Éireann/Screen Ireland
Screen Skills Ireland
TG4
Virgin Media
Why Not Her?
Women in Film and Television
Writers Guild of Ireland
Screen Producers Ireland (SPI)
Screen Directors Guild (SDGI)
Project Open Opportunity
X-Pollinator

Yellow vertical line

Brown vertical line

Pink vertical line

Yellow vertical line

Orange vertical line

White vertical line

Cyan vertical line

Red vertical line

White vertical line

Green vertical line

White vertical line

Red vertical line

Pink vertical line