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CONSULTATION DOCUMENT ON THE DRAFT GENDER, EQUALITY, DIVERSITY and INCLUSION STRATEGY of COIMISIÚN na MEÁN

NOVEMBER 2023

Maynooth University

Consultation Document on the Draft Gender Equality, Diversity, and Inclusion Strategy of Coimisiún na Meán

November 2023

1. INTRODUCTION

The Draft Strategy has been developed with the aim of 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. It will also underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

The Draft Strategy is developed in the framework of rights, obligations and good practice outlined in international (United Nations) and European (Council of Europe, European Union) Human Rights Treaties, Regulations and Recommendations relevant to gender equality, to the rights of various minority and marginalised groups, and to the rights of people with disabilities.

The Draft Strategy is also framed by the Irish legislative and policy framework. Of particular importance are the Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'), which prohibit discrimination in the provision of goods and services, accommodation and education. They 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 highly 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. In aiming to enhance inclusion in the audiovisual media sector, the Draft Strategy also recognises that socio-economic disadvantage should be considered a factor in initiatives for some communities.

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."*

The development of the Draft Strategy is also informed by the recommendations of the Future of Media Commission (FOMC) in their Report and in the subsequent FOMC Implementation and Action Plan published by the government of Ireland.

Developing and publishing the Draft Strategy is part of an ongoing engagement of Coimisiún na Meán in the promotion of gender equality, diversity and inclusion in the sector and further activities will follow in 2024. The Draft Strategy has built on previous work including the BAI Gender Action Plan (GAP), the work carried out in the context of the "Stakeholder Review of the GAP," and a range of research reports commissioned by the (former) BAI. Further extensive stakeholder discussions took place between September and November of 2023. The aim of this was to include additional organisations that were not part of the initial discussions in 2021. It also served to include GEDI experts in a range of other institutions, and to conduct in-depth discussions with other key actors in the area of development, funding and training in the wider cultural, creative and audiovisual sectors who are examining similar issues.

The Draft Strategy aims 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 public interest. The Draft Strategy takes a principles-based approach by outlining key Principles and presenting a range of tools and actions to support and further these Principles. The Draft Strategy is organised under four Pillars.

In this document, stakeholders have the opportunity to provide feedback on the proposed structure and content of the Draft Strategy. Please return the feedback on or before Friday November 24th at close of business. Please send your responses by email only to Mairéad Nic Gabhann at mngabhann@cnam.ie, clearly specifying Draft GEDI Strategy Consultation in the title. After November 24th, Coimisiún na Meán will unfortunately no longer be able to accept responses.

2. PILLARS OF THE GEDI STRATEGY

The Draft Strategy rests on four pillars, as outlined below. These pillars were elaborated on the basis of the broad range of discussions with stakeholders and with reference to best practice in the area of GEDI work in the media sector. These four areas are considered to be interconnected and mutually reinforcing. The specific Principles related to each Pillar, and tools and actions that can be used to support and further these Principles are outlined in additional sections below. Some Principles and tools and actions are repeated under different headings – illustrating the way in which these Pillars are interconnected. The four Pillars are:

- WORK CULTURE

- REPRESENTATION AND CONTENT

- ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

- DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

3. WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1.

Do you have any feedback on the four principles relevant to Work Culture elaborated above? (please limit responses to 250 words)

Would it make more sense in the first principle, tool or action – 'Mainstreaming GEDI objectives across the sector' (instead of organisation) Arguably very few media workers work for 'organisations' they are often freelance or self employed and even small production companies

would not identify as 'organisations' this might make it look like GEDI work is only for the big players like RTÉ/TG4/VIRGIN and the large production companies.

3.1. WORK CULTURE – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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Question 2.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

These work really well.

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document

[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

4. REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.

Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

For me this doesn't capture the issue of the invisibility of women in media representations – 'voice on the airwaves' doesn't for instance capture the absence of women in sport in our media content. Even when read in tandem with the first principle -

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

I still don't think it captures the problem of women being largely absent from so much programming across hard topics like politics, economics, defence and their ghettoization into soft topics like fashion, cookery and caring commentary. Broadcasters could say they have diversity in the round when they add news and current affairs to lifestyle, but men would still dominate in the former and women in the latter...

Would this work better 'Ensuring a gender balance of voices and representation on the airwaves' and 'Promoting diversity of content, voices, opinions and stories across all genres'

4.1. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media

- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[3] – or using other technologies to track on air diversity such as algorithmic tools
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database
- Monitoring of Irish language programme content[4]
- Collaborating with other actors in the audiovisual sector in the creation of content
- Integrating GEDI in Commissioning and content development[5]
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Mainstreaming diverse groups across programming genres
- Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 630 words

5. ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

Do you have any feedback on the four principles elaborated above in relation to Engagement?
(please limit responses to 250 words)

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[3] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content
[4] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024
[5] GEDI Standards to be developed by Coimisiún na Meán

This could be stronger – as surely at this stage equality in outcomes is what is needed, rather than equality of access - opportunities for access can be created but unless they are effective and long term and sustainable they won't lead to long term change in the composition of the media workforce.

Seeing as many of the tools and measures mentioned above are taken from academic research into media representation would it make sense to include somewhere an engagement with researchers working in the area of GEDI and Media that would allow for reflection on the impacts of tools and measures and other relevant issues to be raised?

5.1. ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.[6]
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Engagement with higher education institutions, training institutes and schools and other outreach activities.

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[6] This will be explored and facilitated by Coimisiún na Meán

Question 6.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 750 words)

It's great to see engagement with Higher Education institutions, this is non-existent outside of Dublin and one or two favoured colleges, which means regions loose out and some universities with very diverse student populations are not supported in creating a pipeline of creative workers for the sector.

6. DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development?
(please limit responses to 250 words)

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

It would be interesting to add the idea of sustainability here – creating a precarious workforce with casualised or cyclical employment doesn't really sustain working lives in media.

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

This needs to be clear that it's at all levels, so access and opportunity for leadership roles and management roles and technical roles as much as entry level access.

Again I think there could be a role here for research on the media workforce – as an evidence base for decision making.

6.1. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.

- Conducting 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
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
- It is recommended to develop an Equality, Inclusion and Diversity 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.[7]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
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[7] This will be explored and facilitated by Coimisiún na Meán

- The use of this example across multiple measures comes across a little trite - sometimes allowing applications for internships over video/ podcast as if an online interview will solve issues of accessibililty for colleagues with disabilities – how about a more radical proposal to facilitate online working and job sharing where appropriate? This is good for disability and for people with caring duties, and research in the UK shows it works for media industries.

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- WORK CULTURE

- REPRESENTATION AND CONTENT

- ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

- DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

3. WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

> **Question 1.**
>
> **Do you have any feedback on the four principles relevant to Work Culture elaborated above?** (please limit responses to 250 words)
>
> The Language in the four principles is a bit outdated. If the principles are aspirational, shouldn't be Respect a better term to use than Tolerance?
>
> Also, the use of the term marginalised in this context is problematic, as by applying the adjective, marginalisation seems to be a inherent of the groups being referred here, instead

that caused by power structures and privilege. We would recommend the change the term "marginalised groups" for social groups that are threatened with exclusion.

3.1. Work Culture – Tools and actions to support key principles

The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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Question 2.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

Continuous training in this area and policy revision would be required, and it would be beneficial to involved minority led advocacy groups in staff training, policy making consultation, accessibility, actions and initiatives to promote GEDI.

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document

[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

4. REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.

Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

This are too general principles and if there is not a more specific approach by CnaM, change might be slow or inexistent. Promoting diversity of voices is Ok, the issue is where those voices are being heard, as usually voices of minorities are compartmentalised to areas that content producers consider adequate: migrants to talk about migrant issues, wheelchair users to talk about disability, etc...) So the challenge is to get those voices to take part in discussions of issues that are relevant to the general public.

Similarly, gender balance of voices doesn't necessarily mean different points of views or angles in the editorial approach to the production of content. Women voices can be used to reinforce a patriarchal agenda.

A reflection of the diversity of Irish society is possible, but it would be important that the last principle in this list (fighting stereotypes, hate Speech and denigration) is considered in that reflection, because otherwise the representation of diverse groups might fall into reproducing and reinforcing stereotypes... (There is a Roma character in the TV series, but they are a flower seller...)

We would substitute point 4.. Contributing to society's tolerance... for Promoting an Inclusive society, where diverse groups are treated with fairness and dignity.

4.1. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media
- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[3] – or using other technologies to track on air diversity such as algorithmic tools
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database
- Monitoring of Irish language programme content[4]
- Collaborating with other actors in the audiovisual sector in the creation of content
- Integrating GEDI in Commissioning and content development[5]
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Mainstreaming diverse groups across programming genres
- Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

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Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 630 words)

What would be the penalty for broadcasting organisations that breach GEDI principles? Relying on voluntary compliance might not work. How will be compliance monitored?

The BAI codes are/were at least obligatory for broadcasters, but the likes of the Press Council do not have 'fairness and impartiality' codes, and are voluntary, so how will this be dealt with?

Also, there is a focus on commercially focus organisations, ie, 'Women on Air' only list commercial broadcasters. CnaM should consider engaging in this area with community broadcasters, who have decades of experience in the development and implementation of GEDI principles in the production of their content.

Also, there is a need to understand what a Diversity on Air database will referred to, so it doesn't become a tokenism exercise.

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[3] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content
[4] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024
[5] GEDI Standards to be developed by Coimisiún na Meán

5. ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

Do you have any feedback on the four principles elaborated above in relation to Engagement? (please limit responses to 250 words)

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS:

Again, we would consider changing the 'Marginalised groups' expression for 'groups at risk of being excluded/marginalised'. However, it would be important to define the boundaries of this engagement, as it might become an open door to the alt-right (anti-vaccination groups, anti-migrant and far-right groups who might be considered excluded)

5.1. ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.[6]
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector

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[6] This will be explored and facilitated by Coimisiún na Meán

- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Engagement with higher education institutions, training institutes and schools and other outreach activities.

Question 6.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

There is a need to understand what a Diversity on Air database will actually mean or actually do, so it doesn't become a tokenism exercise.

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6.   DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development?
(please limit responses to 250 words)

It would be important that there is diversity at the decision making level across all relevant organisations.

6.1. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.

- Conducting 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
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
- It is recommended to develop an Equality, Inclusion and Diversity 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.[7]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 750 words)

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[7] This will be explored and facilitated by Coimisiún na Meán

Submission to the Consultation Document on the Draft
Gender Equality, Diversity, and Inclusion Strategy of
Coimisiún na Meán

by

The Institute of Future Media, Democracy and Society at
Dublin City University

November 2023

1. **INTRODUCTION**

The Draft Strategy has been developed with the aim of 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. It will also underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

The Draft Strategy is developed in the framework of rights, obligations and good practice outlined in international (United Nations) and European (Council of Europe, European Union) Human Rights Treaties, Regulations and Recommendations relevant to gender equality, to the rights of various minority and marginalised groups, and to the rights of people with disabilities.

The Draft Strategy is also framed by the Irish legislative and policy framework. Of particular importance are the Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'), which prohibit discrimination in the provision of goods and services, accommodation and education. They 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 highly 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. In aiming to enhance inclusion in the audiovisual media sector, the Draft Strategy also recognises that socio-economic disadvantage should be considered a factor in initiatives for some communities.

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."*

The development of the Draft Strategy is also informed by the recommendations of the Future of Media Commission (FOMC) in their Report and in the subsequent FOMC Implementation and Action Plan published by the government of Ireland.

Developing and publishing the Draft Strategy is part of an ongoing engagement of Coimisiún na Meán in the promotion of gender equality, diversity and inclusion in the sector and further activities will follow in 2024. The Draft Strategy has built on previous work including the BAI Gender Action Plan (GAP), the work carried out in the context of the "Stakeholder Review of the GAP," and a range of research reports commissioned by the (former) BAI. Further extensive stakeholder discussions took place between September and November of 2023. The aim of this was to include additional organisations that were not part of the initial discussions in 2021. It also served to include GEDI experts in a range of other institutions, and to conduct in-depth discussions with other key actors in the area of development, funding and training in the wider cultural, creative and audiovisual sectors who are examining similar issues.

The Draft Strategy aims 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 public interest. The Draft Strategy takes a principles-based approach by outlining key Principles and presenting a range of tools and actions to support and further these Principles. The Draft Strategy is organised under four Pillars.

In this document, stakeholders have the opportunity to provide feedback on the proposed structure and content of the Draft Strategy. Please return the feedback on or before Friday November 24th at close of business. Please send your responses by email only to Mairéad Nic Gabhann at mngabhann@cnam.ie, clearly specifying Draft GEDI Strategy Consultation in the title. After November 24th, Coimisiún na Meán will unfortunately no longer be able to accept responses.

2. PILLARS OF THE GEDI STRATEGY

The Draft Strategy rests on four pillars, as outlined below. These pillars were elaborated on the basis of the broad range of discussions with stakeholders and with reference to best practice in the area of GEDI work in the media sector. These four areas are considered to be interconnected and mutually reinforcing. The specific Principles related to each Pillar, and tools and actions that can be used to support and further these Principles are outlined in additional sections below. Some Principles and tools and actions are repeated under different headings – illustrating the way in which these Pillars are interconnected. The four Pillars are:

- WORK CULTURE

- REPRESENTATION AND CONTENT

- ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

- DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

3. WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1.

Do you have any feedback on the four principles relevant to Work Culture elaborated above? (please limit responses to 250 words)

To effectively break down barriers, it's vital to comprehend their nature: identifying what these barriers are, how they manifest in the workplace, and devising effective strategies to overcome them, as elaborated in our subsequent points.

A lack of diversity in media education within third level institutions may partly account for a lack of diversity in the workforce. We recommend extending the principles to break down barriers to media education (at all levels of further and higher education). Education is addressed in part in principle 6, but it merits attention in relation to work culture as well

3.1. WORK CULTURE – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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Question 2.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 750 words)

We recommend setting specific targets for improvements in work culture.
1) A baseline measure of workforce diversity in different sectors is required to assess gaps and to measure change.
2) Training should be recommended for all recruitment managers and compulsory in companies/outlets over a certain size.
3) Recruitment strategies should target seldom-heard communities. To be effective, this needs to be complemented with genuine efforts to build-relationships with these communities and thereby support applicants from atypical routes.

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document

[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

4) We recognise that some barriers are beyond the control of media companies: the high cost of living, accommodation, and so on. Nevertheless, it should be acknowledged that the workforce for a Dublin-centric media is limited by these barriers and opportunities- such as internships - can only be taken up by those who can afford them.

Given that 'breaking down barriers' is a recurring theme in the principles, fostering partnerships with researchers to delve deeper into the nature of these challenges is crucial. We recommend establishing a strand of research funding that would focus on identifying barriers to advancement and access as well as exploring solutions.

FuJo reports[3] have highlighted higher rates of online gender-based and sexual abuse and harassment among women journalists, leading to self-censorship and exerting a negative impact on professional and civic participation. We recommend clear pathways and support for journalists facing issues with hostility online as well as training that acknowledges risks and provides guidance on how to separate public/private accounts, rather than just focusing on social media as a publishing/marketing tool. There is also a need for media outlets to provide clarity to workers on what is expected of them professionally when it comes to social media as well as a recognition of the additional time and effort spent using social media professionally.

We recommend that Coimisiún na Meán considers policy and regulatory based approaches to addressing this issue directly with social media platforms. Platforms should ensure that they are actively preventing the harassment of journalists, particularly gender-based hostility, through effective moderation, content removal and verification practices and they should consider providing additional filtering options to protect journalists from harassment. If platforms are facilitating harm towards journalists, particularly gender-based in nature, then penalties for breaching regulatory obligations should be considered.

Furthermore, we recommend utilising systematic gender and diversity audits. We would highlight the work of Ofcom in this regard, as they annually collect data and report on the diversity of broadcaster workforces[4].

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[3] https://www.europarl.europa.eu/RegData/etudes/STUD/2023/743341/IPOL_STU(2023)743341_EN.pdf, https://doras.dcu.ie/28323/7/Wheatley%202023_Experiences%20of%20women%20in%20Irish%20journalism.pdf
[4] https://www.ofcom.org.uk/__data/assets/pdf_file/0029/246854/2021-22-report-diversity-in-tv-and-radio.pdf

4. REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.

Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

The principles in this area largely reflect a policy for traditional media representation. What is absent is the nature and challenge of representation on social and online media. This is important because there is ample evidence that these media have negative consequences for public participation by women and minorities and that traditional media representations can result in a backlash on social media. We recommend extending the scope of these principles

We strongly advocate for explicitly including strategies to mitigate online harassment, particularly targeting female journalists and content creators as we have highlighted in question 2. Additionally, providing media training specifically for women and groups as part of development efforts will contribute towards increasing representation.

Representation extends to leadership and we would recommend ensuring the make-up of Board of Directors and and/or Advisory boards reflects diversity through the inclusion of members from minority groups. Additionally, evaluation committees for funding schemes should also include diverse representation.

4.1. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media
- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[5] – or using other technologies to track on air diversity such as algorithmic tools

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[5] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content

- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database
- Monitoring of Irish language programme content[6]
- Collaborating with other actors in the audiovisual sector in the creation of content
- Integrating GEDI in Commissioning and content development[7]
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Mainstreaming diverse groups across programming genres
- Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 630 words)

We welcome the use of tools to assess the balance of gender representation on the air-waves and diversity on the airwaves, although the suitability of using algorithmic tools for monitoring would need to be assessed.

FuJo researchers led Ireland's inclusion in the Global Media Monitoring Project[8], which provides an ongoing international study of gender in news media. Additionally, the Hearing Women's Voices report[9] in 2015 implemented a methodology for monitoring. We would echo its recommendations that monitoring gender breakdown in terms of women's voices, women as news subjects and the gendering of topics should take place at both a programme and station level and that the national media regulator should require all stations (public and private) to report on gender equality performance.

FuJo also produced a report[10] which developed a survey to measure diversity onscreen and off screen at RTÉ with the participation of programme producers. Due to Covid-19 and the cancellation of live guests, it was not possible to implement. However, it remains vital that a solution to the challenge of monitoring onscreen and offscreen diversity is developed and that all stakeholders recognise the need to participate in a trustworthy monitoring process that enables benchmarking and a transparent evaluation of progress on diversity commitments.

We recommend setting specific targets for monitoring gender and diversity representations. This would be in line with the recommendations of research projects (Irish and international) on this topic. Specifically, we recommend

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[6] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024

[7] GEDI Standards to be developed by Coimisiún na Meán

[8] https://doras.dcu.ie/26486/1/GMMP_IRE_X.pdf

[9] https://www.nwci.ie/images/uploads/Hearing_Womens_Voices_2015_final.pdf

[10] https://fujomedia.eu/wp-content/uploads/2021/08/2021_Report_RTE-and-COVID19.pdf

1) specific gender monitoring programmes that target all major media sectors (radio, TV, print, etc);
2) cooperation with media producers to facilitate data collection including the potential for automated collection of data.
3) undertaking research and analysis of the uptake of diversity databases to identify how they could be more effectively integrated into media sourcing practices

DCU's School of Communications submission[11] to the Future of Media Commission, written by staff and students from the journalism programme points out that with appropriate funding and support, journalism students could participate in media monitoring projects which would serve to both improve media monitoring while also making future journalists aware of representation issues before they enter the workplace.

We would highlight the need for a dedicated commitment to funding and establishing the effective completion of monitoring work to ensure that the draft strategy does not merely restate an aspirational goal without being followed up by concrete action.

5. ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

Do you have any feedback on the four principles elaborated above in relation to Engagement?
(please limit responses to 250 words)

The principles for meaningful engagement with diverse groups are crucial. We believe there is a lack of research and dialogue about media representation and its societal impact and so we welcome efforts to address this issue. We would urge explicit inclusion of strategic partnerships with academic entities to enable a continuous cycle of research and discourse.

5.1. ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

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[11] https://www.dcu.ie/sites/default/files/2021-05/dcu-submission-final.pdf

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.[12]
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Engagement with higher education institutions, training institutes and schools and other outreach activities.

Question 6.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

We recommend more targeted or concrete engagement with communities on the ground and not simple high-level representatives on councils. This entails media companies, especially PSM, engaging with schools and community groups to, for example, deliver workshops on creating media site visits. This is also important because it recognises that genuine engagement starts at an early age. We recognise that this requires media companies with resources to work with communities. We would recommend incorporating structured feedback mechanisms from diverse communities to ensure their voices are not just heard but actively shape content and policies.

Based on a recent report on migrant attitudes towards news[13] we recommend the use of multi-language subtitles, particularly for on-demand content and to increase the levels of content produced by migrants and which recognises specific migrant populations living in Ireland, even if only hosted or broadcast on online platforms. We also recommend state support or facilitation of small community-level broadcasting.

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[12] This will be explored and facilitated by Coimisiún na Meán
[13] https://www.bai.ie/en/download/138156/?tmstv=1677668035

6. DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development?
(please limit responses to 250 words)

Again, two of these principles refer to breaking down barriers and we would restate the need to ensure that this includes a commitment to incorporating research on barriers to advancement and access in the sector as well as funding future research to continue to further understanding on a national level.

6.1. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that can be used to support and further these Principles related to Development.

- Conducting 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
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
- It is recommended to develop an Equality, Inclusion and Diversity 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.[14]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 750 words)

We recommend integrating specific training modules, such as online harassment prevention and gender-sensitive reporting, to equip future media professionals with the necessary skills. This could incorporate some of the recommendations highlighted in answer to question 2.

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[14] This will be explored and facilitated by Coimisiún na Meán

We particularly welcome the focus on paid internships both within this section and within the sections on work culture and engagement.

Section 6.6 of the DCU's School of Communications submission[15] to the Future of Media Commission, written by staff and students from the journalism programme, highlights a number of initiatives which would positively impact development. Some of these include establishing non-academic pathways to training, providing scholarships for academic programmes, and using non-traditional recruitment methods such as social media.

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[15] https://www.dcu.ie/sites/default/files/2021-05/dcu-submission-final.pdf

Conradh na Gaeilge

Doiciméad Comhairliúcháin maidir le Dréachtstraitéis Choimisiún na Meán um Chomhionannas Inscne, Éagsúlacht, agus Cuimsiú

Samhain 2023

1. Réamhrá

Forbraíodh an Dréachtstraitéis seo agus é mar aidhm aici tacú le hearnáil na meán closamhairc agus raidió in Éirinn maidir le raon gníomhaíochtaí agus tionscnamh straitéiseacha a phleanáil, a fhorbairt agus a sheachadadh de réir an dea-chleachtais, d'fhonn tírdhreach meán a chothú atá ionadaíoch ar éagsúlacht shochaí na hÉireann agus atá inrochtana di. Beidh sé mar thaca freisin le forbairt caighdeán sa réimse seo ar fud thírdhreach earnáil na meán closamhairc agus raidió in Éirinn.

Forbraítear é faoi chuimsiú na gceart, na n-oibleagáidí agus an dea-chleachtais a leagtar amach i gConarthaí, Rúin, Rialacháin agus Moltaí idirnáisiúnta (na Náisiúin Aontaithe) agus Eorpacha (Comhairle na hEorpa, an Aontais Eorpaigh) um Chearta an Duine atá ábhartha don chomhionannas inscne, do chearta grúpaí mionlaigh agus imeallaithe éagsúla, agus do chearta daoine atá faoi mhíchumas.

Ina theannta sin, tá an Dréachtstraitéis leagtha amach ag creat reachtach agus polasaí na hÉireann. Tá tábhacht ar leith ag baint leis na hAchtanna um Chomhionannas Fostaíochta in Éirinn agus na hAchtanna um Stádas Comhionann in Éirinn ('na hAchtanna'), a chuireann cosc ar idirdhealú i soláthar earraí agus seirbhísí, cóiríochta agus oideachais. Clúdaíonn siad na naoi bhforas frith-idirdhealaithe: inscne, stádas pósta, stádas teaghlaigh, aois, míchumas, gnéaschlaonadh, cine, reiligiún, agus ballraíocht den Lucht Siúil. Chomh maith leis sin, tá an Dualgas na hEarnála Poiblí um Chomhionannas agus Cearta an Duine (2014), an tAcht um Míchumas (2005), an tAcht um Fhaisnéis faoin mBearna Phá idir na hInscní, (2021), an Straitéis Náisiúnta um Chuimsiú an Lucht Siúil agus na Romach 2017-2021, an Straitéis um Chuimsiú LADT+ 2019-2021, an Plean Gníomhaíochta Náisiúnta in aghaidh an Chiníochais (2023) agus an Straitéis Nuálaíochta Uathachais atá le teacht. Agus é mar aidhm aici cuimsiú in earnáil na meán closamhairc a fheabhsú, aithníonn an Dréachtstraitéis freisin gur cheart go mbeadh aird ar mhíbhuntáiste socheacnamaíoch agus pobail á haithint le dírú orthu. mar fhachtóir i bpobail ar cheart go mbeadh siad ina sprioc gníomhaíochtaí.

Tá sainchúram sonrach Choimisiún na Meán sa réimse seo leagtha amach san Acht um Rialáil Sábháilteachta ar Líne agus na Meán, 2022 (Alt 7.2)*, "trína ndéanfaidh an Coimisiún iarracht a chinntiú agus a fheidhmeanna á gcomhlíonadh aige.. c) go bhfuil na seirbhísí craolacháin agus na seirbhísí meán closamhairc ar éileamh atá ar fáil sa Stát oscailte, cuimsitheach agus iolraíoch, agus gur fearr a fhreastalaíonn beartais an Choimisiúin i ndáil leis na seirbhísí sin ar riachtanais mhuintir oileán na hÉireann, agus aird á tabhairt— (i) ar a dteangacha agus ar a dtraidisiúin; … (iii) a n-éagsúlacht, lena n-áirítear éagsúlacht reiligiúnach, eiticiúil, chultúrtha, theangeolaíoch, shocheacnamaíoch agus inscne."*

Tá forbairt na Dréachtstraitéise bunaithe freisin ar mholtaí an Choimisiúin um Thodhchaí na Meán (FOMC) ina dTuarascáil agus ina bPlean Forfheidhmithe agus Gníomhaíochta, ata foilsithe ag rialtas na hÉireann.

Tá forbairt agus foilsiú na Dréachtstraitéise mar chuid de rannpháirtíocht leanúnach Choimisiún na Meán i gcur chun cinn an chomhionannais inscne, na héagsúlachta agus an chuimsithe san earnáil agus leanfar gníomhaíochtaí breise in 2024. Tá an Dréachtstraitéis bunaithe ar obair a rinneadh roimhe seo lena n-áirítear Phlean Gníomhaíochta Inscne an BAI (GAP), an obair a rinneadh i gcomhthéacs "Athbhreithniú Páirtithe Leasmhara ar GAP," agus raon tuarascálacha

taighde a choimisiúnaigh an (iar)BAI. Reáchtáladh babhta breise plé le páirtithe leasmhara idir Meán Fómhair agus Samhain 2023. Ba é an aidhm a bhí leis sin ná eagraíochtaí breise nach raibh mar chuid den phlé tosaigh in 2021 a chur san áireamh. D'fhóin sé freisin chun saineolaithe GEDI a chur san áireamh i raon institiúidí eile, agus chun plé domhain a dhéanamh le príomhghníomhaithe eile i réimse na forbartha, an mhaoinithe agus na hoiliúna sna hearnálacha cultúrtha, cruthaitheacha agus closamhairc i gcoitinne atá ag scrúdú saincheisteanna comhchosúla.

Tá sé mar aidhm ag an Dréachtstraitéis cineálacha éagsúla cur chuige do ghníomhaithe éagsúla atá ag brath ar mhéid agus ar acmhainní, agus freisin ar shainchúraimí, róil agus oibleagáidí na gcineálacha éagsúla asraonta meán ó thaobh rannchuidiú le leas an phobail. Glacann an Dréachtstraitéis cur chuige bunaithe ar phrionsabail trí phríomhspriocanna/príomhphrionsabail straitéiseacha a leagan amach, trí réimse uirlisí a chur i láthair chun na spriocanna sin a bhaint amach. Tá an Dréachtstraitéis leagtha amach faoi cheithre cholún.

Tugann an doiciméad seo deis do pháirtithe leasmhara aiseolas a thabhairt ar struchtúr agus ar ábhar na Dréachtstraitéise atá beartaithe. Seol d'aiseolas ar ais roimh dheireadh an lae gnó Dé hAoine, 24 Samhain. Seol do fhreagraí chuig Mairéad Nic Gabhann tríd an ríomhphost amháin ag mngabhann@cnam.ie ag sonrú go soiléir Comhairliúchán Dréachtstraitéise sa teideal. Tabhair faoi deara nach mbeidh Coimisiún na Meán in ann glacadh le freagraí a thuilleadh tar éis 24 Samhain.

2. COLÚIN NA STRAITÉISE GEDI

Tá an Dréachtstraitéis bunaithe ar cheithre cholún, mar atá leagtha amach thíos. Rinneadh tuilleadh forbartha ar na colúin ar bhonn an raon leathan de plé le geallsealbhóirí, mar aon le tagairt do dhea-chleachtas i réimse na hoibre GEDI in earnáil na meán. Meastar go bhfuil na ceithre réimse seo idircheangailte, agus ag treisiú a chéile. Tá na Prionsabail shonracha a bhaineann le gach Colún, agus uirlisí agus gníomhaíochtaí is féidir a úsáid chun tacú leis na Prionsabail, agus iad a chur chun cinn, leagtha amach i rannáin bhreise thíos. Déantar roinnt Prionsabal agus uirlisí agus gníomhaíochtaí a athrá faoi cheannteidil éagsúla – ag léiriú an chaoi a bhfuil na Colúin idircheangailte. Is iad na seo a leanas na Colúin:

- CULTÚR AN IONAD OIBRE

- IONADAÍOCHT AGUS ÁBHAR

- RANNPHÁIRTÍOCHT (LE GRÚPAÍ AGUS POBAIL ÉAGSÚLA

- FORBAIRT (MAIDIR LE FORBAIRT SCILEANNA AGUS TALLAINNE)

3. CULTÚR AN IONAD OIBRE – PRÍOMHPHRIONSABAIL, UIRLISÍ AGUS GNÍOMHAÍOCHTAÍ

Maidir leis na príomhcheisteanna ar thug páirtithe leasmhara aghaidh orthu, agus an dea-chleachtas i réimse GEDI in earnáil na meán, leagtar amach thíos na prionsabail seo a leanas a bhaineann le Cultúr an Ionaid Oibre:

- Cuspóirí GEDI a phríomhshruthú ar fud na heagraíochta

- Timpeallacht oibre shábháilte, fhulangach, chuimsitheach, agus fáiltiúil a chinntiú

- Deireadh a chur leis na bacainní ar dhul chun cinn na mban san earnáil chlosamhairc

- Deireadh a chur leis na bacainní ar rochtain ar an earnáil do ghrúpaí mionlaigh agus imeallaithe

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Ceist 1.

An bhfuil aon aiseolas agat ar na gceithre phrionsabal a bhaineann le Cultúr an Ionaid Oibre a mionsonraíodh thuas? (250 focal ar a mhéad)

Prionsabal sa bhreis luaite thíos:

- Aitheantas don Ghaeilge mar theanga bheo a chinntiú

3.1. Cultúr an Ionaid Oibre - uirlisí agus gníomhaíochtaí chun tacú leis na príomhphrionsabail

Tugann an tábla seo a leanas achoimre ar na huirlisí, na bearta agus na gníomhaíochtaí atá beartaithe chun tacú leis na Prionsabail seo agus iad a chur chun cinn.

- Polasaithe, pleananna agus straitéisí GEDI a fhorbairt agus a fhoilsiú
- Ceannaire GEDI nó ceannaire bainisteoir sinsearach a cheapadh[1]
- Comhar a chinntiú ar fud ranna (nó comhlachais) trí phróisis chomhoibríocha inmheánacha.
- GEDI a chomhtháthú in Acmhainní Daonna maidir le fruiliú, cur chun cinn agus coinneáil foirne
- Measúnuithe inmheánacha ar chomhdhéanamh an lucht saothair trí shuirbhéanna deonacha gan ainm chun bonn eolais a chur faoi bheartais inmheánacha
- Oiliúint ábhartha a sholáthar i bhfeasacht GEDI, claonadh neamh-chomhfhiosach etc.
- Polasaí a fhoilsiú a chuimsíonn frithbhulaíocht/ frithchiapadh. Pointí teagmhála sonracha agus baill foirne a cheapadh chun déileáil leis na saincheisteanna seo.
- Inrochtaineacht fhisiciúil áiteanna oibre agus inrochtaineacht ábhair ar an scáileán agus ar líne a chinntiú[2]
- Forbairt Grúpaí Acmhainní Fostaithe (ERGanna) a spreagadh
- Tacú le straitéisí i gcomhar le gníomhaithe tionscail agus iriseoirí eile chun timpeallacht shábháilte ar líne a chruthú do gach iriseoir agus oibrí meán chun dul i ngleic le mí-úsáid ar líne.
- Tuarascálacha ar Bhearna Phá idir na hInscní a fhoilsiú (nuair is gá de réir dlí) nó suirbhéanna nó measúnuithe inmheánacha a dhéanamh (nuair nach gceanglaítear sin de réir dlí) mar thomhas ar dhul chun cinn

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[1] Aithnítear go mb'fhéidir nach mbeadh asraonta meán cumarsáide níos lú in ann é seo a dhéanamh agus go bhféadfadh cur chuige eile a bheith acu chun tacú leis na Prionsabail a leagtar amach sa doiciméad.

[2] Clúdaítear inrochtaineacht ábhair ar scáileán agus ar éileamh faoi Rialacha Inrochtaineachta CnaM.

- Athbhreithniú AD maidir le tacaíocht a thabhairt do thuismitheoirí, cúramóirí agus daoine atá ag filleadh ó shaoire mháithreachais/ atharthachta agus cineálacha eile tacaíochta.
- GEDI a chomhtháthú in Acmhainní Daonna maidir le fruiliú, cur chun cinn agus coinneáil foirne
- Páirt a ghlacadh in oiliúint agus forbairt agus tacú leo trí intéirneachtaí, agus meantóireacht straitéiseach. Tacú le hintéirneachtaí íoctha.
- Faisnéis a sholáthar trí thuairisceáin chraoltóra nó trí mheicníochtaí tuairiscithe deonacha eile maidir le gníomhartha agus tionscnaimh chun GEDI a chur chun cinn.
- Athbhreithniú a dhéanamh ar na próisis chun daoine a mhealladh i maoiniú, tionscnaimh, intéirneachtaí agus meantóireacht chun é seo a dhéanamh níos cuimsithí, mar shampla trí iarratais ar intéirneachtaí thar fhíseáin/podchraoltaí a cheadú.

Ceist 2.

An bhfuil aon aiseolas agat ar an raon beart, uirlisí agus tionscnamh atá leagtha amach thuas?

(750 focal ar a mhéad)

Uirlis sa bhreis molta thíos:

Polasaí Gaeilge a fhorbairt agus a chur i bhfeidhm a chinnteoidh feasacht ar an nGaeilge, eolas ar chainteoirí na teanga (idir cainteoirí dúchasacha agus nuachaiteoirí) agus modhanna le cinntiú nach mbeidh fuathcaint/drochmeas léirithe don teanga ná a lucht labhartha ar na meáin

4. Ionadaíocht agus Ábhair – Príomhphrionsabail, Uirlisí agus gníomhaíochtaí

Maidir leis na príomhcheisteanna ar thug páirtithe leasmhara aghaidh orthu, agus an dea-chleachtas i réimse GEDI in earnáil na meán, leagtar amach thíos na prionsabail seo a leanas a bhaineann le hIonadaíocht agus Ábhair:

- Éagsúlacht ábhair, guthanna, tuairimí agus scéalta a chur chun cinn

- Cothromaíocht inscne guthanna ar na haerthonnta a chinntiú

- Léiriú a thabhairt ar éagsúlacht shochaí na hÉireann ar fud raon na seánraí cláir

- Cur le caoinfhulaingt na sochaí agus glacadh le grúpaí éagsúla

- Steiréitíopaí, fuathchaint agus séanadh a chomhrac

Ceist 3.

An bhfuil aon aiseolas agat ar na cúig phrionsabal a mhionsonraíodh thuas maidir le hIonadaíocht agus Ábhair? (250 focal ar a mhéad)

Tá moladh thíos do phrionsabal eile:

- An Ghaeilge a chur san áireamh go cothrom agus ní go himeallach

Eolas Breise: Níl ach ceann amháin i measc an 300+ stáisiún atá ag soláthar céatadán ard dá chláir as Gaeilge, TG4, agus 3 stáisiún eile faoi bhrat RTÉ le soláthar éigin as Gaeilge (cé go bhfuil sé thart ar 3%). Níl ach 3 stáisiún Gaeilge lánaimseartha as an 70+ stáisiún agus astu sin tá ceann amháin dírithe go príomha ar phobal na Gaeltachta, ceann eile ag craoladh i mBaile Átha Cliath amháin ar FM agus níl an tríú cheann ag craoladh ar FM go leanúnach. Bíonn cláir Gaeilge rialta ag an gcuid is mó de na stáisiúin eile ach craoltaítear iad de ghnáth lasmuigh d'amanna barréisteachta. Níl ach dhá nuachtán Gaeilge (Tuairisc.ie agus nós.ie atá ar fáil ar líne amháin) as an 70+ nuachtán sa liosta agus bíonn ailt ó am go chéile ag líon beag de na nuachtáin eile. Chomh maith leis sin, níl ach 4 iris as an 200+ iris agus bíonn ailt ó am go chéile ag líon an-bheag de na hirisí eile. Go héifeachtach is meán aonteangach atá ann faoi láthair. Tá an Ghaeilge á imeallú, is gá í a normalú sa tsochaí tríd é a chraoladh agus a fhoilsiú níos minicí.

4.1. Ionadaíocht agus Ábhair - uirlisí agus gníomhaíochtaí chun tacú leis na príomhphrionsabail

Tugann an tábla seo a leanas achoimre ar na huirlisí, na bearta agus na gníomhaíochtaí atá beartaithe chun tacú leis na Prionsabail seo a bhaineann le hIonadaíocht agus Ábhair agus iad a chur chun cinn.

> - Cur chuige inmheánach tras-rannach a bhunú amhail boird inmheánacha nó boird comhlachais a thugann aghaidh ar éagsúlacht an ábhair
> - Oiliúint feasachta ábhartha a sholáthar maidir le GEDI, claonadh neamh-chomhfhiosach, cuimsiú comhfhiosach, le béim ar leith ar na meáin
> - Uirlisí inmheánacha chun cothromaíocht na hionadaíochta inscne ar na haerthonnta agus éagsúlacht ar na haerthonnta a mheas tar éis mhúnla thionscadal BBC 50/50[3] – nó teicneolaíochtaí eile a úsáid chun éagsúlacht aeir a rianú, mar shampla uirlisí algartamacha
> - Úsáid uirlisí ar nós an bhunachair sonraí "Women on Air"
> - Tacú le bunachar sonraí níos leithne "Diversity on Air" a fhorbairt
> - Monatóireacht ar ábhar i nGaeilge.[4]
> - Comhoibriú le gníomhaithe eile san earnáil chlosamhairc chun ábhar a chruthú
> - GEDI a chomhtháthú i gCoimisiúnú agus i bhforbairt ábhair.[5]
> - Teagmháil a dhéanamh le pobail agus grúpaí éagsúla maidir le forbairt ábhair
> - Treoirlínte agus treoirlínte teanga a chuireann eagraíochtaí ionadaíocha ar fáil a úsáid
> - Príomhshruthú grúpaí éagsúla ar fud seánraí cláir
> - Polasaí agus cóid iompair a thabhairt isteach maidir le tuairisciú ar ghrúpaí éagsúla, rannpháirtíocht (ar an aer, agallaimh, Vox-Pops) le grúpaí nó ionadaithe grúpaí agus pobal

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Ceist 4.

An bhfuil aon aiseolas agat ar an raon beart, uirlisí agus tionscnamh atá leagtha amach thuas?

(630 focal ar a mhéad)

Moltar an uirlis thuas a leasú: go

- Monatóireacht ar ábhar i nGaeilge agus cur chuige gníomhach len í a normalú in imeachtaí eagraíochta

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[3] Córas deonach, féinfhaireacháin é a úsáideann foirne eagarthóireachta agus léiriúcháin chun monatóireacht a dhéanamh ar a n-ábhar féin.

[4] Díreofar freisin ar fheabhsú cháilíocht agus éagsúlacht na meán Gaeilge in athbhreithniú Choimisiún na Meán ar na meáin Ghaeilge, a fhoilseofar in 2024.

[5] Caighdeáin GEDI atá le forbairt ag Coimisiún na Meán.

5. Rannpháirtíocht – Príomhphrionsabail, Uirlisí agus gníomhaíochtaí

Maidir leis na príomhcheisteanna ar thug páirtithe leasmhara aghaidh orthu, agus an dea-chleachtas i réimse GEDI in earnáil na meán, leagtar amach thíos na prionsabail seo a leanas a bhaineann le Rannpháirtíocht:

- Rannpháirtíochtaí fiúntacha a fhorbairt le grúpaí éagsúla agus imeallaithe

- Rannpháirtíocht chomhoibríoch

- Ábhar meán a sheachadadh ar bhealach cuimsitheach

- Bacainní ar rochtain ar an earnáil a bhriseadh síos agus comhionannas rochtana ar dheiseanna a chur chun cinn

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Ceist 5.

An bhfuil aon aiseolas agat ar na ceithre phrionsabal a mhionsonraíodh thuas maidir le Rannpháirtíocht? (250 focal ar a mhéad)

Moltar an prionsabal seo a leasú:

- Ábhar meán a sheachadadh ar bhealach cuimsitheach (teanga san áireamh)

5.1. Rannpháirtíocht - Uirlisí agus gníomhaíochtaí chun tacú leis na Príomhphrionsabail

Tugann an tábla seo a leanas achoimre ar na huirlisí, na bearta agus na gníomhaíochtaí atá beartaithe chun tacú leis na Prionsabail seo a bhaineann le Rannpháirtíocht, agus iad a chur chun cinn.

- Struchtúir fhoirmiúla agus/nó neamhfhoirmiúla rannpháirtíochta le grúpaí faoi ghannionadaíocht
- Rannpháirtíocht le Comhairle Éagsúlachta ar fud an tionscail (nó Comhairlí Éagsúlachta eagrúcháin)
- Moltar Fóram um Chomhionannas, Éagsúlacht agus Cuimsiú a fhorbairt laistigh den earnáil chun ardán a chur ar fáil le haghaidh plé, le haghaidh rannpháirtíochta le grúpaí agus pobail éagsúla agus chun samplaí dea-chleachtais agus cás-staidéir a roinnt.[6]
- Dearcadh na ngrúpaí éagsúla a chur san áireamh i bhforbairt an ábhair
- Úsáid uirlisí ar nós an bhunachair sonraí "Women on Air"
- Tacaíocht d'fhorbairt bunachar sonraí níos leithne "Diversity on Air" chun níos mó comhionannais agus éagsúlachta a chruthú sna guthanna ar an aer

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[6] Déanfaidh Coimisiún na Meán é seo a fhiosrú agus a éascú.

- Dul i dteagmháil le pobail agus grúpaí éagsúla maidir le forbairt ábhair
- Ag baint úsáide as treoirlínte agus treoirlínte teanga arna soláthar ag eagraíochtaí ionadaíocha
- Feasacht a ardú maidir le deiseanna san earnáil
- Tacú le forbairt líonraí nua
- Athbhreithniú a dhéanamh ar na próisis chun daoine a mhealladh i maoiniú, tionscnaimh, intéirneachtaí agus meantóireacht chun é seo a dhéanamh níos cuimsithí e.g. trí iarratais ar intéirneachtaí a cheadú ar fhíseáin/podchraoladh.
- Tacú le hoiliúint, intéirneachtaí agus meantóireacht agus iad a éascú. Tacú le hintéirneachtaí a bhfuil liúntas luaite leo.
- Rannpháirtíocht le hOllscoileanna, institiúidí oiliúna agus scoileanna agus gníomhaíochtaí for-rochtana eile.

Ceist 6.

An bhfuil aon aiseolas agat ar an raon beart, uirlisí agus tionscnamh atá leagtha amach thuas?
(750 focal ar a mhéad)

Obair Choiste na Gaeilge den Choimisiúin a threisiú agus a chinntiú go mbeidh treoir, oiliuint, feasacht agus eile curtha ar fáil maidir leis an nGaeilge

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6. FORBAIRT – PRÍOMHPHRIONSABAIL, UIRLISÍ AGUS GNÍOMHAÍOCHTAÍ

Maidir leis na príomhcheisteanna ar thug páirtithe leasmhara aghaidh orthu, agus an dea-chleachtas i réimse GEDI in earnáil na meán, leagtar amach thíos na prionsabail seo a leanas a bhaineann le Forbairt:

- CUR LE FORBAIRT AN LUCHT OIBRE AMACH ANSEO

- CONAIRÍ A FHORBAIRT CHUN ROCHTAIN AGUS DEISEANNA A FHÁIL

- DEIREADH A CHUR LEIS NA BACAINNÍ AR CHOMHIONANNAS INSCNE MAIDIR LE DUL CHUN CINN SAN EARNÁIL

- DEIREADH A CHUR LEIS NA BACAINNÍ AR ROCHTAIN SAN EARNÁIL AGUS COMHIONANNAS ROCHTANA A CHUR CHUN CINN.

- RANNPHÁIRTÍOCHT I GCOMHROINNT SAINEOLAIS AGUS TAITHÍ AR FUD NA HEARNÁLA

Ceist 7.

An bhfuil aon aiseolas agat ar na cúig phrionsabal a mhionsonraíodh thuas maidir le Forbairt?
(250 focal ar a mhéad)

Moltar an prionsabal a leanas a chur leo:

6.1. FORBAIRT - UIRLISÍ AGUS GNÍOMHAÍOCHTAÍ CHUN TACÚ LEIS NA PRÍOMHPHRIONSABAIL

Tugann an tábla seo a leanas achoimre ar na huirlisí, na bearta agus na gníomhartha is féidir a úsáid chun tacú leis na Prionsabail seo a bhaineann le Forbairt agus iad a chur chun cinn.

- Measúnú inmheánach ar riachtanais foirne amach anseo, mar shampla i réimse na teicneolaíochta agus na meán nua mar fhócas d'fhorbairt foirne amach anseo agus rochtain ar lucht féachana nua agus éagsúil agus níos óige
- Rannpháirtíocht le hOllscoileanna, institiúidí oiliúna agus scoileanna chun cur le traenáil, feasacht a ardú, líonraí nua a fhorbairt.
- Oibriú as lámha a chéile le heagraíochtaí atá maoinithe agus a bhfuil saineolas scileanna, oiliúna agus forbartha acu le feasacht a ardú agus líonraí nua a fhorbairt
- Feasacht a ardú maidir le deiseanna san earnáil
- Tacú le forbairt líonraí nua
- Tacú le hoiliúint, intéirneachtaí agus meantóireacht agus iad a éascú. Tacú le hintéirneachtaí a bhfuil liúntas luaite leo.
- Athbhreithniú a dhéanamh ar na próisis chun daoine a mhealladh i maoiniú, tionscnaimh, intéirneachtaí agus meantóireacht chun é seo a dhéanamh níos cuimsithí e.g. trí iarratais ar intéirneachtaí a cheadú ar fhíseáin/podchraoladh.
- Moltar Fóram um Chomhionannas, Éagsúlacht agus Cuimsiú a fhorbairt laistigh den earnáil chun ardán a chur ar fáil le haghaidh plé, le haghaidh rannpháirtíochta le grúpaí agus pobail éagsúla agus chun samplaí dea-chleachtais agus cás-staidéir a roinnt.[7]

Ceist 8.

An bhfuil aon aiseolas agat ar an raon beart, uirlisí, agus tionscnamh atá leagtha amach thuas?
(750 focal ar a mhéad)

Obair Choiste na Gaeilge den Choimisiúin a threisiú agus a chinntiú go mbeidh treoir, oiliuint, feasacht agus eile curtha ar fáil maidir leis an nGaeilge

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[7] Déanfaidh Coimisiún na Meán é seo a fhiosrú agus a éascú.

Subject	Draft GEDI Strategy Consultation - response from Equality Expert Group

Nov 23, 2023

Hello ███████

Many thanks for sending on the draft GEDI Strategy Consultation document for our review and response. Please find our feedback on the proposed structure and content of the Draft Strategy outlined below.

Kind regards,

The Equality Expert Group

While we welcome this first DRAFT of the GEDI Strategy and acknowledge the time and effort that was put into it by the consultant and staff members, **we do not believe the current version is fit for purpose**. It lacks the essential elements required for an effective strategy (vision/ambition, objectives and desired outcomes, approach/ methodology, KPIs, measurement, monitoring and evaluation, alignment with legislation, compliance and an action plan with who is responsible and deadlines) and it has not fully addressed or embraced the recommendations set forth in the Future of Media Commission report or in the numerous studies on the tools, processes and standards that are proven to work in changing the culture of the media industry.

"Diversity and gender equality strategies without targets or gender equality targets without monitoring have proven to have minimal effect in terms of change", according to *Auditing Gender Diversity and Change in Irish Media Sectors* report by Dr Páraic Kerrigan, Dr Susan Liddy and Dr Anne O' Brien.

The mention of principles based regulation was also of concern as this model has proven ineffective and many regulators - including the Central Bank of Ireland - have moved to **conduct-based** or **outcome based regulation.**

In addition, we are concerned that CnaM does not, to our knowledge, have the dedicated internal resources and staff with the required expertise to manage this very important area. Women make up more than 50% of the population and their proper representation, protection and promotion within the media industry is long overdue. Maintaining the Irish media's boys' club/ status quo of overwhelmingly male voices, experiences and opinions is no longer an option. Every GEDI strategy and action plan is a culture change project and, as such, requires expertise in the areas of culture change, change management, best practice in GEDI, stakeholder engagement, strategy formulation and implementation. You cannot outsource an organisation's thinking. The bulk of the strategic work must be done in-house with the help of outside consultants as needed.

In the final strategy, we expect to see CnaM's vision for change and a clear roadmap - including KPIs - of how that is going to happen. This is also the wish of those working in the industry as highlighted in numerous reports including the ones mentioned below.

AMBITION/VISION

This section should clearly state the Regulator's future vision for the media industry as a diverse, inclusive and safe place to work.

It should also recognise CnaM's central role in shaping industry culture and setting standards for it to follow as is already done by other Irish regulators.

"In terms of leadership for change, the sector noted that organisational change was needed alongside a coherent vision for the future of the sector and most importantly adequate resources to facilitate such a substantial sectoral-level change," according to *Auditing Gender Diversity and Change in Irish Media Sectors*.

"Similarly, Aine Ní Chaoindealbhain Deputy Head of Virgin Media articulated support for public bodies as leaders in diversity and inclusion initiatives. As she put it 'it should be just in people's psyche, it should be part of our culture... anybody who's getting public service funding, it should be a part of the culture that we nurture (diversity)'.", according to the report.

"One producer called for governing bodies to 'step in and insist on diversity. That, then, empowers us to do that job' (Participant J). This was a perspective endorsed by another independent producer who added 'if the major funding bodies adopted that diversity and inclusion (are) best practice, and if companies had to adhere to that... you know, a contractual obligation, people will do that' (Participant I). Paul Farrell Managing Director of VMTV called on the BAI specifically to deliver 'that kind of north star... here's what 'good' looks like.... this is where we're going, and this is how we think we can get there'."

CnaM should focus on **conduct-based regulatory principles** - such as those adopted by the Central Bank of Ireland (CBI) after the financial crash - which allow regulators to shape the industry by clearly setting out their expectations and highlighting best practice.

According to a recent CBI report "Culture is consistently seen as a driving factor in cases of misconduct and conduct risk governance failures". [https://www.centralbank.ie/docs/default-source/regulation/industry-market-sectors/securities-markets/wholesale-markets/thematic-report-fostering-an-effective-conduct-focused-culture.pdf?sfvrsn=4ccf9e1d_4]

C**ulture change** in the media industry is the responsibility of CnaM and those operating within the sector. **This is a culture change project.** The GEDI strategy should provide a **clear roadmap for change** and outline the legal responsibility of company owners, board members, executive team members and senior managers to GEDI. The Central Bank for example has clearly stated their expectations for organisations' senior management in terms of culture "It is a matter for each firm's Board and senior management to set an effective culture, including its conduct-focus."

System of standards: in the CnaM work programme June, 2023 it says of the long awaited GEDI strategy to be announced in Q4 2023 "will outline how a system of standards to ensure greater representation in these important areas across all media, could be adopted and operated." Where is the **system of standards** referred to outlined in this document? How will the standards - when they are stated - be **adopted** (voluntary codes only?) and **operated** (is best practice being recommended in the strategy?) How will they be tracked, measured and reported?

On our call, there was mention of Gender Diversity Standards being delayed for TWO YEARS? Why is this when they were promised in the CnaM's own workplan for Q4 2023?

MEASUREMENT/ DATA COLLECTION
For more than 13 years, various voluntary organisations and individual academics and journalists have highlighted and provided data on the lack of women on radio and TV as expert contributors, presenters and musicians. This stark inequality and sexism, even misogyny, in the industry is a FACT and has been well known for some time. We've been doing the work and giving you the data for free for years. We've used our spare time - outside of our paid jobs - to give the industry free access to experts, networks, tools and GEDI strategies and ideas. That must end. The Regulator has a **legal responsibility** to track and report on diversity and to hold the industry to account for its failure in this regard. This important work cannot rely on the goodwill and personal pockets of campaigners.

When will the Regulator protect women and minorities' human rights and right to gainful employment and a safe workplace? When will it set a baseline and state industry targets so progress can be tracked? When will it show the industry how it must improve?

CnaM must clearly establish the current **baselines** and annual **targets for improvement**. Progress must be tracked, measured and reported. Successes and innovative approaches should be celebrated and rewarded.

The Regulator should not rely on voluntary campaigning groups to track inequality, publish data and/or insist on greater equality in broadcasting. These tasks and tools must become part of what the Regulator does - tracking, measuring and reporting on cultural and GEDI progress or lack of it in the industry. There must be appropriate staffing and resources to support these requirements.

The Future of Media Commission recommendations 2-3 states: "Voluntary publication of available data to align with EDI Strategy due in **Q4 2023** (if appropriate, statutory basis for publication will be subject to bringing forward amending legislation)." - where is this promised data?

CnaM should also explore the **use of technology** to track, collate and create usable data for publication as a monthly scorecard or industry snapshot? Who in the broadcasters will be responsible for providing the relevant, auditable data? Compliance officers? The Board? Senior management team? All of the above? How will this task be as frictionless as possible to ensure industry compliance?

Will an "Audit to Action" tool or framework be given to broadcasters/ organisations so they have a clear of where they need to go? Will diagnostic tools be provided? This is already happening in state bodies around ESG standards and data collection.

Why are many of the measures recommended voluntary ones when we know this hasn't worked in the last 13 years?

ALIGNMENT & COMPLIANCE
How does this "strategy" align with the Future of Media Commission report's recommendations and equality legislation?

Future of Media Commision recommendations
RECOMMENDATION 2-3 EDI MONITORING, DATA AND RESEARCH

| 2-3 | • TCAGSM to engage with Coimisiún na Meán on the establishment of a strategic research unit and the appropriate resourcing of same
• Coimisiún na Meán to develop data standards metrics to be aligned with the National Equality Data Strategy, | Lead: **Coimisiún na Meán** to lead on policy analysis and stakeholder | Timeline for completion: Voluntary publication of available data to |

	to ensure to collection and publication of consistent and comparable baseline EDI data by PSMs and PSCPs • Coimisiún na Meán will conduct an analysis of the options for implementation (in consultation with stakeholders) including voluntary publication of available data (and taking account of proposed EDI Strategy as set out in Recommendation 2.4) • TCAGSM to consider whether legislative amendments to the Broadcasting Act are appropriate in order that PSMs gather and publish EDI data • Coimisiún na Meán will review funding scheme criteria with a view to the potential inclusion of appropriate standards/criteria to ensure the collection of consistent and comparable EDI data • Coimisiún na Meán will monitor EDI data across PSMs and PSCPs.	consultation with **TCAGSM**. **TCAGSM** to consider if legislative amendments are appropriate. **Coimisiún na Meán** - data standards and metrics to ensure the collection and publication of consistent and comparable EDI data	align with EDI Strategy due in **Q4 2023** (if appropriate, statutory basis for publication will be subject to bringing forward amending legislation)

RECOMMENDATION 2-4 EDI STANDARDS

2-4	• As a first step, the BAI will publish their review of Gender Action Plan in Quarter 1 2023. This review will inform the development of an EDI Strategy by Coimisiún na Meán • Coimisiún na Meán will conduct an analysis of the options for implementation (in consultation with stakeholders) • 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	Lead: **Coimisiún na Meán** to lead on policy analysis and stakeholder consultation with **TCAGSM**. Consideration of the most appropriate framework for implementing standards and how adherence can be monitored and reported on **(Coimisiún na Meán)**	Timeline: BAI will publish the review of the Gender Action Plan in **Q1 2023**. Coimisiún na Meán will develop EDI Strategy by **Q4 2023**

to ensure to collection and publication of consistent and comparable baseline EDI data by PSMs and PSCPs	consultation with **TCAGSM**. **TCAGSM** to consider if legislative amendments are appropriate. **Coimisiún na Meán** - data standards and metrics to ensure the collection and publication of consistent and comparable EDI data	align with EDI Strategy due in **Q4 2023** (if appropriate, statutory basis for publication will be subject to bringing forward amending legislation)

RECOMMENDATION 2-5 DIVERSITY BOARDS AND LEADERSHIP
• Coimisiún na Meán will engage with RTÉ and TG4 regarding the recommendation on senior management responsibility for EDI within each respective organisation and make recommendations as to further action which might be considered by the PSMs
 Timeline: For completion by **Q3 2024**
How is this progressing?

RECOMMENDATION 2-6 DIVERSITY EDUCATION, TRAINING AND EMPLOYMENT
How is this progressing? Who are the stakeholders in this engagement?

RECOMMENDATION 5-4 AUDIENCE ENGAGEMENT
• Coimisiún na Meán to engage with other stakeholders to determine what further measures might be appropriate to ensure that audience engagement properly reflects the diversity of Irish society and identify areas where "gaps" in service/content might exist.
 Timeline: For completion by **Q4 2023**

 Where is the data and response to the above?

MMENDATION 9 STAKEHOLDER CONSULTATION GROUP FORMATION & ENGAGEMENT
ı women's/ diversity organisations and individuals representing women and diversity are in this group?

Equality and Sustainability legislation
How will CnaM ensure that broadcasters comply with sustainability and diversity legislation including the CSRD directive for collection of data regarding ESG? This falls within the S - social criteria. What about the UN's SDGs? How will broadcasters comply? If data is being collected for this, it also includes gender data.

What are the consequences for those who do not meet the expected outcomes or targets? What does success look like to the Regulator? Will access to funding only be given based on certification, proof of compliance as is currently being done in agriculture, tourism ect when it

comes to sustainability targets and funding etc. These government bodies provide industry bodies and companies with support frameworks, action plan templates, commitments are made through signed MOUs and 'Audit to Action' processes. Will CnaM do the same?

How will the Regulator assess the business's GEDI maturity level etc? How will they obtain baseline figures and compare them to CnaM targets? Will certification - from an assessed and list of approved providers as is done by other government departments - be required before funding can be drawn down?

Is it possible for broadcasters licensing conditions to be revised retrospectively to include GEDI requirements? (Legal advice we received says it is possible). You can certainly stipulate the Regulator's GEDI expectations in contracts, licenses, funding application and in policy document.

In the Audit Gender Diversity Change report, Niamh O' Connor Deputy Head of Content at RTÉ noted **'There's nothing like the BAI saying "This is what you have to do" in order to get focused'.**

GEDI ACTION PLAN: this should also be a part of the strategy. Where is it or when is it due to be published?

Department of Foreign Affairs diversity action plan [https://www.dfa.ie/media/dfa/aboutus/ourcommitments/GEDI-Action-Plan-July-2022.pdf]

WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS
With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:
- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION
- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT
- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR
- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1.
Do you have any feedback on the four principles relevant to Work Culture elaborated above? (please limit responses to 250 words)

General WORK CULTURE questions:
What **outcomes** are expected under each of these principles? How are these tracked and measured and reported? What does success look like?
What exact data will be collected on workplace culture by the organisations' and how will it be reported to and monitored by CnaM and other relevant agencies? Will these outcomes be collated/ published somewhere? Is all/some of these actions voluntary or required under the law? What laws?

Specific questions under each pillar:
MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION
What does "mainstreaming" mean and look like in practice? Who in the broadcaster/ AV organisation is/are responsible for this action? What are their KPIs? Who do they report to? How is this reported? Which department in CnaM collects this data? How often? Who

reviews it in CnaM? Who monitors CnaM's commitments in this regards? What are the consequences for NOT mainstreaming GEDI objectives across the organisation?

ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT
What does "ensuring a safe, tolerant, inclusive and welcoming work environment mainstreaming" mean and look like in practice? [Is it just a policy statement or a poster or a verbal commitment?] What are the **legal requirements i**n this regards? Who in the broadcaster/ AV organisation is responsible for these steps, measures, action(s)? How is this measured? What are their KPIs? Who do they report them to? How is this reported to CnaM? Which department in CnaM collects this data? How often? Who reviews it in CnaM? Who monitors CnaM's commitments in this regard? What are the consequences for NOT mainstreaming this objective across the organisation?

BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR
What are the barriers exactly? Who defines them? What will success look like? What needs to be done in practice to "break down barriers to the advancement of women"? Who in the broadcaster/ AV organisation is responsible for this action? How is this measured? What are the KPIs? Who do they report them to? How is this reported to CnaM? Which department in CnaM collects this data? How often? Who reviews it in CnaM? Who monitors CnaM's commitments in this regard? What are the consequences for NOT mainstreaming this objective across the organisation?

BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS
What are the barriers exactly? Who defines them? What will success look like? What needs to be done in practice to "break down barriers to access to the sector for minority and marginalised groups"? Who in the broadcaster/ AV organisation is responsible for this action? How is this measured? What are the KPIs? Who do they report them to? How is this reported to CnaM? Which department in CnaM collects this data? How often? Who reviews it in CnaM? Who monitors CnaM's commitments in this regards? What are the consequences for NOT mainstreaming this objective across the organisation?
How will courses be offered and certified? (This is already being done by some government bodies for sustainability courses to ensure the quality of what's on offer. Courses are ranked and scored).

Screen Skills UK has extensive GEDI training options available [https://www.screenskills.com/bookings/equality-and-inclusion-essentials-with-addie-orfila-1/a6a59248-ac18-4901-9443-049146bbf12c/]

WORK CULTURE – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES
The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document
[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

Question 2.
Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

General WORK CULTURE TOOLS & ACTIONS questions:
How are these measures, tools and initiatives tracked, measured and reported to CnaM by the broadcaster\AV body? How often? By what deadline should each of these be in place? Will organisations be required to show proof that these have indeed been done or taken place or do they just need to 'tick a box' that it has been completed? Will these outcomes be published somewhere? Are all/some of these actions voluntary? How many of these are required under the law? **What laws**? What happens if some or none of these actions are taken by the industry and/or organisations?

Developing and publishing GEDI policies, plans and strategies
Who reviews these plans for quality, examines the implementation plans and sets deadlines for delivery? Is there a requirement for organisations to undertake a GEDI Audit - or use a **diagnostic tool** - to see where they are on the maturity scale? If not, there should be so you can track progress.

Appointing a GEDI Lead or senior manager lead -
From what level of the organisation and reporting to whom? What are their KPIs? How often do they report on them?

Integrating GEDI in HR in relation to staff hiring, promotion and retention - what are the best practice standards that these will be measured against**?**

Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies - why is this voluntary and anonymous? The organisation already has this in their payroll data. Just ask them to produce it and provide the supporting data.

Providing relevant training in GEDI awareness, unconscious bias - how will the quality of this be assessed? How often will it be required? Is it mandatory? Who monitors and reports on attendance and satisfactory completion of this training?

Publishing a policy on anti-bullying/ anti-harassment policy. Appointing specific contact points and staff members to deal with these issues.
What 'best practice' elements, wording and reporting processes will be recommended by CnaM? What is the 'best practice' suggestion regarding how and to whom individuals can complain? [An external mediator or independent hotline for example?] How will the complainant and their confidentiality and rights be protected in the process? Will there be a requirement to report harassment and sexual violence to Gardai or outside independent organisations? Will the number of complaints be recorded and reported each year to CnaM? How will this be collated and published? Refer to suggestions published by the Fair Ple and Mise Foiste and WhyNotHer? organisations.

Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
Why is this voluntary when many of these issues are required under upcoming ESG reporting requirements and UN Sustainable Development Fund reporting?

Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse. - How might this be linked to existing workplace health and safety legislation requirements? What are their **legal requirements**?

Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress - publishing where and to what level of detail? [Women are usually in lower paid less secure employment such as zero hour contracts or freelance/ contract roles. They also tend to be given lower levels of bonuses or none at all. Will that need to be specified?]

Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports - How will this be tracked and measured? What best practice standards will CnaM provide in terms of things like job ads, scanning of CVs, selection criteria, parental leave, etc?

REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:
- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES
- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES
- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES
- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS
- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.
Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES
Data collection - how will this be tracked and measured?

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES
How tracked and measured? By whom? Reported where and how often?

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES
How tracked and measured? By whom? Reported where and how often?
RTE's "new voices" KPI was recently dropped..with the blessing of CnaM. Why? What other measures were put in its place?

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS
How will this be measured?

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION
How will this be measured?

REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media
- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[1] – or using other technologies to track on air diversity such as algorithmic tools
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database
- Monitoring of Irish language programme content[2]
- Collaborating with other actors in the audiovisual sector in the creation of content
- Integrating GEDI in Commissioning and content development[3]
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Mainstreaming diverse groups across programming genres
- Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

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[1] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content
[2] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024
[3] GEDI Standards to be developed by Coimisiún na Meán

Question 4.
Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 630 words)

> **Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content**
> Is this a requirement or a voluntary measure? How often will they meet? Once a year is not effective in combating culture change issues.

- **Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media.**
  Who determines what's relevant? Who approves and certifies courses to ensure they lead to real change instead of becoming just a 'tick the box' exercise?

- **Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[1] – or using other technologies to track on air diversity such as algorithmic tools**
  Is this voluntary? What are the best practice tools recommended by the Regulator?

- **Using tools such as the "Women on Air" database**
  This tool has existed for 13 years and has not led to any discernible change on the airwaves. Most broadcasters don't use the database and they don't attend the events which were designed for them as a way to meet possible contributors. What are broadcasters' excuses for not using it?
  How can it be improved? It should not rely on the goodwill of volunteers. It needs to be properly funded and staffed or brought in house to CnaM.

- **Supporting the development of a broader "Diversity on Air" database**
Who will develop this? How will it lead to consistent change?
- **Monitoring of Irish language programme content[2]**
Who will monitor this and often will it be published or reported?
- **Collaborating with other actors in the audiovisual sector in the creation of content**
What does this mean? How will it be promoted and tracked?

- **Integrating GEDI in Commissioning and content development[3]**
How will this work?
- **Engaging with various communities and groups in relation to content development**
How? By what process? Who monitors this?

- **Using guidelines and language guidelines provided by representative organisations**
Many organisations have already provided these for many years and they're not being used. How can the Regulator ensure that these standards are applied?

- **Mainstreaming diverse groups across programming genres**
How? By what process? Who monitors this?

- **Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities**
How? By what process? Who monitors this?

A voluntary, self-monitoring system used by editorial and production teams to monitor their own content"
This will not work, unless it's mandatory they will not follow through. Self monitoring has proven to be ineffective. Why does CnaM think doing the same thing will lead to change? It hasn't so far?

ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS
With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:
- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS
- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY
- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY
- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.
Do you have any feedback on the four principles elaborated above in relation to Engagement? (please limit responses to 250 words)

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS
Who defines meaningful engagement? What does it mean? How is this tracked/ proven?

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY
Who defines collaborative engagement? What does it mean? How is this tracked/ proven?

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY
What does this mean exactly?

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES
What does success look like here according to the Regulator?

The four principles outlined for engagement, within the media sector reflect a robust and inclusive approach. "Developing meaningful engagements with diverse and marginalised groups" underscores the importance of genuine interaction, ensuring that involvement isn't tokenistic but truly values and respects the voices and contributions of all individuals. It is about ensuring this is what happens. How do you plan on ensuring this?

ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES
The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.
- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.(This will be explored and facilitated by Coimisiún na Meán)
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make
this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Engagement with higher education institutions,

Question 6.
Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 750 words)

- Formal and/or informal structures of engagement with under-represented groups
What is a structure of engagement? How long? How many times a year? What format?

- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
What is meant by engagement? Do they just have to be members but don't have to attend or adopt any of the best practices discussed? Is this voluntary?

- It is recommended to develop an Equality, Inclusion and Diversity 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.(This will be explored and facilitated by Coimisiún na Meán)
When? How often? What are the desired outcomes of these engagements?

- Including the perspective of diverse groups in the development of content
How?

- Using tools such as the "Women on Air" database
Doesn't work. They haven't used it to make any real change in the last 13 years.

- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
Who is responsible for developing this? How can this be used to make real change?

- Engaging with various communities and groups in relation to content development
How?

- Using guidelines and language guidelines provided by representative organisations
How can you force them to use something they haven't been using?

- Raising awareness of opportunities in the sector
How? What kind of opportunities?

- Supporting the development of new networks
What does this mean? New network for whom? Goal of these networks?

- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast

Reviewing them with a view to what? Are they fair and equitable? How can we make them more inclusive? By comparing them with proven best practice?

- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
How? Shouldn't ALL internships be paid?

- Engagement with higher education institutions
What does this mean exactly?

DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS
With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:
- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE
- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY
- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR
- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES
- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.
Do you have any feedback on the five principles elaborated above in relation to Development? (please limit responses to 250 words)

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORKFORCE
What does this mean exactly? Setting up courses? Open days? Industry conferences? Changing application processes?

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY
With whose help? Could this be developed with the department of education for example? Skillsnets? Solas?

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR
How? Who defines the barriers and how can they be broken down?

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES
How? Who defines the barriers and how can they be broken down?

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR
What does this mean exactly?

DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.
- Conducting 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.
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
- It is recommended to develop an Equality, Inclusion and Diversity 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.

Question 8.
Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 750 words)

- Conducting 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.
Who will conduct this? How will it be communicated - internally only? How will it be used? For example, would the board and executive use it to define future job roles in an organisational chart etc?

- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
Solas, Skillnets, Apprenticeship orgs too?

- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
What are the training and development organisations in the sector? Do they have GEDI expertise and employees with those skills/ degrees ?
- Raising awareness of opportunities in the sector
How?

- Supporting the development of new networks
How?

- Supporting and facilitating training, internships and mentorships. Supporting paid internships.

Shouldn't ALL internships be paid to ensure true diversity of opportunity?

- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
Reviewing with an eye to what exactly? What's best practice here?

- It is recommended to develop an Equality, Inclusion and Diversity 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.
Who will develop this? How often will they meet? Who will track outcomes and adoption of best practice?

The focus should indeed be on creating a skilled, diverse, and inclusive workforce through internal assessments, engagement with educational institutions, collaboration with industry-wide organisations, raising awareness of opportunities, supporting new networks, facilitating training and internships, reviewing engagement processes for inclusiveness, and establishing dedicated forums.

By preparing for future industry demands, cultivating diverse talent pipelines, enhancing awareness about opportunities, and creating an environment that supports continued growth and inclusion within the media industry, these actions aim to support continued growth and inclusion.

It's really about how to enforce these modalities into the workforce. As I find the wording vague (again) at times and leaving it up to people, on a voluntary basis, will not lead to lasting change. How is much of this going to be facilitated? By what means?... it needs more solidity.

Consultation Document on the Draft Gender Equality, Diversity, and Inclusion Strategy of Coimisiún na Meán

November 2023

1. INTRODUCTION

The Draft Strategy has been developed with the aim of 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. It will also underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

The Draft Strategy is developed in the framework of rights, obligations and good practice outlined in international (United Nations) and European (Council of Europe, European Union) Human Rights Treaties, Regulations and Recommendations relevant to gender equality, to the rights of various minority and marginalised groups, and to the rights of people with disabilities.

The Draft Strategy is also framed by the Irish legislative and policy framework. Of particular importance are the Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'), which prohibit discrimination in the provision of goods and services, accommodation and education. They 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 highly 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. In aiming to enhance inclusion in the audiovisual media sector, the Draft Strategy also recognises that socio-economic disadvantage should be considered a factor in initiatives for some communities.

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."*

The development of the Draft Strategy is also informed by the recommendations of the Future of Media Commission (FOMC) in their Report and in the subsequent FOMC Implementation and Action Plan published by the government of Ireland.

Developing and publishing the Draft Strategy is part of an ongoing engagement of Coimisiún na Meán in the promotion of gender equality, diversity and inclusion in the sector and further activities will follow in 2024. The Draft Strategy has built on previous work including the BAI Gender Action Plan (GAP), the work carried out in the context of the "Stakeholder Review of the GAP," and a range of research reports commissioned by the (former) BAI. Further extensive stakeholder discussions took place between September and November of 2023. The aim of this was to include additional organisations that were not part of the initial discussions in 2021. It also served to include GEDI experts in a range of other institutions, and to conduct in-depth discussions with other key actors in the area of development, funding and training in the wider cultural, creative and audiovisual sectors who are examining similar issues.

The Draft Strategy aims 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 public interest. The Draft Strategy takes a principles-based approach by outlining key Principles and presenting a range of tools and actions to support and further these Principles. The Draft Strategy is organised under four Pillars.

In this document, stakeholders have the opportunity to provide feedback on the proposed structure and content of the Draft Strategy. Please return the feedback on or before Friday November 24th at close of business. Please send your responses by email only to Mairéad Nic Gabhann at mngabhann@cnam.ie, clearly specifying Draft GEDI Strategy Consultation in the title. After November 24th, Coimisiún na Meán will unfortunately no longer be able to accept responses.

2. PILLARS OF THE GEDI STRATEGY

The Draft Strategy rests on four pillars, as outlined below. These pillars were elaborated on the basis of the broad range of discussions with stakeholders and with reference to best practice in the area of GEDI work in the media sector. These four areas are considered to be interconnected and mutually reinforcing. The specific Principles related to each Pillar, and tools and actions that can be used to support and further these Principles are outlined in additional sections below. Some Principles and tools and actions are repeated under different headings – illustrating the way in which these Pillars are interconnected. The four Pillars are:

- WORK CULTURE

- REPRESENTATION AND CONTENT

- ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

- DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

3. WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1.

Do you have any feedback on the four principles relevant to Work Culture elaborated above? (please limit responses to 250 words)

The NDA welcomes the four pillars outlined and recognises the importance of articulating commitments to building an inclusive workplace. In line with this, we suggest it may be helpful to consider naming the minority groups that would be covered in addition to being specific about gender. We are conscious that if some groups don't see themselves clearly named, there

may be an assumption that the principles are not applicable to them. It is important that those people who belong to a number of minority groups also see themselves represented.

The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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Question 2.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

It is important to encourage an inclusive workplace following a Universal Design approach. CEOs, directors and senior management should clearly show their commitment to this by considering ways of ensuring visible role models for employees. Persons with disabilities should be encouraged to be Diversity Champions as a way of driving the organisation's EDI agenda. Visibility may help other employees to feel comfortable sharing their disability status. This will be important when Coimisiún na Meán starts to make its statutory returns under Part 5 of the Disability Act 2005. There may also be learning from mechanisms being introduced at European level in relation to reporting on inclusion and diversity matters, including the Corporate Social Responsibility Reporting Directive. This offers a framework to allow formal measuring of progress in the EDI landscape that may be a useful guide to the Commission as

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document

[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

it begins its work, even in advance of transposition of the Directive, and to complement its commitments in relation to gender.

In order to increase opportunities for disabled people, providing training in disability awareness and EDI for employees involved in recruitment, external recruitment agencies and interview panels is important. We advise that disability awareness and a Universal Design approach are critical elements for increasing recruitment, retention and career progression of persons with disabilities.

Providing all employees with training in EDI, disability awareness and Universal Design will increase awareness and ensure that they can provide professional services to everyone. In addition, following a Universal Design approach to the design of the workplace (including physical and digital environments), as well as all infrastructure, products and services, will ensure that all employees can reach their potential.

4. REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.

Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

We welcome these principles as they stand. It is important that programming reflects the lives of audiences, including people with disabilities, across all genres. We believe that radio/television plays a strong role in public attitudes to disabled people and that greater visibility as well as realistic, accurate and positive depictions of disabled people can contribute to an inclusive society. Coimisiún na Meán should strive to ensure that the representation and portrayal of people with disabilities in programming will put the person first and will take care to avoid defining people entirely by their disability. There could be monitoring of the representation and portrayal of disabled people and other groups covered in the Strategy. While welcoming commitments to increasing gender representation, we advise that the wider range of diversity grounds could be articulated clearly in the GEDI Strategy.

4.1. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media
- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[3] – or using other technologies to track on air diversity such as algorithmic tools
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database
- Monitoring of Irish language programme content[4]
- Collaborating with other actors in the audiovisual sector in the creation of content
- Integrating GEDI in Commissioning and content development[5]

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[3] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content
[4] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024
[5] GEDI Standards to be developed by Coimisiún na Meán

Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 630 words)

The measures here are primarily focused on people-facing roles across the sector. To increase the representation of people with disabilities, the NDA advises that the questions above are framed in a more holistic context. This would facilitate inclusion of people with disabilities in editorial, production, and/or other relevant disciplines. It is important to reflect the need to ensure that (as noted in the context of the previous pillar) the built and physical environment should be accessible, and that a Universal Design approach should be followed.

The majority of the tools and actions specified here are gender focused. While there is intersectionality across all groups it is important that there are measures for all minority groups. We would recommend disability specific measures as disabled people represent around 21% of the population based on Census 2022 figures. For a number of years, the NDA discussed with the former BAI the development of a guide for appropriate language on disability and mental health for independent producers, the development of a database of expert interviewees with disabilities (similar to Women on Air) and increasing opportunities for actors and production crew with disabilities. We would welcome references to similar initiatives above.

5. ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

Do you have any feedback on the four principles elaborated above in relation to Engagement? (please limit responses to 250 words)

The UN Convention on the Rights of Persons with Disabilities (UNCRPD) outlines obligations on Government for how they include disabled people in the development, implementation and monitoring of policies and legislation and other decision-making processes. It applies at the local, national and international level. At the national and European level, there is now a

European Universal Design Standard that demonstrates how an organisation can be more inclusive in its decision making. The upcoming European Accessibility Act will underpin this.

All participation and consultation processes should be underpinned by the principles of Universal Design. This means designing a process that is as inclusive as possible from the outset, rather than trying to add it in later or having a separate, accessible 'disability process' that is additional to the main participation process. There will sometimes be a need to have focused consultation with disabled participants only, but this should not be a substitute for making all mainstream participation processes accessible.

There are many reasons why the participation of disabled people in decision making is important and beneficial for an organisation. Participation is a fundamental right within the UNCRPD. In addition to meeting UNCRPD obligations, improved participation processes help to meet obligations under other international, European and national laws and policy commitments.

Beyond meeting obligations, there are also several benefits to engaging with disabled people in decision making. It makes organisations more responsive to the rights of people with disabilities and makes strategies, policies and services more effective by taking account of the lived experience of those affected. Good participatory processes lead to increased transparency in the development of policy which improves trust and builds relationships which last beyond the timeline of the consultation. Meaningful engagement may also lead to a sense of ownership of the topic in question by disabled people and may lead to enhanced buy-in of the policy or strategy.

5.1. ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.[6]
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.

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[6] This will be explored and facilitated by Coimisiún na Meán

- Engagement with higher education institutions, training institutes and schools and other outreach activities.

Question 6.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

A Universal Design approach to communication would facilitate engagement with all stakeholders. The NDA's "Customer Communications Toolkit for Services to the Public – A Universal Design Approach 2023" provides guidance to inform the design and procurement of customer communications.

We welcome the reference to the use of language guidelines. The NDA's advice paper on disability language and terminology is intended to provide practical guidance for Departments and public bodies on the use of language when speaking and writing about disability. This is a living document which will be updated periodically and we welcome feedback and suggestions on the content within.

For a number of years, the NDA discussed with the former BAI the development of a guide for appropriate language on disability and mental health, the development of a database of expert interviewees with disabilities (similar to Women on Air) and increasing opportunities for actors with disabilities. We welcome references to similar initiatives above.

Coimisiún na Meán should also consider mentorships/internships/apprenticeships as a means of increasing the participation of disabled people in the broadcasting and productions sectors where they are particularly underrepresented. As an example, organisations like AHEAD can recommend suitable third-level graduates under their Willing Able Mentoring programme for disabled graduates.

6. DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development? (please limit responses to 250 words)

As mentioned above under Question 1, we would encourage the Commission to name all the groups to be covered under this GEDI in addition to being specific about gender. We are conscious that if some groups don't see themselves clearly named, there may be an assumption that the principles are not applicable to them.

Employer engagement and support for employers are critically important for the improvement of the labour market situation for persons with disabilities in Ireland. Workplaces need to be flexible and accommodating and may need to consider alternative recruitment practices, including the use of apprenticeship or placement programmes.

Given the challenges faced by people who have acquired disabilities or conditions, and that many of them still want to work, support to help them enter appropriate roles and to navigate employment and have opportunities for promotion and career development is critical.

6.1. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.

- Conducting 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
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
- It is recommended to develop an Equality, Inclusion and Diversity 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.[7]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

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[7] This will be explored and facilitated by Coimisiún na Meán

The NDA would advise that consideration should be given to applying some, or all, of the following suggested measures to increase representation of disabled people both in front of and behind the cameras

• Work with stakeholders to improve attitudes and misperceptions of disabled people

• Increase the presence of/accuracy of the representation and portrayal of disabled people in programming

• Ensure the use of appropriate language in respect of disabled people in programming

• Develop industry reference points or standards concerning the representation and portrayal of disabled people

• Increase participation (including employment) in the industry (on- and off-air) of disabled people

• Improve internal communication amongst industry bodies regarding disability issues, barriers and initiatives

• Initiate communication and outreach between industry bodies and Disabled Persons' Organisations, disability organisations and individuals

• Develop access and training initiatives involving disabled people

Craol and CTA response to Consultation Document on the Draft Gender Equality, Diversity, and Inclusion Strategy of Coimisiún na Meán

24th November 2023

1. **INTRODUCTION**

The Draft Strategy has been developed with the aim of 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. It will also underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

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The Draft Strategy is also framed by the Irish legislative and policy framework. Of particular importance are the Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'), which prohibit discrimination in the provision of goods and services, accommodation and education. They 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 highly 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. In aiming to enhance inclusion in the audiovisual media sector, the Draft Strategy also recognises that socio-economic disadvantage should be considered a factor in initiatives for some communities.

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."*

The development of the Draft Strategy is also informed by the recommendations of the Future of Media Commission (FOMC) in their Report and in the subsequent FOMC Implementation and Action Plan published by the government of Ireland.

Developing and publishing the Draft Strategy is part of an ongoing engagement of Coimisiún na Meán in the promotion of gender equality, diversity and inclusion in the sector and further activities will follow in 2024. The Draft Strategy has built on previous work including the BAI Gender Action Plan (GAP), the work carried out in the context of the "Stakeholder Review of the GAP," and a range of research reports commissioned by the (former) BAI. Further extensive stakeholder discussions took place between September and November of 2023. The aim of this was to include additional organisations that were not part of the initial discussions in 2021. It also served to include GEDI experts in a range of other institutions, and to conduct in-depth discussions with other key actors in the area of development, funding and training in the wider cultural, creative and audiovisual sectors who are examining similar issues.

The Draft Strategy aims 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 public interest. The Draft Strategy takes a principles-based approach by outlining key Principles and presenting a range of tools and actions to support and further these Principles. The Draft Strategy is organised under four Pillars.

In this document, stakeholders have the opportunity to provide feedback on the proposed structure and content of the Draft Strategy. Please return the feedback on or before Friday November 24th at close of business. Please send your responses by email only to Mairéad Nic Gabhann at mngabhann@cnam.ie, clearly specifying Draft GEDI Strategy Consultation in the title. After November 24th, Coimisiún na Meán will unfortunately no longer be able to accept responses.

2. PILLARS OF THE GEDI STRATEGY

The Draft Strategy rests on four pillars, as outlined below. These pillars were elaborated on the basis of the broad range of discussions with stakeholders and with reference to best practice in the area of GEDI work in the media sector. These four areas are considered to be interconnected and mutually reinforcing. The specific Principles related to each Pillar, and tools and actions that can be used to support and further these Principles are outlined in additional sections below. Some Principles and tools and actions are repeated under different headings – illustrating the way in which these Pillars are interconnected. The four Pillars are:

- WORK CULTURE

- REPRESENTATION AND CONTENT

- ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

- DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

3. WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1.

Do you have any feedback on the four principles relevant to Work Culture elaborated above?
(please limit responses to 250 words)

Craol (Community Media Ireland) and CTA (Community Television Association) welcome this GEDI strategy from Coimisiún na Meán. Following on from the Gender Equality (#5) Sustainability Goal in the UN Sustainable Development Goals (SDGs) that featured in the Broadcasting Sustainability Network launched by BAI, we are eager to promote GEDI across our   network   of   stations.

Community Media by its nature is very accessible and access to the airwaves is a must on Community Media, therefore a GEDI strategy is ideal to enhance the experience for all in Community Broadcasting. Striving to reduce exclusion and measure balance on air and behind the scenes in Community Media will make Community Media more welcoming to those from minority backgrounds. Here the principles are most important to Community Media as we operate and give access to communities at scale like no other media does.

We see training as key to fostering a culture of inclusion in our network. As we are the media that most works with minorities already we will have a lot to teach to others starting on this journey with GEDI. Through sectoral education we can help spread the ethos of GEDI as a practice in organisations. We measure the level of inclusion as a Social Benefit output in annual reporting.

While considering the Work Culture there are many great points made in research published by DCU/FuJO for BAI in a qualitative report into the attitudes of first generation Nigerian and Polish migrants to Irish news media (March 2023). Difficulties in licensing of more Community Television channels and the positives of working with the local community radio station are indicators of the difficulties and successes new Irish communities have with engaging with Community Media in Ireland.

The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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Question 2.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

Culture eats strategy for breakfast. This is not to say that the starting point of strategy is wrong. But when it comes to delivery within the organisation and among people, changing the culture is what will deliver the strategy.

Meshing the principles of GEDI with the good governance code and Charities Governance Code will allow us to measure and report on our development of GEDI principles across our organisations.

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document

[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

Policy development and updating will allow us to bring policy forward to serve the kind of Ireland we live in today.

Again training is key and volunteers, staff and boards of management will be able to enhance their understanding of GEDI principles and go on to change the culture in our network of stations. Media organisations should be in a position to train the sector with tailored GEDI training. Across the Craol network & the CTA there are adequate numbers of trained trainers in QQI and City & Guilds.

While physical access to our Community Media facilities is a requirement of our full licences, we can go beyond this minimum requirement. Covid 19 showed that physical access was not possible in every location, but access to the airwaves was important during the pandemic.

Ensuring access to broadcasting for all beyond physical was again a culture change within our sector. Access issues could now be seen in the digital divide which spanned age profiles and poverty gaps, meaning access training and assistance was required to help our more vulnerable members.

Training from external organisations in the areas of neurodiversity, disability and LGBTQ+ are regularly available and undertaken by our member stations staff and volunteers. And in a two way direction, media training and access is provided to the same organisations in the areas where our networks are on air.

Events supported by the Sponsorship Scheme would enable the sector to bring awareness of GEDI strategy on a local and national level.

Community Media can be the vanguard in implementing best practice in GEDI.

As Community Media by its very existence extends plurality and variety of ownership, the more diverse and active Community Media is, the more pluralistic our broadcasting landscape is. This means that universal access to Community Media in every area is needed to fulfil the plurality needs of our broadcasting make up in Ireland. To achieve plurality in Irish broadcasting we must witness an expansion of Community Media. This could begin with the licencing of aspirant stations which have been operating Pilot Community Temporary Services for up to 10 years now.

Gender Pay Gap information is volunteered to research conducted regularly by The Wheel annually.

While incorporating the principles of GEDI in workplace culture, consideration to the rates of pay in the Community Sector must be explored. The living wage in Ireland 2023/2024 is currently €14.80 per hour and this is not always a wage level that is achieved due to the under payment of employment schemes available to Community Media.

4. REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.

Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

With the talk ratio in Community Media often as high as 60%, share of voice within the community is paramount to what is broadcast on Community Media. While diversity in Irish communities varies from area to area, areas with large or small minorities with a Community Station, the station becomes a go to place for migrant voices.

Stations often measure Voices On Air as part of Community Services Programme (CSP) returns. GEDI measurements could also be measured as output to delineate the measured output. Content variety across our network regularly highlights the voices of minority communities. National Community Radio Day (NCRD) is a good example of our networks focusing on minority voices. 2023 NCRD focused on voices of Travellers in Ireland and in 2022 NCRD focused on the new migrant communities in Ireland.

4.1. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media
- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[3] – or using other technologies to track on air diversity such as algorithmic tools
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database
- Monitoring of Irish language programme content[4]
- Collaborating with other actors in the audiovisual sector in the creation of content

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[3] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content

[4] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024

- Integrating GEDI in Commissioning and content development[5]
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Mainstreaming diverse groups across programming genres
- Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

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Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 630 words)

Community Media is already a national leader in diversity and plurality of voices on air, but there is always room for improvement. Research and measurement of the achievements of Community Media to date would provide context to the narrative and put some benchmark numbers in place.

Databases of expert voices, that help producers to book gender balanced guests are very helpful. In Community Media there is a need to have local voices participating on air. While a national expert over the phone/video link is always possible the need to cover the community angle requires local voices to be sourced within the catchment area of the broadcast.

Media training and development over time is Community Media's way of ensuring a gender balanced supply of voices. The rise in participation of women in sport and popularity of women's sport is certainly a positive when it comes to increasing the share of voice. We need to extend this growth to women in politics and business and all aspects of life and promote these. Often this is a demand led initiative, but with extra effort and local databases similar to Women On Air this can be achieved.

Greater than the balance of guest's voices, the predominant voices heard on Community Media are those of presenters. Policies that promote positive percentages on balance with presenters voices will help reduce any areas of imbalance.

Use of promotional and advertising voice gender balance can also adjust the overall balance of a television and radio station. Active consideration to the diversity of voices in station identifications and advertising should help with balance. Community Media stands apart with the inclusion of local voices in advertising. Rural Voices and Working Class voices are often airbrushed from national advertising but are part of the soundscape of Community Media.

With regard to mainstreaming diverse groups across programming genres, Community Media is experienced in not pigeonholing minority voices to programmes about their own topic areas.

It is good to have news read by voices that are not usually heard reading the news in Irish media. And music genre tastes of presenters have little bearing on the nationality of the presenter. While often the multilingual programmes are presented by experts by experience,

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[5] GEDI Standards to be developed by Coimisiún na Meán

a mix of local volunteers in the production of those programmes helps to develop intercultural links within station teams. This is the true strength of a diverse and plural Community Media operation.

In relation to integrating GEDI in commissioning, a gap analysis of what community needs are not being met should tell us where we can perform better and which content to commission and develop.

5. **ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS**

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

Do you have any feedback on the four principles elaborated above in relation to Engagement? (please limit responses to 250 words)

Across Community Media, the ongoing success is not necessarily the continued broadcasting of a diverse programme in the schedule, but success is more related to the ongoing relationship with representative community organisations that will provide a wealth of content and personnel to cover a topic area.

Across the Craol & CTA networks we encourage the sharing of programmes that fill gaps that are needed where local resources do not currently exist. Example: Ukrainian programmes produced in one station can be shared with many others where a sudden requirement arises. Over time, local versions can replace the shared show.

Often the opportunities of access are equal, training can be available for all but the outcome of this training, the graduates GEDI mix getting on air is not always equal. Equality of outcome is as important as equality of opportunity in training and getting on air.

With regard to delivering media in an inclusive way, often the mix of presenters on television and radio and the guests accommodated on air, allows for a sharing of experience.

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.[6]
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Engagement with higher education institutions, training institutes and schools and other outreach activities.

Question 6.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

Similar to the Broadcasting Sustainability Network, an audio and audiovisual sector forum on GEDI can help promote and steer the national development of databases and directories to make the task easier. Ultimately culture at the broadcaster needs to adopt the principles in the strategy by broadcasting this diversity.

Setting limits on content levels in certain areas can lead to the minimum requirement being the maximum achieved. Even where limits are expressed as minimum requirements, limits tend to be limiting. Making funding available to create a positive GEDI culture in media will help community broadcasters exceed the numbers previously attained and grow the equality health of each station in the networks on radio and television.

Not setting limits is not an argument for not measuring. If it is not measured it cannot be tracked over time.

Where GEDI indicators are low it can be a signal that more training is required, or structural issues exist with the implementation of the strategy.

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[6] This will be explored and facilitated by Coimisiún na Meán

6.   DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development? (please limit responses to 250 words)

Community Media is unique in the media sector employing many people across Community Services Programme (CSP), Community Employment (CE) and TÚS. GEDI principles in action across the workforce help deliver the cultural change needed to kickstart the change across the sector.

Many broadcasters get their first foray into media with Community Media. From Transition Year and Work Experience placement from Schools to more formal internships from media disciplines in Colleges, Community Media is the place where first impressions last.

Training supports and bursaries to the Community Media sector can help balance the GEDI benchmarks and help start early career interest in a media landscape that looks like and sounds like the Ireland we live in today.

6.1. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.

- Conducting 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
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.

> - Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
> - It is recommended to develop an Equality, Inclusion and Diversity 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.[7]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

As with all answers above the answer lies with culture. But perhaps in this answer the culture is the inbound shared culture of those availing of access to media from a background where GEDI helps them contribute to the overall media output.

The more colourful the media we create the more representative it is. Community Media is a ground up community development movement. We need to be the community we broadcast from and share the cultural additions that are already with us. We must also be the meeting place of cultures.

Through Community Media Hubs, Community Media can grow cross-cultural ties and become the canvas to display the best of our cultures through media and the ways we present it.

We look forward to the Community Media Scheme funding to open up Community Media Hubs to all parts of Ireland.

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[7] This will be explored and facilitated by Coimisiún na Meán

Consultation Document on the Draft Gender Equality, Diversity, and Inclusion Strategy of Coimisiún na Meán

November 2023

1. INTRODUCTION

The Draft Strategy has been developed with the aim of 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. It will also underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

The Draft Strategy is developed in the framework of rights, obligations and good practice outlined in international (United Nations) and European (Council of Europe, European Union) Human Rights Treaties, Regulations and Recommendations relevant to gender equality, to the rights of various minority and marginalised groups, and to the rights of people with disabilities.

The Draft Strategy is also framed by the Irish legislative and policy framework. Of particular importance are the Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'), which prohibit discrimination in the provision of goods and services, accommodation and education. They 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 highly 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. In aiming to enhance inclusion in the audiovisual media sector, the Draft Strategy also recognises that socio-economic disadvantage should be considered a factor in initiatives for some communities.

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."*

The development of the Draft Strategy is also informed by the recommendations of the Future of Media Commission (FOMC) in their Report and in the subsequent FOMC Implementation and Action Plan published by the government of Ireland.

Developing and publishing the Draft Strategy is part of an ongoing engagement of Coimisiún na Meán in the promotion of gender equality, diversity and inclusion in the sector and further activities will follow in 2024. The Draft Strategy has built on previous work including the BAI Gender Action Plan (GAP), the work carried out in the context of the "Stakeholder Review of the GAP," and a range of research reports commissioned by the (former) BAI. Further extensive stakeholder discussions took place between September and November of 2023. The aim of this was to include additional organisations that were not part of the initial discussions in 2021. It also served to include GEDI experts in a range of other institutions, and to conduct in-depth discussions with other key actors in the area of development, funding and training in the wider cultural, creative and audiovisual sectors who are examining similar issues.

The Draft Strategy aims 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 public interest. The Draft Strategy takes a principles-based approach by outlining key Principles and presenting a range of tools and actions to support and further these Principles. The Draft Strategy is organised under four Pillars.

In this document, stakeholders have the opportunity to provide feedback on the proposed structure and content of the Draft Strategy. Please return the feedback on or before Friday November 24th at close of business. Please send your responses by email only to Mairéad Nic Gabhann at mngabhann@cnam.ie, clearly specifying Draft GEDI Strategy Consultation in the title. After November 24th, Coimisiún na Meán will unfortunately no longer be able to accept responses.

2. PILLARS OF THE GEDI STRATEGY

The Draft Strategy rests on four pillars, as outlined below. These pillars were elaborated on the basis of the broad range of discussions with stakeholders and with reference to best practice in the area of GEDI work in the media sector. These four areas are considered to be interconnected and mutually reinforcing. The specific Principles related to each Pillar, and tools and actions that can be used to support and further these Principles are outlined in additional sections below. Some Principles and tools and actions are repeated under different headings – illustrating the way in which these Pillars are interconnected. The four Pillars are:

- WORK CULTURE

- REPRESENTATION AND CONTENT

- ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

- DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

3. WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1.

Do you have any feedback on the four principles relevant to Work Culture elaborated above?
(please limit responses to 250 words)

The concept of tolerance is mentioned in the document ('Ensuring a Safe, Tolerant, Inclusive and welcoming work environment' and 'Contributing to Society's tolerance and acceptance of diverse groups'.

Some inclusion experts and activists argue for moving beyond the concept of tolerance. Sesil

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Pir observed that "Tolerance (...) does not provide belonging. It doesn't honor our deserving fully and unconditionally included. It only provides temporary relief and creates unspoken distance between parties. What we desire is embodiment. The appreciation of difference, the respect to equal right for our whole being that has the true potential to reducing prejudice."

The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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Question 2.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

- Re applications via video / podcast. Perhaps video/audio might be better as the audio might not be a fully realised podcast.

- Re integrating GEDI in HR. My suggestion would be to provide an example of what this would look like in practice.

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document
[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

4. REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.

Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

My general suggestion would be to provide a clearer definition of what diversity means (for example, BBC provides very clear definitions of under-represented groups £100 million TV commissioning spend (bbc.co.uk) / Channel 4 states that "(…) A key part of our remit is to appeal to people whatever their culture, nationality, religious persuasion, physical and mental ability, sexual orientation, gender, race or age."

In addition, NPR observes that "Diversity is a big tent. It covers race and ethnicity, gender, sexual orientation, gender identity, social class, faith, age, disabilities and abilities, political persuasion and geographic location. It embraces veteran status and family structures, marital status and national origin, immigration status and educational attainment." American Public Radio also adds that "diversity is the unending pursuit of meaningful inclusion in the face of historic and present-day exclusion."

Moreover, please see my comment regarding the concept of tolerance as outlined above.

4.1. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media
- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[3] – or using other technologies to track on air diversity such as algorithmic tools
- Using tools such as the "Women on Air" database

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[3] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content

- Supporting the development of a broader "Diversity on Air" database
- Monitoring of Irish language programme content[4]
- Collaborating with other actors in the audiovisual sector in the creation of content
- Integrating GEDI in Commissioning and content development[5]
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Mainstreaming diverse groups across programming genres
- Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 630 words)

Re "Diversity on Air" database – my suggestion would be for such a database to be industry-wide and prepared with the representatives of under-represented communities (keeping in mind the GDPR considerations).

Re GEDI standards: bringing together a broad selection of stakeholders to work together on those will be my suggestion.

5. ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

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[4] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024
[5] GEDI Standards to be developed by Coimisiún na Meán

Do you have any feedback on the four principles elaborated above in relation to Engagement?
(please limit responses to 250 words)

A clearer definition of what inclusion means, so the principle of 'delivering media content in an inclusive way' can be easily and readily understood.

5.1. ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.[6]
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Engagement with higher education institutions, training institutes and schools and other outreach activities.
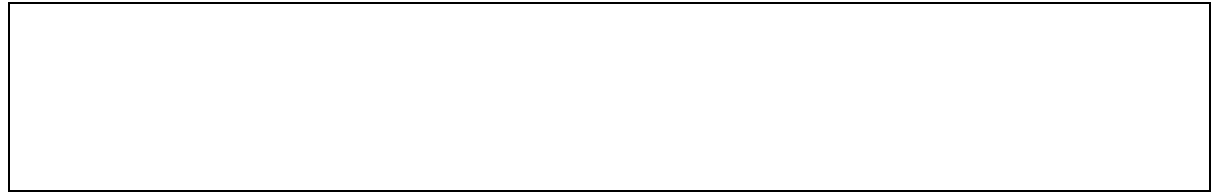
Question 6.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 750 words)

Please see my suggestions re "Diversity on Air" above.

Re Equality, Inclusion and Diversity Forum: I will be very happy to get involved and help in any way I can.

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[6] This will be explored and facilitated by Coimisiún na Meán

6. DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development?
(please limit responses to 250 words)

6.1. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.

- Conducting 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
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
- It is recommended to develop an Equality, Inclusion and Diversity 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.[7]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above?
(please limit responses to 750 words)

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[7] This will be explored and facilitated by Coimisiún na Meán

Linda Coogan Byrne

Consultation Document on the Draft Gender Equality, Diversity, and Inclusion Strategy of Coimisiún na Meán

November 2023

1. INTRODUCTION

The Draft Strategy has been developed with the aim of 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. It will also underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

The Draft Strategy is developed in the framework of rights, obligations and good practice outlined in international (United Nations) and European (Council of Europe, European Union) Human Rights Treaties, Regulations and Recommendations relevant to gender equality, to the rights of various minority and marginalised groups, and to the rights of people with disabilities.

The Draft Strategy is also framed by the Irish legislative and policy framework. Of particular importance are the Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'), which prohibit discrimination in the provision of goods and services, accommodation, and education. They 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 highly 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. In aiming to enhance inclusion in the audiovisual media sector, the Draft Strategy also recognises that socio-economic disadvantage should be considered a factor in initiatives for some communities.

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."*

The development of the Draft Strategy is also informed by the recommendations of the Future of Media Commission (FOMC) in their Report and in the subsequent FOMC Implementation and Action Plan published by the government of Ireland.

Developing and publishing the Draft Strategy is part of an ongoing engagement of Coimisiún na Meán in the promotion of gender equality, diversity and inclusion in the sector and further activities will follow in 2024. The Draft Strategy has built on previous work including the BAI Gender Action Plan (GAP), the work carried out in the context of the "Stakeholder Review of the GAP," and a range of research reports commissioned by the (former) BAI. Further extensive stakeholder discussions took place between September and November of 2023. The aim of this was to include additional organisations that were not part of the initial discussions in 2021. It also served to include GEDI experts in a range of other institutions, and to conduct in-depth discussions with other key actors in the area of development, funding and training in the wider cultural, creative and audiovisual sectors who are examining similar issues.

The Draft Strategy aims 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 public interest. The Draft Strategy takes a principles-based approach by outlining key Principles and presenting a range of tools and actions to support and further these Principles. The Draft Strategy is organised under four Pillars.

In this document, stakeholders have the opportunity to provide feedback on the proposed structure and content of the Draft Strategy. Please return the feedback on or before Friday November 24th at close of business. Please send your responses by email only to Mairéad Nic Gabhann at mngabhann@cnam.ie, clearly specifying Draft GEDI Strategy Consultation in the title. After November 24th, Coimisiún na Meán will unfortunately no longer be able to accept responses.

2. PILLARS OF THE GEDI STRATEGY

The Draft Strategy rests on four pillars, as outlined below. These pillars were elaborated on the basis of the broad range of discussions with stakeholders and with reference to best practice in the area of GEDI work in the media sector. These four areas are considered to be interconnected and mutually reinforcing. The specific Principles related to each Pillar, and tools and actions that can be used to support and further these Principles are outlined in additional sections below. Some Principles and tools and actions are repeated under different headings – illustrating the way in which these Pillars are interconnected. The four Pillars are:

- WORK CULTURE

- REPRESENTATION AND CONTENT

- ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

- DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

3. WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1.

Do you have any feedback on the four principles relevant to Work Culture elaborated above? (please limit responses to 250 words)

When I first spoke to the BAI five years ago they raised their hand and admitted that they ignored and left out radio on air broadcasting for a long time and focused more on TV and other areas of broadcasting. They had no idea how radio stations went about playlisting or organising music played on air. It would be imperative to ensure this does not happen again. As to turn a blind eye on radio which is one of the highest consumed media platform in Ireland would be remiss. Define mainstreaming? This is too vague, it should be an absolute MUST, an obligation. It

also doesn't take into account the Future of Media report recommendations. We need to all work together to make lasting structural change.

The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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Question 2.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document

I found this passage very frustrating as it provides a let off for a lot of media outlets. It is also far too vague, how is a 'smaller media outlet' defined? I would imagine that the majority of the media outlets on the island of Ireland would define themselves as 'small' so this passage facilitates a lack of engagement. We need to NOT do that.

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document
[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

We need KPI's for progress and details on how it will monitor and report on progress.

4. REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.

Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

There needs to be a clear mention of women in music or ways to tackle the inequality there. Also, where is the outline reporting for victims of bullying, harassment and sexual violence, they need to feel protected here and at minimum acknowledged.

- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.

Was listed in the tools section but it needs to be adequately spelled out that there is support for women in music orientated platforms, radio and across media.

4.1. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media
- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[3] – or using other technologies to track on air diversity such as algorithmic tools
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database

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[3] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content

- Monitoring of Irish language programme content[4]
- Collaborating with other actors in the audiovisual sector in the creation of content
- Integrating GEDI in Commissioning and content development[5]
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Mainstreaming diverse groups across programming genres
- Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 630 words)

"A voluntary, self-monitoring system used by editorial and production teams to monitor their own content"

This will not work; they are lazy and unless it's made an imperative action they will not follow through. Disappointing to see such vague lack lustre wording here when it comes to policy.

5. ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

Do you have any feedback on the four principles elaborated above in relation to Engagement? (please limit responses to 250 words)

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[4] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024

[5] GEDI Standards to be developed by Coimisiún na Meán

The four principles outlined for engagement in GDEI, within the media sector reflect a robust and inclusive approach. "Developing meaningful engagements with diverse and marginalised groups" underscores the importance of genuine interaction, ensuring that involvement isn't tokenistic but truly values and respects the voices and contributions of all individuals. It is about ensuring this is what happens.

"Participating in collaborative engagement across the industry" highlights the significance of collective efforts. Collaborative engagement fosters a more comprehensive and impactful approach, leveraging shared resources, knowledge, and experiences for a more significant, industry-wide change.

"Delivering media content in an inclusive way" emphasises the need for content that resonates with diverse audiences, reflects various perspectives, and champions inclusivity. This principle drives content creation that not only represents but respects and values diversity.

"Breaking down barriers to access to the sector and promoting equality of access to opportunities" targets systemic challenges. By addressing barriers and promoting equal access, this principle aims to create a more level playing field, ensuring that opportunities within the sector are open to everyone, regardless of background or identity.

Overall, these principles form a comprehensive framework that not only acknowledges the importance of diverse engagement but also emphasises collaboration, inclusive content creation, and systemic change to promote equality and access within the media sector. Let's hope it sticks and is not just left by the wayside.

5.1. ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.[6]
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database

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[6] This will be explored and facilitated by Coimisiún na Meán

- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Engagement with higher education institutions, training institutes and schools and other outreach activities.

Question 6.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

Underrepresented groups can be engaged through the initiatives and tools you've outlined.

There are several approaches to achieving diversity, including establishing diverse councils, creating dialogue forums, building a diversity database, and utilising databases such as "Women on Air." This is great to see as it never seems to be used in the ways it should be.

The importance of engaging with diverse communities, providing guidance, raising awareness, developing networks, reviewing engagement processes, and supporting mentorship and training programs cannot be overstated. Diversity and inclusivity-focused approaches across different levels, from industry-wide councils to educational outreach, appear robust and comprehensive.

The initiatives create a thriving ecosystem that supports equality, representation, and opportunities for underrepresented groups.

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6. DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development? (please limit responses to 250 words)

The five principles outlined for development within the GDEI framework in the media sector encapsulate pivotal aspects crucial for fostering an inclusive and progressive environment.

These principles, when integrated into industry practices, create an environment conducive to equitable opportunities, professional growth, and a more diverse and skilled workforce within the media sector.

6.1. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.

- Conducting 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
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
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- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
- It is recommended to develop an Equality, Inclusion and Diversity 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.[7]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

Yeah, the measures and initiatives outlined offer a holistic approach to fostering diversity, equity, and inclusion within the media sector.

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[7] This will be explored and facilitated by Coimisiún na Meán

The focus should indeed be on creating a skilled, diverse, and inclusive workforce through internal assessments, engagement with educational institutions, collaboration with industry-wide organisations, raising awareness of opportunities, supporting new networks, facilitating training and internships, reviewing engagement processes for inclusiveness, and establishing dedicated forums.

By preparing for future industry demands, cultivating diverse talent pipelines, enhancing awareness about opportunities, and creating an environment that supports continued growth and inclusion within the media industry, these actions aim to support continued growth and inclusion.

It's really about how to enforce these modalities into the workforce. As I find the wording very vague at times and leaving it up to people will not lead to lasting change. How is much of this going to be facilitated… it needs more solidity.

Consultation Document on the Draft Gender Equality, Diversity, and Inclusion Strategy of Coimisiún na Meán

November 2023

The Draft Strategy has been developed with the aim of 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. It will also underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

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The Draft Strategy is also framed by the Irish legislative and policy framework. Of particular importance are the Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'), which prohibit discrimination in the provision of goods and services, accommodation and education. They 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 highly 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. In aiming to enhance inclusion in the audiovisual media sector, the Draft Strategy also recognises that socio-economic disadvantage should be considered a factor in initiatives for some communities.

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."*

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The Draft Strategy aims 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 public interest. The Draft Strategy takes a principles-based approach by

outlining key Principles and presenting a range of tools and actions to support and further these Principles. The Draft Strategy is organised under four Pillars.

In this document, stakeholders have the opportunity to provide feedback on the proposed structure and content of the Draft Strategy. Please return the feedback on or before Friday November 24th at close of business. Please send your responses by email only to Mairéad Nic Gabhann at mngabhann@cnam.ie, clearly specifying Draft GEDI Strategy Consultation in the title. After November 24th, Coimisiún na Meán will unfortunately no longer be able to accept responses.

PILLARS OF THE GEDI STRATEGY

The Draft Strategy rests on four pillars, as outlined below. These pillars were elaborated on the basis of the broad range of discussions with stakeholders and with reference to best practice in the area of GEDI work in the media sector. These four areas are considered to be interconnected and mutually reinforcing. The specific Principles related to each Pillar, and tools and actions that can be used to support and further these Principles are outlined in additional sections below. Some Principles and tools and actions are repeated under different headings – illustrating the way in which these Pillars are interconnected. The four Pillars are:

1. WORK CULTURE

2. REPRESENTATION AND CONTENT

3. ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

4. DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

a) MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

b) ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

c) BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

d) BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1. Do you have any feedback on the four principles relevant to Work Culture elaborated above? (please limit responses to 250 words)

(Taking the points above as a-d)

a) Comment on The GEDI principles. The priority of Gender might unintentionally lessen the value of other diversities, and there is evident within public service bodies since the introduction of the Public Sector Duty, that Gender and Disability are addressed as first principle targets. The difficulty of that approach, where they are without targeted quotas, it extends out the time to reach those goals, and relegates other EDI groups in the meantime. Therefore, a time lined and planned approach could be recommended, where gender is defined for targeted actions over a period and a recommendation that the other EDI areas are also addressed through a range of actions.

b) That the term 'tolerant', might be reconsidered or included alongside 'culturally component' inclusive and welcoming etc.

> c) Expand beyond 'women' the Principle of breaking down barriers in the Audio-visual sectors, to other diverse groups. Also, an intersectional approach might be adopted to ensure women's representation in a nested quota model, i.e., Traveller women, women with a disability, BME identities etc. And this might be delivered via a defined strand of work / actions to reach those women.
> d) Breaking down barriers to access (to add: **and participation in**) the sector etc…

1.1. WORK CULTURE – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions intended to support and further these Principles.

> 1. Developing and publishing GEDI policies, plans and strategies
> 2. Appointing a GEDI Lead or senior manager lead[1]
> 3. Ensuring cooperation across departments (or associations) via internal collaborative processes.
> 4. Integrating GEDI in HR in relation to staff hiring, promotion and retention
> 5. Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
> 6. Providing relevant training in GEDI awareness, unconscious bias etc.
> 7. Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
> 8. Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
> 9. Encouraging the development of Employees Resource Groups (ERGs)
> 10. Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
> 11. Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
> 12. Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
> 13. Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
> 14. Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
> 15. Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
> 16. Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

> Question 2.
>
> Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words) (Using 1-16 for the above)
>
> 1 And annual monitoring outcomes reports.
> 5. *Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies*. Foremost should be a set of objective criteria , vis a vis data collection , regular monitoring and outcomes reports , of recruitment drives, applications and succesful candiates, length of emploments.
> 7. And an anti racism policy

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document

[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

8. And ensure ' culturally competent workplaces' , ie beyond the physical , to ensure safegaurding for minority and other underrepresnted groups. For eg, anti racism will cover a broad range of diverse groups, but more specific training might be required to defeat particular bias. Traveller cultural competency training should be undertaken in advance of recruitment for example where an internship programme might be planned and other specific targeted actions. (See 14)

The following might also be included:

❑ Set diversity quotas
❑ Ensure Travellers are specifically named in GEDI strategies and Action Plans. Also groups beyond ethnic, and ESA grounds, including on socio economic grounds.
❑ Embed an ethnic identifier question and outcomes reporting (as above) in workforce recruitment processes, and include a requirement of evidence of targeting and promotion to Travellers, minority and underrepresented groups.
❑ Establish an Advisory Council of underrepresented groups from which to draw expertise and oversee the development of the GEDI sector.

REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

5. PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

6. ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

7. REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

8. CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

9. FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3. Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

Taking the points above as 1-5

1. Instead of the line envisaged, to this: Promoting diversity in content, across delivery and output of voices, opinions, and stories

2. a gender (and pluralistic) balance of voices

4. Instead of the line envisaged, to this: Contributing to society's understanding and inclusion of, diverse groups.

Examples of above

Travellers were not a targeted quota in RTE's Diversity and Inclusion vision and strategy, despite it noting an objective *to cover all groups protected under the Equal Status Act and represent and reflect the voice and diversity of Ireland.*

To do this it focused on gender, disability and LGBTQI targets and increasing a quota of "10% of persons from a non-Irish background". The lack of inclusion demonstrated a poor understanding of

diversity and was contrary to matters raised regarding reporting standards and programme content to the FOMC.

Prescribing groups for safeguarding and inclusion, as a universal media standard might be considered. This might include a glossary of groups, protected under the Equal Status Acts and, racially, ethnic, culturally, and linguistically diverse groups. Also socio economic grounds, as an underrepresented cohort.

1.2. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

1. Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
2. Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media
3. Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[3] – or using other technologies to track on air diversity such as algorithmic tools
4. Using tools such as the "Women on Air" database
5. Supporting the development of a broader "Diversity on Air" database
6. Monitoring of Irish language programme content[4]
7. Collaborating with other actors in the audiovisual sector in the creation of content
8. Integrating GEDI in Commissioning and content development[5]
9. Engaging with various communities and groups in relation to content development
10. Using guidelines and language guidelines provided by representative organisations
11. Mainstreaming diverse groups across programming genres
12. Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 630 words)

(Using 1-12 for the above)

1. This should be led from a senior organisational structure which would inform, '*internal cross-department collaborative approaches'.*

2. And anti- racism training

3. The 'voluntary self-monitoring system' reduces the intended outcomes to improve representation and content. A universal tool adopted cross sectorally might improve adoption and provide greater analysis of the sector, in future reporting.

11. To add: in content delivery and subject

12. A review of research commissions, i.e. phone and online polls, about specific communities without due regard to potential for harm and stereotyping.

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[3] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content
[4] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024
[5] GEDI Standards to be developed by Coimisiún na Meán

- Review programme standards, protocols and governance procedures related to content determinations and criteria informing research and editorial decisions ensuring EDI proofing, and improve transparency.

- That GEDI leads would be appointed for the purposes of an Advisory Counsel for the sector to inform and collaborate at national level on learnings, approaches and monitoring. (This might be linked to the Diversity Council envisaged in the Engagement strand, but would have a focus too on Representation and Content)

- Create thematic focuses within content via a planned approach to ensure national visibility of high-profile diversity/ inclusion events etc. For example, matters of national prominence are widely reported across media to inform and educate, but NGOs working in specific areas with expertise and knowledge often must compete for media space to articulate and provide insights on matters of national importance. For e.g. the far-right riot in Dublin November 23rd and resulting media attention required spokespeople for response and analysis. Contrast that with The International Day for the Elimination of Racial Discrimination, International Traveller and Roma Day etc, which give similar opportunities but are often under reported. If there was a planned approach to special days / events rather that those competing with a myriad of stories on the day, this would serve better, for e.g. forward planning features, documentaries etc.

ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

1. DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

2. PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

3. DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

4. BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

Do you have any feedback on the four principles elaborated above in relation to Engagement? (please limit responses to 250 words)

(Using 1-4 for the above)

10. TO ADD: 'FOR DEFINED OUTCOMES'

1.3. ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

1. Formal and/or informal structures of engagement with under-represented groups
2. Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)

3. It is recommended to develop an Equality, Inclusion and Diversity 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.[6]
4. Including the perspective of diverse groups in the development of content
5. Using tools such as the "Women on Air" database
6. Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
7. Engaging with various communities and groups in relation to content development
8. Using guidelines and language guidelines provided by representative organisations
9. Raising awareness of opportunities in the sector
10. Supporting the development of new networks
11. Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
12. Supporting and facilitating training, internships and mentorships. Supporting paid internships.
13. Engagement with higher education institutions, training institutes and schools and other outreach activities.

Question 6.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

(Using 1-13 as numbers for the above)

   11. To add: And reviewing restrictive entry criteria, and higher educational barriers, with a wide view of job oppiortunites in the sector and learning and apprenctieship options.

This might also be included:

Engaging with various communities and groups towards building expert analysis in diversity, inclusion and anti-racism within media structures to bring residual knowledge in the sector and across media in a long term approach related to content development.

DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

11. CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

12. DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

13. BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

14. BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

15. PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

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[6] This will be explored and facilitated by Coimisiún na Meán

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development? (please limit responses to 250 words)

16. COMMENT ON 'BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR'. T

That this should also include with barriers to 'gender equality, (and inequities for minority and diverse groups). Important to see advancement of the sector as being of value to the contribution of diverse groups and not just based on gender. See above at Question 1 General GEDI Principles

This relates also to the Principle of 'BREAKING down barriers to access to the sector and promoting equality of access to opportunities', which is critical, but should be beyond just access and opportunities, and validated as the contribution and participation of people within those diverse groups. IE the naming in the Principle above beyond Gender, would reassure that inclusion in the text of the following Principle.

1.4. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.

13. Conducting 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
14. Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
15. Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
16. Raising awareness of opportunities in the sector
17. Supporting the development of new networks
18. Supporting and facilitating training, internships and mentorships. Supporting paid internships.
19. Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
20. It is recommended to develop an Equality, Inclusion and Diversity 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.[7]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

14. And wider civil society stakeholder interests, and 'non-media' specific under and post graduates' programmes to expand the range of possibility through a broader engagement with third level.

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[7] This will be explored and facilitated by Coimisiún na Meán

Consultation Document on the Draft Gender Equality, Diversity, and Inclusion Strategy of Coimisiún na Meán

November 2023

1. INTRODUCTION

The Draft Strategy has been developed with the aim of 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. It will also underpin the development of standards in this area across the Irish audio and audiovisual media sector landscape.

The Draft Strategy is developed in the framework of rights, obligations and good practice outlined in international (United Nations) and European (Council of Europe, European Union) Human Rights Treaties, Regulations and Recommendations relevant to gender equality, to the rights of various minority and marginalised groups, and to the rights of people with disabilities.

The Draft Strategy is also framed by the Irish legislative and policy framework. Of particular importance are the Irish Employment Equality Acts and the Irish Equal Status Acts ('the Acts'), which prohibit discrimination in the provision of goods and services, accommodation and education. They 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 highly 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. In aiming to enhance inclusion in the audiovisual media sector, the Draft Strategy also recognises that socio-economic disadvantage should be considered a factor in initiatives for some communities.

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."*

The development of the Draft Strategy is also informed by the recommendations of the Future of Media Commission (FOMC) in their Report and in the subsequent FOMC Implementation and Action Plan published by the government of Ireland.

Developing and publishing the Draft Strategy is part of an ongoing engagement of Coimisiún na Meán in the promotion of gender equality, diversity and inclusion in the sector and further activities will follow in 2024. The Draft Strategy has built on previous work including the BAI Gender Action Plan (GAP), the work carried out in the context of the "Stakeholder Review of the GAP," and a range of research reports commissioned by the (former) BAI. Further extensive stakeholder discussions took place between September and November of 2023. The aim of this was to include additional organisations that were not part of the initial discussions in 2021. It also served to include GEDI experts in a range of other institutions, and to conduct in-depth discussions with other key actors in the area of development, funding and training in the wider cultural, creative and audiovisual sectors who are examining similar issues.

The Draft Strategy aims 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 public interest. The Draft Strategy takes a principles-based approach by outlining key Principles and presenting a range of tools and actions to support and further these Principles. The Draft Strategy is organised under four Pillars.

In this document, stakeholders have the opportunity to provide feedback on the proposed structure and content of the Draft Strategy. Please return the feedback on or before Friday November 24th at close of business. Please send your responses by email only to Mairéad Nic Gabhann at mngabhann@cnam.ie, clearly specifying Draft GEDI Strategy Consultation in the title. After November 24th, Coimisiún na Meán will unfortunately no longer be able to accept responses.

2. PILLARS OF THE GEDI STRATEGY

The Draft Strategy rests on four pillars, as outlined below. These pillars were elaborated on the basis of the broad range of discussions with stakeholders and with reference to best practice in the area of GEDI work in the media sector. These four areas are considered to be interconnected and mutually reinforcing. The specific Principles related to each Pillar, and tools and actions that can be used to support and further these Principles are outlined in additional sections below. Some Principles and tools and actions are repeated under different headings – illustrating the way in which these Pillars are interconnected. The four Pillars are:

- WORK CULTURE

- REPRESENTATION AND CONTENT

- ENGAGEMENT (WITH DIFFERENT GROUPS IN SOCIETY)

- DEVELOPMENT (WITH REGARD TO SKILLS AND DEVELOPMENT OF TALENT)

3. WORK CULTURE – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Work Culture are outlined below:

- MAINSTREAMING GEDI OBJECTIVES ACROSS THE ORGANISATION

- ENSURING A SAFE, TOLERANT, INCLUSIVE AND WELCOMING WORK ENVIRONMENT

- BREAKING DOWN BARRIERS TO ADVANCEMENT OF WOMEN IN THE AUDIOVISUAL SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR FOR MINORITY AND MARGINALISED GROUPS

Question 1.

Do you have any feedback on the four principles relevant to Work Culture elaborated above? (please limit responses to 250 words)

NYCI welcomes the broad principles set out in this respect, and reflect the challenges and opportunities we have seen through our engagement with young people, and young women and minorities, in particular, in the sector.

The following table outlines the tools, measures and actions intended to support and further these Principles.

- Developing and publishing GEDI policies, plans and strategies
- Appointing a GEDI Lead or senior manager lead[1]
- Ensuring cooperation across departments (or associations) via internal collaborative processes.
- Integrating GEDI in HR in relation to staff hiring, promotion and retention
- Internal assessments of make-up of workforce via voluntary anonymous surveys to inform internal policies
- Providing relevant training in GEDI awareness, unconscious bias etc.
- Publishing a policy on anti-bullying/ anti-harassment. Appointing specific contact points and staff members to deal with these issues.
- Ensuring physical accessibility of workplaces and accessibility of content on screen and online [2]
- Encouraging the development of Employees Resource Groups (ERGs)
- Supporting strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse.
- Publishing Gender Pay Gap reports (where required by law) or carrying out internal surveys or assessments (where not required by law) as a measurement of progress
- Reviewing HR in relation to supporting parents, carers and people returning from maternity/ paternity leave and other forms of support
- Integrating GEDI in HR in relation to staff hiring, promotion and retention and other supports
- Participating in, and supporting training and development via internships, and strategic mentorships. Supporting paid internships.
- Providing, via broadcaster returns or other voluntary reporting mechanisms, information on actions and initiatives to promote GEDI
- Reviewing the processes for engaging people in initiatives, internships /mentorships to make this more inclusive, e.g. by sometimes allowing applications for internships over video/ podcast

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Question 2.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

NYCI welcomes the inclusion of methods to support participation and inclusion, via paid internships, and strategic mentorships. We do believe additional supports are currently required to support the sector in developing clear career pathways, apprenticeships and paid graduate trainee roles for from minority and disadvantaged backgrounds.

Research by our partner organisation, the European Youth Forum, identified that young people in households with the lowest economic standing were 4 times less likely to say they can afford to take on unpaid internships than young people in medium standing economic households and 8 times less likely than those in the highest standing economic households.

Likewise, those from marginalised backgrounds, including migrants, travellers, young people with disabilities, young women and people from lone parent families were less likely to take on an

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[1] It is recognised that smaller media outlets may not be in a position to do this and may have alternative approaches to supporting the Principles outlined in the document

[2] Content accessibility on screen and on-demand are covered under Accessibility Rules of CnaM.

unpaid internship with 15% of young people from marginalised backgrounds saying they could afford it, compared to 29% of young people from non-marginalised backgrounds.

The media sector must take steps to ensure careers are not only sustainable but accessible. The ending of unpaid internships within the sector, done in collaboration with the sector, would benefit the overall aim of gender equality, diversity and inclusion within the sector.

The media sector must take steps to ensure careers are not only sustainable but accessible. We know from speaking with young people in the media sector, unpaid internships are a particular barrier to those with limited financial resources and can cause a hollowing out of talent, and a closing off of opportunities to young people from more diverse backgrounds.

We welcome the recommendations around paid internships and organisations within the sector should be supported to ensure they can deliver fairer, fully paid internships and graduate trainee programmes.

The National Youth Council has campaigned over many years to end the exploitative practice of unpaid internships and recommends:
• An end to unpaid internships in the sector;
• Coimisúin na Meán identify funding opportunities to support media outlets in providing paid graduate trainee roles for young people from minority and disadvantaged backgrounds

The safety of young journalists, especially female journalists, from online harm is a paramount concern for many and we welcome the action to support "strategies in collaboration with other industry actors and journalists to create a safe online environment for all journalists and media workers to combat online abuse."

The prevalence of online harassment and abuse of young journalists is deeply concerning. A UNESCO-International Centre for Journalists (ICFJ) survey of journalists across 125 countries showed 73% of female journalists reported they had experienced some form of online violence. 1 in 4 experienced threats of physical violence, including sexual violence. The same proportion reported mental health impacts and 4 in 10 said they had been targeted in online attacks that appeared to be linked to orchestrated disinformation campaigns.

As part of exercise to inform our [engagement with the Oireachtas Committee on media](), we interviewed a selection of young journalists who told us of the impact social media abuse had on their own mental health, confidence, and careers. There was a clear gendered element of abuse, acknowledged by all interviewees. NYCI believes action needs to be taken to prevent the online abuse and harassment of young journalists and to support those who have been impacted by it.

NYCI recommends that:
• CnaM offer guidance to media outlets on mental health supports for staff;
• Media outlets appoint online safety editors;
• The Online Safety Commissioner should proactively review categories of harmful content to ensure harassment of young people, including journalists, is sufficiently addressed;

4. REPRESENTATION AND CONTENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following are the principles relevant to Representation and Content:

- PROMOTING DIVERSITY OF CONTENT, VOICES, OPINIONS AND STORIES

- ENSURING A GENDER BALANCE OF VOICES ON THE AIRWAVES

- REFLECTING THE DIVERSITY OF IRISH SOCIETY ACROSS THE RANGE OF PROGRAMMING GENRES

- CONTRIBUTING TO SOCIETY'S TOLERANCE AND ACCEPTANCE OF DIVERSE GROUPS

- FIGHTING STEREOTYPES, HATE SPEECH AND DENIGRATION

Question 3.

Do you have any feedback on the five principles elaborated above in relation to Representation and Content? (please limit responses to 250 words)

NYCI welcomes the key principles outlined in improving representation and content and believes if delivered will improve GEDI. However, NYCI believes that 'Ensuring best practice protective measures are in place' should be an additional key principle within the strategy. With increased representation, there is a potential risk of increased harm to those conducting public facing work from minority groups.

The Irish audio and audio-visual media sector have a responsibility to take measures to support those from minority backgrounds from the potential harm from this increased representation. Other sectors both in Ireland and the UK have begun similar work to protect the safety and welfare of their employees, for example within the public transport sector, and in healthcare settings

4.1. REPRESENTATION AND CONTENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Representation and Content.

- Establishment of internal cross-department collaborative approaches such as internal boards or association boards addressing diversity of content
- Providing relevant training in GEDI awareness, unconscious bias, with a specific focus on the media

- Using tools to assess the balance of gender representation on the air-waves and diversity on the airwaves following the model of the BBC 50/50 project[3] – or using other technologies to track on air diversity such as algorithmic tools
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database
- Monitoring of Irish language programme content[4]
- Collaborating with other actors in the audiovisual sector in the creation of content
- Integrating GEDI in Commissioning and content development[5]
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Mainstreaming diverse groups across programming genres
- Introducing policies and codes of conduct regarding reporting on various groups, engagement (on air, interviews, Vox-Pops) with groups or representatives of groups and communities

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Question 4.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 630 words)

The NYCI believes that it is also important for the GEDI strategy to commit to increasing the consultation of and representation of young people in media and providing meaningful opportunities for them to contribute to the development of the Irish media sector of the future.

The Future of Media Commission's own research supported the view that younger age groups, especially the 18-24 age group, feels least fairly represented by media, that there is too little coverage of the issues they care about and they are more likely to say Public Sector Media (PSM) and Public Service Content providers (PSCP) channels do not represent people like them.

NYCI's engagement with young journalists provided some additional context in this respect with some feeling there can be broad characterisations made in media outlets around young people in deprived communities; on issues like drugs and crime; stereotyping of young people and; unbalanced discussion of incidents of socialising during COVID among other challenges, which may feed into the impression young people aren't fairly represented. Along with this, some commented that young voices are often not adequately represented on issues that affect wider society but are not typically viewed as "young people's issues", with the example of energy costs cited.

There is limited research in an Irish context on the portrayal and representation of young people in media since a 2006 report by NYCI, but previous interviews conducted by NYCI with young journalists touched some on themes arising from research across seven countries during the pandemic which showed young people felt they were portrayed as irresponsible. Research from Queen's University found young people in the Northern Ireland believed that they received the most extreme labels for perceived involvement in 'anti-social behaviour' and 'crime'.

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[3] A voluntary, self-monitoring system used by editorial and production teams to monitor their own content
[4] The improvement of the quality and diversity of Irish language media will also be addressed in Coimisiún na Meán's review of Irish language media, to be published in 2024
[5] GEDI Standards to be developed by Coimisiún na Meán

To support the industry to adapt, and to ensure young people are better represented in the media the NYCI recommends the following tools be included within this GEDI strategy:

- Coimisúin na Meán conduct a study of representation of young people in Irish media, to identify themes and examine negative portrayals;
- Coimisúin na Meán work to ensure that young people are included on diversity boards and youth panels are established by media outlets;
- Extend FoMC report recommendation that PSM should ensure that writers and producers have received adequate training in how to engage with diversity content to youth content;
- Coimisúin na Meán engage with youth representative organisations and young people in the development of guidelines in relation to reporting on or developing storylines relating to young people;
- PSMs and PSCPs collect data on representation of young people across their content and make recommendations to ensure more young voices are heard.

As stated above, NYCI also believes that protective measures should be developed by the sector to ensure protection of minority groups from harm associated with increased representation.

While the issue of protection of minority groups is bigger than any one sector, research from the UK on third party abuse on young workers made key recommendations for employers when it comes to the issue of potential harassment from third parties:

- Strengthen harassment prevention policies
- Adopt a zero-tolerance approach to all forms of harassment, abuse and violence
- Provide comprehensive training for all managers and supervisors to ensure proper support for staff
- Work in partnership with unions to agree policies, procedures and training

Resources to support the development of anti-racism protocols for organisations exist within an Irish context, such as this report from the Immigrant Council of Ireland.

NYCI believes action needs to be taken to prevent the online and offline abuse and harassment of young employees and creators within the Irish media sector, alongside any positive work to increase representation of minority group. Best practice protocols for protection of minorities should be developed with the sector and other key stakeholders for oganisations to adopt.

NYCI also welcomes the proposal to follow positive models such as the BBC 50/50 project, and recommends examination of models introduced in other countries such as Iceland, which include editorial quotas around representation of women in media.

5. ENGAGEMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Engagement are outlined below:

- DEVELOPING MEANINGFUL ENGAGEMENTS WITH DIVERSE AND MARGINALISED GROUPS

- PARTICIPATING IN COLLABORATIVE ENGAGEMENT ACROSS THE INDUSTRY

- DELIVERING MEDIA CONTENT IN AN INCLUSIVE WAY

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

Question 5.

Do you have any feedback on the four principles elaborated above in relation to Engagement? (please limit responses to 250 words)

NYCI believes that young people from diverse backgrounds should be supported to engage in any consultations, engagements and forums. The new 'Young Ireland' policy clearly states the importance of participation and inclusion of children and young people.

5.1. ENGAGEMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Engagement.

- Formal and/or informal structures of engagement with under-represented groups
- Engagement with an industry wide Diversity Council / Forum (or organisational Diversity Councils)
- It is recommended to develop an Equality, Inclusion and Diversity 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.[6]
- Including the perspective of diverse groups in the development of content
- Using tools such as the "Women on Air" database
- Supporting the development of a broader "Diversity on Air" database to create more equality and diversity in the voices on air
- Engaging with various communities and groups in relation to content development
- Using guidelines and language guidelines provided by representative organisations
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Reviewing the processes for engaging people in initiatives, internships and mentorships to make this more inclusive e.g. by sometimes allowing applications for internships over video/ podcast
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Engagement with higher education institutions, training institutes and schools and other outreach activities.

Question 6.

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[6] This will be explored and facilitated by Coimisiún na Meán

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

The National Framework for Children and Young People's Participation in Decisionmaking supports departments, agencies and organisations to improve their practice in listening to children and young people and giving them a voice in decision-making. It aims to establish and improve mechanisms to ensure that seldom-heard and vulnerable children and young people are listened to and involved in decision-making for policy, legislation, services and research. This framework can be used, along with consultation with those in the youth sector, to ensure any of the engagement work under this GEDI includes the voices of young people.

6. DEVELOPMENT – KEY PRINCIPLES AND TOOLS AND ACTIONS

With reference to the key issues addressed by stakeholders and good practice in the area of GEDI in the media sector, the following principles relevant to Development are outlined below:

- CONTRIBUTING TO THE DEVELOPMENT OF THE FUTURE WORK FORCE

- DEVELOPING PATHS TO ACCESS AND OPPORTUNITY

- BREAKING DOWN BARRIERS TO GENDER EQUALITY IN ADVANCEMENT IN THE SECTOR

- BREAKING DOWN BARRIERS TO ACCESS TO THE SECTOR AND PROMOTING EQUALITY OF ACCESS TO OPPORTUNITIES

- PARTICIPATION IN THE SHARING OF EXPERTISE AND EXPERIENCES ACROSS THE SECTOR

Question 7.

Do you have any feedback on the five principles elaborated above in relation to Development? (please limit responses to 250 words)

NYCI welcomes the principles outlined above. It is important that both principles of 'developing paths to access and opportunity' and 'breaking down barriers to gender quality in advancement in the sector' promote greater representation of women, and people from minority backgrounds, including younger people, at middle and senior leadership within the sector.

6.1. DEVELOPMENT – TOOLS AND ACTIONS TO SUPPORT KEY PRINCIPLES

The following table outlines the tools, measures and actions that that can be used to support and further these Principles related to Development.

- Conducting 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
- Engagement with higher education institutes, training institutes and schools to contribute to training, raise awareness, and develop new networks
- Collaboration and cooperation with industry wide skills, training and development organisations to contribute to training, raise awareness and develop new networks
- Raising awareness of opportunities in the sector
- Supporting the development of new networks
- Supporting and facilitating training, internships and mentorships. Supporting paid internships.
- Reviewing the processes for engaging people in funding, initiatives, internships and mentorships to make this more inclusive .g. by sometimes allowing applications for internships over video/ podcast.
- It is recommended to develop an Equality, Inclusion and Diversity 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.[7]

Question 8.

Do you have any feedback on the range of measures, tools and initiatives outlined above? (please limit responses to 750 words)

NYCI believes that it is vitally important that CnaM's GEDI strategy includes clear actions to promote greater representation of women, and people from minority backgrounds, including younger people, at middle and senior leadership within the sector.

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[7] This will be explored and facilitated by Coimisiún na Meán

For example, within journalism, women are not only underrepresented in media in Ireland, but are lower paid and less represented in senior positions. This is reflected internationally, with a 2023 survey across 12 media markets finding that only 22% of editors in the sample analysed were women, even though, on average, 40% of journalists in those 12 markets are women. While a 2013 European Institute for Gender Equality study found "significant problems of segregation within media organisations which impact on employee retention and the content of media itself".

The is a lack of reliable data on wider diversity in the media sector in Ireland, and this is a major barrier to policy change and greater inclusion. A 2022 study which included interviews with senior management in the Irish TV and industry showed that data collected within the larger Irish broadcasters was confined solely to gender and did not encompass other forms of diversity. It is very welcome that this issue will be addressed strategically by CnaM, to ensure monitoring of representation of people from minority backgrounds within the sector, and within leadership positions in the sector, in Ireland.

Under this section, NYCI recommends the inclusion of the following would assist in realising this strategic aim:

- CnaM commits to working with PSMs and PSCPs to support the establishment of access programmes for women, people with a disability, from a minority ethnic background, travellers, migrants, and LGBTQ+ people;
- That the GEDI strategy includes a commitment to develop adequate career pathways and practical supports to ensure women and people from minority backgrounds progress into editorial and senior management roles;
- Coimisúin na Meán progress FoMC recommendation that boards of larger PSM and PSCP organisations have a diversity lead at senior management level and ensure adequate representatives from a minority community on their board;
- Coimisúion na Meán and PSMs and PSCPs work to establish a national database to understand gender and diversity in the media.