

Racial Diversity Initiatives in UK Film & TV

A Report Presented to the Film and TV Charity
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1. Executive Summary

The UK film and television industry (henceforth UKF&TV) plays a crucial function in how the nation is imagined and experienced. Its recent growth has amplified UKF&TV's economic, political and cultural significance. Whilst the concept of screen sector diversity has evolved over the past twenty years, a central aim has been to manage the inclusion and representation of different social groups under a broad political agenda of social cohesion. However, UKF&TV has also been a space in which deep social inequalities have been produced and sustained. A range of evidence points to how these structural inequalities have also been systematically racially marked. This has included the denial of opportunities for Black, Asian and minority ethnic writers, directors, producers, and other key positions in the UKF&TV production process and an absence of Black, Asian and minority ethnic acting and presenting talent that fully represents the racial and ethnic heterogeneity of contemporary Britain.

We are now familiar with the central tenets of the diversity agenda within UKF&TV: the training and upskilling of ethnic minorities for the industry workforce; the provision of time-bound and institutionally cordoned spaces for Black, Asian and minority ethnic production; and attempts to 'diversify' the commissioning, recruitment and funding processes. More recently, the ongoing public debate over the effectiveness of diversity initiatives has been influenced by the promise of dedicated funding for diverse programming, as well as by the use of monitoring data to both evaluate levels of diversity across the sector and encourage industrial change through greater representativeness. Specifically, a question that has accompanied the diversity agenda from its onset has been how, and to what degree, are diversity policies able to respond to the lived experiences of racial exclusion, discrimination and inequality within UKF&TV? Diversity policies, schemes and initiatives have been subject to sustained scrutiny and criticism from industry workers and those who have been precluded from gaining entry, as well as by academic researchers, suggesting an inherent and continued problem with the intentions of diversity policy and its real effects. The highly influential and structuring industrial norms and 'lores' of UKF&TV continue to determine how and in what ways racial and ethnic difference can exist within the sector.

In considering how "diversity" has been devised, developed, and established as the policy framework through which UKF&TV constructs and manages ethnic and racial difference, we are met with a number of competing agendas, barriers and imperatives, with a variety of political, cultural, industrial, economic and sociological dimensions.



In practice, the apparatus of “diversity” has not successfully tackled structural inequalities. For example, ‘diversity’, as an industrial endeavour has remained distanced from the structural racism that conditions the industrial experience of so many within the industry.

This report provides an examination of various significant diversity policies, schemes and initiatives that have been generated by UKF&TV organisations over the last two decades. These are policies, schemes and initiatives that are significant and publicly available. We do not seek to represent all diversity interventions in the UKF&TV sector, which would be beyond the scope of this report. We seek to contribute to the public discussion about how the industry can collectively develop not just a language but a practice of equality and inclusion. Such a commitment, we suggest, has to function as a sustained and socially responsive intervention into the racial inequalities that are still embedded in the sector.

2. Key Findings

- 1. There are problems with the evaluation and accountability of diversity outcomes and reporting within the sector.** There has been reluctance amongst UKF&TV institutions, organisations and bodies responsible for diversity funding, training and support to be open and transparent about the success and impact of their diversity plans. As a result, there is an absence of reliable data and monitoring of specific diversity initiatives and programmes within UKF&TV. In addition, the disinclination of organisations to make the data collected through their diversity schemes publicly available has curtailed the ability of subsequent diversity programmes and discussions to build upon previous initiatives by responding to the gaps and problems that may have emerged in the policy evaluation. It can be argued that this has produced a 'knowledge deficit' within the sector that may have contributed to the stagnation of diversity initiatives over the last twenty years, in addition to disconnecting policy aims and policy effects and acting as a barrier to cross-industry understanding.
- 2. The language of 'diversity' within UKF&TV has evolved over the past twenty years.** A distinction should be drawn between diversity and anti-racism: diversity can be understood as a remedial measure to address under-representation, whereas anti-racism tends to be more interventionist and structurally focused. Whilst there is evidence for a recent shift towards describing the conditions for ethnic minorities in the UKF&TV industry in terms of 'structural racism', policies between 2000-2020 show little evidence of the language of anti-racism and structural inequality. Since the public awareness of the Black Lives Matter movement has increased following the murder of George Floyd in the US in May 2020, there has been a resurgence in the language of racial injustice within the sector, particularly within television.
- 3. There is an over-emphasis on quantitative data over qualitative data, and tremendous scope to increase the knowledge-base with qualitative-led research that examines how racism affects individuals personally and professionally.** Within the quantitative data that exists, there is fluid terminology and data categorisation that can make it difficult to clearly discern the targets and outcomes of diversity initiatives. This is particularly the case with the common policy usage of the term 'BAME' (Black, Asian and minority ethnic) because it does not make visible the nuanced experiences of different ethnic and cultural groups that are included in the broad category. The policy language examined also suggests that the sector has not created space for direct testimonies from the Black, Asian and minority ethnic workforce. This has limited understandings of the barriers to achieving diversity and suggests a reluctance to acknowledge how the lived experiences of the UK's Black, Asian and minority ethnic film and TV workforce can be determined by inequality, discrimination and racism. Furthermore, the available data does not capture intersectional experience, or the nuanced distribution of labour within an organisation (by work area or seniority), or differences in levels of representation across various parts of the UK.
- 4. The film and TV sectors share a concern with diversity and inclusion, but neither has invested in addressing the structural dimensions of exclusion and inequality that remain the underpinning factor in film and TV diversity.** The 'creative diversity' agenda, for example, has often overlooked structural forms of racism (Malik, 2013). Diversity policy between 2000-2020 was unwilling to interrogate and unsettle the racially discriminatory industrial conditions that impacted the recruitment, retention,

attrition and progression of Black, Asian and minority ethnic talent off screen and within organisational settings. This has been a major failing of the diversity agenda in the sector.

5. **Diversity initiatives and schemes tend to focus on young, emerging talent.** This is particularly true of interventions built on the 'deficit model' of training and upskilling. The intention is apparently to prepare a new and 'fresh' generation of writers, producers, directors and crew to populate an expanded and more diverse production workforce. Whilst our report supports this policy, there appears to have been scant regard to what can be described as a 'lost generation' of UKF&TV talent off-screen who are likely to be older than those traditionally supported by such training and development initiatives. In spite of these initiatives and schemes (or, arguably, in part because of them) there remains a tremendous body of Black, Asian and minority ethnic cultural workers who have been unable to sustain positions within the sector; the process of diversity policy simply 'renewing' itself by focusing on a new group of emerging Black, Asian and minority ethnic talent, to maintain an image of progressiveness, itself constitutes a serious barrier for older, experienced individuals, and also suggests weak outcomes of the several diversity policies that have been presented by UKF&TV organisations over the past decades.

3. Background

The Film and TV Charity (the Charity) have commissioned this report in order to map current and previous initiatives that have sought to improve off-screen diversity with a specific focus on racial and ethnic diversity. The Charity is particularly interested in having a clear overview of what is currently on offer to Black, Asian and minority ethnic workers in the UK film and TV industry. Which initiatives are seeking to improve diversity, and in what ways? In addition, the authors have been asked to reference, where available, previous off-screen diversity initiatives where evaluation and appraisals are available. What has been the outcome of these initiatives and how has this been measured and evaluated?

Our focus in this report is on UKF&TV industry initiatives, including programmes, pilots, campaigns, targets/standards, training, data collection/monitoring and other interventions in the industry. Whilst UKF&TV includes broadcasters and SVODs, studios, production companies, funders, sales, distribution, and marketing companies, as well as support organisations (sector bodies, membership organisations, unions, charities, and guilds), the report focuses on large broadcast and film organisations. In the report the term “off-screen” is used to refer to the non-performance workforce operating behind the camera, and includes a range of roles spanning development, production management, craft, technical, post-production and sales and distribution.

The report is underpinned by the following research questions:

RQ1: What diversity initiatives exist in the film sector that are designed to improve off-screen diversity with a specific focus on racial and ethnic diversity?

RQ2: What diversity initiatives exist in the television sector that are designed to improve off-screen diversity with a specific focus on racial and ethnic diversity?

RQ3: What do we know about the outcomes of these diversity initiatives and how have they been evaluated?

4. Report Structure and Methodology

The report begins by outlining the research context of how off-screen diversity in the UKF&TV screen industries has been discussed in academic literature and in non-academic or 'grey literature'. It then goes on to consider, where it is possible to do so independently, off-screen diversity initiatives in film (Section 7) and off-screen diversity initiatives in television (Section 8), keeping the focus on the specific issue of how ethnic inequalities in the workforce have been addressed through policy. The report ends with a set of key recommendations.

With regards to methodology, the authors examined the diversity initiatives produced by UK film institutions and the television sector through collating and reviewing industry-published policy reports and relevant grey literature. Where possible, data on the initiatives discussed were sourced from both primary and secondary literature, including reports conducted through academic research, as well as articles and public-facing industry publications. The decision to scope a period of the last twenty years is motivated by two key, interrelated factors. Firstly, beginning our analysis at the turn of the century brings into play a context of a number of new social, cultural, political and economic phenomena and conditions emergent at that time, which came to influence both the birth of diversity as a cohesive term/industry practice and its rhetorical interest in race and cultural difference. Secondly, as the report reveals, despite the conflating of film and TV diversity, its manifestations within industry practice have not been linear. By observing over this extended timeframe, we are able better to identify patterns of discontinuity, as well as some shared trends, which apply across both these parts of the screen sector, especially in terms of the volume and scope of initiatives.

The report offers a robust review of the development of film and television industry initiatives over the past two decades and highlights key case studies intended to draw out structural themes (rather than act as appraisals of the organisations discussed). As stated, the selection of diversity initiatives we look at is not meant to be exhaustive and does not represent a comprehensive examination of all the policies and schemes devised within any given organisation, or in terms of all organisations within the UKF&TV sector. The selection made, however, does indicate what we have identified as the main trends in – and also some of the different approaches to – tackling off-screen ethnic diversity within the screen sector. Moreover, in selecting these initiatives, we can identify how the shifting language forms and organising principles that have informed the motivation, function and practice of diversity policy, have been articulated. This, in turn, recognises that 'diversity' itself is a mobile and continuously evolving concept that has undergone multiple iterations, and continues to do so (Malik, 2013; Nwonka, 2020).

5. Terminology

Within this report, the authors open up a critical lens to consider how terms such as 'diversity', 'creative diversity' and 'BAME' are used in UKF&TV policy. This is both because the terms themselves are used flexibly across and within organisational policy and because they are, in fact, contested terms within and outside the sector. 'BAME' for example, is a term used within public institutions to describe racially diverse populations, and more specifically is used to refer to members of non-white communities in the UK. BAME is short for 'Black, Asian, and minority ethnic' and is commonly used in cultural policy. Within the report, we use Black, Asian and minority ethnic rather than its acronym, BAME; however, on the occasions we do use BAME, Black and Asian or ethnic minority, based on how the film or broadcasting organisation have used it in their reporting or statements at the time.

It has become increasingly clear, that 'BAME' is a term that is not necessarily chosen or engaged with by all African, Caribbean, South Asian, East Asian, and 'other minority ethnic' communities. Many choose to identify themselves in other more culturally specific, or indeed hybrid, ways. The proposal to shift away from 'BAME' was a key plank of the UK Government's recent Commission on Race and Ethnic Disparities, whose report was published in Spring 2021 (CRED, 2021). More controversially, the Commission stated a concern 'with the way the term 'institutional racism' is being applied in current discourse on racial disparities' (CRED, 2021, p. 35) and confirmed that 'The Review found no evidence of systemic or institutional racism' (CRED, 2021, p. 76). This is a finding that the authors of this report suggest is not borne out by the evidence within the screen sector.

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6. Research Context

In addition to a proliferation of non-academic or ‘grey’ literature on the screen industry’s approaches to diversity (which includes industry-reports, public facing reviews, and organisations’ own reports), academics over the past decade have paid increased attention to questions of diversity in the Cultural and Creative Industries (CCIs). Among research conducted on diversity and the CCIs, race and ethnicity, along with sex and gender, are the categories most attended to.

This research has included a small body of work that has considered UKF&TV sector inequality, and particularly the issue of on- and off-screen diversity within the production industries (Malik, 2013; Saha, 2018; Nwonka, 2020). A subset of this research has scrutinised the industry’s inactivity on the question of racial equality and suggested a number of factors that have continued to create barriers to entry into the sector and influenced the poor retention and progression of ethnic minorities in the industry workforce (Saha, 2020; Nwonka, 2015). Other studies have relied on the availability and use of workforce data as a means through which to evidence underrepresentation and exclusion. In addition, workforce data has been used to reveal how the intersections of gender and race remain unexamined within industry efforts to increase the number of women filmmakers (Wreyford and Cobb, 2017; Cobb, 2020; Newsinger and Eikhof; 2020). This work has also revealed the unequal employment experiences for Black, Asian and minority ethnic groups in key ‘above the line’ roles in the film industry (Cobb et al, 2018; Nwonka, 2021).

Further, other critical perspectives identify underrepresentation as a consequence of the uneven distribution of institutional power; the lack of BAME people in decision-making roles across UKF&TV is seen as a primary hindrance in efforts to racially diversify the industry workforce. It has been argued that the recruitment of Black and Minority Ethnic individuals into senior positions within the film and TV industry ecology would seamlessly enable a greater consideration of racial difference in commissioning practices and produce more favourable outcomes for Black, Asian and minority ethnic talent (Saha, 2021). The reality however is that ethnic minorities are rarely employed in the kind of stake-holding positions from which it is possible to influence funding and commissioning processes within the UK screen industries. There are a number of arguments that can be drawn from this. Firstly, when it comes to senior level recruitment in the industry, one finds that in the main ethnic minorities have been positioned within specific ‘diversity officer’ roles: positions that have a crucial function in overseeing the implementation of diversity schemes and ensuring best practice within institutional inclusion drives, but which rarely have any direct involvement in the commissioning and funding of creative projects. Secondly, the sector’s emphasis on diversifying senior level positions implies that processes are simply afflicted by the presence of unconscious bias – a term that has gained currency in the industry discourse on race and inclusion over the last five or so years. (It should be noted, by the way, that this emphasis on diversification is a rhetorical one and there remains a significant absence of Black, Asian and minority ethnic senior figures within the film and TV sector’s leading institutions and organisations.) This indicates a further ideological departure from the reality of racial discrimination in favour of a reading of racial exclusion within the sector as a benign but natural tendency of white directors, producers, screenwriters and funders to conceive the industry within their own dominant racial image (Nwonka, 2020). This identification of unconscious bias as the basis

of underrepresentation also unwarrantedly validates the advancing of unconscious bias ‘training’ as another, more recent component of the industry’s diversity strategy.

Finally, the supposedly causal relationship between increasing the number of ethnic minorities among the industry workforce and achieving the idea of industry equality advanced by sector diversity initiatives has been critiqued, for example by Saha (2017).

The inclusion of ethnic minorities within the industry’s dominant whiteness does not necessarily produce a more racially harmonious industrial condition. Black and minority ethnic creatives are often denied autonomy, editorial control, and must exist within an unaltered institutional climate where they remain subjected to various and habitual forms of racism. This suggests that more off-screen diversity does not necessarily produce ‘better representation’ on screen or neatly unsettle industry norms.

Within the literature, there has been a tendency to keep film and TV distinct in terms of analysis. Whilst they are two separate sites, with their own industrial logics, the two sectors have always shared a close relationship in terms of personnel, remits, funding streams, links to the independent sector and so on. Taken as a whole, UKF&TV is a key part of our culture in terms of representation, participation, sharing and creative expression. Diversity has been a major pillar of how UKF&TV has aspired towards inclusion and wide social relevance. We can see this in the hyper-visibility of diversity and inclusion initiatives within UKF&TV that have been high on the screen industry’s policy agendas. Regarding representation of the population of the UK there are two separate issues: the diversity of those working in the industry (off-screen) and the diversity of portrayals (on screen). This is made more complex by the fact that much of the academic and grey literature, as well as diversity policies themselves, often amalgamate both off screen and on-screen concerns in their discussions of diversity.

Malik (2013) has argued that diversity initiatives and sector inequalities can co-exist and that diversity schemes as a form of discourse can maintain structural inequalities; having a more diverse workforce may not, in itself, guarantee ‘better’ representation on screen or address any perceived deficits in representation. By their own admission – and an admission unfolded over several years – organisations within the UKF&TV industries have recognised that they also function as sites of structural inequalities that reflects wider inequalities, racial and otherwise, in society. What we find in UKF&TV, is that these are industries that are actively producing data, largely quantitative, that checks its own performance against targets that are internally set. There is a question however, of whether the commonly used quota system is the most efficient way to maintain and improve representation. Put simply, what does more workforce diversity actually ‘do’? The impulse to ‘boost diversity’ can create an assumption that more diversity leads to clear outcomes. There may, in fact, be a need to disaggregate representation regarding the industry workforce from representation regarding portrayal and content.

The stubborn reality and unstated subtextual truth actuality of inequalities in the sector remains a challenge (Brook et al., 2020). These inequalities include barriers to entry in a

number of professions in the CCIs. Academic research has identified specific problems that exist within the UKF&TV sectors in terms of attaining equality of opportunity, participation and retention (Warwick Commission, 2015; Malik and Shankley, 2020; Creative Skillset, 2012). Researchers have also identified a disproportionate incidence of labour precarity among Black and Minority Ethnic personnel in the sector, something which may have been exacerbated by the impacts of COVID on the creative industries more broadly since 2020 (Cobb and Wreyford, 2020).

7. Diversity in the UK Film Industry

Overview

The UK film industry has been positioned as a primary site for the inclusion agendas of the Cultural and Creative Industries (CCIs) over the last 20 years. This positioning was influenced by two main factors. Firstly, the identification of the film sector as central to the social cohesion and cultural plurality ideals that accompanied New Labour's vision for a 'Creative Britain' (Smith, 1998). Secondly, the continued demands for recognition and equality of access and representation from Black and Minority Ethnic actors, directors, producers and creative talent, who had been structurally excluded from the film industry throughout the 90s.

The initiatives, policies and schemes considered below emerged within this period as a response to these needs and agendas and have been evaluated chronologically. In doing so, we want to trace how, from its advent in the early 2000s up to the present, the film industry diversity agenda has attempted to manage the tensions created by the marginalisation of ethnic minorities within UKF&TV and perpetuate central ideas and ideologies that have underpinned industry diversity methods.

In contrast to the TV sector that we will go on to discuss in the next section, where PSBs have responded to the question of diversity through a plethora of approaches to underrepresentation, we find that film industry diversity has been characterized by both sparsity and differences in form. On the one hand, we encounter macro approaches (large scale, expedient diversity initiatives specifically aimed at increasing the numbers of underrepresented groups within the sector) and micro, ancillary approaches orientated towards the development of skills and opportunities that may produce positive outcomes for non-white talent and a diversity of representation. In this section we adopt a case study approach which examines the individual diversity actions pursued by various film institutions and organisations, their practices and where possible, an analysis of their impact on their targeted groups. To again refer to our methodology, we use the terms policy, scheme, and initiative loosely, in part to mirror the interchangeability of the terms in industry literature and language.

Channel Four Film Four: Spirit Dance (2000-2001)

In 2000, Channel Four's Film Four Productions announced the film production scheme Spirit Dance. Film Four Productions had been established in 1998 as a separate entity from the main arm of the channel, with a specific agenda of creating large budgeted and commercially focused films that marked a decisive break away from the low-budgeted and British orientated Channel Four Films strand led by David Rose, and later Alan Fountain and the Independent Film and Video Department. Launched in collaboration with the African American actor Forest Whitaker through his film production company of the same name, Spirit Dance promised to produce a body of feature films made by Black, Asian and minority ethnic filmmakers in Britain. Whilst not specifically announced as a diversity policy intended to intervene in the continued omission of Black, Asian and minority ethnic filmmakers from the industry, Channel Four's public literature at the time of the announcement did state that the partnership would aim to 'bring more Black and Asian film talent to the screen' (Channel 4, 2001).

Given its extremely short lifespan and the obscurity of the scheme in either Channel Four literature or existing academic research, very little is known about the specific ways in which Spirit Dance sought to respond to the challenge of increasing the presence of Black and Asian (the preferred term at the time, as seen in the Channel's own terminology) talent within UK film production. Moreover, there is actually no evidence that any UK feature films were made under this scheme (although evidence suggests there may have been a 'first look' deal in place between Channel Four and the Spirit Dance producers). It is significant that Spirit Dance was launched during a period where one of Film Four's specific aims was to produce bigger budgeted films with international co-production, notably with US studios such as Warner Bros. Whilst there are no details on the budgets or financial arrangements of the scheme, it could be argued that Film Four Production's overall emphasis on large-budgeted film productions and cultivation of such a commercially-driven production context may have curtailed the ability of Black, Asian and minority ethnic film projects to engage and thrive – an argument given further credence when one considers the general tendency within the British film industry to restrict Black, Asian and minority ethnic acting talent, films and filmmakers to low and micro-budgets: a reductive orthodoxy advanced under the disingenuous justification of 'commercial viability' that has continued to the present moment.

UK Film Council: New Cinema Fund (2000-2008)

The UK Film Council was established in 2000 as the main public body to develop the UK film industry. Supported by £17 million in National Lottery funding at a moment of increased public investment in culture and the arts, the UK Film Council can be seen as a central component both of New Labour's Culture Secretary Chris Smith's rapid commercialisation of the UK's creative industries and of the increasing belief in the utility of culture and creativity as a vehicle for social cohesion and equality. The later concern took on a greater significance after the Macpherson Report into the murder of Black teenager Stephen Lawrence and the accompanying discourse of diversity (as a proxy for anti-racism), given practical expression through, amongst other things, the Equality Impact Assessments that were part of a number of public sector interventions mandated by the 2000 Race Relations Amendment Act.

One of the 12 key objectives of the UK Film Council upon its establishment was increasing diversity in the UK film industry. Whilst its flagship Premier Fund, with an £8 million budget per year, was geared towards mainstream, large-budgeted productions often made in collaboration with US studios, it was in the New Cinema Fund where the UK Film Council would concentrate its diversity agenda. The New Cinema Fund, which sought to finance less commercially orientated low budget feature film projects from filmmakers in the UK nations and regions with non-mainstream ambitions, had a budget of £5 million to invest in up to ten feature films each year. Given its focus on emerging British filmmakers – a mandate that can be compared to the non-commercial, cultural ethos that defined Channel Four's film support in the 80's and early 90s' – one can perhaps understand the desire to conceive the New Cinema Fund as a film strand possessing a similar commitment to Black, Asian and minority ethnic representation, with the UK Film Council's Board declaring that the fund would become a crucial platform for the development of Black, Asian and minority ethnic filmmakers. Indeed, beyond the New Cinema Fund, the UK Film Council's diversity efforts expanded to the creation of the Diversity Sub-Committee in the New Cinema Fund, the Leadership on Diversity in Film Group and the appointment of Marcia Williams as first its Head of Diversity in 2002.

We previously mentioned the need to distinguish between micro and macro forms of diversity policy. Another important distinction, drawn by Newsinger and Eikhof (2020), is between explicit and implicit diversity policies. In their terms, explicit policies are devised specifically to remedy diversity issues, while implicit diversity agendas are described as beneficial outcome of broader policy aims (e.g., economic/regulatory). In the New Cinema Fund we can observe two variations of micro/implicit policies. From one perspective, despite the UK Film Council's public emphasis on the New Cinema Fund as the main vessel through which their strategic aims towards diversity would be pursued in the film industry, this was not specifically a diversity fund/policy, and the issue of racial inclusion was one of a wide number of industrial and cultural imperatives within the New Cinema Fund. From another perspective, the UK Film Council's diversity strategies were manifest through a number of peripheral funding and support strands. For example, Blank Slate, administered by London-based B3 Media and one of four major short film schemes the UK Film Council supported through the New Cinema Fund, was created to support emerging and established Black, Asian and minority ethnic filmmakers, and could be understood as a more macro/explicit form of diversity action in regard to the development of Black, Asian and minority ethnic film talent. In addition, the UKFC Breakthrough Brits programme (2005-2009) would fund and support a group of emerging UK film talent working across directing, acting, producing and writing through a programme of networking events in the US. In both 2008 and 2009 this programme focused on Black, Asian and minority ethnic talent and would include a number of individuals who would later forge highly successful careers in the industry, including Noel Clarke, Amma Asante and Riz Ahmed.

Despite these actions, it is only through an examination of the projects funded through the New Cinema Fund that we can evaluate its effectiveness. The key study here was conducted in 2007 by Reena Bhavnani, who looked specifically at how the UK Film Council had performed in relation to diversity and equality across its functions, within a broader investigation of the various ways in which ethnic minorities experience discrimination and exclusion in the industry. The overall picture in the industry was very bad, with ethnic minorities reporting experience of tremendous barriers towards accessing development and production funds; indeed, minority ethnic applicants would receive just 8% of 409 UK Film Council Development Funds between 2000 and 2007. However, for the New Cinema Fund, the picture was even worse: from its inception, just 4% of these awards were allocated to ethnic minority applicants, with 70% being allocated to white, able-bodied men (Bhavnani, 2007). As an indication of the ways in which the broader economic agenda and the primacy of the UK Film Council's aims of achieving 'sustainability' within the industry undermined the pursuit of the Fund's stated aims, just 3% of the 99 Premier Fund applications would be awarded to ethnic minority producers/directors from a monitoring form response rate of 58% (ibid). Whilst the monitoring response rate for the New Cinema Fund for ethnic minorities was 38%, necessitating some caution in our response to the data, this figure appears to represent a huge failure in the UK Film Council's aims of fostering a more diverse industry. Moreover, the financial decisions made by the UK Film Council, specifically the way funds were allocated across their production and development strands as evidenced in the Bhavnani Report were a major influence in the lack of progress towards diversity in this period.

Film London: London Calling Plus (2012-2018)

Film London, who in a previous incarnation as the London Film Video and Development Agency (LFVDA) had supported filmmakers through a number of feature and short

film strands under their London Production Fund, had from its inception in 2003 been positioned as a key part of the film industry agendas to both increase inward investment in the film sector through the global promotion of London as a production location and crucially, through training and talent development.

Film London's most notable funding scheme for filmmakers was Microwave: an annual micro-budget feature film strand which launched in 2006, in collaboration with BBC Films, and awarded directors up to £100,000 to make a full-length feature film. Microwave can be understood as a more implicit form of diversity intervention, given the films' on-screen representation of a multi-racial London and the production of non-mainstream British cinema. However, Film London's main contribution to the diversity agenda was through London Calling. The main part of this short film scheme awarded London-based emerging filmmakers £4,000 for their projects, but in its adjacent funding strand, London Calling Plus, four Black, Asian and minority ethnic filmmakers would be awarded an increased £15,000 for their short films. Significantly, the existence of London Calling Plus can be attributed not just to public discussion of the undiminished racial inequalities in the UK film sector, but also to the increased availability of data on the percentage of ethnic minorities working in the UK creative industries: the scheme purported to offer a direct intervention in the sector's inaction on diversity by 'specifically addressing the fall in minority professionals working in the production industries as reported by Creative Skillset's census' (Film London, 2014). However, a key difference from the main strand of London Calling was that successful applicants to London Calling Plus were required to demonstrate an established/proven track record in film or other areas of the cultural industries, such as theatre, radio and TV. Whilst this may on the one hand be seen as a method of fast-tracking recognised talent from other creative sectors, it also seems to suggest that, within London Calling Plus, Black, Asian and ethnic minority filmmakers actually applied within a much more demanding range of criteria than the main London Calling strand.

One can understand London Calling Plus specifically (and London Calling more generally) as an attempt to nurture new filmmaking talent through funding and industry mentoring. For London Calling Plus, the funding and development support would also help Black, Asian and minority ethnic filmmakers to make the transition to feature filmmaking through exposure to industry networks and larger funding opportunities; a central tenet of the scheme would be the platform given to the filmmakers by having their films screened at the BFI London Film Festival.

This said, despite the significant difference in production funds allocated to each scheme, the partitioning of London Calling and London Calling Plus on grounds of race and ethnicity in some ways aligns itself with the methods of 'segregated inclusion' that were common in screen industry policy on cultural and creative diversity from the 2000s (Nwonka, 2015; Saha, 2018). As such, it serves as an indication of the ways in which film industry policy makers' inability to diagnose and remedy the discriminations endemic to the mainstream of the sector's development and commissioning cultures may produce well-intentioned but equally marginalising inclusion strategies that satisfy only an expedient industrial need to publicly display their diversity interventions. Indeed, in 2017, Film London would also commit to allocate at least three of the main London Calling awards to new Black, Asian and minority ethnic talent. While there is no publicly accessible workforce data on the films that emerged from London Calling Plus (the researchers did request this data from Film London for the purpose of this study), nor any reliable mode of assessing either the impact of the scheme on the underrepresentation of

ethnic minorities in the UK film industry or its success in generating a new, critical mass of Black, Asian and minority ethnic filmmaking talent, the scheme remains a notable funding strand among the film industry's measures to widen access over that decade. The scheme would go on to close in 2018.

British Film Institute: Diversity Standards (2016-Present)

Upon becoming the lead body for film production in the UK in 2011 after the abolition of the UK Film Council in 2010, the BFI launched their Diversity Standards in 2016 after a year-long pilot, Diversity 'Three Ticks' was trialled in 2014. The Standards require all feature film projects applying for BFI Film Fund investment to include a number of underrepresented groups in their productions. Specifically, each project is required to diversify their production cast/crew by meeting two of the policy's four Standards: Standard A (on-screen) Standard B (off-screen) Standard C (industry access) and Standard D (audience development) against one of the protected characteristics cited in the 2010 Equalities Act.

The most recent internal assessment of the Diversity Standards, published by the BFI in January 2020, revealed that 50% of all films during this period adhering to the Standards passed by way of Race/Ethnicity representation in Standard A, 40% in Standard B, 27% in Standard C and 12% in Standard D. This seems to suggest a healthy representation of ethnic minorities in the industry. That said, a more comprehensive analysis of the Diversity Standards is found in the report *Race and Ethnicity in the UK Film Industry: An Analysis of the BFI Diversity Standards* and displays an extremely unequal industry landscape for ethnic minorities. Of the 235 films adhering to the Diversity Standards (65 of which were funded productions by the BFI and 170 were films funded by Film4 and BBC Films or applying for BAFA's or BIFA Awards) the study found that just 34% of film productions cited Race/Ethnicity in main character roles (A1), 26% of productions for films main storyline (A3) and just 37% for department heads (B1) within a policy dedicated to increasing the representation of already marginalised identities in the sector. Further, Black, Asian and minority ethnic actors were far more likely to be selected as background and 'other' characters in comparison to other protected characteristics, and there was no Black, Asian and minority ethnic representation in any film production adhering to the Diversity Standard B (off screen) in the whole of the Midlands between 2016-2019. The study also revealed extremely poor representation of ethnic minorities in film productions set and produced outside of London, and a tendency of films with either an ethnic minority director or producer to pass the standards on grounds of Race/Ethnicity, with this last point suggesting that the burden of industry-wide change in regard to race and ethnicity is unevenly placed on the small number of films with Black, Asian and minority ethnic creative leadership.

Any evaluation of the success of the Diversity Standards in specific regard to race and ethnicity should be tempered by two key factors. Firstly, given that the policy was developed in 2016 as a direct response to the extremely low percentage of ethnic minorities in the film sector, which stood at less than 5% in 2015 (Skillset 2015) there is an absence of crucial comparative data needed to assess how the Diversity Standards have intervened in the exclusion and inequality faced by ethnic minorities in the film sector. This, in many ways is an outcome of the broad scope of the Diversity Standards and the sophisticated data it has produced. For example, in the *Race and Ethnicity in the UK Film Industry* study, Nwonka was able to derive data not just on the general landscape of racial and ethnic representation both on-screen and off-screen, but crucially, the racial

composition of specific roles and positions in relation to other protected characteristics across film productions. Indeed, it must be noted that the general lack of comprehensive data on the Black, Asian and minority ethnic presence in the UK film industry prior to the BFI Diversity Standards is also a contributing factor in the continued ineffectiveness of the diversity agenda that has occurred over the last 10 years. The UK Film Council's failure to both evaluate the effectiveness of their strategies towards diversity and racial equality and representations through their aforementioned funding streams and collect reliable workforce data on the racial composition of the film industry between 2000 – 2010, despite its rhetorical emphasis on diversity, should be seen as a major hindrance in the subsequent efforts of the BFI and other film organisations to devise policy approaches based on a reliable data-led understanding of the existing inequalities faced by ethnic minorities across a number of roles and positions.

This being said, the Diversity Standards remain the most sophisticated and wide-ranging model for improving the status of Black, Asian and Minority Ethnic equality and representation in the UK film sector. However, the BFI must accept that the loose and fluid mechanisms of the Diversity Standards (where a film production can quite easily pass the standards without making any reference to Race/Ethnicity) contributed significantly to the potential for some of the Standards to produce extremely poor results in regard to Race/Ethnicity – risks that were noted in academic research during the policy's initial trial iteration (Nwonka, 'Three Ticks', 2015). As a result, whilst changes are required to the Diversity Standards framework to ensure that some of tendencies observed across the data results in 2020 are addressed in future iterations of the Standards (the BFI is currently in the process of reviewing the stringency of the Standards in response to the finding/recommendations in the Race and Ethnicity in the UK Film Industry study), the success of the Diversity Standards as a diversity initiative (which must be distinguished from an anti-racism initiative) is equally reliant on the willingness of film industry stakeholders to respond to the Diversity Standard options in expansive, non-biased and anti-racist ways.

Doc Society (2020-Present)

Doc Society pledged to prioritise racial equity efforts within the organisation in July 2020 in response to the Black Lives Matter protests of that summer. Whilst we do not conceive these measures as a diversity scheme per se, a number of commitments and organisational changes have been made that refer implicitly to the broader (and very public) agenda of rearticulating diversity and indicate a departure from the language of inclusion and towards an anti-racism vernacular. The creation of a new Head of Film role in Autumn 2020 with a remit to oversee the organisation's film programmes and awards in the UK and internationally was conceived as part of their renewed commitment to 'advancing racial justice in the cultural sector' (Doc Society, 2020). In an effort to address what Doc Society diagnoses as the inherent whiteness of the organisation, they have also promised a restructuring of their executive team to disrupt the internal decision-making processes that, as Doc Society has recognised, have produced unequal outcomes for the support of Black filmmakers.

In addition, some of the measures promised by the organisation speak directly to what has been described as the 'politics of diversity data' (Nwonka, 2020). The term refers to a phenomenon in which the willingness of cultural institutions to reveal workforce and commissioning data is often tied up in a more cynical agenda of managing the public perception of both the institution and their responsiveness to inclusion and

diversity demands. Doc Society has acknowledged that statistical evidence (and its public dissemination) is essential to both identifying and responding to the points within the application and funding processes where racial inequalities take place. As a result, they will offer greater transparency and accessibility through an opening up of the data generated from their funding awards to external evaluation and assessment by researchers, and, crucially, they will also disaggregate their awards data to more accurately assess and address the specific disparities in funding faced by Black filmmakers.

BFI Network (2021-Present)

Launched in March 2021, the BFI Network and Together TV's Diverse Film Fund allocates £10,000 to five filmmakers to produce a short documentary film that captures diverse experiences and perspectives within Black Britain. Supported by industry mentorship, the films will be broadcast on the channel during this year's Black History Month in October.

In some important respects the BFI's collaboration with a digital social change channel slanted towards programming at the community level suggests an expansion of its methodological approach to diversity and inclusion which goes beyond the framework of the Diversity Standards and feature filmmaking. In addition, for the new and emerging filmmakers, the broadcast platform offered by Together TV demonstrates an investment in the early career development of filmmakers akin to Film London's London Calling/London Calling Plus and the screening of the completed short films at the BFI Film Festival. (It should be noted however that unlike London Calling Plus's insistence on its filmmakers having an already established position in the cultural and creative industries the Diverse Film Fund requires that its applicants have not previously gained a credit as a director or Producer.)

However, in other ways the Diverse Film Fund, by being on the general continuum of what can be understood as an explicit diversity policy in its definite focus on increasing representation and diverse content, also carries with it some of the limitations found in London Calling Plus's emphasis on short filmmaking as industry participation. In this regard, beyond the value of supporting the creation of diverse short films, in evaluating the success of any short-term diversity fund there must also be some consideration of the participants' ability to secure future commissions and production funds from other sources at the conclusion of the scheme. As Bhavnani argued in her analysis of futility of the UK Film Council's diversity agenda (2007), the success of such early career schemes remains contingent on the level of funding available for other subsequent explicit diversity schemes (particularly those referring to racial difference), where the economic framework within which diversity policies function disallows the kind of long-term industry support required by new Black, Asian and minority ethnic directors/producers to navigate the difficult and racially unequal trajectory from emerging to established talent.

BAFTA Elevate 2017-2020

The British Academy of Film and Television Arts (BAFTA) launched their Elevate programme in 2017, with a specific mandate to respond to the underrepresentation of certain groups in the film and television sector. This intervention was informed by

BAFTA's own 2017 report, produced in collaboration with BFI and Creative Skillset, which explored the industrial factors that determined the career success of performers and practitioners from underrepresented groups in the film and television industries. The findings of the report placed a tremendous emphasis on what can be described as the 'deficit model'. In this model, pro-diversity schemes and training programmes encourage participants to overcome the internal barriers to success through the development of competencies, characteristics, skills and methods of sustaining their creative output in the absence of opportunities (and maximising opportunities when they arise). Notably, of the eight factors identified in the findings, just one (external influences around company infrastructure and the wider industry) was about the structural barriers underrepresented groups may face in the sector, a challenge which the report suggested might be remedied at least in part by 'developing strategies to overcome negative experiences' and 'developing resilience to prejudices' (BAFTA, 2017).

It should be noted that the scheme was conceived as part of a broader BAFTA/BFI diversity agenda targeted at the structural level. Accordingly, Elevate's primary aim was to create a space for the development of collaborative relationships, networks, confidence and industry knowledge. Participants benefitted from the input of industry experts and the accompanying publicity and 'cultural capital' afforded by involvement in a scheme with the industry prestige symbolised and embodied by BAFTA. Each annual programme to date has been themed around a particular industry role and/or identity characteristic identified as under-represented: 15 female directors in 2017, 18 writers in 2018, and 21 actors in 2019 (no details are available on any further intakes since that year). There is also an emphasis on developing the personal, interpersonal and advanced industry knowledge (participants apply with a demonstrable track record in film and TV) needed to progress towards the production of 'high end' film and TV (BAFTA, 2017). Whilst Elevate was not specifically directed towards support for Black, Asian and minority ethnic talent, the programme's scope did allow for the intake of a large number of Black, Asian and minority ethnic participants across all three cohorts.

BAFTA 2020 Review

In addition to Elevate, BAFTA undertook a major review of its organisational culture and nominations processes in direct response to the very public debates over the #baftassowhite moment in 2020, where there were no nominations for Black, Asian and minority ethnic people from all of the 20 acting nominations that year. This review, which consulted with over 400 industry figures, policy makers and academics, resulted in a number of changes within its organisation with the specific aim of increasing diversity. This included: an expansion of BAFTA's current membership, with the strategic recruitment of 1,000 new members from underrepresented groups and the establishing of a Future Members Group to assist in the continued development of a diverse membership body; and 'conscious voter training' to assist voters in navigating 'the wider societal influences that can impact the voting process' (BAFTA, 2020). Further, BAFTA would announce comprehensive changes to the nomination process for their film awards, including the creation of an additional round of voting to allow members an exposure to a greater number of films for an extended period of time, and the expansion of the number of nominations within the Acting, Directing and Outstanding British Film categories.

These policy responses from BAFTA can be seen as a variant of both the implicit and macro diversity initiative modes: macro, in the sheer scale of the amendments that

very much apply at the structural level; but also, implicit, in the sense that the BAFTA Film Awards, where the results of these approaches become most evident, is the public sphere where ideas of the value, recognition, and consecration of films are negotiated and conveyed to the nation. The fact that BAFTA is not involved directly in film funding arguably also renders their diversity policies implicit responses to racial inequality in the sector (and of course race and ethnicity is just one of a number of underrepresented characteristics they target). However, whilst there is yet to be any empirical analysis of the efficacy of the Review, evidence from the 2021 BAFTA Film Awards, where Black, Asian and minority ethnic made up two thirds of the acting nominations, suggest that the changes may have had an impact on the levels of industry consciousness towards racially diverse talent. Of course, one could argue that the increased presence of ethnic minorities may also be the simple outcome of an expanded number of nominations, a heightened and defensive reaction to the whitewashed BAFTA nomination accusations of the previous year, and the increased awareness of the industry's own racial inequalities as a result of the Black Lives Matter protests in June 2020.

Thus, in a similar vein to the BFI Diversity Standards, the BAFTA Review should be understood as an evolving initiative and many of the BAFTA Review interventions will be subject to continued evaluation, and, crucially, external academic and critical analysis. For example, BAFTA have also implemented changes to how films with the benefit of larger budgets gain a decisive advantage over smaller budgeted films in 'campaigning' during award season periods. From a Cultural Studies perspective, we feel there is scope for further research on how campaigning approaches are race and class determined. Such research might focus, for example, on how the nomination and award decision making process may be influenced by industry "buzz" and public hype, achieved through the hypervisibility of particular film talent associated with a film project (actor/director). Hypervisibilisation is arguably an especially important phenomenon, given that the horizontal campaigning strategies involved in social media/newspaper and magazine articles may also themselves be influenced by (and are arguably the outcome of) intimate, longstanding and exclusive cultural and industrial networks that both rely upon and produce tremendous amounts of social and cultural capital (Bourdieu,1986; Nwonka, 2015).

Conclusion:

In examining industry diversity interventions around race and ethnicity across the last twenty years we can identify one outstanding common feature: an unwillingness to address the structural elements of the exclusions faced by Black and Ethnic Minorities in the sector. What this has commonly meant in practice is that the emphasis on on-screen representation and the pro-empowerment and upskilling rationale underpinning the training and mentorship approaches that characterised diversity initiatives during this period have diverted attention away from a more holistic interrogation of the discriminatory practices imbedded in the film industry's funding awards, recruitment methods and institutional cultures.

One may argue that the responsiveness of policies and schemes to the specific inequalities faced by ethnic minorities may have been hampered by the absence of reliable data on the composition of the film industry and the uptake of the various initiatives. (We should note however that Newsinger and Eikhof [2020] have argued persuasively against the instinctive correspondence implied by the new industry

reliance on diversity data as producing knowledge which then necessitates policy action.) Further, unaccountability emerges as a recurring trend in the various literatures examined; there is a notable absence of an account, analysis or explanation from the various institutions and organisations as to why such schemes and initiatives have produced stagnated, or in many instances, regressive outcomes for Black and Ethnic Minorities in the film sector.

Evidence from the BFI's Diversity Standards and the public responses made by the BFI in the aftermath of the external review conducted by Dr Nwonka in July 2020 suggests that they have come to recognise the need to subject the Standards to both internal and external evaluation, from which a number of changes can and have been proposed. Whilst there are a number of problems within the framework of the Diversity Standards that have produced the negative industry conditions for ethnic minorities reflected in the data analysis (particularly off-screen), an understanding of the Diversity Standards as a continuous system of inclusion rather than a scheme or policy does allow for the continued analysis and development of the Standards in ways that may not have been available to policy makers and researchers before, given the short-term nature of previous industry approaches. That said, how we evaluate the effectiveness of this, and other industry interventions must also be determined by the intention of the intervention, which may not cohere with the experiences and needs of the targeted groups themselves. From the above analysis, this intention has been in the main the temporary altering of the on-screen/off-screen racial composition of the film sector through the language of inclusion, and there remains no initiative, scheme or policy that has successfully responded to the specific question of racial inequality and in the UK film industry.

8. Diversity Initiatives in the Television Sector

Overview

As with the film sector, off-screen diversity initiatives within television have become increasingly varied and visible in recent years. Whilst ‘the diversity question’ might feel new, the UK TV sector has long built diversity remits into its mission statements and institutional planning. Over time, diversity discourse has become ever more prevalent for the UK broadcasters as part of their cultural policymaking. Since 2020, there has been a perceptible shift towards anti-racism being mentioned within some television diversity and inclusion initiatives, combined with an acknowledgment of the impact of the Black Lives Matter movement in foregrounding structural racism as an issue to be taken into account.

The opening section will contextualise off-screen diversity initiatives within the TV sector. In addressing the specific relevance of diversity for Public Service Broadcasting (PSB), it is noted that ‘creative diversity’ has become the dominant policy frame through which diversity has been addressed within the sector over the past twenty years (Malik, 2013). The next section goes on to consider the role of Ofcom and Diamond which helps us to understand what data is available on race and ethnicity off-screen and what the current situation is regarding the Black, Asian and minority ethnic presence in the TV workforce. A closer and more historical discussion of the BBC and Channel 4 follows: the BBC, because it is so central to PSB and the concept of universality and fair representation; and Channel 4 because of the multiculturalist ideals on which it was founded in 1982. In addition, the BBC and Channel 4 are the two organisations which have been written about the most in academic and non-academic research on diversity and television. The report also discusses Viacom, as an example of another major UK broadcaster (Channel 5), ITV and Sky, as well as the global streamer, Netflix. This helps to build a fuller picture of how off-screen ethnic diversity is currently being tackled in different parts of the TV ecology.

The public service basis on which much of UK television operates adds a new dimension to ‘diversity’ in UKF&TV. Communicating with and representing all citizens is an essential part of the public service remit and UK PSB has positioned diversity as a core pursuit and framework in order to deliver public service. Diversity initiatives – based on the recognition that the population consists of multiple and overlapping sets of minorities – are central to the continuing relevance (or impending irrelevance) of any public service media system (Malik, 2018). PSB is also under intense pressure in an increasingly crowded, marketised media landscape, with its many moving parts. Increased convergence of the internet and television has meant that the PSBs are also adapting to broadcast video-on-demand services (BVoD), such as iPlayer and IT Hub (free at point of access), as television repositions itself as an on-demand service. Beyond PSB, SVoD players (subscription video-on-demand) that includes Sky’s NowTV, Amazon Prime Video, Disney+, Netflix are also actively promoting their diversity credentials.

In this complex ecology, the presentation of and motivation for workforce diversity initiatives are likely to be varied, caught up in a tricky negotiation of social and economic goals. The need for ‘more

diversity' and an increase in more ethnically diverse personnel underpins the overriding quantitative and target-oriented approach to initiatives in this area.

The case for diversity moves between civic, moral and social arguments (widening access, equality of opportunity, geographical distribution of opportunity) to more market-oriented ones (strategic visibility, diversification of talent, mainstreaming of diversity).

Ofcom and Diamond, Capturing Data

It is certainly the case that there is considerable data on ethnic representation in the workforce, but that progress is measured and reported against targets that have been set by broadcasters themselves. As has been indicated in the earlier section on film, this data is not always nuanced in relation to categories within 'BAME' or in ways that help us understand intersectionality as a part of diversity.

The relevance of PSB for our understanding of diversity initiatives is also that it is a sector that is regulated. The Office of Communications (Ofcom) is the government-approved regulatory and competition authority for the broadcasting, telecommunications and postal industries of the UK. The growth of the creative industries in the UK has seen a corresponding expansion of Ofcom's remit to regulate the entire broadcasting sector. Previously Ofcom seemed to have a more ambiguous role in supporting broader diversity and their apparent reluctance to push for more data to be gathered to audit and monitor ethnic representation has been a particular problem. After a certain amount of pressure to address issues of diversity and hold broadcasters accountable, the regulator's former CEO announced that Ofcom, "...will be looking at diversity data across the broadcasters we regulate helping us to get the most comprehensive picture yet of how well each broadcaster is doing. This is an important step towards greater transparency and greater accountability" (Clarke, 2016).

Since 2017, Ofcom has reported on diversity data within the broadcast sector on an annual basis although it no longer gathers data on training and skills, which would potentially be useful for better understanding issues of diversity in the workforce. Ofcom (2019) provides in-depth diversity data and analysis for all UK employees across ten broadcasters: the five major broadcasters, which are BBC, ITV, Channel 4, Sky and Viacom (the owner of Channel 5); and five further broadcasters which are STV, Turner, Discovery, Perform Investment Ltd and QVC. Racial group data provision was mandatory for each of the ten broadcasters, and these were broken down into data on job level, job role, joiners, leavers, trained and promoted. The main five broadcasters were also asked by Ofcom to evaluate progress on their ongoing diversity initiatives, although, as the research for this report indicates, these evaluations are not always easy to locate. There is a concern then that targets are set internally, evaluation is not always made publicly accessible and that, as a consequence, accountability and the legacy of diversity initiatives can lack transparency.

Some of the headlines of Ofcom's 2019 report are:

- Employees from minority ethnic backgrounds make-up 13% of employees, which is in line with the UK workforce average of just over 12% but below the BBC's 2020 target of 15%
- Employees from minority ethnic backgrounds remain underrepresented across all job roles within the BBC, except for business management and administration (17%), and technical, engineering and data analytics (14%)
- BBC divisional breakdowns still show that the nations and regions have a lower proportion of employees from minority ethnic backgrounds.

Run by the Creative Diversity Network (CDN), the umbrella organisation that seeks to enable the UK broadcasting industry to increase diversity and inspire inclusion, Diamond is a single online, industry-wide data collection system used by broadcasters including BBC, ITV, Channel 4, Channel 5 and Sky, to monitor and report diversity in broadcasting. Since August 2016 when its data collection began, Diamond has sought to build a picture of diversity, including of the workforce on UK productions. The CDN's Race and Ethnicity Report: A Deep Dive into Diamond Data (2020) focused on off-screen inequality in the UK television industry and made an important distinction between the 'need to balance and substantiate direct experiences and anecdotes with evidence and data'. This touches on an important concern with regards to the relationship between quantitative methods (the preferred approach in the industry to capturing data) and qualitative data (rarely used). In addition, the report does break down the 'BAME' category to capture where, for example, South Asian, East Asian, Black workers are situated within the industry. As stated in the report, there is a tendency to 'report people with very different cultures and identities together' (CDN, 2020, p, 30) which can limit a nuanced understanding of how race and ethnicity is placed within the workforce.

The major broadcasters have asserted that Diamond data has helped them to understand better where to focus their diversity initiatives. For the Viacom President, Diamond "data insights provide a critical foundation upon which to build our diversity and inclusion drive in the UK" (cited in Diamond, The Fourth Cut, 2021). In terms of its findings that pertain to matters of off-screen racial diversity, the 2021 Diamond report notes:

- A lack of representation for many groups is more apparent off-screen than on-screen, including amongst those who are part of a BAME group
- Off-screen BAME contributions have fallen from 12.3% last year to 11.8% in 2019-20, which is below the national workforce estimate (13%)
- Low BAME contributions in the roles of Writer and Director: 6.5% of Writer contributions and 8.4% of Director contributions are by those who identify as BAME.

Diamond's previous report (2020) found that between 2017 and 2020, the overall proportion of off-screen contributions made by BAME groups to UK programmes had increased from 9.7% to 12.3%. This was slightly below the UK BAME population (12.8%)

but 'well below the BAME population of London (40.2%), where a high proportion of TV programmes are made' (Diamond, 2020, p.6). It is clear from these recent findings that 'BAME' is the preferred terminology when capturing data (arguably flattening out the specifics of ethnic groups because of its broad categorisation) and that the focus on numbers of personnel is the main point of the data capture rather than an emphasis on structural or institutional issues or on the experiences of those personnel.

The BBC's specific involvement with Diamond has come under scrutiny by BECTU, the union for creative industry workers in non-performance roles, and the Writers' Guild of Great Britain because both unions accused the corporation of not being transparent enough with respect to publishing data (for example, data on gender, on jobs and on the grades of staff working in the corporation) (The Stage, 2017). The unions called for Diamond to publish the equality monitoring data by production so that they could identify which production companies or broadcasters have the most diverse workforce and can learn what works and what does not, to improve them for ethnic minority workers. The unions subsequently argued that without this information new ethnic minority recruits would experience challenges in retaining their position in the sector. The former Ofcom Chief Executive, Sharon White, said to the Digital, Culture, Media and Sport Select Committee in May 2019, that Diamond "started with very, very good intentions and there have been challenges in terms of the reach and the quality and the depth of data" (DCMS, 2019). White went on to say that this is one reason why Ofcom have used their statutory powers to collect from diversity data across TV and radio but that even Ofcom has limits to accessing this.

The data presented in Ofcom's 2020 report does echo some of the Diamond findings. It finds that 'minority ethnic people' [the term it uses in its report] – and particularly Black colleagues – are under-represented in senior management across the industry: 8% of those employed by TV broadcasters in senior management roles are from a Minority Ethnic Group ("MEG") compared with a national workforce average of 12% (which increases to 35% in London and 31% in Manchester). It finds that Black colleagues are more underrepresented in senior management than other minority ethnic groups, at 1% (compared with 3% of the working population).

BBC 'Diversity and Inclusion' plans (2016 – present)

BBC Reports allow us to map fairly well the diversity initiatives it has put in place and developed over the years. Borrowing the distinction between macro and micro interventions from the discussion of film above, a brief overview of the BBC's macro policies over the past ten years indicates steady improvements in terms of workforce inclusion in relation to race and ethnicity. However, there is a continuous push for more diversity and schemes to boost employment diversity.

The BBC Trust, the independent governing body for the BBC between 2007 and 2017 (when the Trust closed), stated in its 2008-09 report (BBC Trust, 2008-9) that there had been an increase in the proportion of BME (the preferred term at the time) staff across the BBC from 11% to 12.1%, which included an increase in representation at senior levels from 5% to 5.6%. The BBC's original targets of 12.5% (all staff) and 7% (senior management), which were intended to have been achieved by 2007, were extended to 2012. What was significant about the BBC Trust's recommendations was the injunction that, in addition to achieving these targets, the Corporation needed to understand several key issues: why

BME staff might leave the organisation (the question of retention as much as recruitment); the significance of increasing staff across different programme areas (the question of where 'diversity' is distributed); and the need to review the effectiveness of diversity initiatives (the question of evaluation and legacy). Whilst it is clear that over the years the BBC has largely met its targets and done so on time, over a decade on from when these recommendations were made, they are still pertinent when we reflect back on the success of diversity initiatives at the BBC and more broadly in the television sector.

The BBC's 'Everyone Has a Story: BBC's Diversity Strategy 2011-15', unveiled in 2011, was influenced by the desire to connect with the licence-fee paying audience and frame its diversity remit in line with the newly introduced Equality Act 2010 (Rice, 'Everyone has a story – the BBC's new diversity strategy, 24 May 2011). At the time, this meant that diversity policy at the BBC was organised into three main pillars: this new Diversity Strategy; the equality information report ('Telling Our Story', 2011), framed in line with the specific duties under the Public Sector Equality Duty; and finally, its Divisional Diversity Action Plans, required by each BBC division. Close analysis of the BBC's own diversity documents indicates the new alignment to the single equality legislative framework and an early nod towards 'creative diversity'.

Moving a few years on, the slow creep of quota-based off-screen diversity initiatives was in evidence at the BBC, alongside a consideration of how labour is distributed within the organisation. For example, the BBC's 2016 Diversity and Inclusion Plan set new 2020 Workplace targets that included 15% of the leadership team coming from ethnic minority backgrounds. The 2016 plan also committed to strengthening its working relationship with industry partner CDN and Project Diamond, to measure its progress against its diversity objectives. Reflecting back, the BBC reported that it had achieved a workforce that was 13.4% BAME, which was above the Census and general workforce figures (12.9% and 11.3%). It also noted the importance of collaborating with organisations outside of the broadcasting sector such as Creative Access, Jobcentres across the UK, the Mama Youth Project and the Stephen Lawrence Trust.

One initiative that has garnered praise has been the BBC's Commissioners Development Programme, which has been running since 2017. The tangible effects of the programme can be evidenced by the fact that some of the scheme's alumni have successfully competed for permanent commissioning roles in the BBC and other top broadcasters. This more integrated step towards investing in the professional development of Black, Asian and minority ethnic personnel over a sustained period (in this case of six months) indicates how 'slower-burning', thoughtful initiatives can make a deep change in terms of how diversity is embedded within an organization to help produce the next generation of creative leaders within the industry. The scheme has its antecedents in the Commissioner Development Programme led by CDN: an executive level initiative involving all the major broadcasters including the BBC, Channel 4, Channel 5, ITV and Sky, and operating across genres including drama, factual and sport (Creative Skillset, 2015). The 2020 A Deep Dive into Diamond Data reports the relative success of Black, Asian and minority ethnic people in getting commissioning roles across the industry, compared to writer and director positions (CDN, 2020).

The BBC has now embedded 'creative diversity' within its structure, recently marked by its setting up of a Creative Diversity Unit (CDU) in November 2019. Currently, the BBC has several initiatives that link to boosting the Black, Asian and minority ethnic off-screen workforce. In 2019, it was announced that the BBC's dedicated Head of Diversity

role would be split into two jobs – the Director of Creative Diversity, and the Head of Workforce Diversity and Inclusion – suggesting a discernible strategic distinction between content/output and workforce apropos of diversity.

The BBC Creative Diversity report (BBC, 2020) states that change is being delivered more slowly off-screen than on-screen. This was followed, in early 2021 by the organization setting out its plan to be the industry “gold standard” for workplace diversity and inclusion. The BBC 2021-23 Diversity and Inclusion Plan, led by the BBC’s Workforce Diversity & Inclusion team, is focused on increasing diversity of the leadership team, boosting career opportunities for people from all backgrounds and overhauling recruitment processes. The plan also proposes an outreach programme focused on those communities currently under-represented in the BBC workforce, and more apprenticeship places offered at mid-career level. The workforce diversity plan, announced in September 2020, is based on a 50:20:12 workforce diversity target: 50% gender, 20% ethnicity (BAME) and 12% disability, to be achieved in the next three to five years.

On a micro level, there is a plethora of current initiatives at the BBC, including a £2m Diversity fund designed to strengthen off-screen representation through ‘tailored investments, talent initiatives and bursaries’ (CDN, 2020), and a £1m Small Indie Fund which includes mentoring and bespoke support packages for independent companies with a turnover of less than £10m. This demonstrates how a single organisation (complex though it is) can simultaneously initiate several diversity-focused policies, including some level of differentiated goals for divisions. This does make evaluation of the BBC’s diversity programmes more difficult, since any publicly available evaluations typically only give an organization-wide overview rather than specific analysis that digs down into the data of a particular scheme or division. The question of who monitors and evaluates the outcome of diversity plans is also significant; at the BBC, diversity action plans have routinely been set and reviewed by management boards and by the corporation’s central Diversity units.

Channel 4 360° Diversity Charter (2015 – present) and a return to anti-racism (2020)

Since its foundation in 1982, with a remit informed by radicalism and a strong commitment to multiculturalism, Channel 4 has adopted a range of approaches to racial diversity. Diversity strategies over the past decade or so have not been limited to race and ethnicity, but also show the organisation’s commitment to gender equality, disability visibility and inclusion, and UK-wider representation and engagement, suggesting an acknowledgement of the single legal framework of the Equality Act 2010.

According to Ofcom (2019), a fifth of Channel 4 employees (19%, compared to 18% in 2017) are from a minority ethnic background, which brings them close to achieving their 20% target for minority ethnic employees across the organisation. The proportion is still higher at non-management level (23%, compared to 21% last year) than more senior positions. Channel 4’s BAME network, The Collective, has focused on the problem of unlocking the potential of the ‘frozen middle’, i.e., middle managers who are the gateway between junior to mid-level employees and leaders in the corporation, and to nurturing the progression of Black, Asian and minority ethnic employees into leadership roles. In 2018, Channel 4 announced its ‘4 All the UK’ strategy, aimed at ensuring that Channel 4 serves the whole of the UK. Through increased spend, boosting representation in the nations and regions, moving jobs and creating new ones, it aims to reflect the full diversity of the UK, on and off screen.

In 2015, Channel 4 launched its 360° Diversity Charter geared towards showing 'leadership in diversity at every level'. Prominently, the Charter also stated that, 'Leadership is about people. It's about all the people who contribute to our content, not just those on-screen' (Channel 4, 2015). Each year, the Channel has reflected on the results of its charter aims and made these reports widely accessible through its website. In its report, 360° Diversity Charter: Three Years On (2018), the Channel reported on what had been achieved and where more effort was needed. It also identified a new need to focus on BAME progression at Channel 4, by enhancing the careers of ten BAME by taking on more senior roles at the channel or within the wider industry. The same report also noted that there had been the first year-on-year decline in BAME employees (one of its target groups for in-house employee diversity targets) which it partially attributed to high staff turnover.

Two recent interventions have been of particular note.

1. The first is Channel 4's return to anti-racist principles which, by its own admission, was a pledge that has been triggered by the death of George Floyd and the BLM movement in 2020. In June 2020, Alex Mahon, Channel 4's Chief Executive, set out the six new principles designed to position the channel as a 'driver of anti-racism'. The pledge includes a clear declaration that the channel is an anti-racist organisation and has a responsibility as a PSB to educate, challenge and drive change against racism; a commitment to strive for BAME equity as an employer; broadcast content that reflects the lives of BAME communities and ensure that this is 'fair representation'. In addition, the pledge includes a new commitment to fair BAME representation in the supply chain and to use its influence as an advertiser-funded broadcaster to ensure BAME representation in advertising. What is especially striking here is the explicit return to anti-racist principles, as opposed to 'creative diversity' ones, and a promise to dismantle the racialised inequalities which prevail in the sector, even within the organisation of a broadcaster that has repeatedly been commended for its diversity credentials.
2. The second is 'Black to Front' or what was originally billed as the 'Black Takeover': a set of 'disruptive' programmes and scheduling in 2021 to enhance careers and transform representations. In collaboration with The Sir Lenny Henry Centre for Media Diversity, the Channel 4 initiative aims to boost visibility, new commissions and 'meaningful off-screen commitments to ensure the day leaves a lasting legacy' (<https://www.channel4.com/commissioning/black-front>). Whilst it is too early to evaluate the impact of either of these two initiatives, it is clear that they are focused on producing real change and re-connecting with the channel's original remit.

ITV Diversity Acceleration Plan (2020)

Ofcom (2019) figures show that in 2018, employees from minority ethnic backgrounds were significantly underrepresented among the ITV workforce at 9%. In 2019, the figure was 10%. These figures are still both below the UK workforce average of 12% and 'for the third year running, the lowest figure amongst all the main broadcasters' (Ofcom, 2019). Data also suggests an issue in terms of levels of seniority, with employees from a minority ethnic background more likely to be in a non-management role (10%) than at a more senior level (8% across senior/middle/junior management). These figures have

improved more recently. Off-screen diversity data gathered by ITV itself shows that BAME representation (as at 31/12/20) is 10.6% of its senior leadership team, 10.1% of managers; and 12.9% of all colleagues. For all three areas, ITV has set a target of 15% to be achieved by 2022.

ITV presents itself as broadcaster with a social purpose. In July 2020, ITV announced its Diversity Acceleration Plan to 'accelerate change' (ITV, 2020). Initiatives have included an increase in investment such as a new Director-level role of Group Diversity and Inclusion (a role that was filled in Autumn 2020). ITV has a network for colleagues from a BAME background called Embrace, as well as an Inclusion and Diversity Council.

On a practical level, it is noteworthy that ITV identified five areas on which to focus and a 12-month timeframe in which to deliver these. It is not always the case that targets are clearly defined in terms of timescale. Nor is it the case that reporting mechanisms are always transparent; ITV has put in place annual reporting against targets, and a Cultural Advisory Council (independent external advisers) tasked with challenging the broadcaster on its inclusion and diversity activities. This is significant because it recognises the need to build evaluation and accountability into the cycle of diversity policymaking.

Amongst the five areas in the ITV Diversity Acceleration Plan is a pledge to improve diversity and career progression in TV production through a 'Step Up 60' initiative with the aim of providing an opportunity for at least 60 people to attain their first senior editorial and production role (this is to be overseen by newly-appointed Creative Diversity Partners). The Acceleration Plan also puts recruitment on the agenda, with a commitment through positive action to directly tackle under-representation at middle management and entry-level. It is interesting to see that one of the pledges also explicitly names 'racism': 'educating and developing ourselves so everyone understands racism and their role in creating an inclusive culture' (ITV, 2020). The Race Forward development programme is identified as a space through which this particular target can be tackled. With a nod towards the value of creating space to hear about lived experiences of racism, ITV launched Black Voices, a series of short films designed to give a platform to share stories on racism and this included the perspectives of colleagues from across ITV.

ViacomCBS 'No Diversity, No Commission' (2020)

Ofcom (2019) figures show that for ViacomCBS (which wholly owns public service broadcaster, Channel 5), employees from minority ethnic backgrounds now make up a fifth of Viacom's workforce, which is closer to the London proportion than any of the other main five broadcasters. Employees from minority ethnic backgrounds remain more likely to hold non-management positions (24%) than management positions (16%). Those in technical, engineering and data analytics (24%) and business management (29%) roles remain above the average across the organisation (20%). However, significantly, the proportion of employees from minority ethnic backgrounds in creative roles has fallen by 10 percentage points to 16% since Ofcom's previous report on diversity and equal opportunities in television (Ofcom, 2018). Of the main five broadcasters, Viacom has the joint highest proportion of employees who are either Black, African, Caribbean or Black British (together with Channel 441), at 6%. However, as the Ofcom 2019 report states: 'Viacom provided no clear and definable targets in key areas of under-representation but reiterated that it was business-critical for it to reflect the society in which it operates and the communities to whom it broadcasts.' (Ofcom, 2019, 62). This signals a wider issue

in the sector of the relationship between the language of diversity and a practice of equality and inclusion.

Viacom has signed up to the Business in the Community's Race at Work Charter and committed to publishing ethnicity pay gap data. In July 2020, it unveiled its new 'No Diversity, No Commission' content policy for its suppliers, which includes the requirement for all new international productions to be made by a diverse team. First launched in the UK, this has now been rolled out to ViacomCBS Networks International (VCNI) which spans 5 continents and 180+ countries. All production companies will be expected to follow these diversity guidelines before budgets are signed off and before productions are greenlit. An explicit directive is that a variety of balanced, diverse voices is also to be involved in all areas of production. The company also agreed to extend the CDN's Diamond diversity data monitoring across all its pay TV brands. ViacomCBS has also announced a new 'Promotion Opportunity Project' to identify and support BAME mid-level freelancers, including gaining skills and experience on prime-time commissions, as well as a BAME talent sponsorship programme to connect senior leaders with 'diverse talent'.

Sky, 20% and 5% by 2025 (2021)

Ofcom (2019) figures show that the proportion of employees from minority ethnic backgrounds who make up Sky's workforce has been between 14% and 16%. The 2019 report showed that the proportion of employees from minority ethnic backgrounds at senior management level and middle/junior management level are 8% and 15% respectively develop not just a language but a practice of equality and inclusion – the latter still exceeding the UK workforce average of 12%. Employees from minority ethnic backgrounds remain under-represented in journalism (11%) and creative roles (10%), but broadcast management has increased to 16%, between the 2018 and 2019 Ofcom reports. There is relatively strong representation in technical, engineering and data analytics (27%) and sales and marketing (16%).

Sky is a signatory to Business in the Community's Race at Work Charter. This comprises five calls to action, which are: appoint an Executive Sponsor for race; capture ethnicity data and publicise progress; commit at Board level to zero tolerance of harassment and bullying; make clear that supporting equality in the workplace is the responsibility of all leaders and managers; and take action that supports ethnic minority career progression.

Many of the broadcasters have seen a renewed drive towards diversity and inclusion since the Black Lives Matter movement accelerated in Spring 2020. Sky has put tackling racial injustice explicitly on its agenda, committing £30m across three years to: improve Black and minority ethnic representation at all levels; make a difference in communities impacted by racism; and use the power of Sky's voice and platform to highlight racial injustice (Sky, 2020). This was followed, in January 2021, by a new set of diversity commitments.

Interestingly, Sky's new workforce targets make a distinction between BAME as a broad category and specific groups within it; across its UK and Ireland business it aims to have 20% BAME representation by 2025, with at least 5% of that target to be Black. The explicit acknowledgement that BAME does not only mean Black and can include many different minority ethnic communities (including White ones) indicates a more nuanced approach to data, target-setting and understandings of what BAME constitutes. Sky has stated that

whilst its Black and BAME statistics (3% and 15% respectively) are in line with or above the UK average of 3% Black and 13% BAME, there are particular inequities when it comes to regional variation and leadership positions being occupied by both Black specifically and BAME more widely. As with other broadcasters such as ITV, Sky has set up a new diversity council to help steer its diversity plans, although it is not clear whether the council will evaluate its new 2025 diversity targets. Sky has also announced a new collaboration with Creative Access (an organisation that provides opportunities for paid internships in the creative industries for talented young people from under-represented BAME backgrounds) to launch 18 new placements for under-represented groups within Sky News, Sky Sport, UK Content and Sky Studios.

Netflix: An 'inclusion lens' (2021)

The production of new programming that seeks to benefit and reflect the whole of the UK has been a vital part of PSB, but PSB is under intense pressure in an increasingly crowded, marketised media landscape, with its many moving parts. Increased convergence of the internet and television has meant that the PSBs are also adapting to Broadcast video-on-demand (BVod) such as iPlayer and IT Hub (free at point of access) as television repositions itself as an on-demand service. Beyond PSB, SVoD players (subscription video-on-demand) including Sky's NowTV, Amazon Prime Video, Disney+, Netflix, are also actively promoting their diversity credentials.

In this complex ecology, the presentation of and motivation for workforce diversity initiatives are likely to be varied, caught up in a tricky negotiation of social and economic goals.

Netflix has published diversity data (quarterly) on its website since 2013. As a US-founded company, it is worth noting that currently close to half of its U.S. workforce (46.4%) and leadership (42.0%, director level and above) are made up of people from one or more underrepresented racial and/or ethnic backgrounds, including Black, Latinx or Hispanic, Indigenous, Middle Eastern, Asian, and Pacific Islander backgrounds. The number of Black employees in the U.S. doubled in the last three years to 8% of its workforce and 9% of its leadership (director level and above). (<https://about.netflix.com/en/news/netflix-inclusion-report-2021>)

Now a key player in the UK TV landscape, the global streamer has become very prominent in developing diversity interventions, including most recently, a large investment in nurturing the next generation of BAME talent. Specific interventions include a £350k fund (part of a \$5m diversity fund) to support 30 year-long scholarships for students at the Identity School of Acting, and collaborations with social enterprises Million Youth Media and the MAMA Youth Project, which recruits and trains 18-25 year-olds from under-represented groups or those with limited educational or employment opportunities. It has also recently set up a UK Documentary Talent Fund and runs a shadowing scheme on the TV drama Top Boy. Anne Mensah, Netflix's Vice President of Original Series recognises emerging, diverse talent but also the need to "do more, not just to support the current generation of British talent, but also to develop a more inclusive pipeline of upcoming creatives across the entire production process."

<https://www.hollywoodreporter.com/news/netflix-uk-diversity-identity-school>

Netflix appears to be being proactive by adopting the idea of an 'inclusion lens', and also in seeking transparency to understand better the outcomes of its inclusion practices. In early 2021, it published its first Inclusion report, which captured figures on the racial representation of its employees. Netflix also commissioned the Annenberg Inclusion Initiative at the University of Southern California to analyse inclusion in Netflix films and series in 2018 and 2019 (Smith et al. 2021). One important finding from the USC Annenberg report is that, in terms of off-screen representation, women of color (the preferred US terminology) were largely absent in creative roles, both on Netflix films and series. Less than 10% of roles across each position evaluated (directors, writers, producers, creators) went to underrepresented women (Smith et al. 2021). This will be a fertile area for the global streamer to tackle and demonstrate its leadership in, potentially inaugurating change across the TV landscape, including in PSB.

Conclusion

There has been a strong level of engagement across the major broadcasters with questions of workforce diversity and internally-set targets are typically met. For most of the major broadcasters, there has been an increase in the racial diversity of its workforce. This may be as a result of diversity initiatives but there are likely to be other factors also at work, including an increasing BAME demographic, more skilled media graduates, and a digital TV ecology that suggests that public service content is itself expanding.

UKTV, a leader in branded television with channels such as Dave, Gold, W, Drama, Alibi, Eden and Yesterday (delivered to audiences through UKTV Play, Freeview, Sky, Virgin Media, BT, TalkTalk, YouView, Freesat and Amazon Fire), joined the Creative Diversity Network (CDN) in late 2020. By joining other 'Diamond broadcasters' such as the BBC, ITV, Channel 4, Sky and ViacomCBS, UKTV's collaboration with CDN signals how the diversity remit is expanding well beyond public service television and is also a nod to how cross-platform and cross-sector initiatives are being formed through an expansive 'creative diversity' agenda. The influence of Netflix in terms of the novelty of its recent diversity interventions, suggests a future broadcasting ecosystem that moves towards more shared models of diversity practice. Recent pledges and declarations by Viacom in terms of the 'No diversity, no commission' approach and Channel 4's '6 part anti-racism plan' indicate a more radical and assertive endeavour to agitate for structural change in the TV sector.

There is still a deficit of publicly available diversity data, a problem that Ofcom, ScreenSkills and Diamond are trying to address.

When we dig down into the available data, it is difficult to discern the relationship between diversity initiatives and clear diversity outcomes.

As indicated in the literature outlined at the start of the report, hyper-visible diversity mission statements are critiqued for being box-ticking exercises that are

too preoccupied with targets and quotas instead of creating an inclusive working environment. Furthermore, there is some ambiguity about the extensiveness and reliability of how data is being captured, as pointed out BECTU's criticisms of Diamond. For PSBs, discoverable data suggests that those from Black, Asian and minority ethnic backgrounds are fairly well represented in the workforce. However, this data could be more granular, for example in terms of identifying which genres and in which sector roles Black, Asian and minority ethnic workers are located. There is a further issue of the independent sector not always reporting effectively.

Ofcom's 2020 report proposes three areas that it would like the sector to prioritise in its future diversity planning that pertains to the specific concerns of Black, Asian and minority ethnic off-screen representation: 1. Critical under-representation of Black colleagues in crucial decision-making roles such as senior management and employees in commissioning, content and creative roles; 2. Understanding class and geographic diversity, for example in how characteristics such as ethnicity interact with class and geography, and 3. Accountability where broadcasters are 'to be accountable for delivering not just diversity initiatives but real change' (Ofcom, 2020, p. 4). This point about accountability is crucial. Ofcom (Ofcom, 2020) suggests setting clear measurable workforce targets and diversity and inclusion objectives, with tangible outcomes; undertaking better, more transparent, evaluation of work designed to produce change, so that efforts can be focused, and results accelerated; and holding production partners to account for meeting diversity requirements. Significantly, whilst Ofcom has taken up the task of monitoring diversity, it conceded in its latest report (2020) that there are issues with evaluation and that they. "are disappointed that generally broadcasters did not provide a detailed response" to the question of how they evaluate their initiatives and outcomes, thus creating "a barrier to demonstrating the transparency and accountability which our diversity monitoring and reporting aims to increase" (Ofcom, 2020, p. 26). This is an important determination that chimes with the analysis presented in this report.

9. Report Recommendations

1. Nuancing Language:

- The industry should acknowledge and understand the differences in policy-making between diversity and anti-racism, recognising that initiatives over the last twenty years have not responded to the widespread presence of racism nor presented their policy aims in ways that recognise the experiences of Black, Asian and minority ethnic people in UKF&TV.
- Notwithstanding their adherence to the Diversity Standards, both BBC Films and Film Four should undertake and make public an independent external review of their anti-racism policies and approaches within their organisational structures, workforce and productions. This should include data that can be made publicly available.

2. Data:

- The industry should develop much more expansive data sets which capture the nuances and variables across identities and production modes, to enable more informed policy decisions in the future. This includes capturing data on freelance labour, regional variation, and workers' organisational/production positions and levels of seniority.
- The industry should commit to and demonstrate how they will complement quantitative data approaches with qualitative ones, including the use and value of anecdotal evidence from Black, Asian and minority ethnic workers in UKF&TV. This will facilitate deeper understandings of the lived experiences of inequality, discrimination and racism, allowing for structural answers to those problems to be developed that do not place the burden of change back on to Black, Asian and minority ethnic people.

3. Evaluation and accountability:

- UKF&TV organisations should ensure that diversity initiatives are robustly evaluated, at least annually, and in a timely fashion. Such evaluations need to be made easily accessible and open to public scrutiny through approaches such as open-sourcing data.
- The industry should undertake a holistic rethinking of the legitimacy and efficacy of current 'skills and training' approaches to inclusion, with greater consideration of the duration, destinations, career progression, attrition and age ranges of the participants.

4. Leading the agenda:

- The Department of Digital, Media, Culture and Sport (DCMS) should take a more dynamic role in the racial equality agenda in the screen industry, for example by ensuring that film organisations in receipt of public resources are fully transparent with data collected across their schemes and programmes in relation to range of protected characteristics specified in the 2010 Equalities Act.
- The DCMS should ensure that resources are available for UKF&TV organisations specifically to carry out vital racial equality policy activities, including monitoring, data capture and evaluation and its public dissemination.

5. Cross-sector collaboration:

- In addition to quantitative data, there is considerable scope to develop qualitative understandings of the relationship between diversity and the UKF&TV sector. This could include collaboration with individuals, advocates and community groups who have lived experiences that might help better inform how practices of equality and inclusion are developed.
- The industry should demonstrate a greater commitment to the examination and evaluation of their policies towards racial equality by developing stronger and more transparent relationships with external researchers, particularly those from academia, to ensure the objective and uncompromised analysis of policy approaches and data.
- UKF&TV organisations should expand the current scope of their partnerships with UK Higher Education institutions and degree programme to ensure that the benefits of these partnerships are evenly distributed across a number of non-elite institutions that are located in areas of the UK that capture students of colour, particularly those from working class and lower-socioeconomic backgrounds. Notably, the recent launch of The Early-Stage Access and Diversity Accelerator Programme, a collaboration between the BFI and the National Film and Television School, is an example of how the diversity agenda is informing attempts to make screen education more accessible. Existing and future industry/HE collaborations should seek to expand the reach and breadth of these partnerships towards less established and resourced institutions and degree programmes.

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Nwonka is currently writing on the political economy of diversity policy within the UK film industry, neoliberal aesthetics in contemporary black cinema and the representation of the white working class in American Independent Film. His monograph on the aesthetics of British urban cinema will be published by Bloomsbury in early 2021. Nwonka is also co-editor (alongside Dr Anamik Saha, Goldsmiths) of the second iteration of *Black Film British Cinema* through Goldsmiths Publishing/MIT Press and the ICA. He is also the Principal Investigator on the project 'The Colour of Diversity', a major 3-year AHRC funded study on racial inequality in the UK film industry that will conduct a data-led analysis of the BFI's Diversity Standards.

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