

# **WFTV comments on the Ofcom Review of the Television Production Sector consultation document**

## **1 Executive Summary**

Women in Film and Television (WFTV) shares Ofcom's view that diversity has a key role to play in the television production sector, both in terms of input into the production of programmes and the resulting programming output.

As a women's organisation, our specific focus is on gender-related issues. However, we believe that a mixed and diverse culture is essential for a healthy, inclusive, balanced society and thriving and vibrant economy.

To achieve this, the television production sector should be one where men and women of backgrounds have equal status and make equal contributions at all levels of the production chain - from creative and technical production through to board-level policy decision-making.

Only when this is achieved will the television industry and its output reflect accurately the viewer and consumer needs and choices in our society.

In this document we set out the areas of specific concern to WFTV, namely the need for accurate recognition and reflection of women's role in the 21<sup>st</sup> century and proactive policies to ensure that women in television are enabled to participate on equal terms with their male counterparts.

This is a timely debate with two recent Government-led initiatives to redress the gender gap and we encourage Ofcom to take the initiative by making diversity of gender a central tenet of the industry it regulates through the introduction and monitoring of specific measurable obligations.

## **2. About Women in Film and Television**

WFTV is a non-profit making membership organisation open to women with at least one years' professional experience in any aspect of the film, television or digital media industries. Founded in 1990, WFTV exists to protect and enhance the status, interests and diversity of women in the industry and aims to provide training and support for the professional development of our members. Since its inception, WFTV has established itself as a respected industry body, with a membership of some 700 women drawn from a broad spectrum of film and television professionals. WFTV (UK) is part of WIFTI (Women in Film & Television International), an umbrella organisation linking all other chapters in a global network.

We are also the only gender-related organisation in the industry and as such are the central mouthpiece and lobbying point for all issues relating to women, working closely with government and public bodies.

## **3 Introduction**

We support Ofcom's observation in its consultation document on the television production sector that diversity (in all its forms) is "important not just in programming

output, but also as an input to the production of programmes”, and welcome the opportunity to address the issues relating to one aspect of diversity, that relating to gender.

We believe that insufficient attention is being paid to the role of women in the television industry itself and also in their on-screen portrayal, and that this has significant social and economic implications.

In this response, we will address the two specific questions that Ofcom raises in connection with Diversity, relating to the interests of TV viewers and citizens and the link between viewers’ interests and diversity of production. We will then address a third area, that of recent government-backed initiatives that have given the debate about gender diversity a new urgency.

#### **4. The interests of viewers as consumers and citizens**

*Section 2, Question 1 asks: “Do you share the view that Ofcom’s focus in the TV production sector should be on furthering the interests of viewers as consumers and UK citizens?”*

WFTV supports the view that Ofcom, as the regulator, should be focused on ensuring that the TV production sector furthers the interests of viewers as consumers and citizens.

Since women make up over half the population it is important that their interests are measured and known, and also reflected in broadcast output. We have identified two key areas that need addressing: women as viewers, and the portrayal of women by and on television.

##### **Women as viewers**

Women are an important constituency of every sector of the viewing public.

Ofcom has carried out impressive research into all aspects of the industry it regulates, including for this consultation into the independent production sector. However, we note that the research that Ofcom has carried out in the past rarely includes information about gender. For example, the research into the importance of television and the audience’s opinions and perceptions in Public Service Broadcasting does not contain any analysis which takes gender considerations into account.

We would therefore welcome the extension of all future Ofcom research projects which investigate audiences or employment to include a gender dimension to ensure that the opinions and interests of both sexes are clearly measured, and in particular to include the carrying out of gender impact assessments on its research plans, particularly those which examine audiences, employment or other relevant issues. This would also ensure compliance with new general Gender Equality Duty that will require that services are designed with the specific needs of women and men in mind (see section 6).

## Portrayal of women on television

Whereas a great deal of information is collected about gender differences in viewing habits for advertisers and programme makers, there is little research carried out about the portrayal of women, except in academic circles.

Recent research carried out into news media showed that the portrayal of women in this sector was not good. The Global Monitoring Project<sup>1</sup> published a snapshot of gender in news media on one day across 76 countries in 2005. The invisibility of women was a common theme throughout, including in the UK. Women appeared in, or were the subject of news stories in television much less than men: when they did appear they were usually there as celebrities or in some kind of decorative role; the stories they appeared in tended to be 'softer' news stories, or they were there as presenters, reporters or contributors; and professional women appeared much less than professional men. News, the so-called 'mirror on the world,' was not seen as giving an accurate portrayal of the role that women now play in society.

Television has been identified as the most important source of information about politics and news, but the audience is receiving a skewed picture of 21<sup>st</sup> century women. This also has an impact in other countries: UK television news and current affairs is internationally respected and professionals from other countries are trained by the BBC. Our UK news values and methods are emulated by other cultures and thus whatever is portrayed in our media influences more than just our own society.

The recent Women and Work Commission report "*Shaping a Fairer Future*"<sup>2</sup> also addresses the issue of the image of women in the media, and makes the specific recommendation that: "*Government information campaigns should show women in occupations not traditionally taken up by them, and men as parents and carers. The media, in particular drama and advertising, should be encouraged to do likewise. The DCMS should set up two high-level groups of advertisers and key players in television drama to encourage non-stereotypical portrayals of women and men at work.*"

We believe that Ofcom has an important role to play in making sure that the voice of women is heard. A first step towards ensuring this would be to gain a better understanding of the different ways in which men and women are portrayed across television output.

We would therefore welcome the instigation by Ofcom of research into the portrayal of men and women sector by sector, in news and current affairs, factual programming and fiction in the UK by regulated licensees.

### **5. Relationship between viewers' interests and diversity of production**

*Section 2, Question 2 asks: "Do you agree that Ofcom's assessment of the role of diversity in its different forms is an appropriate framework within which to think about the links between viewers interests and diversity of production?"*

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<sup>1</sup> "*Global Monitoring Project 2005*", World Association for Christian Communication (February 2006)

<sup>2</sup> "*Shaping A Fairer Future*", Women and Work Commission (February 2006)

WFTV agrees with Ofcom that the television production sector can best fulfil its audience interests by delivering diversity both in television programming and in the input to the production of programmes.

Ofcom's definition of diversity in the consultation document as an input to production is:

- i Diversity of social, cultural and geographical perspectives (whether location, ethnicity, gender, lifestyle)
- ii Diversity of corporate scale and structure (in-house or external, large or small)
- iii Diversity through a plurality of players in the market,
- iv Diversity of channels
- v Diversity of commissioning within channels.

As a women's organisation we are particularly focused on definition (i), the diversity of social and cultural perspectives, which we interpret as encompassing equal opportunities for all, and including the promotion of gender diversity, both in the workforce and in programme output. However, we also believe that the pursuit of definitions (iii) and (v) may also have the best chance of being achieved by the proactive encouragement of a more diverse workforce, including more women at all levels, in the television production sector. This will, we believe, result in more vibrant and creative broadcasting.

We have identified three key areas that should be addressed in order to ensure genuine gender diversity in the sector. These are: employment practices in the industry in general; the role of women in the boardroom; and redressing gender imbalances in creative and technical areas.

### **Employment practices and gender diversity**

The Women and Work Commission report "*Shaping a Fairer Future*"<sup>3</sup> shows that, in spite of the Equal Pay Act, women are still disadvantaged in their working lives and the gender pay gap is still wide. Women account for more than 50 per cent of the population and are a vital resource for the UK economy. It is crucially important that their abilities and talents are used to their maximum potential for the future health and wealth of the UK. This is particularly important in film and television where to deny women equal opportunities is to discriminate against them both directly in employment and indirectly to pass on this discrimination to women as viewers.

WFTV has become increasingly concerned that gender (in) equality is no longer considered to be an issue that affects the television industry. Cultural diversity is increasingly taken to mean ethnic diversity only and does not include gender diversity. Gender seems to have dropped off the agenda.

In the film and television industry women continue to earn less than men across all income brackets. More women than men are earning less than £20,000 per annum and more men than women earn more than £50,000 per annum. Female-dominated areas such as costume, makeup and hair have a lower value placed upon them than those that are traditionally male, such as camera, sound and lighting. Further, there is little transparency about pay in our industry, and even women in high-level jobs can earn less than their male peers. Among freelance workers, who account for an increasingly large proportion of the workforce, women are also doubly discriminated against in terms of hours and conditions with inadequate and expensive childcare.

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<sup>3</sup> *ibid*

Skillset research into the workforce in audiovisual media<sup>4</sup> shows a high drop-out rate among women during their thirties. A significant proportion of this is likely to be attributable to women who stop working to have children and do not return to work in the sector. There is also evidence that those women who do leave the industry while caring for children have difficulty in returning to work at all or in resuming their careers where they left off. This results in a lack of experienced women at the top-level in many sectors and the loss of a large and experienced section of the workforce. This is detrimental to the individuals concerned, but the loss of so many skilled workers also has serious financial implications for the industry which has invested time and money in their training. It is vital for the future health of the industry that these women are actively encouraged to return to work.

Under the terms of The Communications Act 2003, Ofcom has responsibility for setting out conditions which it thinks appropriate to require licence holders to promote equal opportunities in employment and training. A policy for equal opportunities is a condition of the licence fee but the ways in which the licensees interpret this is voluntary.

We note that the Equal Opportunities Toolkit for Broadcasters which was published by Ofcom last year to help broadcasters promote equal opportunities in television concentrates on ethnicity and disability. The section on monitoring, for instance, does not suggest ways to monitor gender, a dimension of diversity which is relevant across all cultural diversities.

We would welcome the assumption by Ofcom of specific gender duties, including an on-going monitoring role and requiring licensees to adopt transparent and verifiable employment practices and where relevant comply with verifiable targets or objectives with regard to gender, as well as any general duty under the Gender Equality Duty. Such leadership from Ofcom to the television production sector would demonstrate a proactive commitment to promoting gender diversity in employment and training equally with ethnicity and disability.

We believe that it the promotion of diversity cannot be left to the voluntary networks alone, such as the Cultural Diversity Network and the Broadcasting and Creative Industries Disability Network, and that a 'light touch' approach will not ensure that diversity is given sufficient priority within the industry. This is particularly important for gender which is not covered by these voluntary networks, and broadcasters do not have networks specifically for gender issues.

We would therefore encourage Ofcom to take a proactive role in encouraging the industry to promote diversity.

WFTV notes the creation in 2005 by Ofcom of the Broadcast Training and Skills Regulator (BTSR) to address training practices in the industry.

We would welcome the introduction by Ofcom and/or the BTSR of an initiative to ensure that all industry training courses are evaluated by means of gender impact assessment in trainee selection and the content of courses.

We would welcome the encouragement by Ofcom and/or the BTSR of a data collection programme to monitor women and employment patterns in the industry.

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<sup>4</sup> "Skillset Annual Employment Survey of the Audio Visual Industries 2004", Skillset (2004)

We would also welcome the encouragement by Ofcom and/or BTRC of specific training for women to redress imbalances of women in technical, creative and management areas (see below).

## **Women in the Boardroom**

In January 2006 WFTV looked at the makeup of boards of the top 50 independent production companies listed by *Broadcast* magazine and found that overall women made up about 25 per cent of the board directors. However, this figure is misleading. The boards of larger, more powerful companies had proportionately fewer women than the smaller companies, several of which had been set up by women. Whereas the number of women in senior management positions is increasing, this is not reflected in the composition of the boards.

The business case for increasing the number of women on boards has been made forcefully. Maarten van den Bergh, chairman of Lloyds TSB, has pointed out that boards that have diverse membership are more successful than homogenous boards at problem solving and are more responsive to their markets. Derek Higgs made this point again, very clearly, in his 2003 report on company management and the make-up of boards.<sup>5</sup> Professor Amin Rajan's report "*Harnessing Workforce Diversity to raise the Bottom Line*," shows that in a sample of 500 companies, 40 per cent said that productivity had increased as a result of diversity initiatives.<sup>6</sup>

Boards are the driving force of a company and also provide role models for the rest of the company. We therefore believe it is critical that women's representation on television company boards is increased.

We would therefore welcome the encouragement or incentivisation by Ofcom of media companies to appoint more ethnically and gender-balanced boards.

## **Gender Imbalance in Directing, Screenwriting and the Technical Crafts**

### Directing and Screenwriting

There is a significant gender imbalance in both these areas. A spot survey in 2003 carried out by Freshminds, commissioned by WFTV, into 10 prime-time UK dramas during one week's transmissions showed that the percentage of female director's was only 15.4 per cent and the percentage of female writers only 24.6 per cent. And these are programmes which have a high percentage of female audiences. WFTV has, in partnership with other interested parties, developed several initiatives to address specific imbalances in the film industry. In particular:

- Working with UIP, we have developed Directing Change, a mentoring scheme which finances women directors to work alongside an experienced and internationally established director on a big feature film production.
- Working with the UK Film Council, we have developed a scoping study to look at the lack of women scriptwriters in the UK and possible reasons for this.

We would welcome the opportunity to work in association with the BTRC or other appropriate body to set up similar programmes for the television industry.

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<sup>5</sup> "*Review of the Role and Effectiveness of Non-Executive Directors 2003*", Derek Higgs, DTI

<sup>6</sup> "*Harnessing Workforce Diversity to raise the Bottom Line*", Professor Amin Rajan (2005)

## The technical crafts

There are significant gender imbalances in the technical grades such as camera, sound, lighting, and special effects. This is clearly shown in the Skillset Annual Census<sup>7</sup> and over the three years the Census has taken place there has been little improvement. The Women and Work Commission report, 'Shaping the Future'<sup>8</sup> makes several recommendations as to how girls and women might be attracted into non-traditional areas of work at school and in higher education. These are designed to attract females into technical grades when looking at careers in the media, in the same way that the building and engineering trades have recruited more women by going to the grassroots. But there is also a strong case for positive discrimination when selecting candidates for training, particularly in these technical areas.

This year WFTV, in partnership with Skillset and UIP, has extended the principle of Directing Change by setting up a new mentoring scheme called Technical Change. This aims to place up to six talented individuals with leading professionals in lighting, camera, special effects and post-production over the next two years.

Again, we would welcome the opportunity to work in association with the BRSR or other appropriate body to set up similar programmes for the television industry.

We would welcome the encouragement by Ofcom of industry bodies to take the lead, where necessary, in changing those cultural attitudes which still make it difficult for women to work in those parts of the industry which are still male-dominated.

We would further welcome the encouragement by Ofcom/BTSR of tracking studies to find out why graduates of training courses do not stay in the industry. This would help expose unhelpful and/discriminatory practices, where they exist, and provide useful comparisons by gender.

We would also welcome the encouragement by Ofcom/BTSR of the principle of special subsidy for the training of women in the technical, writing and directing areas where there is a definite gender imbalance with additional financial support for eligible women who require assistance with childcare. Responsibility for childcare remains a predominantly female issue and women need help to cover childcare costs when training or re-training. This is particularly relevant for work returners, and the cost of providing such assistance may be offset by the additional value to the industry of being able to tap into this valuable but under-utilised resource.

## **6. Other relevant developments**

In the sections 4 & 5 we have addressed the specific questions raised by Ofcom in its consultation document.

Since this consultation was launched there have been two Government-led initiatives which have brought gender into the spotlight and which present an opportunity for Ofcom to strengthen its own obligations for the monitoring and regulation of gender, and also to place itself at the forefront of a movement to redress the imbalance which still exists between the genders in the television - and wider broadcasting - industry.

In brief, these initiatives are:

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<sup>7</sup> "Annual Census 2004", Skillset

<sup>8</sup> *ibid*

- The Equality Act sets out a general Gender Duty which will require all public authorities to pay due regard to promoting gender equality and eliminating sex discrimination. This means that service providers and public sector employers will have to design services with the different needs of women and men in mind. Some public bodies will have to comply with extra specific duties.

The Government has not yet replied to the consultations so far on what these specific duties should be. A Code of Practice which will interpret these duties needs to be drawn up and the Equal Opportunities Commission (EOC) is at present publicly consulting on this Code and the special gender duties on behalf of the Government.

The EOC has also set out some special duties which it would like to be included in the Duty. This consultation lists the public bodies subject to special duties and Ofcom is not yet listed.

Some of the suggested special duties for public bodies are:

- to identify gender equality goals and draw up an action plan showing the action it will take.
- to set and publish gender equality goals and action plans,
- to monitor progress and publish annual reports on progress
- to review the gender equality goals and actions every three years.
- to conduct and publish gender impact assessments of its policies and strategies.
- to take action to address the causes of the gender pay gap.
- to encourage strategies to bring more women onto the boards of companies

The Women and Work Commission Report "*Shaping a Fairer Future*" makes many recommendations to promote equal opportunities for women in employment through strategies such as job sharing, flexible working, equal pay reviews, better careers information and special training for women returners. These are all relevant areas to address the gender gap in our industry.

We would welcome a decision by Ofcom to opt to become one of the listed public bodies which will comply with specific as well as general duties towards gender and to work, together with the licensees, to fulfil them. The decisions that Ofcom makes affect society as a whole and it is essential that it follows the latest and best practice in diversity. In addition to adopting these duties internally, Ofcom should also extend these best practices to the industries it regulates, in particular television.

We would further welcome the adoption by Ofcom of equal policies towards gender as it does towards ethnicity and disability, and extension of this best practice to the industries it regulates.

## 7. Conclusion

We believe that the concurrence of Ofcom's consultation on its review of the television production sector with these two recent Government-led initiatives make this a particularly timely debate on gender diversity, and creates a unique opportunity for Ofcom to play a leading role in addressing once and for all the issue of gender diversity in the television industry.