Cultural diversity reporting in the Canadian audiovisual industry: making monitoring meaningful

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Abstract

Responding to calls for greater diversity in media representation and in the workplace, in 2001 the Canadian Radio-television and Telecommunications Commission (CRTC) instituted measures to monitor broadcasters' diversity management. This paper presents a critical qualitative examination of the diversity reports provided by Canadian broadcasters since then. Our analysis reveals that reports vary significantly in format, content, breadth, and depth of reporting style, permitting only nominal monitoring of compliance. We argue that a more meaningful monitoring regime is urgently required. The analysis demonstrates the need for standardization, measurability, and follow-up, and underscores the importance of addressing the realities of broadcasting in the digital age.

Keywords

Cultural diversity, media policy, broadcasting, Canada, diversity monitoring.

Resum

En resposta a la petició d'una major diversitat en la representació mediàtica i al lloc de treball, el 2001, la Comissió de Radiotelevisió i Telecomunicacions Canadenca (Canadian Radio-television and Telecommunications Commission, CRTC) va establir mesures per monitoritzar la gestió de la diversitat en els organismes de radiodifusió. Aquest estudi presenta un examen qualitatiu crític dels informes de diversitat proporcionats pels organismes de radiodifusió canadencs des d'aquell moment. La nostra anàlisi revela que els informes varien significativament pel que fa al format, el contingut, l'amplitud i la profunditat en l'estil de notificació, la qual cosa tan sols permet una monitorització nominal del compliment de les mesures. Sostenim que cal establir amb urgència un règim de monitorització més significatiu. L'anàlisi demostra la necessitat d'estandardització, mesurabilitat i seguiment, i accentua la importància d'atendre les realitats de la radiotelevisió durant l'era digital.

Paraules clau

Diversitat cultural, política mediàtica, radiodifusió, Canadà, monitorització de la diversitat.

Introduction

In 2015, BroadwayBlack.com managing editor April Reign instigated the "#OscarsSoWhite" campaign and mobilized significant industry and public opinion pressure behind an issue that had long been known among industry and advocacy groups: the alarming paucity of opportunity afforded to minorities in the screen media production industry. Even before the issue burst into public awareness and occupied social media feeds around the world, government agencies, advocacy groups and industry organizations were emphasizing that individuals from disadvantaged groups (women, racialized minorities, Aboriginal persons, and persons with disabilities) are underrepresented in occupations throughout the audiovisual industry (CMG 2013; Creative Skillset 2012; Davis et al. 2014; Hill and Capriotti 2009; Murray 2002; Phillips 2011; Smith et al. 2011;WIV,

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2013a; WIV 2013b; Zboralska 2017b), especially in top creative decision-making roles (WIFT 2012). Such studies suggest that minorities experience greater difficulty in both the 'getting in' and 'getting on' phases of their careers (Allen et al. 2012; Antcliff, Bielby 2009, Coles 2016; Coutanche, Davis and Zboralska 2015; Eikhof and Warhurst 2013; Grugalis and Stoyanova 2012; Holgate and Mckay 2007; Lee 2011; Saundry and Stuart 2011; Zboralska 2017a, b) and earn less on average than their non-minority counterparts (CMG, 2013; WIFT, 2012). The discussion about screen diversity and systemic racism in media work has continued since the mobilization of #OscarsSoWhite in 2015, at industry events, in press coverage and on social media. Implicit in this discussion is a call to action, an appeal stating that "something must be done" about media diversity. This discussion is clearly more than a mere PR crisis for Hollywood, as it asks fundamental questions about the legitimacy, privilege and equality of the media industry and of the government agencies whose cultural policies underpin and oversee it. To identify what can be done about media diversity, it is necessary to examine previous and current approaches to the issue. We do so in this paper by evaluating the effectiveness of broadcaster diversity reporting, a Canadian media policy framework established in 2001 to monitor and contribute to media diversity in the domestic broadcasting industry.

Canada serves as a particularly illuminating case study of the challenges in attaining cultural diversity in media. Not only is Canada a bilingual country with two official languages, English and French, and thus two large and distinct cultural markets, but it also has high rates of immigration on which it relies for population growth, as well as a historically strained relationship with its Aboriginal peoples. Canada often presents itself as a multicultural mosaic (Bloemraad 2006; Byers and Tastsoglou 2008; Cameron 2004; Citizen and Immigration Canada 2010, 2012; Day 2000; Statistics Canada 2008), and the "constitutional and legal scaffolding" for diversity is stronger in Canada than in many other countries (Murray 2009). The commitment to diversity is expressed in the Canadian Broadcasting Act (the Act), which requires the broadcasting system to reflect Canada's cultural and demographic diversity through its programming and employment opportunities (s.3.1.d.iii). The main regulatory body, the Canadian Radio-television and Telecommunications Commission (CRTC), has since 2001 required broadcasters to report annually on their diversity management strategies (Decision CRTC 2001-457). Despite these measures, employment of marginalized groups in the broadcasting sector remains disproportionately low (WIFT 2012; WIV 2015).

In this paper we review Canadian diversity reporting in the broadcasting sector based on analysis of nearly 200 broadcaster reports submitted to the CRTC since 2001. Our analysis shows that these reports vary significantly in format, content, breadth, and depth of reporting style, and some are more effective than others at demonstrating progress toward cultural diversity in media. We diagnose the reasons behind these variations, note

a certain degree of progress in recent years, and assess the diversity monitoring framework's readiness for the future.

We argue that a more robust, evidence-based monitoring regime is required to make diversity policy effective. The lack of standardized, consistent, regularly produced indicators in pursuit of measurable goals is a barrier to genuine progress in the area of diversity policy. Our case study demonstrates the need for standardization, measurability, and follow-up in diversity monitoring regimes, and underscores the growing importance of designing initiatives that address the realities of media work in the digital age.

This paper is divided into three sections. In the first, we examine the contours of cultural diversity in media policy and its operationalization in the Canadian system; in the second, we present findings from our analysis of the submitted reports; and in the third section, we diagnose the deficiencies in the reports and offer recommendations to ameliorate the current policy framework.

The scope of "cultural diversity" in media policy and its operationalization in the Canadian system

The term "cultural diversity" does not have a consistent meaning in media policy and has been called a "dynamic concept" (Millwood Hargrave, 2007) that shifts depending on the broadcasting regulator, its location and particular preoccupation (Campion 2005; Horstti and Hulten 2011; McGonagle 2010; Millwood Hargrave 2007). Policy frameworks encompassing cultural diversity can be usefully theorized as targeting either 'international' or 'intranational' diversity –although nation-states typically embrace both concepts to varying degrees in separate frameworks and through separate governing bodies. The former concept encompasses nationalist policies that seek to define the way a country's own media products are regulated in relation to *foreign* products. Inter-national cultural diversity policy is of central concern in multi-state unions and partnerships. European Union media cultural diversity policy, for example, has largely focused on international cultural diversity, given the strong and distinct national identities of member states. Intranational cultural diversity media policies, on the other hand, govern the way different groups within a country's own borders have access to the media system. Policies aimed at intracultural media diversity are most common in countries with significant rates of immigration including Canada, Australia and the United Kingdom, and are becoming more common across the world due to increasing levels of globalization and transnational mobility.

Definitions of intra-national cultural diversity vary widely among regulators, however, and include references to linguistic differences, national communities, traditionally disadvantaged groups within society, and media ownership (e.g. ownership and cross-ownership rules), and there is often conflation of these concepts by regulating bodies (Millwood Hargrave 2007). In the

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Canadian media regulatory context, "cultural diversity" largely has a single referent –the representation of certain groups in mainstream broadcasting (BPN CRTC 2008-4). Intracultural diversity has long been an area of concern for Canada's media regulators. The 1980s represented a period of transformation in Canadian social policy. New legislation came into effect that aimed at officially recognizing Canada as a multicultural country and ameliorating the status of visible and cultural minorities in the nation. These legislations include the pivotal Canadian Charter of Rights and Freedoms of 1982, the Canadian Human Rights Act of 1985, and the Employment Equity Act (EEA) of 1986. These wide-reaching legislative frameworks cemented Canada's commitment to establishing a flourishing multicultural country. The "designated groups," namely women, visible minorities, individuals with disabilities and Aboriginal persons, were identified in the EEA as groups who faced undue barriers to equitable representation in employment.

The Canadian Broadcasting Act, long used as an instrument for promoting social cohesion and national unity, was amended in 1991, soon after these legislations came into force. Under the new Act, the CRTC was tasked with ensuring that the broadcasting system should:

> "through its programming and the employment opportunities arising out of its operations, serve the needs and interests, and reflect the circumstances and aspirations, of Canadian men, women and children, including equal rights, the linguistic duality and multicultural and multiracial nature of Canadian society and the special place of aboriginal peoples within that society." (3[1][d][iii]) [2]

In 1992, the Commission acknowledged the "need for a practical system of public accountability" and "more effective and affirmative action on the part of the broadcasting industry in the area of employment equity" (BPN CRTC 1992-59). The Commission's monitoring of the status of minorities in the broadcasting system has undergone several iterations owing to changes in its supervisory jurisdiction. The current diversity reporting requirements, established in 2001 (Decision CRTC 2001-457), require broadcasters to submit reports annually on their initiatives to increase the representation of the designated groups on and off screen.

According to the CRTC, the annual reporting on cultural diversity by broadcasters is "the key mechanism the Commission has to *measure such progress* and, ultimately, to ensure that it occurs" (BPN CRTC 2005-24; emphasis added). These reports are required to address the following three areas, which are considered "important to furthering the cultural diversity initiative":

1. Corporate accountability.
2. Reflection of diversity in programming.
3. Community involvement (BPN CRTC 2004-2).

In this article, we focus only on the first two areas. While broadcaster community involvement is important, the first two areas (diversity off the screen, and diversity on the screen) are most relevant to this discussion.

Regarding corporate accountability, the Commission expects broadcasters to "set goals toward creating a corporate culture that supports a programming service reflective of Canada's cultural diversity, including its Aboriginal reality" (BPN CRTC 2004-2). Through this expectation, the Commission assumes that a corporate culture that welcomes diversity will lead to the creation of programming that is representative of Canadian diversity.

To provide evidence of progress in this area, in their reports, broadcasters are expected to:

- Identify a senior executive within the corporation who "will be accountable for" cultural diversity and associated practices, and for ensuring that management also becomes more representative of Canadian cultural diversity.
- Set "clear goals" for managers regarding the reflection of diversity.
- Ensure that managers receive "appropriate training".
- Ensure that staff are provided with "regular opportunities" to evaluate the progress made toward representation of cultural diversity, and to identify "future challenges".
- Indicate their plans for the hiring and retention of the designated groups and how they plan to train staff in this area (BPN CRTC 2004-2).

To provide evidence that broadcasters are making progress toward the reflection of diversity in their programming, the Commission expects that each report include "specific initiatives" that aim to ensure that diversity is "reflected fairly and consistently" in both produced *and* acquired content (BPN 2004-2). According to the Commission, the reports should also address "*the way* that Canada's diversity is portrayed in programming" (BPN 2004-2; emphasis added). This requirement makes clear that the Commission is interested in more than mere presence; it is also concerned with the manner in which the designated groups are portrayed on screen. However, the requirement that Canadian diversity be reflected in imported content is obviously problematic; as such programming is generally created for international audiences and lacks a Canadian context.

When detailing measures related to programming, reports should also address the way "the portrayal and presence of visible minorities and Aboriginal peoples" will be integrated into "all stages of the production and acquisition of such programming, including decisions about which programs will be broadcast" (BPN 2004-2). Here the Commission expects to see evidence that the portrayal of diversity is not an afterthought for broadcasters, and has been carefully implemented throughout the production process.

It is evident that the Commission's monitoring regime is not a command-and-control model of regulation concerning cultural diversity. The regulator gives broadcasters the

flexibility to interpret how terms and expressions (including the interpretation of "clear goals") should be operationalized and adapted for their unique circumstances. The Commission expects that broadcasters "develop strategies specific to their own operations" toward the attainment of the goal of fair and accurate representation (BPN CRTC 2005-24).

Notwithstanding this intentional flexibility regarding the way broadcasters choose to set and implement their strategies, the Commission is clear in its expectation for specificity and measurability. It stresses that submitted reports "should include *detailed, specific initiatives* relating to each of the...areas" and "must also specify *how* progress will be assessed with respect to the initiatives in each of these areas" (BPN 2004-2; emphasis added). Thus, as a minimum requirement, the regulator is clear in its request for broadcasters to set specific goals and provide details regarding how they plan to operationalize and measure their progress. An assessment of the submitted reports must therefore consider whether broadcasters met this minimum standard.

Evaluating broadcaster cultural diversity reporting in Canada

Methodology

From 2003 to 2016, over 200 reports were submitted by broadcasters for evaluation by the CRTC.[3] We examined most of these reports by way of an initial, high-level, exploratory analysis. The analysis included both English-language, and French-language broadcasters, but did not include Canada's national public broadcaster, the Canadian Broadcasting Corporation (CBC), since it does not follow the same reporting process, and does not submit annual cultural diversity reports to the CRTC. Following the initial exploratory analysis, we subsequently selected three reporting years (2011, 2012 and the most recent, 2015) for further intensive examination and evaluated all reports submitted during these years, totaling 43 individual reports. We coded the reports using the qualitative data analysis software program, QDA Miner. The CRTC's expectations for reporting served as the basis of our coding scheme. We also coded for other factors that we know to be salient from our own research and from previous studies, including whether or not the reports address barriers to the advancement of the designated groups including the difficulty of breaking in, the challenges of moving into senior levels of creative management, and others.

To maintain focus on the core of the paper's argument, namely on the insufficiency in reporting substance and style in submitted reports, in the discussion that follows we have replaced the names of broadcasters quoted with simple codes, 'Broadcaster A', 'Broadcaster B', 'Broadcaster C' and so forth. A table containing the referents and their codes is appended. In areas in which we observed marked changes between the earlier

reporting cycles and the most recent one, we cite examples only from the latter cycle.

Findings

Heterogeneity in formatting and reporting style

We found significant variation in reporting style among submitted reports. The reports vary widely in length, breadth, depth, and data presentation. Each report explicitly addresses the areas outlined by the CRTC, but the information included under each category varies. The reports are primarily qualitative in nature, although they present some quantitative data. Due to the significant range of variations in content, presentation and formatting of these reports, direct comparison between them is difficult.

Definitions of diversity

While all of the reports primarily define diversity in relation to the designated groups (i.e. women, visible minorities, individuals with disabilities and Aboriginal persons), several broadcasters expand the definition to include other categories including regional diversity, age, mental illness, caregiver status, religion, income, sexual preference, gender identity, as well as ethnic and cultural groups not recognized under the Employment Equity Act (e.g. the Polish).

Framing of diversity initiatives

The reports primarily present a business case for the incorporation of cultural diversity in their programming and larger corporate environments. To a lesser extent, these reports supplement the economic rationale with one that frames the incorporation of cultural diversity as a public good (for instance, as an issue of access to one's cultural heritage, as an issue of fairness and equality, or as an issue related to the enrichment of society at large). Some of the reports also frame cultural diversity as a legal requirement and cite specific public policies that their companies comply with regarding human rights and discrimination, while also highlighting internal discrimination and harassment policies.

Indeterminate language

Broadcasters often employ indeterminate language, making it difficult to decipher their level of commitment to the diversity initiatives they cite, which contradicts the Commission's emphasis on specificity in relation to diversity initiatives. One broadcaster's goal is to "ensure that those responsible for acquiring foreign programming **take into account** the corporate policy on cultural diversity programming" (Broadcaster F, 2015). Another broadcaster "**encourages** producers from all cultural

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backgrounds to submit proposals" (Broadcaster D, 2012). This type of indeterminate language is common across reports and, in signaling concern without specifying commitment, does not appear to comply with the Commission's requirement for specificity.

Showcasing representation

Our examination of the submitted reports has revealed a variety of approaches taken to present evidence of diversity on-screen. To provide evidence of the incorporation of diversity practices in programming, broadcasters cite programs that provide representation of individuals from the designated groups. Often, however, the cited examples are not contextualized and simply state that a member of the designated groups appeared in the program. For instance, one broadcaster reported that:

Visible minorities are also well represented in both World Wrestling Entertainment (WWE) and Total Nonstop Action Wrestling (TNA). Among them are TNA Television Champion Devon, TNA Tagteam Champions Hernandez and Chavo, women's Knockout division stars Gail Kim, Rosita, and ODB, WWE Intercontinental Champion Kofi Kingston, WWE Superstar Booker T... (Broadcaster D, 2012).

Such descriptions do not clarify which minority groups are represented, and there is no analysis of the extent to which this programming contributes positively to cultural diversity. The professional wrestling programming mentioned here, for example, is notorious for resorting to ethnic and racial stereotypes. Similarly, another broadcaster reported the number of times members of designated groups appeared on a particular program over a period of time. The "color by numbers" approach is problematic, and without proper contextualization, elicits a misleading picture of progress (Campion 2005; 2006). The regulator is not simply interested in presence, but also *portrayal.* From many of the examples cited by broadcasters, however, it is not possible to get a sense of the meaningfulness of the appearances cited (i.e. are they playing a lead role? supporting role? instrumental to plot?), or the quality of the portrayals. Previous studies have pointed out the frequently shallow, unsubstantial or 'rootless' portrayal of individuals from the designated groups in Canadian television (Murray 2002; Solutions Research Group 2003a; Murray 2009; Fleras 2011). This is therefore a relevant and important issue that should be addressed in the reports, as requested by the Commission.

In the newest reporting cycle, many of the reports examined have moved primarily toward what we are calling the 'highlight reel' approach, whereby broadcasters emphasize and contextualize specific programs they believe provide evidence of progress in representation and portrayal on-screen.

Beauty and the Beast is an outstanding illustration of on-screen diversity, reflecting the mix of multicultural groups of a large metropolitan city. Star Kristin Kreuk leads the way as a Canadian actress born in Indonesia with both Dutch

and Chinese ancestry. Her fellow cast of series regulars include actors from African American, Filipino, and Sri Lankan backgrounds. Season 3 supporting cast and guest stars continue to include casting diversity throughout the series. **The series promotes women as role models in the workplace by featuring two strong independent female detectives. One of the lead female characters, portrayed by African American actress, Nina Lisandrello, is promoted to Police Captain. (**Broadcaster B, 2015)

This example above not only discusses presence, but also portrayal, and provides a rationale for its inclusion in the report. Although certain approaches to reporting on diversity in programming are more meaningful than others, all of the various approaches observed fail to put the representation of the designated groups into temporal perspective, making it impossible to determine if programming has become more inclusive over time, especially in the key categories (lead and supporting roles). The measurement of progress is a central goal of the Commission (BPN CRTC 2005-24). As Murray (2009) points out, authentic portrayal has three main features. It needs to be diverse (individuals from the designated groups should be just as likely to be cast in any role as their non-minority counterparts); balanced (not 'whitewashed' but complex); and born out of compelling narrative, which would likely be initiated with more diverse representation behind-the-screen (*ibid.*).

Corporate accountability, measurement and progress

Our examination of submitted reports reveals that reporting on the employment status of the designated groups was much improved in 2015 over prior reporting cycles. Though the improvement was marked, it was not universal, and important and urgent changes are still required.

When discussing their commitments to corporate accountability in the area of cultural diversity, broadcasters are expected to comment in their reports on the hiring and retention of people from the designated groups and "must also specify how progress will be assessed" (BPN 2004-2). In prior reporting cycles, reports demonstrated a greater degree of inconsistency regarding *how* they would report on their staff. Responses such as, "Our stations hired people from the Dominican Republic" (Broadcaster D, 2012) were more common. Such responses were highly problematic; they did not provide even basic information including the number of individuals hired and the roles they were hired to perform. In the 2015 reporting cycle, most reports, at minimum, provide an overall snapshot of their workforce. For instance, Broadcaster E (2015) states:

As of December 31, 2014, [Broadcaster E] employed 1,268 full-time employees, 122 part-time employees and during peak periods, and an additional 226 temporary employees. The full-time workforce representation by designated group included 573 Women (45.19%), 9 Aboriginal Persons (.71%), 18 Persons with Disabilities

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(1.42%) and 139 members of Visible Minorities (10.96%). The part-time workforce representation by designated group included 48 Women (39.34%), 0 Aboriginal persons (0%), 3 Persons with Disabilities (2.46%) and 11 members of Visible Minorities (9.02%). Nationally, [Broadcaster E] continues to work on increasing its representation of all designated groups and remains committed to reducing access barriers.

The report then provides details on the distribution of designated groups across various broad employment categories (e.g. senior managers, technicians, clerical workers, etc.). Although this was the best approach identified across the reports, it still lacked key details and contextualization. The data is not discussed in relation to the labor market availability of the designated groups in the region in which the broadcaster is based. Broadcaster E is headquartered in Toronto, Ontario, Canada where visible minorities *make up nearly 50% of the population* (Toronto 2017). Additionally, as previous studies have shown, women and visible minorities are most underrepresented in top *creative* decision-making roles (Davis, Shtern, Coutanche and Godo 2014; WIFT 2012; WIV 2015). While it is useful to know how the designated groups fare in management roles and across general occupational categories, it is important to also know more granular information including what proportion work in creative roles *specifically*.

The most glaring lack of information under this category has to do with productions commissioned through independent producers. Some broadcasters have recognized the need to take more responsibility over staffing in the productions they commission. Broadcaster C (2015) now requires all producers it commissions to submit a 'diversity report' prior to, and after, production:

> Based on conversations with the content team, in 2015 [Broadcaster C] updated its original programming agreement templates to include an obligation on third party independent producers to consider diversity during development and in production. The language we have put in place is as follows: In the development stage, the following is a deliverable: Diversity Plan (a written summary/plan outlining the ways in which cultural diversity will be encouraged and/or represented in all stages of production of the Program. In production, almost identical to above, and also as a deliverable under the Programming License Agreement: Diversity Report - A written report outlining steps taken to encourage and/or represent cultural diversity in all stages of production of the Program.

The same broadcaster has also begun, selectively, to supply some detail regarding behind-the-screen production teams:

Behind the scenes, *Beauty and the Beast* was created by two women, Jennifer Levin and Sherri Cooper. Both the writer's room and the roster of directors have included a number of women. The Season 3 director lineup includes 4 female directors Norma

Bailey, Jill Carter, Maizee Almas and Deborah Chow, as well as Sudz Sutherland who is of African-Canadian descent.

While Broadcaster E's current reporting on staffing in commissioned productions is a step in the right direction, a more comprehensive, consistent and wide-ranging approach is still urgently required. No other reports submitted in the 2015 cycle approached even the selective level of detail provided by Broadcaster E in the area of equity in staffing on commissioned productions.

Discussion

The diversity reports submitted by broadcasters lack overall consistency, specificity, comparability, and granularity to ascertain whether or not meaningful progress in the representation of diversity (both on and behind the screen) is taking place in Canadian television. Our findings show that there has been overall improvement in broadcasters' reporting of on-screen representation (from reporting that lacked contextualization to the more widespread adoption of the highlight reel approach), and of diversity in their *internal* workforces. These improvements are not universal, however, and crucial details are still lacking, including the distribution of the designated groups in lead roles, and how much this representation has changed over the years, if at all.

With respect to the employment of the designated groups behind the screen, the numerical data that is provided is not contextualized in relation to both national and regional labor market availability of these groups. Key indicators regarding the proportion of the designated groups that occupy top *creative* decision making roles are not provided, and there is no consistent reporting across broadcasters on diversity in the staffing of commissioned productions. This lack of reporting on commissioned, rather than in-house productions and staff is highly problematic given that 75% of all Canadian-produced content broadcast by the majors is produced by independent production companies (CRTC 2008-4).

Although broadcasters' diversity reports could better respond to the CRTC's request for specificity and measurability, in our view, clarification of the regulator's expectations is necessary. In 2005, the Commission expressed a desire to "streamline reporting requirements" to "ensure that annual reporting is as seamless and as efficient as possible" (BPN CRTC 2005-24), but to date, this standardization has not been instituted. The lack of standardization with respect to the format, style and content of submitted reports has undoubtedly contributed to some of the issues we found in our examination.

Broadcaster C (2015) explicitly asks the Commission to re-evaluate its reporting requirements:

> As requested in previous reports, we again encourage the Commission to streamline the reporting process. Although no streamlining measures were initiated, we have continued to report according to current Commission guidelines and

our commitments. We believe it would be appropriate for the Commission to review the obligation to file this report on an annual basis going-forward. These reports are time-consuming to prepare, and many of our plans, activities, and anticipated results cover several years. The Commission currently has detailed records of diversity-related activities/efforts occurring throughout the broadcasting sector. In our view, it is clear that progress is being made and the detailed nature of the annual report requires significant resources that might be better deployed advancing our many projects and initiatives in this important area.

While we disagree with the view that "it is clear that progress is being made" (Broadcaster, 2015), it is apparent that a significant amount of work is generally put into the reports. This is concerning as it is unclear how these reports are evaluated by the Commission. Although the Commission states that it "closely" evaluates submitted diversity reports at the time of the renewal of a broadcaster's license (BPN CRTC 2008-4), which typically occurs every five to seven years, we generally found no evidence of corrective action taken by the regulator in response to a broadcaster's performance in the area of cultural diversity at the time of license renewal. Such an action would be difficult to imagine based on the lack of critical and consistent data in submitted reports. Even if the Commission wanted to take action, the enforcement tools available to it are limited. In a recent hearing, CRTC Chairman Jean Pierre Blais acknowledged that the Commission has very few tools of enforcement at its disposal, and almost has "to go nuclear right away" by revoking licenses (Blais, 2014). It has no capacity to set even financial penalties (Murray, 2009).

Overall, greater accountability and leadership are required, as the Commission's commitment to cultural diversity has lacked continuity. In 2001, the Commission established a 'task force' (the Task Force) to conduct research to "help define the issues" and "present practical solutions" about cultural diversity in broadcasting (BPN CRTC 2001-88). The Task Force was to be a partnership between broadcasters, community representatives and other interested parties, headed by the private sector industry association, the Canadian Association of Broadcasters (CAB) (*ibid.).* One of the most significant outcomes of the Task Force was a study that provided a snapshot of the presence and portrayal of the designated groups on Canadian television (Solutions Research Group, 2003a), which demonstrated many problems in relation to the portrayal of diversity. The Task Force recommended that a follow-up study be undertaken "in three to four years time" to ensure that progress is in fact being made (CAB, 2004: 50). The Task Force was dissolved in 2009, however, and a follow-up study was reportedly only recently contracted. The results of this study are still unknown.

In the most recent License renewal period, the topic of diversity –specifically the representation of women in key creative roles in the industry– only emerged during the hearings as an issue of importance after it was brought to the Commission's attention by a women's industry advocacy group (WIFT 2016). In an unanticipated but welcome move, as part of its decision on broadcaster license renewals following this hearing, the Commission announced that it "intends to monitor broadcasters' efforts" by requiring them "to provide information on a yearly basis regarding the employment of women in key leadership creative positions in the productions they broadcast" in order to "allow the Commission and the public to better identify women's challenges in the television industry prior to the next renewal process" and to address the "lack of data" in the area (CRTC 2017-148). The Commission also committed to holding an event "on women in production, with particular emphasis on women in leadership positions" (CRTC 2017-148). No details were provided, however, on the form the new monitoring regime is to take, what 'creative' roles will be examined, and whether there will be any standardization across broadcaster groups with respect to the information reported. The scope of the Commission's requirement for broadcasters to provide data on "the productions they broadcast" is also unclear (CRTC 2017-148). It is uncertain, for example, whether the new requirement extends to *all* content shown by broadcasters, including licensed content, or whether the requirement is for commissioned content only. The relationship between the current diversity reporting regime and the new monitoring initiative is also unclear. What is clear, however, is that the newly announced initiative is solely focused on gender, and does not extend to examining visible minority status and other categories of diversity (ex. age, sexual orientation, gender identity etc.) in key creative roles.

Two major challenges exist with respect to the Commission's progress in matters of diversity in broadcasting.

Jurisdictional challenges

The CRTC has only limited jurisdiction over employment equity matters. National oversight of employment equality is governed by the Employment Equity Act (EEA), instituted in 1986. The EEA applies to all employers with more than one hundred employees in federally regulated industries, of which broadcasters are a part. Prior to 1996, both the federal government, through the EEA, and the CRTC (for broadcasters only) had jurisdiction over employment equity. In 1996, amendments to both the Broadcasting Act and the EEA limited the Commission's jurisdiction in this area. According to the amended Broadcasting Act, the Commission's powers no longer "extend to the regulation or supervision of matters concerning employment equity" for broadcasters subject to the EEA (i.e. those with greater than 100 employees) (2.5). This means that the Commission only has jurisdiction over on-screen representation, and could explain its reluctance to institute a more rigorous and robust monitoring regime requiring broadcasters to provide more granular measurements of their labor force. The Commission only asks broadcasters to report on their employment practices "as they relate to on-screen presence and portrayal of cultural diversity" (BPN 2001-457).

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The improvements noted in the way broadcasters are reporting on internal workforce representation in the 2015 cycle, stem from data the broadcasters are appending from their EEA submissions. The problem is, the type of numerical data broadcasters must annually submit on account of their EEA reporting duties is the same across federally regulated industries, which include disparate fields such as banks, marine shipping, air transportation, railway and road transportation, Crown corporations, uranium mining and many others. There are no special requirements that pertain to *creative* or *cultural* firms despite their unique features. Only the Commission's recent decision on monitoring the employment of women "in key leadership *creative* positions" (CRTC 2017-148; emphasis added) signals an understanding of the uniqueness of the sector. However, as already mentioned, the new initiative does not extend to other key categories of diversity. Without this wider requirement to provide numerical data that goes beyond what broadcasters already submit to the federal government as part of their EEA obligations (for example, data on how the remaining designated groups are represented in creative roles both on and behind the screen), a lack of clarity regarding how progression of on-screen diversity should be measured and evaluated, and without the key measurement of diversity among workers in commissioned programming, important information will continue to be missed. Studies of intranational cultural diversity policies aimed at ameliorating the status of underrepresented groups reveal that the most successful initiatives incorporate monitoring, measurement and the *consistent tracking of outcomes* (European Commission 2009; McGonagle 2010; Millwood Hargrave 2007; Solutions Research Group 2003b). The European Commission (2009) stresses the importance of "clear and quantifiable goals" such as "minimum targets in diversity recruitment, minimum annual training hours for the workforce, and concrete targets for increasing audience share from diversity groups" (p.7).

New media and the unregulated sphere

Perhaps the greatest challenge to the Commission's ability to improve diversity in broadcasting is the rapidly shifting audiovisual landscape owing to advances in technology that threaten the Commission's oversight of cultural diversity, and the effective regulation of the audiovisual system. The current reporting requirements are already lacking in the sense that they only encompass *licensed broadcasters*, meaning the Canadian independent production sector is bypassed completely. Even if broadcasters were made more widely accountable for the diversity of staffing in productions commissioned from independent producers, the efficacy of these rules will be increasingly challenged as independent production companies look to newer, alternative partners and platforms for the distribution and commissioning of their content, including (unregulated) domestic and foreign over-the-top (OTT) services.

Oversight of cultural diversity in this changing landscape requires the implementation of measures that move beyond traditional tools. Several Canadian government agencies including those that provide funding for productions are moving toward initiatives aimed at gender parity including Telefilm and the Canadian Media Fund. These agencies, however, have not committed to requirements related to the participation of the other designated groups in programming. Recent research indicates that underrepresentation of diversity in key creative roles persists in the emerging Canadian web series sector (WIV, 2015; Zboralska, 2017b). More comprehensive industry indicators, which would cover the regulated media system as well as the unregulated independent production sector (including companies producing professional screen content for alternative, online platforms), are required. The production of accurate, industry-specific indicators has been inconsistent, and has been left to advocacy groups and academics, both of which are limited in resources. The Canadian government, through its various cultural agencies, must consider the adoption of wider, clear diversity targets for the media sector as recommended by past studies of broadcasting diversity best practices (European Commission 2010; McGonagle 2010; Solutions Research Group 2003b). Adequate financial support must be earmarked for the production of these indicators to ensure consistency.

A significant overhaul of monitoring of both on and behind the screen representation in the broadcasting industry is needed. Neither the EEA reporting policy, nor the current and newly announced CRTC reporting regimes comprehensively measure representation and progress along the parameters that are most germane to this sector. The issue will become even more pronounced with the growth of the digital sphere. The focus of both the EEA and the CRTC's reporting policies has been the domestic broadcasters, which are highly institutionalized entities with established rules and processes. But an exclusive focus on these institutional spaces obscures wider, persistent problems.

On the topic of gender parity, one executive at the CRTC's License renewal hearing observed,

> [I]n broadcasting it may have been a bit easier [to increase the representation of women in management roles] because we're working within a corporation that will put programs and opportunities in place that will benefit...certain segments of the company. And it's for their development and advancement. In the production community they're all individual entrepreneurs so there's not that one cohesive program that people can participate in and benefit from. (Wheeler, 2016, para. 6775)

The entrepreneurial nature of screen work outside of these spaces, particularly in the OTT environment, and the increasing prevalence of non-standard screen work thus requires an expansion of the monitoring regime.

A recent approach to industry-wide monitoring of diversity in the United Kingdom could serve as a powerful potential model for Canada, and other countries that aim to track on-

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and off-screen diversity comprehensively and consistently. The Diversity Analysis Monitoring Data (DIAMOND) system, launched by the United Kingdom's self-regulatory industry group the Creative Diversity Network, aims to track six key diversity metrics including age, gender, gender identity, ethnicity, sexual orientation, and disability in both on-screen programming and in production workforces (Creative Diversity Network, 2016). The DIAMOND system is an online system that is being adopted by the United Kingdom's major broadcasters including the BBC, ITV, Channel 4, Sky and others (Creative Diversity Network, 2017). Broadcaster members will track the diversity of their internal workforces and programming using the software, and production companies will be responsible for reporting on projects that are commissioned by the broadcaster members (Creative Diversity Network, 2016). With respect to on-screen diversity, DIAMOND is designed to capture not only 'actual diversity', or the identity characteristics of the *actors* appearing on screen, but also 'perceived diversity', or how an audience is likely to interpret the diversity of the *characters*. A key aim of the DIAMOND system is industry-wide standardization of the type of data collected and the method by which it is collected, permitting meaningful comparison and analysis (Creative Diversity Network, 2016). Unlike Canadian EEA reporting, which does not require the collection of data on occupational categories that are unique to, and of central importance in, the broadcasting sector, the DIAMOND guidelines require that information be collected on the diversity of individuals who occupy key *creative* roles including commissioning editor, director, writer, producer, director of photography and others (Creative Diversity Network 2016). After the DIAMOND data is collected from the various sources, the findings are to be released in a report on a consistent basis. The DIAMOND system resolves many of the inadequacies outlined in the Canadian system. Not only does the system provide standardization that permits meaningful comparison and tracking, but it also accounts for *commissioned* programming.

Concerns have emerged, however, over the overall transparency of the DIAMOND system. The planned reports will present only anonymized data, sparking trepidations from a United Kingdom broadcasting union (Sweney 2016). In addition, broadcasters join the DIAMOND initiative on a *voluntary* basis. Productions made for streaming services that have not opted to join the DIAMOND system are therefore not required to submit data. Because of its central role in funding, Canada could consider requiring all productions (including those produced for new streaming services) that draw on public funds (including tax credit programs) to participate in such a program as a condition of funding. The CRTC could also require broadcasters to participate in the program as a condition of license for reporting on their internal staff and productions. Removing the voluntary nature of the program could improve its effectiveness. To ensure independence, a non-broadcaster affiliated third party could administer the system, and synthesize the findings. In addition, the system could be made to compare diversity representation

levels in companies and productions to regional representation levels for added contextualization. The section on 'perceived diversity' could be further expanded to include data on whether on-screen characters challenge or perpetuate stereotypes—a problematic area for Canadian programming (Murray, 2002; Solutions Research Group, 2003; Murray, 2009; Fleras, 2011). Indeed, as McGonagle (2010) points out, diversity indicators must be 'contextually embedded', and reflective of the issues in the jurisdiction of concern. Such a monitoring system could be expanded globally through multi-state regulatory agreements between countries in which intranational cultural diversity is a concern. To ensure comprehensiveness, transnational (online) broadcasters like Netflix could then be made to participate in the program through such multi-state regulatory intervention.

Conclusion

This paper presents a critical qualitative examination of the diversity reports provided by Canadian broadcasters to the CRTC since 2001. Our analysis reveals that reports vary significantly in format, content, breadth, and depth of reporting style, permitting only nominal monitoring of compliance with diversity policy.

Much work needs to be done if Canada's audiovisual industry is to be representative of the 'cultural mosaic' the country is often claimed to be. Although the current CRTC reporting regime in Canada is well-intentioned, its lack of consistency has hindered its effectiveness. Additionally, while the CRTC's newly announced monitoring initiative on the status of women in key creative leadership positions is a welcome one, it requires greater clarity, and even if it is designed according to best practices, it represents only a partial solution to a much larger monitoring problem that will only increase in urgency as the media industry continues its transformation. This case study demonstrates the need for effective monitoring in diversity reporting regimes. If reporting is truly meant to be a key contributor to gauging and implementing progress, it must be standardized, tracked, reflective of the disintermediated nature of 21st century screen work, and consistently evaluated. As public and industry pressure mounts globally to "do something" about the lack of diversity in screen media work and about the structural barriers that minorities experience in actualizing their creative careers, it is worth reflecting on the tools that are currently being deployed by policymakers to tackle related questions. As our research into the 15-year history of Canada's diversity reporting suggests, "doing something" to create more meaningful media diversity may require global conversations and innovative, multi-stakeholder solutions.

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Acknowledgment

Notes

1. Henceforth in this paper, references made to "cultural diversity policy" should be understood in the Canadian context (i.e. policies aimed at ameliorating the status of designated groups), unless otherwise stated.
2. Raboy (1990) stresses that the measures concerning cultural diversity were was added only after significant pressure was placed on the federal government from minority identity groups, and that the diversity that exists within the Canadian broadcasting system is owed solely to "the struggles and persistence of the communicationally less powerful" (p.7-8).
3. This figure reflects the number of reports that were archived on the CRTC's website at the time this paper was written.

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Appendix 1. Broadcaster Coding Table

Broadcaster A	Rogers
Broadcaster B	Bell
Broadcaster C	Shaw
Broadcaster D	Astral
Broadcaster E	Corus
Broadcaster F	Allarco

Note to the reader: Only the broadcasters *directly quoted* in the paper are reflected in this coding table.

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