



BIRMINGHAM CITY
University

BBC CREATIVE DIVERSITY COMMITMENT

**A report on the impact of the BBC's
£112 million Creative Diversity Commitment**

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EXECUTIVE SUMMARY

This report, commissioned by the BBC, presents a research review of their £112 million Creative Diversity Commitment which was launched in April 2021 and ended in March 2024. Specifically, the BBC asked the Sir Lenny Henry Centre for Media Diversity (LHC) to review aspects of the commitment and related matters, such as the impact of the £112m commitment on under-represented talent and diverse production, the external messaging about it and lessons the BBC could draw for the future.

Through desk research, a survey, interviews with both key stakeholders and academics, and secondary analysis of the data available from the BBC, the research team of the LHC obtained findings and reached conclusions that provide well-grounded support to the following series of recommendations on how the BBC should best design, promote, implement and monitor future investments.

On Criteria

1. Any new commitment criteria need to support the development of diverse leadership and, more specifically, diverse company leadership in radio and production leadership in TV, as these were the criteria least met in the £112 million Commitment 2021-2024. We recommend that it be mandatory for these to be one of any requirements needing to be met in radio and TV respectively in order to qualify for future investments.
2. As part of a commitment to supporting greater diversity in leadership and senior roles, we recommend improved and systematic opportunities for networking and mentoring, as well as a mechanism for companies to demonstrate their progress in leading, senior and middle-ranking roles being taken up by a diverse workforce.

On Communication

3. Any new commitment criteria drawn up needs to be clearly expressed and communicated more systematically, particularly to the industry groups being targeted. Part of that expression needs to explain how their implementation will be monitored and reported.
4. Where commissions meet the criteria, the involved companies and production teams should be informed, including which criteria they met. Where titles do not meet the criteria, information and/or advice to be provided to production companies so that they can progress towards meeting the criteria in their new productions.

On Funding

5. While bearing in mind that the commitment was not a new fund, we draw the following two-fold recommendations on implications for future funding:

first, there should be additional ring-fenced funding - possibly genre-specific to build capacity and support development.

and second, there should be a requirement that commissioners continue to use diversity criteria as part of their usual decision-making processes for all programmes.

On Measurement and Transparency

6. To be more effective and transparent, we recommend that metrics for any future commitment have greater detail and context. Namely, a total number of titles to compare with those qualified, focusing on genres and commitment criteria, as well as the specifics of company or production leadership in order to see the segmentation, and the correlation between diverse-led indies and new programmes - for instance, whether individual titles or series, the spend on this genre compared to the other genres, etc.
7. We further recommend that these baseline and ongoing metrics be systematically reviewed and published – on a 6-monthly or yearly basis - with as much granular detail on the protected characteristics as possible. This will enable future commitments and other creative diversity investments to respond in a timely manner to the needs and gaps of the industry.
8. Additional monitoring to bolster self-reporting should be in place, post-commission, where this is not currently the case, so as to track any leadership changes or developments which occur within production companies and teams on returning commissions. This will help to monitor future impact of the commitment for the wider industry.

On Widening the Net

9. We recommend that the BBC identifies and encourages new production companies and teams that commit to creative diversity, offering opportunities for them to see possibilities for future development and collaboration. The BBC should, therefore, target a wider group of companies and production team in their communication and events when launching future creative diversity investments or initiatives, but also initiate wider consultation and advice to companies and production teams earlier in the process, when planning, preparing or designing such initiatives or investments.

INTRODUCTION

This report, commissioned by the BBC, reviews their £112 million Creative Diversity Commitment which was launched in April 2021, had a 3-year duration (2021-2024) and, hence, it came to a close at the end of March 2024. The remit is specifically to review how the BBC's Commitment has been received by the production sector and whether it has established a legacy for continued impact. This review report presents quantitative and qualitative data that the Sir Lenny Henry Centre for Media Diversity (LHC) collected through a survey and interviews with key stakeholders, as well as through the analysis of secondary BBC data on this delivery and implementation of the Commitment.

The Commitment was the result of the BBC's decision to dedicate at least £100m of existing TV commissioning budget and £12m of existing Radio commissioning budget to cover diverse broadcast content. According to [Jessica Schibli, BBC Head of Creative Diversity](#), "the Commitment is the biggest financial investment in on-air inclusion in the industry" and "within the first two years the BBC had invested a total of £128.5m into TV and Radio content – exceeding the original creative diversity commitment."

The Commitment was launched amid a context of fast developments in the sector, wherein concerns about measurement and accountability of diversity in the media sector, as well as calls for transparency in reporting of diversity by Marcus Ryder at LHC and Simon Albury, from the Campaign for Broadcasting Equality, were quite prominent. In the phase of the Commitment's inception and design, in 2020, the BBC established its criteria and definitions with some feedback from the LHC. As a result, the BBC set out the following three criteria for a production company to qualify for a commission from the Commitment. The minimum requirement is the company for its commissioned programme to meet two of these criteria:

- Criteria 1: Diverse Content: Stories and on-screen portrayal. This aimed to promote diverse representation with regard to all protected characteristics.
- Criteria 2: Diverse production leadership, concerning influential roles off-screen, shaping and making the programmes. The requirement is at least two people in key creative decision-making roles on the production to be B.A.M.E, have a disability or have come from a lower socio-economic background.
- Criteria 3: Diverse company leadership, concerning senior roles in the company, setting and delivering strategic direction. The requirement is at least two individuals in leadership roles in the company are B.A.M.E, disabled and/or have come from a lower socio-economic background for a minimum of six months.

Each of these criteria was underpinned by detailed definitions set out in official communication materials.¹ In its [Diversity Commissioning Code of Practice Progress Report 2020/21](#), the BBC explained how it would record and track progress on the implementation of the Commitment and stated the introduction of self-declaration forms in BBC PITCH where companies could share their information as for the diverse-led criteria of the Commitment. The Commitment and its criteria essentially came to rest on the foundations of the BBC Diversity Commissioning Code of Practice, which, according to the BBC, in the same 2020/21 progress report, provides “us with an opportunity to analyse our effectiveness and impact. We are able to assess progress and identify any key areas for improvement” (p.4). In this sense, the Commitment should be seen within a broader context of developments within the BBC and across the sector (as presented in detail in the “Literature Review” part of this report) and within the vision of the BBC to pursue the [5 principles of its 2018 Commissioning Code of Practice](#): 1. BBC Commissioners will lead by example; 2. Portrayal should be authentic; 3. Casting should be open and fair; 4. A diverse workforce makes better content; 5. Measurement (of compliance with the Code on an annual basis).

The report begins with a critical review of the context within which the commitment was designed and launched, also overviewing other, similar initiatives in the sector, as well as with an appraisal of the communications around the commitment and the reactions to or even critiques of it. Then, the report continues with analysis of the BBC data on delivery and implementation of the commitment, which is followed by sections on the analysis of the primary survey data and of the interview data the LHC researchers collected. The methodological details for the collection/analysis of each dataset are provided at the outset of the relevant section.

Focusing on industry impact, the LHC researchers close this report with: a) conclusions on whether the BBC’s 3-year Commitment has had an impact on companies and producers of diverse content and b) with a set of recommendations on how best the BBC can accelerate the pace of change for improved access for underrepresented production talent, particularly in leadership roles, in the future.

¹ See, for example, at <https://www.bbc.com/creativitydiversity/investment/home>

LITERATURE REVIEW

This literature review aims to review the context within which the BBC committed to spend £112 million on diverse and inclusive television and radio content over three years (i.e., 2021/22 to 2023/24), thus appraising the diversity and inclusion policy landscape up to the time this investment was announced. Also, this review presents the communications around the commitment as well as the reactions to and critiques of it.

To develop this review, we have drawn upon a range of literature materials, among which academic and open access literature, alongside internal and external BBC communication material. Reports and documents on government policy for public broadcasters have also been examined. The review begins with an overview of key developments on media diversity in the period 2003-2020, with respect to the BBC and other broadcasters and then it continues with an overview of communications around the commitment and related reactions and critiques.

Developments on media diversity in 2003-2020

Key timelines

In 2003, media diversity was enshrined in the [Communications Act, Section 337](#) of the Act required Ofcom to include conditions in radio and television broadcasters' licences obliging licensees to make arrangements to promote equal opportunities in employment on the basis of sex, racial group and disability. Section 27 of the Act placed a further duty on Ofcom to promote equal opportunities - Good EDI practices should include provisions for other protected characteristics in the Equality Act 2010 as well as for socio-economic background.

Then, in 2009, diversity was prioritised by the establishment of the [Broadcast Training & Skills Regulator \(BTSR\)](#). BTSR was renamed (BETR) Broadcast Training and Equality Regulator. Then, in 2010, BETR was dissolved by Ofcom and the [Equality Act](#) was announced. The Act legally protected people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations.

Five years later, in 2015, Ofcom produced new diversity and inclusion guidance with the Equality and Human Rights Commission, called '[Thinking Outside the Box](#)'. A year later, in 2016, Ofcom restarted its annual monitoring of diversity in the television and radio industries. In the same year, workforce diversity was explicitly written into the renewal of the BBC Charter. The BBC's [Charter](#) required the BBC to reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions. Ofcom set a number of diversity-related conditions in the BBC Operating Licence, including a requirement to produce a Diversity Commissioning Code of Practice and to report to Ofcom annually on compliance with this code of practice.

Later, in 2017, Ofcom launched an annual monitoring scheme designed to hold broadcasters to account on diversity called [Diversity in Broadcasting](#). The scheme was intended to gather a wide range of equal opportunities data across the broadcasters it regulates, thereby enabling Ofcom to get a more comprehensive picture of what broadcasters are doing to promote and encourage diversity. In the same year, the [Creative Diversity Network](#) launches the first report of the Diamond Project² titled, “[The First Cut](#)”.

A year later, in 2018, the BBC launched its Diversity Commissioning Code of Practice. This Code of Practice set out several equality, diversity and inclusion commitments such as the directives and protocols for commissioning content to ensure that all communities across the UK are accurately portrayed and represented. This code aligns with Purpose 4 of the BBC [Charter](#):

“To reflect, represent and serve the diverse communities of all of the United Kingdom’s nations and regions and, in doing so, support the creative economy across the United Kingdom.”

The Code included a commitment to diversity of age, disability, gender reassignment, race, religion and belief, sex, sexual orientation and socio-economic background. Moreover, diversity at entry level has been emphasised. The Code of Practice outlined that the BBC would only work with content makers outside of the organization who have prioritised diversity and inclusion policies and have them in place and practice.³ In the same year, 2018, the Creative Diversity Network published the second report of the Diamond Project titled, “[The Second Cut](#)” and in 2019 the third report of the Diamond Project titled “[The Third Cut](#)”.

A landmark was the year 2020. After the killing of George Floyd in the United States in May 2020, the Black Lives Matter movement gained global traction, especially in the United Kingdom. Companies were also quick to rally behind the cause with statements of support as well as financial pledges to the movement and civil rights groups ([BBC, 2020](#)). Industry experts called for more systematic reports and data collection with diversity and inclusion. In that year, the Creative Diversity Network publishes the fourth report of the Diamond Project titled “[The Fourth Cut](#)”. Also, in their 2019/2020 ‘Diversity and equal opportunities in television and radio’ report, Ofcom [set targets for broadcasters](#): “During the next twelve months we particularly want to see progress on the critical areas of under- representation (including disability), an increased understanding of the role of class and location, and greater evidence of senior broadcasting staff taking accountability for tangible improvement.” Key outlined areas in the report included: addressing critical areas of under-representation; making progress on disability; diversifying decision-makers; getting better data and using data better; understanding the role of diversity of class, and national/regional diversity. Ofcom also stated that they expected broadcasters to: increase accountability; set clear and measurable workforce diversity targets and diversity and inclusion objectives with; tangible outcomes; undertake better evaluation of work designed to produce change; and hold production partners to account.

² The Diamond Project has been run by the Creative Diversity Network (CDN) and has aimed to capture diversity and inclusion data.

³ The latest BBC Diversity Commissioning Code of Practice Progress Report annual report is due the financial year 22/23 and is available at <https://www.bbc.co.uk/creativitydiversity/documents/bbc-diversity-code-of-practice-2022-2023.pdf>

Below, there are two figures. The one on the left (Figure 1), taken from the BBC Diversity Commissioning Code of Practice [2019/2020](#) progress report, presents the on-screen and off-screen diversity before the commitment in 2020. The one on the right (Figure 2), taken from the BBC Diversity Commissioning Code of Practice [2021/2022](#) progress report, presents the on-screen and off-screen diversity they year after the commitment in 2021. The figures show that between 2020 and 2022, there was an increase in B.A.M.E on-screen and off-screen diversity.

Figure 1: On and off-screen diversity – April 2019 to March 2020 Figure 2: On and off-screen diversity 2021-22

Actual on and off-screen diversity: 1 April 2019 to 31 March 2020
Data provided from contributions by individuals who have a role in eligible programmes.

	Actual off-screen	Actual on-screen	Perceived on-screen
Female	54.7%	55.7%	46.2%
BAME	9.8%	26.8%	23.0%
Disabled	5.8%	8.4%	5.2%
LGB	12.1%	11.5%	6.1%
Transgender	0.2%	0.4%	0.1%
Number of contributions*	220,358	78,576	480,696
% for whom diversity characteristics were determined	–	–	89.3%

* An individual may make multiple contributions to a programme or programmes

BBC Diamond Data for the 2021/22 Financial Year – representation achieved on and off screen

	Off screen	On screen
Female	54.5%	53.6%
Black, Asian and Minority Ethnic	10.5%	27.9%
Disabled	7.4%	8.9%
LGB	12.6%	12.9%
Transgender	0.2%	0.5%
Number of contributions*	260,254	78,493

* An individual may make multiple contributions to a programme.

After various broadcasters made pledges to increase diversity and inclusion in 2020, Ofcom stated the following in the 2019/2020 '[Diversity and equal opportunities in television and radio](#)' report:

The response by broadcasters to the anti-racism protests has signalled that the industry acknowledges the unique role it must play in not only addressing inequality of opportunity for people from minority ethnic backgrounds, but also changing perceptions of inauthentic portrayal of diverse experiences in Television and Radio programmes. In the follow-up to this moment, we believe it is vital that broadcasters take a long-term, sustainable approach to addressing inequality and underrepresentation.

Diversity and inclusion in the media

As established above, developments prior to 2020 such as the [Equality Act](#) of 2010 were significant impetuses for companies and organisations to implement diversity and inclusion plans. However, in 2020, Creative Diversity Network Chief Executive Deborah Williams [said](#):

"In spite of advances, it's clear from the Diamond data that the U.K. TV industry has a long way to go before it is genuinely representative of its viewers, and particularly in the off-screen and senior working opportunities it offers to people from different ethnic backgrounds."

Diamond Project data for the period [1 August 2019 and 31 July 2020](#), indicative figures of which are presented in Tables 1-2, offer a snapshot of the landscape just up to year 2020. The table below shows displays on-screen contributions data during peak television times, that is, any role in front of the camera from 6:30pm-10:30pm. Measured categories include: female; transgender; 50 and over; B.A.M.E, Disabled and LGB. The number of participants in the Diamond Project survey from the BBC total 20,026.

Table 1: On-Screen contributions data from peak television (6.30pm-10.30pm)
Source: Diamond: Full Data Release [The Fourth Cut Report](#)

On-Screen Contributions (PEAK)%	BBC	ITV	Channel 4	C5/Viacom CBS	Sky
Female	49.9%	52.4%	48.3%	41.1%	43.9%
Transgender	0.7%	Redacted	0.3%	Redacted	Redacted
50 and Over	26.1%	20.1%	30.5%	35.9%	35.4%
Black, Asian and Minority Ethnic	21.1%	18.3%	16.9%	16.5%	23.0%
Disabled	7.8%	8.8%	8.5%	7.8%	4.7%
LGB	13.0%	12.5%	12.5%	10.2%	7.0%
Number of contributions	20026	8712	18493	4706	4338

While on-screen portrayal is key to understanding the context of the reviewed BBC commitment, as it constituted one of the BBC's £112 million commitment's qualification criteria, measuring off screen contributions is paramount, especially as off-screen figures tend to be researched less than on-screen portrayals ([Edwards and Moss, 2024](#)).

Table 2 shows off-screen contributions data between [1 August 2019 and 31 July 2020](#). The table displays off-screen contributions data during peak television times, that is as indicated before, any role in front of the camera from 6:30pm-10:30pm. Measured categories include: female; transgender; 50 and over; B.A.M.E, Disabled and LGB. The number of participants in the Diamond Project survey from the BBC total 53,875.

Table 2: Off-Screen Contributions data from peak television (6.30pm-10.30pm)
Source: Diamond: Full Data Release [The Fourth Cut Report](#)

Off-Screen Contributions (PEAK)%	BBC	ITV	Channel 4	C5/Viacom CBS	Sky
Female	53.9%	47.4%	58.2%	51.0%	48.0%
Transgender	0.4%	Redacted	0.6%	Redacted	Redacted
50 and Over	27.0%	23.2%	14.2%	15.9%	32.9%
Black, Asian and Minority Ethnic	8.1%	11.8%	13.9%	13.0%	12.0%
Disabled	6.1%	5.5%	5.5%	5.0%	3.1%
LGB	13.2%	19.8%	14.4%	14.0%	7.6%
Number of contributions	53875	26486	44718	16317	7643

[The 2020 Project Diamond](#) report also revealed that off-screen contributions made by B.A.M.E groups increased from 9.7% to 12.3% in the last three years. However, it was also found that all minority ethnic groups are still making more contributions on-screen than off-screen. This B.A.M.E. increase in on-screen portrayals over the last three years registers at 0.9%, moving from 21.8% to 22.7%. While this is progress, during the same timeframe, on-screen contributions from South Asian groups have fallen by 1.5% - from 7.1% to 5.6% (Creative Diversity Network, 2020).

It was also found that while people who identify as B.A.M.E. are better represented in scripted programmes compared to non-scripted programmes, people who identify as Mixed, Black or Other, are less well represented on-screen at peak times than at other times. Even if in a role on-screen, people who identify as B.A.M.E are more likely to be contributing in a supporting role rather than in a lead role (Creative Diversity Network, 2020).

Creative Network Diversity data from the [Third Cut](#) which was published in the first quarter of 2020, examines senior roles. The report showed that while on-screen representation of B.A.M.E people is improving, contributions to programmes made by B.A.M.E people working behind the camera fall below 10% in most senior roles. Just 2.4% of production executives, 4.4% of series producers, 8.3% of heads of production and 9.3% production managers identify as B.A.M.E (Creative Diversity Network, 2020)

In terms of B.A.M.E. representation in non-senior roles, while 12.8% of the U.K. population was classified B.A.M.E at the time of the report, only camera operators came close to this number, with 12.5% B.A.M.E people represented in this role as seen in the table below (Creative Diversity Network, 2020).

Craft groups

Table 11 Craft groups contributions %

	Camera	Costume & wardrobe	Hair & make-up	Lighting	Set design	Sound	National workforce
Female	17.3	68.8	98	3.7	42.8	15.1	47
50 and over	19.6	30.0	27.6	52.5	7.5	32.9	31
BAME	12.5	4.8	3.4	0.3	3.7	6.3	13
Disabled	4.7	R*	R*	R*	R*	5.0	17
LGB	5.8	31.9	2.6	10.8	67.9	5.3	6.4
Contributions	22,984	6,886	7,247	8,130	9,169	26,019	

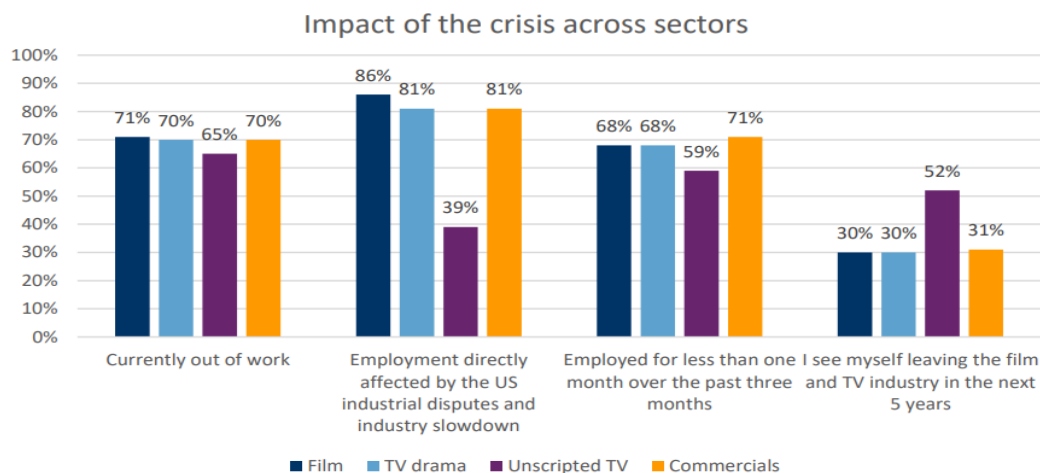
*Redacted: data is not reported due to low sample size.

Source: [Diamond Report – The Third Cut](#)

Regardless of the improvements attempted in the sector, the latest Broadcasting, Entertainment, Communications and Theatre Union (BECTU) report “UK film and TV industry in crisis” has shown “a slowdown across film, TV and commercial production and commissioning in the UK is leaving huge numbers of people out of work” (BECTU, 2024). This crisis, according to BECTU, “poses an existential threat to [the industry] with huge proportions of the workforce planning to leave film and TV employment altogether.

The figure below shows evidence of this “existential threat” (BECTU, 2024) for those who work across film, television dramas, unscripted television and commercials. Over 65% of people across all sectors are currently out of work with more than 30% of workers across all sectors seeing themselves leaving the film and television industry within the next 5 years. Within the film sector, 86% of workers were directly affected by the US industrial disputes and industry slowdown. In this same sector, 68% of workers were employed for less than one month over the past three months.

Figure 3: Impact of the crisis across sectors
Source: [BECTU, 2024](#).



Women and people of colour, according to this same report, are “even more likely to feel pushed out from the environment of precarity, suggesting a step backwards in industry diversity” (BECTU, 2024).

Indicative is what a development executive - quoted in the BECTU report – stated: “We are the lifeblood of the industry, and many of us have worked our knuckles to the bone for an industry we all love, only to have it thrown back in our faces. After this slowdown there’ll be no more diversity, we’ll have gone back 20 years in terms of only the elite being able to afford to work in the industry” (BECTU, 2024).

With regard to financial hardship for the workforce, in particular, The Film and TV Charity (FTVC), in its 2024 “Money Matters” report, offers a timely analysis of the financial situation of those working off screen in the film and television industry states ([FTVC, 2024](#)):

- 45% find it difficult to manage financially. This is particularly high among certain groups, including freelancers, those with a disability or long-term health condition, carers with adult dependents, and those working in film.
- 42% have less than £1000 in cash savings, including 27% who had no cash savings whatsoever.
- 40% feel they would be able to make ends meet for no more than one month if they lost their income.
- Over a quarter (27%) have had work cancelled to the US writers and actors strikes.
- 71% expect to not have enough work over the next 6 months.

As evidenced from the above, even though diversity and inclusion in the media has been on the agenda for more than two decades, it is a complex goal to achieve. Global and country-wide events which trigger economic, social and political crises affect how diversity and inclusion in the media is rendered. Commitments which measure success in a quick uptick in metrics fail to accommodate the scope and depth of the human experience of so many.

In their 2024 study, 'Rapid Evidence Analysis of Diversity in UK Public Service Television: What Do We Know and What Should We Find Out?' Lee Edwards and Giles Moss examine research on diversity in UK public service television broadcasting from 2016-2021. They too report on this lack of depth within on screen representations of gender, class, race and ethnicity and migration, stating that these portrayals tend to be stereotypical and reinforce "reductive narratives that reinforce negative identities," ([Edwards and Moss, 2024, p.13](#))

Scholars and industry experts acknowledge that progress is being made and progress is good. However, they also underscore ([Albury 2020; Edward and Moss, 2024; Kerrigan, Liddy and O'Brien, 2022; Nwonka, 2020](#)) that the way diversity and inclusion in the media is conceptualised, framed, researched and scored, needs definitive revision.

BBC's approach to diversity

The BBC had been prioritising diversity, equity and inclusion (DEI) since 2011 when Mark Thompson was Director-General. Thompson implemented the 'BBC's Diversity Strategy 2011-2015: Everyone Has a Story' (BBC, 2011). Within the document, the BBC (2011) acknowledged the impetus of the 2010 Equality Act (Great Britain. Government Equality Office, 2013) as an external driver for change saying:

The new Equality Act 2010 has simplified and strengthened the law on equality and diversity and has, in particular, introduced a stronger public sector equality duty. The public sector equality duty requires public bodies to have due regard to eliminating unlawful discrimination, harassment and victimisation of individuals based on the 'protected characteristics' of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. But more than this, it puts the responsibility on the BBC, as an organisation, to consider how it can advance equality of opportunity for people irrespective of their own characteristics and to foster good relations between all people and groups. This ensures that we integrate the consideration of equality and good relations into our day-to-day business, requiring us to be transparent and open by showing how we are meeting the general duty, setting equality objectives and publishing equality information.

Director-General Tony Hall, who took up the position in 2013, continued to prioritise these commitments. Within the '[Equality and Diversity at the BBC 2014/2015](#)' report, Hall expressed, "It is twelve months since I set out an ambitious plan of diversity actions to ensure that every licence fee payer could recognise their world, hear their voice and see themselves in our content and workforce. I am pleased to report that all of these actions have been implemented, and we are beginning to see the impact of an approach that has focused on bringing the best talent into our business and helping them reach their creative potential." Hall cited targets to increase B.A.M.E representation from 10.4% in 2013 to 15% by 2017 and quadruple the on-air portrayal of disabled people from 1.2% to 5% at the same time. Benchmarks outlined included: 355 new apprentice and trainees and over 1500 young people getting a first taste of the industry through work experience opportunities being led by the BBC Academy in Birmingham. Hall also announced the establishment of a "£2.1million "Diversity Creative Talent Fund", which would be "reprioritised from other budgets" to help change the portrayal of ethnic minorities in its programmes" ([Telegraph, 2014](#)).

In 2017, Hall unveiled the results of the most "recent and most comprehensive staff census that shows the BBC has met its 2017 targets - and is well on the way to hitting our 2020 goals" ([BBC, 2017](#)): 14.5% of our workforce are from Black, Asian or minority ethnic background, including more than 10% of our leadership; Over 48% of our staff are women - approaching the 50% target set for 2020; Over 10% identify as Lesbian, Gay, Bisexual or Transgender; More than 10% of our staff have told us they have a disability - already ahead of the goal for 2020. These 2020 DEI goals were set out in the Diversity and Inclusion Strategy 2016-2020 ([BBC, 2016](#)) which also included on-air portrayal targets "to ensure our content on screen and on air reflects our audiences" (ibid). The report also outlined new commissioning guidelines to ensure that BBC values and commitments were implemented from programme makers to content.

In a [piece](#) announcing that the "BBC commits £100M to increasing diversity on TV", in the wake of the Black Lives Matter protests, Tony Hall commented:

The senseless killing of George Floyd - and what it tells us about the stain of systemic racism - has had a profound impact on all of us. It's made us question ourselves about what more we can do to help tackle racism - and drive inclusion within our organisation and in society as a whole. This is our response - it's going to drive change in what we make and who makes it.

(Tony Hall, June 2022)

It was then when the BBC announced its commitment to commission £112M for television and radio diversity and inclusion. The BBC also announced a new Creative Diversity Commitment, which required 20% of the talent on new network TV and Radio commissions from April 2021 to be from diverse backgrounds with a focus on the characteristics of disability, ethnicity and social mobility. This commitment, as part of the broader Creative Diversity strategy of the BBC, is to deliver Public Purpose 4 of the BBC Charter, namely is meant to reflect diverse communities across the UK. This commitment is also to be placed within a broader nexus of parallel initiatives, such as the BBC's [Value for All strategy](#), [Across the UK strategy](#) and [Digital First plan](#), which are all centred on driving the value of the BBC to all audiences, heartland, and opportunity – including under 35's, those outside the South of England, Disabled, deaf and neurodivergent, SED and ethnic minority audiences.

Diversity announcements by other broadcasters

While the £112M commitment to diversity was a landmark moment for the BBC, other “British television broadcasters [had] rightly announced a number of promises and policies” (Ryder, 2021).

In June 2020, Channel 4 [committed](#) to being an anti-racist organisation and launched its Black, Asian and minority ethnic-led Indie Accelerator. In this initiative, [ten indies](#) are selected in partnership with The TV Collective, to work with Channel 4 and be championed by Commissioning Heads of Department for unscripted genres (Channel 4, 2020). The TV Collective is a “networking resource that connects content creators of colour working across TV, Film and Digital media to paid opportunities, the industry and each other” (TV Collective, 2024). In another 2020 announcement on their website naming the indies chosen for the Accelerator, Channel 4 also [committed](#) to “double the number of B.A.M.E-led independent producers we commission from by 2023”. They also launched the ‘[Black to Front](#)’ campaign, a day dedicated to Black representation on both sides of the camera ([Ryder, 2021](#)).

ITV’s [2020 Diversity Acceleration Plan](#), in turn, announced “five clear ambitions” to accelerate change in diversity on screen and across ITV by creating more opportunities for those from Black, Asian, minority ethnic and other underrepresented groups ([Ofcom, 2020](#)). ITV also committed to increasing general diversity at management level and creating a more inclusive culture that better understood the issues of racism ([Ryder, 2021](#)).

Further, in a June 2020 [announcement](#), Sky committed £30m over three years to support the fight against racial injustice and to invest more in diversity and inclusion. It focused on “improving representation at all levels, making a difference in communities impacted by racism, and use the power of Sky’s voice and platform to highlight injustice” ([Ofcom, 2020](#)).

In this sense, the BBC’s commitment to “investing £100m of its TV budget over a three-year period to produce ‘diverse and inclusive content’” ([BBC, 2020](#)) joined the above broadcasters in acknowledging and addressing diversity and inclusion deficits within the organisation. While clarity around commitments was a key critique ([Ryder, 2021](#); [Innes-Smith \(2020\)](#); [Albury, 2020](#)), the BBC did set some clearer targets - such as the mandatory target where “20% of off-screen talent must come from under-represented groups in the next three to five years” ([BBC, 2020](#)).

The TV Access Project (TAP), which was launched in August 2022, is an alliance of ten of the UK’s biggest broadcasters who have agreed to work together towards a shift in the industry which allows greater access provision for Disabled talent. The broadcasters are: Britbox, Channel 4, Disney, ITV, Amazon Prime Video, Paramount, Sky, STV, UKTV and the BBC. In alignment with the abovementioned commitments, the successes such as increasing engagement with Deaf, Disabled and Neurodivergent talent, as well as areas outlined for improvement within the TAP, are important to note.

At the 2023 Edinburgh TV Festival, the TAP announced “20 sustainable, tangible solutions” to achieve inclusion, some of which were already being rolled out. In terms of introducing and establishing access roles, “an outline of key access related roles and responsibilities across productions and commissioning is to be adopted, including – alongside Access Coordinators – Access Champions at every broadcaster and streamer, Access Funding Contacts for every commission, and Access Links on all productions,” ([Creative Diversity Network, 2024](#)). There was also a call for a commitment from all TAP members to fund necessary access costs not covered by Access to Work, over and above the production budget (*ibid*).

In terms of best practice guidance, the TAP created the 5A’s, “a set of simple guidelines and principles [which ensures] the full and equal inclusion of deaf, disabled and/or neurodivergent talent, both behind and in front of the camera,” ([BBC, 2023](#)). Developing TAP Audit Checklists for Production Spaces, was also identified as a “sustainable, tangible solution” which would enable businesses to self-assess the key accessibility features that can represent a barrier to some Deaf, Disabled and/or Neurodivergent people ([Creative Diversity Network, 2024](#)).

Concerns and Critiques

This section provides a review of the communications about the £112 million commitment and an overview of the reactions to and critiques of it. This review builds first broader critiques of the tools for measuring diversity and their accountability and second on specific communications and critiques about the £112 million commitment.

Measuring tools and their accountability

Scholars have argued that research and tracking of diversity in the media have mainly been focused towards on-screen and on-air numbers, documenting tallies rather than looking at how key data in one area correlates to another. Edward and Moss (2024) report that there has been a lack of intersectionality and scope within industry metrics and academic research ([Edward and Moss, 2024](#)).

More specifically, [Nwonka](#) (2020) has criticised the structure of data collection, raising the point that the rigidity of categories can often result in further alienation and exclusion, especially for women of colour and especially with a deficit of intersectional considerations. Edwards and Moss (2024, p.2) also point out that the focus of data collection is myopic. They outline that this field is “dominated by studies of on-screen diversity, rather than production or reception, and BBC content receives most attention, while other public service broadcasters are analysed much less frequently.” ([Kerrigan, Liddy and O’Brien, 2022, p.218](#)) also corroborate this argument, underscoring that “research has tended to focus on matters relating to under-representation.”

A lack of context has also been a criticism on data gathering in the sector. With on-screen portrayals of class, disability, race and ethnicity, stereotypes which generally lack context tend to be the representative storylines: “Reductive narratives reinforce negative identities” (Edward and Moss, 2024, p. 14). Key information about structural inequalities is often left out, leading to an impression that the people in the story are solely responsible for their circumstances ([Forest and Johnson, 2019](#)).

From a fairly different perspective, Edward and Moss (2024, p. 3) have also put forward a mixed criticism on data measures pointing out that “industry data on diversity was sparse until statutory reporting was introduced, after which the quality and volume of diversity in public service media organisations have been regularly reported, although in varying detail and with varying levels of rigour”. Edward and Moss identify the Diamond Project and Ofcom as sources of regular reporting on diversity in television and radio, adding though that “beyond these sources it is unclear how much research on diversity in public service media provision has been done, nor what the conclusions might be from the work that exists” (ibid).

Even these sources of data, the Diamond Project and Ofcom, have both have been criticised by stakeholders for disappointing response rates and an inability to report programme-level data since the inaugural report launched in the summer of 2017 ([B60, 2019](#)). Then, in 2019, Deborah Williams, CDN Chief Executive, defended the project [saying](#), “the system was simply not built for programme-level data and data protection rules prevent it from reporting granular detail” (Ibid). In 2022, the CDN published its fifth Diamond Project Report (i.e., [the Fifth Cut](#)) where it analysed more than 2.75 million programme contributions across five years and has earned kudos from several key industry stakeholders. Tim Davie, Director-General of the BBC, commented that “Project Diamond provides us with the information and analysis to help the industry work to common goals and share best practice” ([Televisual, 2022](#)). Also, John McVay the CEO of Pact acknowledged the progress that the Diamond Project made by saying:

Now in its fifth year, the Diamond reporting system has grown – not only in the volume of data it collects and reports on – but in its ability to influence and shape conversations around diversity in the TV industry. We clearly still have a long way to go, particularly in the representation of disabled people both on and off screen but having such data available can only help us to work harder to improve the situation over the coming years (Televisual, 2022).

Other industry representatives such as Carolyn McCall, CEO of ITV, Richard Watsham, Director of Commissioning, UKTV AND Alex Mahon, Chief Executive, Channel 4, also praised the progress of the Diamond Project with Mahon saying, “Five years on and Diamond data has complemented and strengthened our own diversity monitoring at Channel 4” (ibid).

Ofcom, on the other hand, has been criticised for a “lack of accountability on diversity and inclusion” ([Olusoga, 2020](#)). While delivering a lecture to the Edinburgh Television Festival in 2020, Professor David Olusoga stated:

...when it comes to diversity Ofcom has a history of giving the broadcasters a clean bill of health, or at worst a cursory note that they could do better, but with no consequences attached or even suggestions as to what better would look like. Just as there is a historic lack of trust towards the broadcasters, Ofcom, I am sad to say, lacks credibility and trust among many Black and Asian programme makers. If Ofcom is not able or not willing to hold the industry accountable on diversity and inclusion, or able to use its power to set minimum standards, then the DCMS should set up a new body willing to do so (ibid).

Block ([2021](#)) notes that Ofcom also states dissatisfaction with their diversity reporting, especially with regards to transparency, placing the onus for shortcomings onto broadcasters. Ofcom reported that when they asked broadcasters to detail their evaluation methods, “broadcasters did not provide a detailed response to this question, beyond noting outcomes against targets.” However, Block echoes Professor Olusoga’s comments here, arguing that Ofcom needs to hold broadcasters to account on the evaluation of their diversity and inclusion programmes.

Communications and critiques of the commitment

In June 2020, the BBC published a release on its website titled “BBC commits £100m of its content spend on diverse productions and talent” ([BBC, 2020](#)). The release stated that “The BBC’s Creative Diversity Commitment IS the biggest financial investment to on-air inclusion in the industry and will prioritise £100m of the existing commissioning budget over three years (from 2021/22-2023/24) towards diverse and inclusive content. In the same release, it is stated that this investment will be supported by a new mandatory 20% diverse-talent target in all new network commissions from April 2021” (ibid).

This early release acknowledged that the commitment was being allocated from the “existing commissioning budget”. However, June Sarpong, then Director of Creative Diversity, was quoted saying that: “As Director of Creative Diversity, I’m pleased that we’re announcing this fund as the first of a series of bold steps that will help make the BBC an instrument of real change. As a Black woman, I feel and share in the pain that so many are feeling worldwide. It makes it all the more important that we show up now not just with words but with meaningful action” (BBC, 2020). Sarpong described the commitment as a “fund”. This language, which was used in other early communication materials that announced and outlined the commitment sparked confusion amongst stakeholders.

Moreover, proper detail about the commitment was sparse in 2020 even though the release that announced the commitment promised “further plans in other production areas in the coming weeks” (BBC, 2020). A detailed Diversity Commissioning Code of Practice was also promised “later that year”. One year later, Marcus Ryder, previous Head of External Consultancies at the Sir Lenny Henry Centre for Media Diversity, appraised the commitment ([Ryder, 2021](#)), criticising it for a lack of clarity on how the commitment worked financially. Ryder (2021) pointed out that even though Ofcom published that the BBC had “ringfenced” £100M to distribute over three years, when directly [questioned](#) at the Edinburgh International Television Festival, Miranda Wayland, then Head of Creative Diversity at the BBC stated in August 2020: “This is not ring-fenced money”.

Even though Ryder’s piece was published in July 2021 and a Diversity Commissioning Code of Practice was also promised “later that year [2020]” (BBC, 2021), a lack of clarity around the commissioning details were still present at the time of publication of his commentary in 2021, as Ryder questioned: “Will the £100M be in addition to the current amount that is already invested in “diverse and inclusive content” or will it include existing commissions?” and “How much of the BBC’s existing productions currently meet the criteria of “diverse and inclusive content?” (ibid). To both questions Ryder answered: “We simply do not know” (2021).

Defining the shows which qualify for the commitment was important as, with the guidelines available at the time, “productions are able to be classified as “diverse content” if they meet criteria around socio-economic diversity, disability and non-white representation (of which Black is obviously just a part). This means that it would be possible for all the production companies to meet the criteria set out by the BBC for “diverse content” without employing a single Black person – for instance, by meeting socio-economic diversity behind the camera (Ryder, 2021). This means that dramas like *EastEnders*, with substantial production costs, would qualify. If this is the case, then the BBC could have met the promised spend even before the announcement.

To address the lack of granular details and scant material on the commitment that made it difficult to understand what it meant in practice, the BBC intensified their communication efforts throughout 2021, with more events happening closer to the official launch date of April 2021, and onwards. Internal communications documents (BBC, 2020; 2021; 2022; 2023) outline meticulous communication plans. These opportunities for communication and discussion were coordinated and hosted by the then Director of Creative Diversity, June Sarpong, and then the Head of Creative Diversity, Miranda Wayland, and their team to explain the particularities of the commitment and ensure that all relevant parties had all the necessary information to engage it.

Channels of external messaging and communications about the commitment included television, radio, individual and group meetings, roundtables, Q&A's and seminars with messaging going out several times over a number of months. The target audience of these meetings were members of the creative industry sector. Meetings were held for the benefit of, and at times, in conjunction with members such as Creative Diversity Network, Creative Coalitions, Pact, the British Film Institute (BFI) as well as industry representatives, such as the Director's Guild and the Writer's Guild. External suppliers such as the TV Collective, Triforce, the Disabled Artists Networking Community (DANC), Screenskills and Talent Manager were also briefed as was Ofcom, the National Union of Journalists (NUJ) and BECTU. Black-led indies such as Cardiff Films, Maroon productions, Proper Content, Big Deal, Green Acre Films, Milk and Honey Productions, ACME, Cosine Advertising and Sugar films, were also prioritised for communications and discussions.

Additional to critiques regarding the clarity of the commitment were critiques concerning the criteria set in the commitment for defining diversity and qualifying programmes as diverse. Ryder (2021) criticised the lack of focus on anti-Black racism the "fundamental issue raised by the [BLM] protests", the springboard the BBC used to underscore the seriousness and timeliness of the commitment. Spectator journalist, Innes-Smith (2020) put forward the same critique saying: "As it stands, the thinking appears to be that all minorities form part of the same group but this patronisingly reductive way of viewing difference ignores the remarkable complexity of individual lives." James Innes-Smith (2020) criticised the 20% diversity quota and described it as "patronising" and went on to question: "So why 20 per cent? Why not 50 or 10 per cent?" For Innes-Smith, this was a question that was directly relevant to what the former BBC Director Tony Hall had described as the 'stain of systemic racism', a term that has yet to be unpacked and explained.⁴

Regardless of these critiques, the £112 million commitment (and not only) signalled the existence of "a genuine desire to shift the dial when it comes to diversity in general, and there has been a substantive change in the level of conversation around diversity" (Ryder 2021). Whether this progress is experienced by the under-represented actors and talent in the sector, and it is properly validated by continued social, financial and political support is something that remains to be seen.

⁴ It is worth noting that at this point in time, while this commitment was in full flow, the local radio stations went through [cuts](#), resulting in SED and B.A.M.E. on and of air talent being negatively impacted, damaging diversity and inclusion strategy across the UK.

DELIVERY OF THE COMMITMENT: BBC DATA ANALYSIS

The analysis of the data on the delivery and implementation of the commitment is split between the £12 million element dedicated to radio and the £100 million element for television. For each of these two elements, the analysis presents the following findings:

- **Total number of qualified programmes and also number of programmes by year.**

It is important to note that the analysis presented here does not include the full and final dataset for the final year of the commitment (financial year 2023/2024) as the final year of the commitment came to an end in April 2024 and thus the dataset for that year could only become available after the completion of this commissioned research.

Especially for radio, it is important to note that the data available at the time of the writing of this report only cover up to the end of the third quarter (Q3) of the year.

This is to say that while the analyses presented in this part of the report are informative of the overall delivery of the commitment, they do not capture fully and in complete accuracy the performance and delivery of the commitment in its final year.

- **Spending by year.**

The analysis relied on spending/cost bands that provide an indicative picture of spending for radio and television within the remit of the commitment. Due to confidentiality reasons, the exact spending for each qualified programme could not be disclosed and used in the analysis.

- **Commitment criteria the programmes qualified for.**

Given that qualified programmes were required to meet at least 2 of the 3 commitment criteria, it is important to understand their distribution for each and across all 3 criteria.

- **Profiling of the qualified programmes.**

The profiling mostly focuses on genre and distribution of genre across the three years of the commitment, the three commitment criteria and the commissioning networks, for radio.

This part of the report presents the above data first for radio and then for television.

Radio

Overall, 224 new suppliers were registered to be able to pitch for Network Radio commissions between April 2021 and September 2023. 55 of those 224 were commissioned and 19 of those 55 met two or three of the qualifying criteria during the 3-year course of the commitment⁵. Thus, there were 19 new Indies being commissioned by the BBC for programmes that qualified.

As for spending, in the first year of the commitment (FY 21/22), commissions worth £4m were awarded to 39 different suppliers, including 8 in-house teams from BBC Audio plus BBC News, covering 89 titles. Due to the mixed reporting methodologies in 21/22, it is likely these figures are an under-estimate⁶. In the second year (FY 22/23), commissions worth £8.16m were awarded to 65 suppliers, covering 195 titles between them. This includes 15 in-house teams from BBC Audio plus BBC News and BBC Scotland. In the third year of the commitment (FY 23/24) and to the end of Q3, commissions worth £7.2m had been awarded to 68 suppliers covering 195 titles. This included 13 in-house teams from BBC Audio plus BBC News and BBC Scotland.

As for spending, the BBC's overall spend⁷ on radio programmes for the financial years 2021-2023 (the data on 2023-24 is not available yet) was £975 million, thus the amount of £12 million over the three-year course of the commitment is 1.23% of the overall radio budget in the first two years of the commitment.

Qualified Programmes by Commitment Criteria

Regarding the number of qualified radio programmes, the data shows that in the second and third year of the commitment the number of programmes that qualified were more than double compared to the first year, with a total number of qualified radio programmes by the end of the third quarter of the third year being 479 (Table 1).

Table 1: Qualified Programmes (by Year)

Year	N	Percent
21/22	89	18.6
22/23	195	40.7
23/24 to end of Q3	195	40.7
Total	479	100.0

⁵ Worth reminding here that qualifying against the diversity criteria has never been a sole reason for winning a commission. Thus, not meeting any of the criteria is not a barrier to a proposal being commissioned.

⁶ When the £112m initiative was launched in April 2021, Network Radio was not yet set up to capture performance data in the way required. Therefore, the first year's results are based on a combination of manual reporting by individual commissioning teams, and a more automated tracking and reporting methodology which was introduced later in the year. Considering these different methodologies, the first-year data may not have captured in full the performance of the commitment.

⁷ Data available at <https://www.nao.org.uk/wp-content/uploads/2022/11/departamental-overview-the-bbc-group-2021-22.pdf> and <https://www.nao.org.uk/wp-content/uploads/2023/10/BBC-DO-2022-23.pdf>

As for Criteria 1 (Stories and portrayals), 86.8% of the qualified programmes met it, with double the number of qualified programmes for it in years 2 and 3 of the commitment, compared to year 1 (Table 2). As for Criteria 2 (Production Leadership), 89.6% of the qualified programmes met it, with more than double the number of qualified programmes in years 2 and 3 of the commitment, compared to year 1 (Table 3). Finally, as for Criteria 3 (Company Leadership), the number of programmes that qualified for it was 68.1%, namely about 20% less than the percentage of programmes that qualified for the first two criteria, while the number of qualified criteria in the second and third years was four times more than in the first year, when only a limited number of programmes qualified (Table 4).

Table 2: Criteria 1 - Stories and Portrayals (by year)

		No	Unknown	Yes
Year	21/22	2	0	87
	22/23	15	14	166
	23/24 to end of Q3	14	18	163
Total		31 (6.5%)	32 (6.7%)	416 (86.8%)

Table 3: Criteria 2 - Production Leadership (by year)

		No	Unknown	Yes
Year	21/22	5	1	83
	22/23	16	9	170
	23/24 to end of Q3	12	7	176
Total		33 (6.9%)	17 (3.5%)	429 (89.6%)

Table 4: Criteria 3 - Company Leadership (by year)

		No	Unknown	Yes
Year	21/22	37	21	31
	22/23	33	13	149
	23/24 to end of Q3	37	12	146
Total		107 (22.3%)	46 (9.6%)	326 (68.1%)

Profiling of Qualified Programmes

It is interesting that the dominant two genres in the qualified radio programmes are 'factual' and 'music', with both totalling 375 of the 479 qualified programmes. This picture becomes even more striking when one looks at the annual breakdown of factual programmes, in comparison to other genres. As shown in Table 5, the annual increase of qualified factual programmes is significantly higher than the annual increase of all other genres, with the number of factual programmes in the three first quarters of the final year of the commitment exceeding the total number of factual shows in the first two years.

Figure 1: Genre of qualified programmes

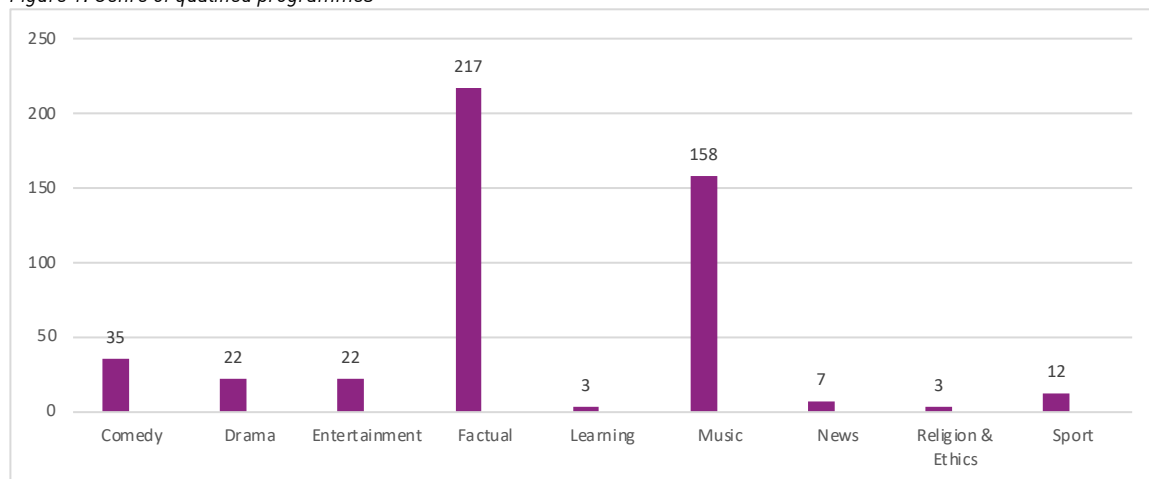


Table 5: Genre by year

		Comedy	Drama	Entertainment	Factual	Learning	Music	News	Religion and Ethics	Sport	Total
Year	21/22	0	18	18	16	0	29	0	1	7	89
	22/23	21	2	1	80	2	78	5	2	4	195
	23/24 to end of Q3	14	2	3	121	1	51	2	0	1	195
Total		35	22	22	217	3	158	7	3	12	479

As for the genre of programmes by commissioning network, one can observe in Table 6⁸ that, while there has been a reasonable distribution of programmes across various networks, Radio 4 dominates, as it is the network that has commissioned about 30% of all qualified programmes (156 programmes).

⁸ This table includes only those networks which commissioned a minimum of 10 programmes across all genres, namely a total of 441 out of 479 programmes.

Table 6: Genre by commissioning network

Genre	1Xtra	5Live/Sounds	Asian Network	BBC Sounds	Pop Podcast	Pop/Sounds	Radio 1	Radio 2	Radio 3	Radio 4	Radio 4 Podcast	Radio 5 Live Podcast
Music	22	0	19	6	19	2	13	48	13	0	0	0
Comedy	0	0	0	0	3	0	0	0	0	18	14	0
Drama	0	0	0	0	0	0	0	0	1	19	2	0
Entertainment	0	5	0	1	0	11	0	0	0	1	0	2
Factual	0	8	6	5	0	0	0	0	27	115	26	19
Learning	0	0	0	0	3	0	0	0	0	0	0	0
News	0	0	0	0	0	0	0	0	0	1	3	2
Religion and Ethics	0	0	0	0	0	0	0	0	0	2	0	0
Sport	0	4	0	0	0	0	0	0	0	0	0	1
Total	22	17	25	12	25	13	13	48	41	156	45	24

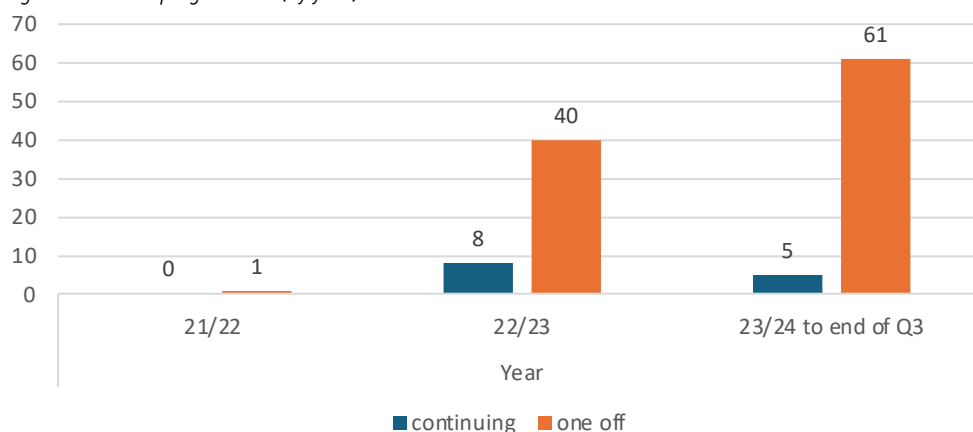
Given the dominance of ‘factual’⁹ programmes (Figure 1), it is worth looking more into the nature of those programmes. As Table 7 shows, most of those programmes were one-off, not returning, while it becomes clear from Figure 2 that, for both types of factual programming, the second and especially the third year of the commitment were those when factual programmes made an impressive appearance within the remit of the commitment’s criteria.

Table 7: Factual programmes

One-off VS. Continuing		
	N	Percent
Continuing	13	11.3
One-off	102	88.7
Total	115	100.0

⁹ While the BBC does not propose a single definition of ‘factual’, as it varies depending on which reporting it comes under, for the purposes of this analysis, if it is a programme that is not news, drama, religion, entertainment or comedy, it is effectively considered to be programming with a factual basis.

Figure 2: Factual programmes (by year)



One final consideration in the profiling of qualified radio programmes concerns the possible correlation between criteria of the commitment and the genre of qualified programmes. As shown in Table 8, company leadership was the criteria that was met the least across nearly all genres, with a small exception being the genre of 'comedy', as 'stories and portrayals' comes at the bottom of all three criteria for this genre.

Table 8: Genre by commitment criteria

		Criteria 1 (stories and portrayals)	Criteria 2 (production leadership)	Criteria 3 (company leadership)
Genre	Comedy	24	33	29
	Drama	21	22	2
	Entertainment	21	20	12
	Factual	179	183	165
	Learning	2	3	1
	Music	148	150	104
	News	6	6	4
	Religion and Ethics	3	3	2
	Sport	12	9	7
Total		416	429	326

Television

Generally, out of a total of 366 qualified television programmes, only 18 were from production companies that were new to the BBC (Table 9), which is a similar number to the number of new companies that qualified for one or more radio programmes (as presented above).

Table 9: Production companies that are new to BBC TV (by year)

		No	Yes	Total
Year	21/22	100	6	106
	22/23	139	7	146
	23/24	109	5	114
	Total	348	18	366

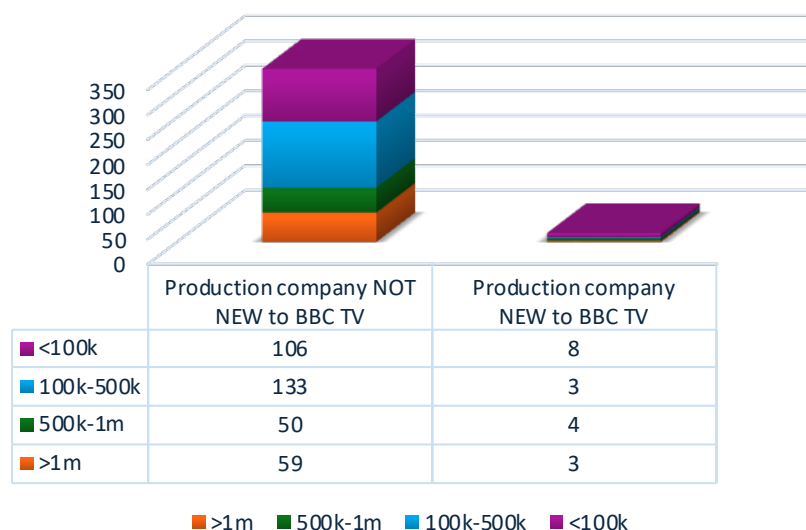
As for spending, the BBC's overall spend¹⁰ on television programmes for the financial years 2021-2023 (the data on 2023-24 is not available yet) was £3,654 million, thus the amount of £100 million over the three-year course of the commitment is 2.73% of the overall BBC television budget in the first two years of the commitment. Regarding the spending for the qualified television programmes, as shown in Table 10, most of the qualified programmes were funded with up to £500,000.

Table 10: Levels of spending within the commitment

Cost bands	Qualified programmes (number)
>1m	62
500k-1m	54
100k-500k	136
<100k	114

If these levels of spending are examined from the perspective of whether the commissioned companies were new to the BBC or not, one can see (Figure 3) that 11 of the 18 qualified programmes that were produced by companies that were new to the BBC TV were funded with up to £500,000.

Figure 3: Spending for new-to-the BBC production companies



¹⁰ Data available at <https://www.nao.org.uk/wp-content/uploads/2022/11/departmental-overview-the-bbc-group-2021-22.pdf> and <https://www.nao.org.uk/wp-content/uploads/2023/10/BBC-DO-2022-23.pdf>

Qualified Programmes by Commitment Criteria

Regarding the number of qualified television programmes, it was in the second year of the commitment when the number of programmes that qualified was the highest, even compared to the final year (Table 11).

Table 11: Qualified Programmes (by Year)

FY	N	%
21/22	106	42.1%
22/23	146	57.9%
23/24	114	31.1%

As for Criteria 1 (Overall portrayal)¹¹, 127 of the 366 qualified programmes met it, with the number of the programmes that qualified for overall portrayal in year 3 of the commitment being the smallest (Table 12). Interestingly, the measure of Criteria 1 that had the smallest number of qualified programmes (half than the other two measures) was that of landmark portrayal, which is a significant parameter regarding the extend and potential meaningfulness of diverse content. As for Criteria 2 (Production Leadership), about half (181) of the qualified programmes met it, with an increase of the number of qualified programmes in year 2 of the commitment and further increase in year 3 (Table 13). Finally, as for Criteria 3 (Company Leadership), the number of programmes that qualified for it was the large majority of all qualified television programmes, (303 out of 366) namely significantly more than the number of programmes that qualified for the first two criteria, with the second year presenting the highest number of qualified programmes, compared to the other two years (Table 14).

Table 12: Criteria 1 - Overall Portrayal (by year)

		No	Yes	Total
Year	21/22	11	95	106
	22/23	19	127	146
	23/24	41	73	114
Total		71	295	366

Table 13: Criteria 2 - Production Leadership (by year)

		No	Yes	Total
Year	21/22	67	39	106
	22/23	81	65	146
	23/24	37	77	114
Total		185	181	366

Table 14: Criteria 3 - Company Leadership (by year)

		No	Yes	Total
Year	21/22	17	89	106
	22/23	23	123	146
	23/24	23	91	114
Total		63	303	366

¹¹ For a television programme to meet Criteria 1, it had to meet two of the following measures – measure 1: landmark portrayal, measure 2: incidental and integrated portrayal; measure 3: on-screen and on-air talent scripted.

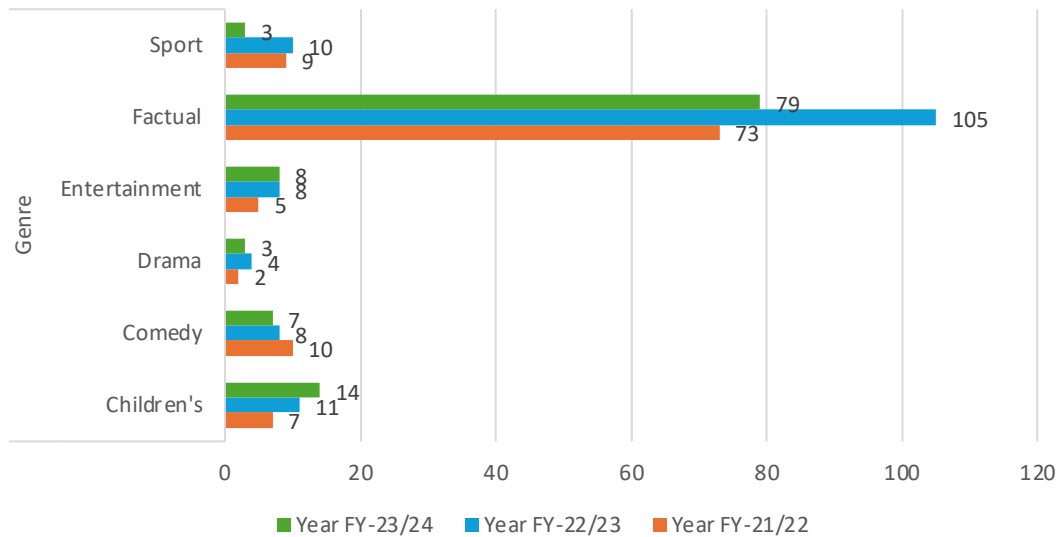
Profiling of Qualified Programmes

The dominant genre in the qualified television programmes is 'factual', totalling 70.2% of all qualified television programmes (Table 15). Looking at the annual breakdown of factual programmes, it is quite striking that the number of qualified factual programmes was the highest in the second, not the third, final year of the commitment (Figure 4).

Table 15: Genre of qualified programmes

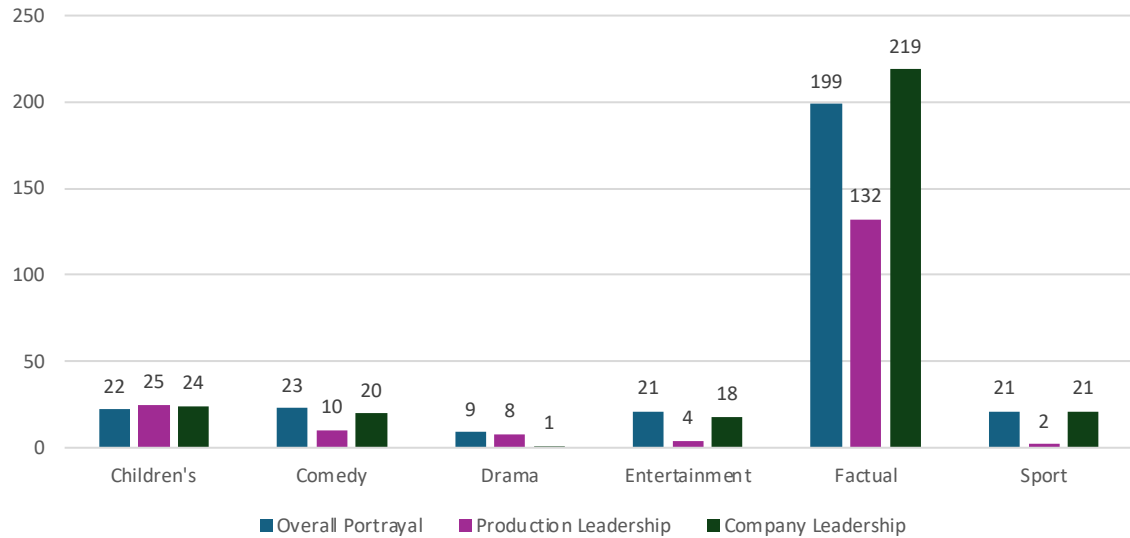
Genre	N	%
Children's	32	8.7%
Comedy	25	6.8%
Drama	9	2.5%
Entertainment	21	5.7%
Factual	257	70.2%
Sport	22	6.0%

Figure 4: Genre of qualified programmes (by Year)



One final but very important consideration in the profiling of qualified television programmes is that of the possible correlation between the three criteria of the commitment and the genre of television programmes. As shown in Figure 5, production leadership was the criteria that was met the least in most genres and especially in the numerically dominant genre of 'factual' programmes.

Figure 5: Genre by commitment criteria



Conclusions

The analysis of the data on the delivery of the Commitment has generated the following conclusions.

First, although the complete data on the BBC television and radio budget of 23/24 is not available yet, the analysis has shown with sufficient clarity that the £112 million budget is only a small fraction (significantly less than 5%) of the overall budget), posing the question of whether more significant financial investment in systematically promoting creative diversity is needed.

Second, a very small number of new-to-the-BBC companies qualified for one or more programmes, both in television and radio, posing the question of whether commissioning diversity programmes is a level playing field or not. This is a question that is supported when looking at the levels of spending for these new-to-the-BBC companies, as 11 of the 18 qualified programmes that were produced by those companies were funded with up to £500,000.

Third, the qualified television and radio programmes met to a different degree the three criteria of the Commitment, with Criteria 1 (Stories and Portrayal) being the only one met across the board by the large majority of qualified programmes. At the same time, it appears that in television there has not been the progressive increase of qualified programmes in the final year of the commitment that one can see in radio.

Fourth, while the data allows us to see the overall trends by year and they can be profiled by certain indicators, such as genre, they do not break down in the specifics of company or production leadership in order to see protected characteristics or the segmentation by ethnicity, disability and/or socio-economic background.

Fifth, factual programmes appear to be the dominant genre of qualified programmes in both television and radio (music was the second prevalent genre for radio), in a way inviting further thought on why and whether the other genres appear a lot less competitive when it comes to meeting diversity criteria in terms of content/portrayals and/or leadership roles. Delving deeper into the dominance of factual programmes in both radio and television, it is worth considering that factual commissioning commonly involves less spending of singles and short series, or individual titles and more budget into series or big brands, while factual traditionally has more suppliers and more titles but not necessarily more spend overall.

Sixth, looking into genre and commitment criteria, the analysis showed that, whereas company leadership was the criterion met the least in the dominant genres of radio programmes (i.e., factual and music), production leadership was that criteria which was met the least in the dominant genre of television programmes (i.e., factual programmes).

Seventh, specifically for television, the data has shown that the second year of the Commitment was the relatively most successful of all three years for television programmes in terms of overall figures of qualified programmes and especially in relation to the commissioning of factual programmes in television. This poses the question of whether this is due to the lack of complete data for the final year., while also reposing the same questions around the large number of factual titles and what that means in terms of diversity and equal opportunities.

SURVEY

As the survey aimed to capture a wider set of opinions than would be possible through the in-depth interviews of senior and experienced actors, the survey participants targeted were:

- Company leaders.
- Production leaders.
- Under-represented production talent and on/off screen/air talent, especially bearing in mind that talent might be difficult to be tracked down and captured in the in-depth interviews.
- Other actors in the sector who might have been unaware of the details of the creative diversity commitment but could reflect on diversity in the sector and their own experiences.

A total of 76 responses were received in the 48 days when the survey remained open. The analysis of the responses that follows is organised around the following themes:

- Awareness of the commitment.
- Understanding/knowledge of the commitment.
- Perceived impact of the commitment.
- Needs and recommendations for the future.

Design

The survey was designed and administered on the Jisc Online Surveys platform. We aimed for the overall number of respondents to be between 50-100 participants. Given the topic- and sector-specific nature of this survey, as well as its online administration, we considered this a satisfactory number of responses. As for the groups of respondents, we refrained from laying down specific numbers regarding, for instance, companies with BBC commissions vs those without.

To push towards more and better representativeness in the survey of the different actors/roles and different groups (as per involvement and experiences), we followed a systematic approach to cascading the survey to eligible participants. First, we reached out and disseminated the survey through professional networks (the LHC team put together lists of contacts and networks to participate in the survey and/or the interviews) but also via the BBC Creative Diversity team. Also, the press and communications departments of the BCU/ LHC and the BBC helped via press releases to raise the publicity/awareness on the survey.

Findings

Awareness of the commitment

Most of the respondents (42) stated that they are not aware that the BBC has committed £112 million towards ‘diverse content’ in its programme commissioning budget over the last 3 years from April 2021 to March 2024. On the other hand, only 34 of the respondents stated that they are aware of the commitment (Table 1). As a result, only 34 of the respondents were in a position to answer specific questions about the commitment.

Table 1: Awareness of the commitment

	N	%
No	42	55.3%
Yes	34	44.7%

It is important to profile these two categories of respondents.

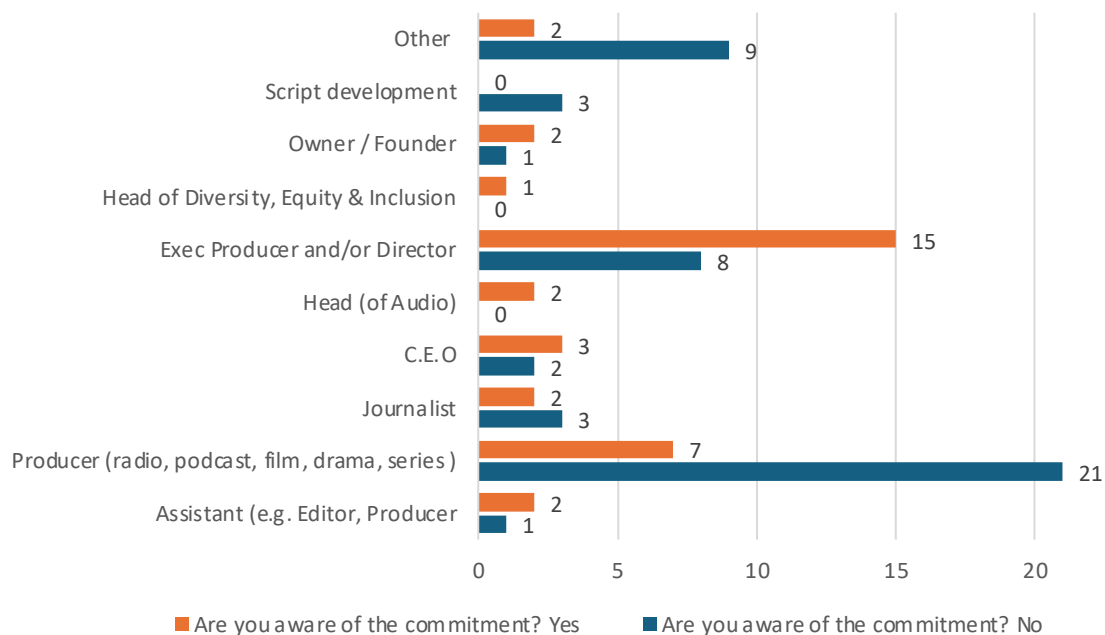
Regarding their demographics, as shown in Table 2, 25 of those unaware of the commitment have Black, Asian or minority ethnic background and 18 have lower-income background. On the other hand, 12 of the respondents who were aware of the commitment have lower-income background and 9 have Black, Asian or minority ethnic background.

Table 2: Do you identify as a person who.... (by awareness of the commitment)

		has Black, Asian or minority ethnic background.	has a long-term disability.	has lower-income background.	does not have any of these 3 demographics.	Prefer not to say.
Are you aware of the commitment?	No	25	6	18	7	2
	Yes	9	2	12	10	2

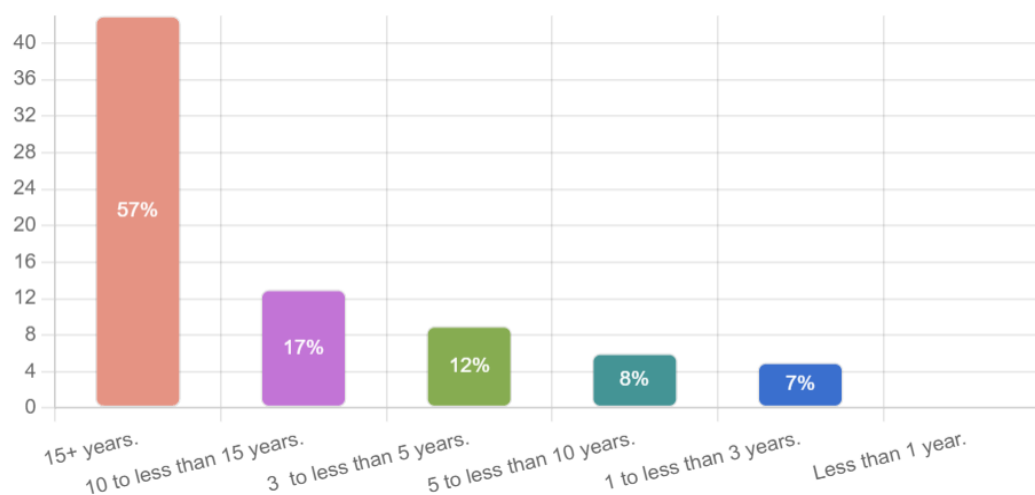
As for the role / job title of the respondents, as shown in Figure 1, the majority of those who were not aware of the commitment are producers, whereas the majority of those who were aware of the commitment are executive producers or directors, namely mostly in more senior positions than the unaware respondents.

Figure 1: Current job title (by awareness of the commitment)



Finally, with regard to the seniority and experience of the respondents, there is high representation of very experienced professionals in the survey (57% have 15+ years of experience, see Figure 2) and the analysis did not show that the level of experience is dramatically different between those who were aware of the commitment and those who were not. Nevertheless, a higher number of those with many years of experience in the sector were aware of the commitment than those with fewer years of experience.

Figure 2: How long have you been working in the media industry?



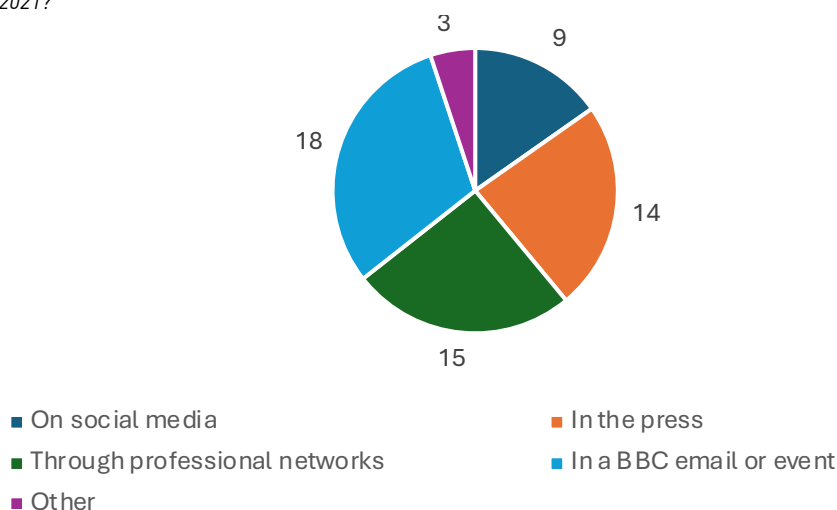
Understanding of the commitment

In this section, we look more closely into the level of understanding of the commitment among those who were aware of the commitment (34 respondents, 'respondents-aware' thereof).

As for the knowledge of the commitment criteria, 20 (59%) 'respondents-aware' answered 'yes' to the question 'Do you know what diversity criteria the BBC uses in assessing whether programmes qualify for the £112 million commitment?'. On the other hand, 14 (41%) answered 'no' to this question. 'The diversity criteria change all the time' (8 responses) and 'there's not enough information on this' (6 responses) were the main reasons the 'respondents-aware' mentioned as to why they lack knowledge of the criteria.

Regarding the channels or routes via which they obtained information about the commitment, as shown in Figure 3, most 'respondents-aware' have heard about the commitment from the BBC, in the press and from their professional networks. Going deeper into the spread and impact of BBC events on the commitment such as briefings and webinars, 16 out of the 34 'respondents-aware' have attended one or more BBC events on the commitment.

Figure 3: Where did you hear about the BBC's £112 million commitment to diverse content for TV and radio announced in 2021?



As for their initial or early understanding of the nature of the commitment, there is a split between those 'respondents-aware' who thought that the commitment was a fund and those who thought that it was an investment from existing budgets on diverse content (Table 3). 11 of the 34 'respondents-aware' changed their thoughts about the commitment over its three-year course, with most of them realising that the commitment was not a new fund, and it was not exclusively and only for racial and ethnic minorities or for Black people.

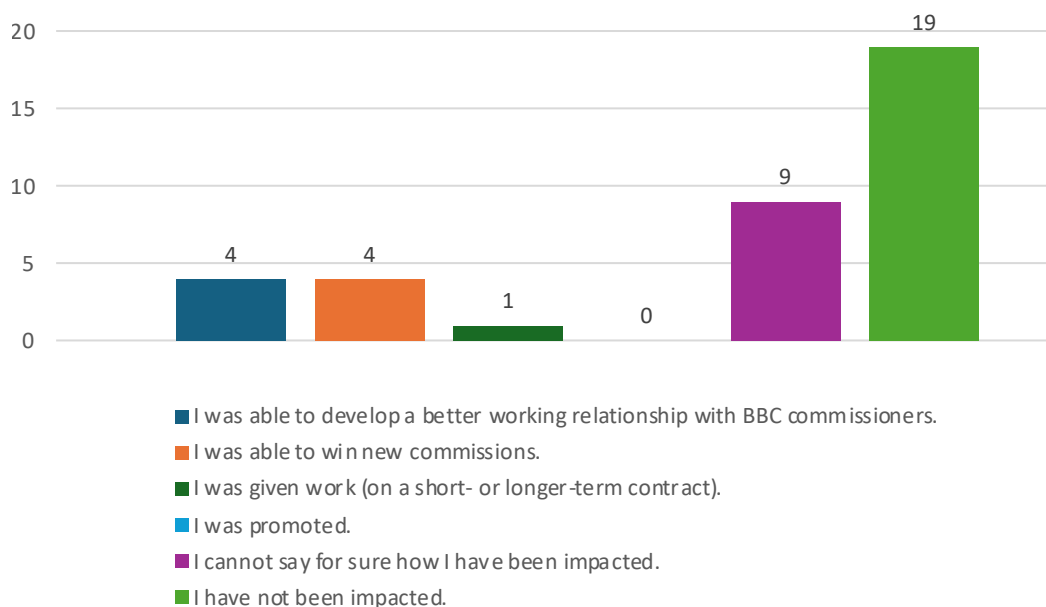
Table 3: Did your thoughts change about the £112 million commitment over its three-year course?

	N	%
A fund of new money for diverse content.	11	32.4%
From existing budgets but NOT exclusively for diverse content.	6	17.6%
From existing budgets set aside for diverse content only.	13	38.2%
Not sure.	4	11.8%

Perceived and/or experienced impact of the Commitment

As for the impact of the commitment, interestingly, the majority of the 'respondents-aware' (19 out of 34) stated that they have not been impacted and another 9 stated that they are not sure if the Commitment has had any positive impact on them. Only a total of 8 said they were able to win new commissions and develop a better working relationship with BBC commitments thanks to the commitment and its direct or indirect impact (Figure 4).

Figure 4: How do you think you have been directly or indirectly impacted by the £112 million commitment to diverse content?



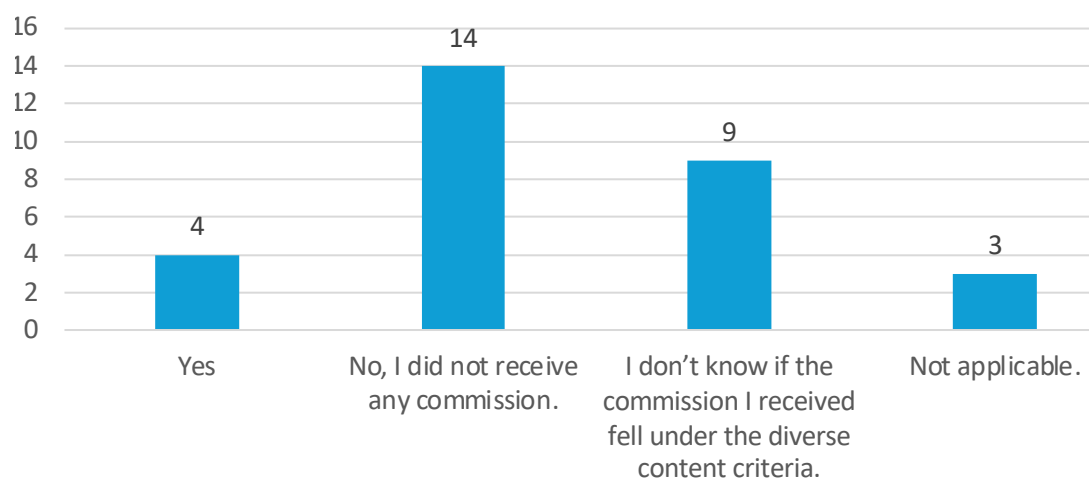
On the other hand, regarding influence - not 'impact' per se - a fair number of respondents said that the commitment influenced them on their programme ideas, hiring decisions and/or their decisions on placing their stories/staff/ company out of London (Table 4). Also, 5 of the respondents (15%) pitched an idea to the BBC that they may not have submitted otherwise, if there was not this Commitment in place.

- Table 4: Influence of the Commitment

The £112 million commitment towards diverse content influenced...	N	%
my programme ideas/pitches over the time-period.	13	38%
hiring decisions at my company / the company I work for.	7	21%
my decisions on placing my stories/staff/company out of London.	10	29%

However, only 4 of the 'respondents-aware' answered 'yes' to the question of whether they have received a programme commissioned from the BBC between April 2021 and March 2024, while 9 of the 'respondents-aware' (9) stated that they do not know whether the commission they received fell under the qualifying criteria of the commitment (Figure 5). In an open-ended question, some of the 'respondents-aware' expressed explicitly the lack of follow-up communication from the BBC about their commissioned programme in relation to the commitment: 'We made huge strides in creating more diverse content and diversifying our team. We would win commissions for projects which met the criteria but receive no further guidance'.

Figure 5: Did you receive a programme commission from the BBC between April 2021 and March 2024, as a result of qualifying under the 'diverse content' criteria?



This rather critical picture the 'respondents-aware' provided about the commitment's impact was further illustrated when they were asked to consider whether the commitment has led to a lasting positive impact, as only 29% agreed that the commitment has led to a lasting positive impact, with the other 71% thinking otherwise. In justifying their answer, those who answered 'no', namely the large majority of the 'respondents-aware', said:

No major plank of the schedule on the main channels has changed in terms of the point of view that the story or content is told from. To create lasting change you need stability, whereas this was largely a thousand flowers blooming with no legacy show in the schedule.

I feel that pre-existing ideas around “diversity” haven’t really altered. E.g. what constitutes “diverse” content especially when it comes to “low socio economic” - really think there remains a stereotypical idea about what this is.

I don’t get the communication that it is a sustained focus of diversity beyond this commitment.

No, because it completely misses the point. Schemes like this continually fail to benefit ordinary ‘diverse’ professionals in the industry who are doing the hard yards trying to climb the production ladder (or establish themselves in their role amongst increasing competition). The whole setup labours under the impression that ‘diverse’ people only want to work on (or are only good for working on) diverse content, but they can do so much more. There are better ways to help people establish their career (or to assist their career progression).

The majority of our industry is still overwhelmingly white/male/middle-class and is only going to get worse in terms of representation due to the lack of commissions overall and an employment drought. Those from diverse backgrounds are the first to be pushed out and last to be welcomed back during seasons of uncertain times in our industry. While the fund has helped BBC’s profits, I don’t think it has changed the overall Industry.

BBC has made these kinds of announcements previously and I have seen no change behind the scenes in diversity or in commissioning. They give the funds to the same people and companies they did prior to their “commitment” to diversity.

To the best of my knowledge, the ethnically diverse groups that the commitment purportedly wanted to include have not been at all impacted by it. Rather, it appears to have been an exercise in BBC corporate obfuscation and self-interest.

A misguided policy that rewards identity rather than talent.

At the same time, a smaller number of positive or mixed arguments regarding the positive lasting impact of the commitment, were put forward, such as the following:

It has allowed our production to expand its reach...

I think it’s helped improve attitudes towards diverse talent off and onscreen and made producers more aware of the difficulties diverse production staff face in developing their careers.

Open up the industry for all.

It has been great for on screen and off-screen talent but there is a GAPING hole in supporting diverse led indies. ALL the drama commissions have been to White led indies that are now making diverse content to try and get access to this new fund. They do this by hiring diverse writers and directors and putting a show together, but they are not hiring people at the top. Unless diverse led indies who genuinely have been making diverse shows for years are properly supported the system will not properly change. You cannot just get white led companies to suddenly start making diverse shows that prove time and time again to be inauthentic - that is not success

Certainly within our team and our approach it did.

Potentially - hard to say but I would lean towards yes.

It wasn't clear how or where the money was spent, and the parameters weren't strict enough. There hasn't been a change in those in leadership positions behind the scenes. On screen, representation has improved.

I am not clear on which programmes or output it has led to, there has not been publicity on how it has changed things.

Yes for the existing white production companies to profit, curate, and dilute our culture. I'm sure some diverse talent it has helped them short term win jobs, but it has further undermined the lack of equity and further reinforced the structure that drives real wealth, profit, ownership and control to the same white companies, except now they are scooping up our stories and telling them instead of us.

Whereas these mixed discourses do not omit to point out the positive impact of the commitment, one can observe that they point to a degree of uncertainty and unawareness, at best, and a lack of clarity, at worst.

Needs and recommendations

Returning to the total sample of 76 respondents, they provided recommendations for the BBC and the sector, at large, on how best to support diverse content and underrepresented talent.

The entire list of possible changes and areas of support (see Table 5) seem to be supported by most of the respondents, with regard to how best they could progress and gain more opportunities in the industry. In addition, 16 respondents pointed to 'other' changes, such as the need for a better definition of diversity, for more emphasis on women, disability and other characteristics beyond colour/ethnicity, the need for increased access for diverse producers/teams and for increased transparency, as well as the need for financial support and better salaries esp. within London.

Table 5: What would make the biggest difference to you in helping you progress and gain more opportunities in the industry.

	N	%
Financial commitment to diverse content, within overall BBC commissioning budgets.	54	71%
Improve networking and mentoring opportunities.	50	66%
Improve access to training.	41	54%
Improve diversity at senior levels in the BBC and inside production companies.	59	78%
Ringfence commissioning money which can be spent solely on ideas which fulfil the diversity criteria.	44	58%
Data monitoring and checks on diversity in BBC productions.	49	65%
Move more decision makers and productions outside London.	35	46%
Other	16	21%

Conclusions

First, as for awareness, a minority of the survey respondents were aware of the Commitment, with those lacking awareness being mostly:

- Black, Asian or minority ethnic background
- lower-income background
- lower jobs in a company's hierarchy.

These are startling observations, as we need to acknowledge that the Black, Asian or minority ethnic background and the lower-income background were the two demographics mostly represented in the survey.

Second, as for the understanding of the Commitment:

- 41% of those who were aware of the Commitment did not have knowledge of its qualifying criteria, while a similar number, namely less than half, had attended one or more the BBC communication events on the Commitment.
- This lack of understanding poses the question around 'accuracy' of such understanding, as half of those who were aware of the Commitment thought initially that it was a fund, while a third of the same body of respondents changed their initial perceptions of the nature of the Commitment, without necessarily, though, developing a fully accurate understanding of it.

Third, regarding perceived and/or experienced impact:

- The questions on 'impact' and 'influence' received different answers. While the large majority of respondents reported on impact of the Commitment on their careers, when it came to answering questions about influence, they seemed to recognise a lot more significantly the positive influence of the Commitment, especially with regard to their programme ideas, hiring decisions and/or their decisions on placing their stories/staff/company out of London.
- Thus, there exists a differential interpretation of 'impact' and 'influence', with the respondents understanding that impact should result in a career-changing effect for them, while influence can be a lighter effect on both creative and practical elements of their work.
- The impact/influence question though is correlated with that of limited awareness, overall, as some of the respondents found difficult to assess impact or influence given that they were unaware of whether their programmes qualified for the Commitment or not.
- This also connects with their reservations the respondents articulated with regard to the possibly lasting impact of the Commitment, as only 29% agreed that the Commitment has led to a lasting positive impact, while in their comments they pointed to the existence of a degree of uncertainty and unawareness, at best, and a lack of clarity, at worst, about the Commitment which drives them to objecting its lasting impact.

Fourth, as for their needs and the sort of support they required, they emphasised:

- the importance of promoting diversity at the senior level and not just at the entry level for the workforce in the industry
- the importance of financial commitment to diverse content within overall commissioning budgets.
- their need for improved networking and mentoring opportunities, which can be easily connected with their overall sense of a lack of awareness of and information on the Commitment.
- the need for data monitoring and checks on diversity in BBC productions, which links to past problems of casual or incomplete measures, to questions concerning transparency and accountability, as well as to the lack of clarity on monitoring and check-in mechanisms in place for qualified programmes under the Commitment.
- the idea of ringfenced commissioning money which can be spent solely on ideas which fulfil the diversity criteria. This is a critique echoed by various directions at the outset of the Commitment (see the 'Literature Review' section).
- The need for improved access to training. This suggested that, for the respondents, access to training is not unrestrained and widely available to them.

INTERVIEWS

In conducting this review, it was important to delve into the impact of the BBC's £112 million Creative Diversity Commitment on the UK's independent TV and audio production sector. In order to develop a nuanced understanding of this impact, we complemented and furthered the survey findings by interviewing key stakeholders as well as academics with a good understanding of the media industry in the UK.

In this part of the report, we start with a presentation of the design of the interviews, and we continue with a discussion of the interview findings on the topics discussed with all interviewees. This part of the report closes with a series of recommendations that the interviewees have put forward for the BBC and the sector at large.

Design

Sampling

In total, we spoke to 24 people in interviews ranging in duration from 26 minutes to 1 hour 15 minutes. Four of the interviews were with academics and with research expertise and/or past experience in the industry. 15 of the interviewees were mainly involved in TV production and 5 are mainly involved in radio/audio production.

Generally speaking, stakeholders such as company leaders are in a unique position to take the temperature on their thinking and approach in submitting pitch ideas for programmes to the BBC and also in making decisions around production and on-air talent recruitment and hiring; all key areas for assessing the Commitment's impact. More specifically for this review, most of the interviews we conducted were with TV and Radio company leaders and/or those who were part of senior production and on-air talent of BBC TV/radio/audio programmes and had been involved in BBC programmes over the three-year time-period covered by the Commitment. The companies the interviewees represent cover different regional bases around the UK and some are based in London. The size of the companies varied but ranged from large to micro indies.

Ethics and topics

All interviewees were requested to sign and return to the research team their Consent Statement, which confirmed their informed consent to participating in this research. Their informed consent also involved their agreement that their personal information would not be disclosed, and we ensured their anonymity in order to enable a full and frank discussion with them on the £112 million Creative Diversity Commitment.

The interviews followed a semi-structured format with the researchers having pre-selected broader topics for discussion around the interviewees' appraisal of the industry backdrop, their awareness, experiences and evaluations of the 3-year Commitment, as well as their recommendations for the future. Within these broad topics, there were set questions to gauge their level of awareness of the Commitment when it was launched and how their expectations were met over the three years of the Commitment. Also, we discussed questions about their experiences that centred on the three criteria of portrayal of stories, production leadership and company leadership. Each interview allowed for a wider discussion and follow-up questions to pick up on points made within the interview.

Findings

Industry Backdrop

Aiming to place the discussion about the £112 million Commitment into a broader context, we discussed with the interviewees the industry backdrop which identified several other factors and initiatives influencing their thinking and decision making around diversity within. Indicative is the discussion with company leaders of the Small Indie Fund for TV and the BBC Radio and Music Indie Development Fund as a number of them had applied or had heard about the Fund over the same 3-year period and felt that it formed part of the discussions around the Commitment.

In what follows, we present these interview discourses for other broadcasters and their recent initiatives and developments regarding diversity.

Channel 5. A number of TV company leaders mentioned the current commissioning attitude at Channel 5 favourably. They pointed to clear messaging from Ben Frow as an excellent example of encouraging diverse stories and diverse-led companies by embedding this into commissioning decisions. One of the regionally based Indies said that Channel 5 said with clarity: "no diversity, no commission".

Channel 4. By stark contrast, there were many critical voices about Channel 4's recent record on diversity since they had severely curtailed their commissioning spend. Some pointed to their accelerator programme for emerging diverse Indies, who had been through the whole scheme without getting a single programme on-air. It is "nonsense" said one TV leader:

"Because Channel 4 had the accelerator scheme the vast majority of people did not get a programme on air. And then, and they've got another one which is ... I think it's actually called the diversity fund that's paid for by Motion Content, which means that the originator doesn't get any long-term fee out of it. As I keep saying these things are designed to keep us on the plantation."

Another leader explained how Ch4 partners on the above scheme were taking IP from the production company and that this was particularly egregious, since they were a huge company; and they were already getting money from the advertising slots they were taking when the programme was being aired.

Diamond. The Diamond diversity monitoring also came through as a key driver in embedding change on diversity by demanding the form filling which had become habitual for every production:

"We feel like we are accountable much more because of Diamond. And because of that, and it feels like accountability is the thing, that has really made the progress."

Sky. The Sky initiative was also flagged as demanding production teams be 20% diverse but that this was a hindrance for those companies based regionally in places where the demographic profile of localities was overwhelmingly white and that such a demand for them did not take this into account, therefore the outcome was that they were hiring freelancers from London, rather than drawing on a local freelance pool which seemed counter-productive.

Nations Commercial Broadcasters. For TV companies based in the UK Nations, one pointed to commissions they received from the local commercial broadcaster as commissioning stories which embraced and supported their idea in more ways than just investing in a commission, reflecting an important diverse story, where they were able to train and work with a diverse producer. They felt that in comparison to the BBC, they had received much more support both financially and in other important ways:

"They were phenomenally proactive and helpful when we were making that programme. I went to that department, and I went to the Department Commissioner and told them, [the national broadcaster] this deserves a special screening for the community, and I think we should ask [named influential individuals] to come. To their credit they provided a cinema and we just had the best ever screening and XX turned up and it was actually one of the best nights I've ever been involved in, as it was really important because – and this is important to feed into the BBC because we've heard from others as well that have said it's not just the programme – it's what else, what is the other stuff that the programme can do outside just it being aired."

Indeed, other company leaders, in both TV and radio, said that the extra support around marketing and promotion of the diverse programmes they delivered to the BBC received little if not zero support in terms of allowing audiences to discover the programme, therefore it often felt that their hard work disappeared into the iPlayer.

Black Lives Matter (BLM). Many interviewees pointed to the fact that BLM happened in the summer of 2020 as an important societal backdrop to the diversity initiatives currently happening in the media industry. The movement directly led to diverse story commissions being invested in and that it also led to a change in thinking among many leaders about the importance of hiring diverse staff for stories that centred diverse people and that off-screen hiring decisions were just as important as on-air portrayal.

TV in crisis. A number of the larger, established companies reflected on the current state of the TV industry as they were making lay-offs and redundancies due to a downturn in commissioning spend which they said was due to a downturn in advertising spend in TV. They said this had a direct impact on diversity as 'lots of commissions seem to be risk averse at the moment' and that they wouldn't recommend for their own children to become TV producers, let alone anyone from a lower socio-economic background. A number of interviewees recounted anecdotes of TV freelancers taking jobs as Uber and Amazon drivers.

"It's like it's an absolute shit show. These initiatives, they were really constructive and working, if you had an industry that was stable because we were making progress. But now, I wouldn't suggest that anyone from any background, unless you've got a significant amount of wealth behind you, should go into television. Because half of my AD's are pizza delivery drivers, it's just awful."

However, there were also observations made by the interviewees that the larger companies were investing in diverse talent, even amid the current downturn.

"I think that some of the individual production companies or the super indies are making their own efforts, regardless of what else is going on in the wider ecology, which I think is good, [they're] thinking much more about inclusive recruitment, how people are recruited and how they're retained even in this tough climate."

Local BBC Radio Cuts. In radio, cuts in the BBC local radio landscape were mentioned as a backdrop to decisions around nurturing diversity in audio production as experienced freelancers on shows which were the evening Black and Asian shows had been impacted which in turn was another push factor for experienced radio people to leave the industry. Other push factors cited were the lack of formalised HR structures within the BBC to deploy and promote under-represented talent into the main national networks, significant gender/race pay disparities as well as the general attitude and disjointed thinking of BBC managers when approached by 'outsiders':

"It's the attitude, it's the arrogance. They've got to treat people - freelancers and talent with respect because they don't. Just because you're an editor doesn't make you superior. You're a human being. I think the BBC will struggle if they don't reach out, because again, you've got different stations and networks operating as separate entities, everybody keeps on talking about one BBC and it's far from it."

BBC Indie Fund. As mentioned previously, there were £250k worth of annual funds made available for radio and £1m annually for TV companies; these have so far been delivered in two rounds; for Radio: in 2022 with 15 recipients¹² and in 2023 with 13 recipients¹³; for TV: in 2023 with 50 recipients¹⁴ and in 2024 with 48 recipients¹⁵. The aim of the fund as stated by the BBC's Charlotte Moore was to "help us ...to champion new talent, increase diversity and be more representative of audiences." Radio recipients were successful in receiving money for relocation but felt the development fund was not joined up with commissioning:

"The critical element was that the Indie Development Fund and commissioning was totally disjointed, and the BBC went, hey, have some money to develop a creative base. But that money only lasts a certain amount of time. And what I was saying to the BBC was, we're in commissioning rounds. If the BBC are serious about growing a creative in any location, it needs to start with is a couple of programmes. One or two programs made by one indie, one or two made by another, one or two made by another. Because then you are able to have the shared economies of scale of growing a freelance pool and all this stuff that that goes with it. The point was, was that the BBC spent a lot of money on the Indie Development Fund and very few of those companies went on to win work that would enable a long-term investment in that area. What happened was a large chunk [of commissions] went to one company."

¹² <https://www.bbc.com/mediacentre/2022/inaugural-recipients-of-the-bbcs-radio-indie-development-fund-confirmed>

¹³ <https://www.bbc.com/mediacentre/2023/new-recipients-from-across-the-uk-confirmed-bbc-radio-indie-development-fund>

¹⁴ <https://www.bbc.co.uk/mediacentre/2023/small-indie-fund-recipients>

¹⁵ <https://www.bbc.co.uk/mediacentre/2024/bbc-announces-recipients-of-small-indie-fund-2024>

For TV Fund recipients, experiences varied. One company, who received development money from a different BBC development fund recently, set out their concerns around the obligations they were put under in how they should spend the money, which was not going to stretch as far as the BBC were imagining it would. They were furthermore conflicted due to an obligation they felt the BBC had put on them, to payout a large chunk of this money to a well-paid white 'mentor' who was allocated to them by the BBC. The difficulty for them was the idea of using the money towards the mentor rather than using it all to support under-represented diverse talent (which was the original intention for the funding).

A lack of transparency was again cited as an issue surrounding the allocation of Development Funds, although it was an extremely welcome sum which did help companies a lot.

"It wasn't like a massive amount of money, but it was really, really helpful because it gave four young people a chance to come onto a professional set and work [for two weeks] while we're on location actually filming, and it also gave us an extra pair of hands on what was a tight budget."

The company leaders felt that rather than shouting about the fact they were using this money for a good cause, there was a feeling that it was being 'suppressed' by the BBC due to fear of criticism in the press and elsewhere that they might be attacked for giving money away for diversity which may be deemed a politically sensitive topic.

Awareness of the Commitment

There were a range of responses when the interviewees were asked about awareness and knowledge of what the Commitment was and how it was communicated at the outset. What follows provides a nuanced mapping of the discourses with the interviewees' awareness of the Commitment and its elements being in-focus.

Black Lives Matter

The BBC announcement and comms around the Commitment, as set out in the Literature Review part of the report, was released during the Summer of 2020 when Black Lives Matter protests were happening globally in the aftermath of George Floyd's death in the USA. A number of our interviewees noted these events as linked to their memories of attending BBC webinars about the Commitment.

“It felt like there was a lot of noise at the start” one interviewee remembers “vividly” and narrates how they were sitting in their dining room during lockdown watching a “spiky” BBC webinar which outlined the Commitment. The “spikiness” related to the questioning by attendees of what was initially perceived as a ‘Fund’ of ‘new money’ amounting to £112 million for TV and radio, but which was later felt to have been retracted in favour of wording which referred to an already existing commissioning budget which would not be allocating any new money towards diverse content.

“I think one of the frustrations was that it wasn’t new money and quite a lot of the spikiness from the call was that it was rebadging existing money.

So my understanding was, this wasn’t new money for specific projects, but a kind of a ring-fencing of existing money, was my understanding of it.”

Furthermore, some company leaders were under the impression that due to the timing of the Commitment the diversity criteria would be more heavily targeted towards racial diversity, whereas some still held this belief, namely that the Commitment was specifically related to ethnic diversity: “As far I’m aware, it is that the BBC are there to tell more ethnically diverse stories and trying to kind of champion ethnically diverse content.”

A company leader stated that they felt the BBC were being ‘disingenuous’ with the announcement of the Creative Diversity Commitment and likened it to being:

“a bit like government saying that we’re putting huge amounts of money into rail investment, when the investment’s already going on.”

A few of the company leaders mentioned they were “cynical” about the announcement and that the inconsistencies over language and the perception of a ‘fund’ which they said, turned out not be a fund, had led to a loss of trust. One called it the BBC engaging in a game of ‘smoke and mirrors’ and taking the initial announcements with “a pinch of salt”. Some felt it ‘better to wait, to see what the outcomes would be, before judging their merit’.

A company leader in TV stated that they had initially felt overjoyed by the announcement of the Commitment; as a racially diverse leader of an Indie, they said:

“I felt like it was Christmas, Diwali, Eid, Hanukkah and Vaisakhi all at once!”

A slightly more understated tone of optimism was voiced by another racially diverse company leader who said they found the announcement to be 'encouraging' as it placed emphasis on diverse leadership of companies and in production roles. They thought that for the BBC to be saying that this 'really mattered' and they hoped that this would 'kick-start a collection of 'Black led indies' or that it would 'encourage white owned companies to invest in Black leaders.' In this sense, they were hopeful that the Commitment might 'create opportunity' for Black, South Asian and mixed heritage people in the industry in such a way as to 'develop the next generation of creative leaders.' In more detail, this interviewee stated:

"The fact that it was modern, it was looking at company ownership. It was looking at people in leadership. I thought it was a step forward, and I thought that some of the [Black-led] small indies might get a chance to really grow and sort of consolidate and move away from being hand-to-mouth operations and become sustainable. I was excited, because I thought there was an opportunity to do something different and develop a new layer of leaders."

Another company leader of an established, larger TV Indie was also positive; saying they thought the BBC "were seemingly serious about wanting to do something in terms of diversity and inclusion" as that they were "putting their money where their mouth was".

However, some on-the-spot calculations during an interview by a company leader led to the realisation that this money was not going to make much of a dent overall. They started with £100million and divided this over three years and then calculated this as a percentage of the annual TV commissioning budget for the year. The tiny percentage that came through (in the region of 1-2%) led the interviewee to laugh and conclude:

"If they're spending over a billion pounds a year and probably over 50% of the population qualify or fall under one of the diversity categories, it seems to me... so meaningless ...a slap across the face. Oh my God, it's so disrespectful".

A few of the TV company leaders (those mainly from more established and larger companies, although not exclusively) were not confident in their awareness of the Commitment. One of them stated they 'had no idea' about it and sometimes it felt like they:

"signed up to commitments and that – it's not that they're meaningless – they're well-intentioned, but unless it's actually accountable, it feels like they don't really work."

The confusion and wide range of perceptions received by our interviewees over the exact meaning of the Commitment seems to stem from the BBC itself not being sure over the clarity of its messaging from the outset. Also, this has constituted one of the early critiques of the Commitment, as noted in the Literature Review. Marcus Ryder, former head of External Consultancies for the Sir Lenny Henry Centre for Media Diversity and now Chief Executive of the Film and TV Charity, hosted a conversation on stage at the Edinburgh TV Festival¹⁶ of 2021. When the BBC representative was asked whether the financial commitment of £112m was ring-fenced money they said it was not, but then were unable to clearly describe what it was.

Many of the company leaders and producers we spoke to, were still under the impression that the Commitment related to a 'fund' or 'pot of money' which was in some way 'ring-fenced' in that it had to be spent on commissions for diverse content or companies and productions which were diverse led. One TV company leader set out what they thought the Commitment was more accurately than the rest and probably hit the nail on the head by setting it out in the following way:

"If a show is in that 'diverse field' and the BBC can say that X amount of money has gone towards production, so it's not that they're carving out 100 million. They're saying, there are going to be shows that are going to be commissioned regardless. And if they have a diverse presence, then that is included as part of the spend. So, it's almost like doing it backwards. It's like we [the BBC] are going to commission these shows anyway, and if there is an underrepresented theme to it, then it will be attributed to the Diversity part of the budget."

This interviewee adds: "I've known for the last three years not to rely on that [i.e. the Commitment] as a way of getting a commission."

A similar conclusion had been reached by another company leader who said:

"This is complete speculation because I'm not in any of those meetings, but I feel it's retrospective. I think there is accounting done at some point in the year where they [the BBC] go and look to measure 'how have we done on this criteria'. I don't feel it's proactive. I don't think it's the top of the meeting agenda to say so in terms of commissioning, 'where are we at with this?'"

Finally, one company leader surmised that the Commitment amounted to "an internal exercise for the BBC." and another who watched the Edinburgh TV Festival conversation about the Commitment also concluded that the Commitment¹⁷ amounted to an "internal accounting tool".

¹² This conversation has been recorded by Edinburgh TV Festival and is available at <https://watch.thetvfestival.com/videos/does-tv-need-a-black-controller>

¹³ It is available at <https://watch.thetvfestival.com/videos/does-tv-need-a-black-controller>.

Awareness of the diversity criteria

Many interviewees were still unsure of the diversity criteria for the three areas of eligibility. Some began speaking about their own backgrounds and how this led them to be aware of this characteristic in their teams. As previously stated, some interviewees were under the impression that there was particular emphasis on ethnic diversity. Others mentioned their own working-class upbringings alongside 'invisible disabilities'. One interviewee began with saying that the diverse company leadership criteria seemed straightforward, but then felt that including the top 6 in the company led to some complications and that not all diversity was obvious.

The academics we spoke to were not clear on the specifics of the criteria, but when shown; one interviewee commended their detail and specificity.

"I can see that it's very carefully worded and carefully thought through [in the commitment] not in a slippery way. I think it's incredibly detailed and helpful for producers and it still retains some flexibility".

However, a point of inflexibility was noted on company leadership criteria in practise as one interviewee said they had an established Indie with a senior person of colour in their team but when they asked the BBC if they would qualify, they had been told 'no', as the person was not in one of the roles specified by the Commitment. Another interviewee from a company based outside London where the locality had lower socioeconomic demographic profile, had a member of their senior team who also came under one of the diversity characteristics set out in the Commitment criteria, however they were under the clear impression that it was 'diversity in terms of ethnicity'. Another interviewee felt that the socioeconomic criteria was so vast that it encompassed 'probably half the country'. More uncertainty over criteria was expressed by a leader of an established Indie:

"I think...I think the production has to have ...Black ...oh I'm going to get it wrong aren't I? ...had to have Black leadership or disabled leadership."

A few of the interviewees whose companies would have qualified under either the disability criteria or due to their lower socioeconomic backgrounds or because of the racial diversity of their senior leader teams, described a lack of direct engagement from the BBC with them, about the Commitment. One interviewee looked through emails from the BBC to refresh their memory over the time period and felt that there was justification in the thought of the BBC being somewhat dismissive at that time as well as non-cooperative over requests for more guidance on what the Commitment might mean for them.

"I'm going over these emails that I've received from [the BBC] and ... I asked whether funding applied to XX programme. I was told no, it doesn't. ...We'll be in touch. ...it is just very unclear, very uncoordinated comms ...you've sort of gone round in circles..."

Another interviewee told us they felt like an ‘outsider’ when it came to this latest commitment, despite being involved with industry diversity initiatives in the past:

“No one spoke to me one-to-one. I was just aware of the announcement through the press.”

One of the academics noted that they had difficulty in using three different diversity criteria at the same time in terms of trying to bring together race, class and disability under the same umbrella and they also pointed to the problems encountered when “the criteria is too wide.” Another academic we spoke to warned about the dangers of focusing solely on racial diversity, since they said, it was not always the case that some South Asians or people of mixed heritage are suffering disadvantage and perhaps “you will find people with more disadvantage for sure” They concluded that these are “difficult determinations to make.” Another academic agrees that the mixing together of the diversity characteristics makes it “very difficult to deconstruct how much went to this group, how much went to that group’ but that the importance of having a diversity initiative was ‘good signalling’ that the BBC is making an effort, “even if it hasn’t achieved it yet”.

Experiences of the Commitment

Differing experiences in relation to the Commitment sometimes depended on whether the production company was ‘diverse led’ in terms of racial diversity or whether they were an established company already producing on-going strands for the BBC. This distinction was less noticeable among the radio company leaders we spoke to. There were however some overall trends in the responses to how individuals felt their company or company practises had been impacted by the BBC’s Creative Diversity Commitment over its three-year course and in relation to its 3 criteria.

Impact of the Commitment on Diverse Stories

In terms of diverse content and stories that the interviewees we spoke to were pitching into the commissioning rounds, most company leaders across both TV and radio said that the Commitment had not significantly impacted on the diverse stories they were submitting to the BBC. Racially diverse company leaders told us that they were always pitching these kinds of stories anyway as they always do.

“To be honest with you, the relationship that we have as an independent producer to the BBC is basically, we stick to the ideals of our programming and the things we want to say or the things that we want to do. Essentially, we pitch what we want to make. We go in with ideas that we believe in. It [the Commitment] didn’t change our approach to commissioning.”

Another racially diverse company leader re-iterated the point that they would “always be pitching what we believe to be diverse stories.” The challenge that they felt keenly in the BBC’s commissioning process was what they perceived as reluctance to trust Black-led indies in telling their own stories, due to the lack of understanding at this level of diverse perspectives. They said they were not sure whether:

“The commissioning setup is as diverse as it needs to be. And I still think even when they’re dealing with diverse ideas and individuals, I still feel there’s a sense that you have to make your story fit their understanding of your story. There’s a lack of freedom to totally give over the reins to somebody else.”

Another company leader also felt there was a lack of cultural understanding for their ideas by commissioners; and recounted a pitch which featured global, racially diverse actors. This interviewee didn’t think the BBC understood their relevance to a British audience as they probably did not know “who these artists even were.”

An interviewee who had delivered some diverse portrayal commissions over this 3-year time period was sceptical that the Commitment announcement played any part in the decision to move forward with their ideas, as they had been in development prior to the announcement and therefore they would not be changing their usual way of doing business with the BBC.

It is important at this point to stress two core arguments within this broader discussion of impact on diverse stories: “increasing inflow of diverse ideas” and “diverse content commissions as ‘one -offs’ and ‘scraps’”.

- Increasing Inflow of Diverse Ideas

A small number of interviewees pointed in the direction of increased inflow of diverse ideas during the Commitment. For instance, a racially diverse company owner was asked whether the Commitment might have led to their Indie pitching more diverse ideas than they would have prior to the announcement, and they acknowledged that, “yes”, “it encouraged me to put in ideas. Yes, it definitely did.” A larger more established TV company leader said the Commitment had led to them submitting more diverse ideas into commissioning rounds and they felt they had indeed won commissions based on the existence of the Commitment. They had come to this conclusion saying that, otherwise, without the commitment, those ideas they pitched would ordinarily have been considered ‘too niche’ for commissioners:

“Truthfully, I think because the Commissioners wouldn’t be convinced, they’d get a wide enough audience. Whether they’re right or not, I don’t know. So, they [i.e. the diverse commissions] were perceived as niche programming and therefore probably wouldn’t have got commissioned otherwise.”

- Diverse content commissions as 'One-offs' and 'Scraps'

On the other hand, a number of company leaders were concerned that the diverse commissions they had won, which fell under the diversity criteria set out by the Commitment, were not profitable or self-sustaining and would not improve the overall financial health of their companies long-term.

One company leader said:

"The commissions that we got, that I think were - that felt like they were - through this [Commitment] were scraps. We didn't make any money on them."

Another leader agreed, saying that they were only ever commissioned to do "shorts, tasters, micro-shorts, it never feels like you're in with a real shot."

One interviewee, who had hired more diverse talent for a programme, so as to qualify for the Commitment, said that they felt there was no follow-up in the post-programme delivery period, as they were not able to offer more work to the freelancer afterwards, posing the question of real opportunity for those eligible:

"Would we have pitched that [programme] without this Commitment? Probably not. So it has had an impact, but I wouldn't say it's changed the way we're thinking. It's probably just refocused the importance and value of it for us from a commissioning perspective. But we're not then able to say ...what's the next thing and what's the next thing. And that I think is part of the legacy challenge of a lot of these projects."

Impact on Company Leadership

As for the impact on company leadership, one of the interviewees had high hopes that the announcement of the Commitment could help establish a new generation of racially diverse leaders. To follow up with how this had worked in practise, they told us what needed to happen next:

"Let's do an audit of how many Black owned indies were working with the BBC before they announced the scheme and how many they're working with now. That will be an interesting way of seeing whether it has actually done anything."

They also stated that if the aim is to increase diverse company ownership, then the money would be better spent by targeting money for this specific purpose - towards identifying perhaps 10 companies and then giving them £50,000 each for development.

An interviewee working in TV thought there had been no changes over the 3 years, that they had seen in company ownership. One of the radio suppliers felt that the Commitment had not helped diverse-led companies as they had seen some of these companies fail over the past three years. This contrasted with a TV company leader who felt there were more diverse-led TV production companies than there were five years ago. They wanted to acknowledge that there had been progress on this point. When asked why they thought this was the case, they pointed to Channel 5 commissioning diverse-led companies, as opposed to what the BBC had been doing. They pointed to the importance of having diverse commissioners, as follows:

"You've got to have diverse commissioners. That was a game changer for us. And when you've got diverse Commissioners, then you know people on the other side will start having confidence. OK, well, I've got someone to pitch to it. You're in. You're in no man's land. If everyone is white on the commissioning side, no one has an understanding of the perspective that you're trying to bring to the table and trying to put on screen."

However, another diverse-led TV Indie had a contrasting view of the current media landscape as the TV industry was facing a funding crisis due to a loss in license fee and advertising revenue and having therefore fewer commissions to go round.

"That has created an oversupply of Indies and I think it's small, diverse Indies that are going to go to the wall first and that's kind of problematic from a diversity point of view. Because it's almost like we're all encouraged to enter the industry and make it work, and then when the industry starts crumbling, it's going to be people like us that get impacted first."

Impact on Production Leadership

Amongst both the radio and TV companies, there was a general feeling that there were not enough racially diverse senior producers available for work and that it was a struggle often to find the people they needed to fulfil this part of the Commitment. They did not think that the Commitment had done anything to change this reality.

"We struggled to find people who are exec producer level and up. We struggle to find them. And they tend to be the same people who've been in the industry for a long time. So yeah, I would say it hasn't changed."

Among the academics we spoke to, one interviewee who had extensive experience of working in the industry said that they were 'not sure that there was enough talent' to 'actually service the requirement' to bring in more diverse senior leaders and off-screen producers.

Other radio leaders, whose company senior structures are less diverse, told us that they had become more aware of the necessity to hire diverse staff on stories that covered issues relating to people of colour, or where gay people or disabled people were central to the narrative for example.

An academic we spoke to, who also has previous experience working in the media industry argues that it is not always necessary to be from a diverse background to tell diverse stories but that reflecting the community you are covering is necessary.

"I wouldn't say that only Black people can make Black stories and only white people can make white stories. The difference between the production team is that it's boots on the ground, so when you go out into the community, do you want the community to respect and have confidence that the people they are dealing with, get them? And I think the more diverse your production house can be, the better that reflection."

One of the larger TV company leaders said there were only around 5 racially diverse senior producers that they could rely on and that they were very much in demand and as a result, their wages had been pushed up. Another TV leader told us they had done significant outreach work to find a racially diverse senior producer and out of a large number of applications, they had 3 applications from producers of colour. They told us that they found the whole process "very, very tricky", as two of those 3 applications were people who did not have the necessary skillsets and, in the end, they hired the person of colour who was the best out the three.

It was acknowledged by another interviewee that diverse producers were being fast-tracked so that the companies could access certain funding:

"It is almost a fast tracking of mediocrity you know so you know what happened is people will be parachuted into roles that were of a senior level so that they could access certain funding but what that did was it kind of elevated people a lot quicker than their actual acumen"

In a larger, more established TV company, hiring decisions were discussed at length, the interviewee explained that they were telling more diverse stories and that their casting was getting much better than it used to be. In terms of producers working behind the camera, they admitted that they "are having to get better ...so that the crews don't feel so, so that you know it's a more inclusive environment generally." They explained that they had made hires and moved less experienced diverse producers further up the ranks than they were ready for, just to meet the criteria:

"But we've done it because we've had to do it to meet the criteria and then, it's been awful for everybody, including for them and we've had to sort of parachute additional resource in to support them or regrettably in some instances people have had to leave production because they've been completely out of their depth and you know ..and everyone around them has been unhappy."

This contrasts with the experience of a diverse-led Indie whose leader had cultivated a rich, diverse network of people over many years of working in the industry as a person of colour themselves and said they 'naturally' formed a network of diverse people who came to them for work. They similarly promoted a diverse producer on their shoot:

"We got a commission for the series, she volunteered herself to be the producer of the series. Conventional wisdom would have been absolutely not; she's not delivered anything ...series producer is a whole different category.

We backed her. I thought I could see that she had good skills. I could see that she was a calm head. What she lacked in experience of managing personalities she made-up for with her calm persona and just getting stuff done and not complaining.

And so we backed her. And yeah, you know, she hit it out the park; she also paid it forward as well. She absolutely gave opportunities to other people of colour."

One of the academics in our interview sample pointed to the importance of noting why there were not enough people from diverse characteristics currently in the industry. They highlighted the difficulties that the BBC had faced in retaining diverse staff:

"The problem in the industry is it's been very difficult to retain people, to create a sustainable pathway for people who are not white ... you don't have sustainable pathways if you don't value difference. And if you don't value difference, you get a certain way of thinking at the top and what that means is [the BBC] never get people who are 'different', rising [up]."

Experiences of under-represented socio-demographics

The interview discourses on the Commitment in relation to under-represented socio-demographics in the sector were focused on 'disability portrayal' and the 'diverse content for 1Xtra and Asian Network' for radio.

- **Disability Portrayal**

An interviewee stated that they had seen an uptick in the work over the past three years. They were not sure whether this was related to the BBC Commitment as there were other initiatives which were having an impact at the same time (namely the TV Access Project). They described their experiences with the BBC as generally positive:

"For us, [there] has been increasing access to production teams and Commissioners, increasing willingness for production teams and Commissioners to engage with us.

An increasing sense of responsibility about how disabled stories are told."

This experience contrasts widely with that of another interviewee who had a “terrible” time when a programme they were working on was dropped from the schedules:

“There was a lack of communication. The show was dropped without any proper constructive feedback. The treatment was so disrespectful to all involved.”

Another indie felt that the BBC’s approach to disability had been inconsistent with the messaging around the Commitment, with one commissioned programme on disability representation being made by a company that wasn’t a disabled-led indie.

- **Diverse Content for 1Xtra and Asian Network**

For radio suppliers of diverse content specifically targeting networks that serve under-represented audiences, such as Asian Network and BBC 1Xtra, diverse stories and portrayal of racial diversity were considered integral to the work they did everyday anyway and therefore they did not feel their programmes should be counted for inclusion in the £112m on this basis. The reasoning provided was:

“Because it’s a part of a public service where the station is specifically set up to reach this audience...you’re basically double counting. Your content is going to speak to this audience anyway, so I feel that shouldn’t be counted.”

They said that for them, it made more sense for the money to be targeted towards “other networks where there is less representation, where there’s under representation – that is where the money should be spent.”

Some radio suppliers wanted the Commitment to represent an opportunity to move into winning commission across these other BBC networks, so as to encourage growth for Black and racially diverse led companies into networks where established suppliers often comprised of companies where there was very little or no racial diversity in leadership structures.

Transparency and the Commitment

The final theme in the interview discourses regarding experiences related to the Commitment is that concerning transparency.

All the company leaders could not say for certain whether any of the commissions that they had won over the 3-year period had qualified under the criteria. There was a general lack of transparency over whether their programmes would or would not be included in the Creative Diversity spend. When asked whether they would want to know this information, a large majority agreed that it would be beneficial to share this information with them formally as it would probably encourage them to pitch diverse stories or indeed to show they have diversity in their leadership structures.

Here is a selection of comments from interviewees on this suggestion to share information on whether they have qualified under the diversity criteria set out under the Commitment:

"I think transparency is important as otherwise you are essentially blind to the outcomes."

Also, they added that currently they "don't get a result card back that says congratulations. You've made this amount of programmes under diversity + inclusion... [but] I think it would be quite useful."

Nevertheless, one of the company leaders felt they did not need to know this information: "I think that the BBC needs to know because I think it needs to be tracked on their side."

A Lasting Impact?

A final core interview finding of the analysis concerns the interviewees' views and perceptions of whether the Commitment can have a lasting impact or not.

The thinking around diversity in media productions had become embedded by almost all the company leaders we spoke to and was often seen as part of their 'modus operandi'. Many attributed this to the spotlight placed upon them both externally and internally as a result of Black Lives Matter, rather than as a result of the impact felt by the Commitment. "We're thinking about diversity all the time, in that sense it has changed, definitely, massively changed." In practical terms, one of the company leaders referred to forms they now had to fill in for applications to industry awards, which were all asking about diversity of the production.

It has made a difference ... there are six diversity categories I had to fill in about content, the production team and served audiences, with disability etc, etc. So there has been a shift because people love awards. And if you can't get an award without being able to fill in the boxes, so yeah.

They also believed that there had been 'transformational change' for on-air portrayal at the BBC, pointing specifically to BBC Three commissions for younger audiences such as 'Borders'. In talking about change, another racially diverse company leader felt that it was important to discuss the fact that the Commitment had delivered very few 'returners', namely i.e. repeat series commissions in particular the drama and comedy categories where budgets were larger and would have had greater significance in impact on the financial health and strength of their companies. They noted how difficult it remained to penetrate these genres within the BBC.

Many of the interviewees were shown a social media clip that the BBC put out on Twitter/X in 2020 which announced the Commitment in a black square with the words that they were committing £100 million and that this would lead to a 'movement not a moment'. Three years on, watching the clip back, our interviewees reflected on whether this spirit of the Commitment had been felt through the industry.

"I think they probably need to have a son or daughter of the scheme to make sure that it's continuous."

"The real lived experience of many of us is that no, that's just talk."

"What's so important is it doesn't become a moment... that the Commitment isn't just parked now and moved on. This is something that takes consistent commitment."

Concluding recommendations

Following on from the above discussions about the Commitment, the interviewees offered a number of practical suggestions for what might come next. Specifically, the interviews analysis pointed to the following key recommendations:

- Provide a ring-fenced fund for diverse commissions.

The clearest demand for improving the Commitment was to make it a clearly ring-fenced funding that could only be spent on diverse commissions. Furthermore, the funding should be new money made available for this purpose.

- Allocate diverse commissioning funds for each diversity characteristic separately.

In terms of the diversity criteria, and from the experiences of other organisations such as the BFI, the most effective way to increase diversity of each characteristic is to measure and allocate clearly separate and ring-fenced funding for each of the different criteria being measured. Therefore, the interview discourses recommended a fund for racially diverse commissions only, for instance, separate from the fund for socioeconomic diversity etc.

- Training and progression support to the independent sub-sector.

What the interviews recommend is a central BBC diversity point of contact, who has the power and budget to offer independent production companies financial support for training diverse individuals working on BBC commissions.¹⁸ This would be for both production and presentation roles and at all levels from entry to more senior progression through the ranks. For instance, an interviewee proposed to extend the BBC Sounds Audio Lab scheme to cover senior producers who come from under-represented backgrounds. Audio Lab currently operates for entry level producers to work with independent audio production companies, on an idea for a series which is commissioned by BBC Sounds. The suggestion was to extend the scheme to provide progression opportunities for more experienced producers to step up and take on a narrative series. Another interviewee proposed the formalisation of HR practises with oversight to bring in more fairness into progression and movement of under-represented talent, aiding their deployment into roles that match their experience and skillsets, across the organisation.

Also, the interview texts advised on the referral of potential under-represented producers, directors, on-air presenters and others, who apply to BBC trainee schemes and other jobs including freelance shifts, to the independent production sub-sector. This relates to the pointing out of the need for awareness-raising of opportunities available in the independent sector for applicants to BBC jobs.

Another proposal was in favour of lobbying the government in order to allow independent production companies to use their apprenticeship levy funds for the purposes of employing under-represented producers/talent.

- Business support for diverse-led Indies.

Interviewees recommended the provision of access to a business mentorship with specialist expertise of the media industry, so as to support diverse-led indies for advice on infrastructure and scaling up, financial and legal support, especially in the area of intellectual property negotiations.

- Promotion and marketing for diverse commissions.

Connecting BBC marketing, PR and audience teams to independent production companies so that they work on strategies that will amplify their content to target audiences. An independent production company can work with in-house BBC teams to provide digital content and boost the discoverability of their diverse stories for the BBC on iPlayer and socials for those audiences. One company leader asked that they be given the data from iPlayer which tells them how many times their content has been viewed/downloaded.

¹⁸ It is important to note that the BBC offers the diverse talent development fund, which ring-fences £2million of TV development spend every year to help support and accelerate projects that need extra funding, beyond the usual production budget. See at <https://www.bbc.co.uk/commissioning/diversity-development-fund>

- Reduce commissioning gatekeepers.

The experiences of independent production company leaders with the BBC commissioning system left some demanding change so that “commissioning decisions are not left on the shoulders of individuals” The interviewees compared the BBC process with those of the streamers, where decisions were much more collaborative and worked in a more transparent and efficient way as decisions were being made on an on-going basis through committee and in commissioning circles, involving a variety of individuals. This approach to commissioning would prevent ideas from indies languishing in BBC email inboxes which were often going unchecked and unanswered.

- Increase the diversity of commissioners.

The BBC assistant commissioner scheme which brought in a more diverse selection of people from under-represented backgrounds was commended and a number of interviewees thought that this was making a real difference to the decisions being made at this level. Some company leaders wanted this scheme to continue and be expanded across other BBC genres and departments, since the importance of representation across the commissioning layer, was considered such a crucial piece in the jigsaw for supporting diverse stories, under-represented people working in the industry and for strengthening diverse-led companies.

- Better and more effective monitoring of the Commitment.

Monitoring in practise was flagged as a needed improvement. The interviewees outline this as monitoring which does not rely solely on self-reporting or that is anecdotal, with transparency in processes and also clarity on consequences for not fulfilling the qualifying criteria.

One interviewee stated that monitoring how people had performed in their jobs, in TV, tended to be quite anecdotal, rather than relying on actual formalised processes which were explicit and known by all parties. They said that relying on anecdotal and informal remarks is not effective in monitoring staffing or for ensuring that the right people are being hired for future productions. One interviewee noted that they had noticed improvements when proper monitoring was implemented for a short time, when they worked on a BBC production:

“If you put a presenter on a programme, no one watches, it doesn’t really get out...we started to become more aware ... and started to grow a pipeline and crucially, we also did a bit of succession planning where we started to spot good people coming through”

The lack of transparency over the BBC's initiatives to improve regional representation was cited as a reason why more and better improvements in monitoring were needed. The interviewees wanted to see some follow-up on whether the production company had in fact delivered on its' promises made at the outset of the commission:

"It's called the 'Lift and Shift' controversy whereby ...they really do bend the rules."

This interviewee went on to describe some named examples of productions which had accessed money meant for regional productions, but most staff had been hired from London and/or company leaders were London-based but had merely registered an office in the regions to access the regional funds. The problem with this was that "the people who come and leave, that's not really helping build the [regional] industry. One recommendation I would make would be that BBC should be transparent about consequences."

The above interviewee wanted to bring in more transparency by the BBC over what the consequences would be for those independent production companies who were not fulfilling the criteria. They also noted the effectiveness of "regular deep dives" of the diversity data, rather than relying on self-reporting by the Indies. This is where you get to see patterns in the data from the channel, that you might not be aware of otherwise, they said.

WHAT NEXT: RECOMMENDATIONS AND REFLECTIONS

Awareness and clarity

The collected survey and interview data has demonstrated that the Commitment and its criteria are either unknown or largely unclear to many professionals in the sector.

In confirming early critiques over the Commitment's insufficient clarity ([Ryder, 2021](#)), the survey and interview data analysis has concluded that a significant number of key actors lack awareness of the Commitment or have an inaccurate understanding of its nature and criteria. This becomes even more problematic when one pays close attention to the fact that the majority of the survey participants who are unaware of the Commitment have a minority ethnic and lower-income background and/or are lower in the company's hierarchy.

We suggest the BBC considers whether raising awareness in the sector can be supported by systematically and consistently informing companies and their production teams across the sector on: a) the nature, goals and value of the Commitment, encouraging them to pitch new programmes within the remit of the Commitment and b) whether a commissioned programme has qualified for the Commitment.

Appraisal of Commitment's nature and criteria

As for the Commitment's nature, the survey and interview data have brought up the idea of ringfenced commissioning money which can be spent solely on ideas that fulfil the diversity criteria. This is a critique that had also been forward at the outset of the Commitment (see the 'Literature Review' section). The interviewees went even further stressing the importance of allocating separate and ring-fenced funding for each of the different socio-demographic and other categories of diverse and under-represented talent.

It might also help, if the BBC is trying to create an ecosystem which would allow companies and individuals to invest, for future Commitments to be genre specific as producers and production companies work in specific genres. Thus, many would value genre specific ring-fencing in order to plan for the longer term.

As for the three Commitment criteria, the analysis of the secondary BBC data has shown that the two leadership criteria are those met the least and not across the board, essentially showing that enabling under-represented talent and diversity in TV and radio production remains a goal that the BBC must address. This was confirmed in the survey data, which highlighted the importance of promoting diversity at the senior level and not just at the entry level for the workforce, with some of the survey respondents arguing that this can be accomplished if there is: a) further financial commitment to diverse content within overall commissioning budgets b) improved networking and mentoring opportunities and c) training that is unrestrained and widely available.

Training needs were especially the focus of the interview discussions, as the interviewees recommended a central BBC diversity point of contact, with the power and budget to offer independent production companies financial support for training diverse individuals working on BBC commissions. As part of the increased training and related support, the interviewees mentioned that the BBC needs to raise awareness of opportunities available in the independent sector for under-represented producers, directors, on-air presenters and others, and even to steer independent production companies towards dedicating their apprenticeship levy funds to the employment of under-represented producers/talent.

Impact: evidence and perceptions

We reviewed the impact of the Commitment at two levels: the evidence level and the perceptual level.

Regarding evidence, the analysis of the delivery of the Commitment showed that the £112 million budget is only a small fraction (significantly less than 5%) of the overall budget, inviting more significant financial investment for the impactful promotion of creative diversity. Beyond financial figures, limited impact was also demonstrated in the analysis by the fact that only a very small number of new-to-the-BBC TV and radio production companies qualified for one or more programmes, with those programmes' budget being fairly low, thus questioning whether the commissioning of diversity programmes is a level playing field.

At the level of perceived impact, the survey data suggests that, while actors in the sector recognise that the Commitment has had some positive influence on the creative and practical elements of their production work, the prominent argument is that the Commitment has not impacted on the career development of under-represented talent. At the same time, the limited awareness and/or understanding of the Commitment constitutes a barrier that prevents people from going into depth and assessing the Commitment's impact, especially with regard to whether it can have a lasting impact.

To address limited impact, the interviewees recommended mentorship and connecting BBC marketing, PR and audience teams to independent production companies for the promotion and marketing of diverse commissions. The interviewees argued that these tools could prove useful for diverse-led indies that need advice and support. However, whether and how this could become an integral element of or a parallel activity to future Commitments is something to discuss with the BBC.

Two-fold transparency: measuring tools and monitoring

In both the survey and interview data analysis, transparency came up as a central, two-faceted theme.

Its first facet is to do with the measuring tools. While existing critiques flag up the arguably problematic structure of data collection ([Nwonka, 2020](#)), point to a lack of intersectionality and scope within industry metrics ([Edward and Moss, 2024](#)) and also stress the lack of context ([Forest and Johnson, 2019](#)), the analysis of the secondary BBC data leads us to the conclusion that for measuring the implementation of future Commitments, the following metrics are needed:

- total number of titles to compare with those qualified, focusing on genres and commitment criteria, in particular, so as to enable clearer targeting in future initiatives.
- the specifics of company or production leadership in order to see the segmentation by ethnicity, disability and/or socio-economic background. While companies need to be careful with reporting formally on personnel data on sensitive protected characteristics due to issues of identification and self-disclosure, it is important to pursue the generation of more segmented and nuanced data on a production reporting level. This would allow the BBC to create further impact and make targeted strikes at areas of deficit.
- the correlation between diverse indies and new programmes, especially focusing on the profiling of factual programmes (i.e., the dominant genre of qualified programmes for both TV and radio) – e.g., spread in the sector for the indies, whether individual titles or series, spend on this genre compared to the other genres.

The second facet of transparency is to do with monitoring. The survey data showed that actors in the sector require data monitoring and checks on diversity in BBC productions, which links to past problems of casual or incomplete measures, to questions concerning transparency and accountability, as well as to the lack of clarity on monitoring and check-in mechanisms in place for qualified programmes under the Commitment. The interviewees argued that monitoring must not rely solely on self-reporting or be anecdotal and favoured both transparency in processes and clarity on consequences for not fulfilling the qualifying criteria.

Given that many of those surveyed and interviewed in the research appeared to lack knowledge of whether and how the BBC required the qualified companies to report on how they met the criteria, we recommend that the BBC develops and communicates broadly a set of protocols and standard processes that apply across the board, for both television and radio, with respect to checking-in and monitoring the compliance of the qualified titles with the criteria of the Commitment. It would also be of value for the BBC press and communications teams to disseminate related news and updates in the form of campaigning and diversity promotion in the public domain and across the sector.

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