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Working Group II
Achieving greater diversity in broadcasting - special focus on gender;
Benefits and best practice approaches
Comparative background paper¹
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1. Background

Four years have elapsed since the EPRA session in Tbilisi on 'Ensuring Diversity and Inclusion in the Media' explored how national regulators approached representation of age, social class, ethnicity, gender, sexuality and disability in the media. In the meantime, the issue of how to achieve greater diversity in broadcasting has gained prominence in many jurisdictions and at the European level.

The issue of improving representation of gender in the media has been an ongoing discussion and debate for a number of years and there appears to be recognition and understanding within the broadcasting industry that diversity is important, both on-screen and off-screen.

Among the cooperation networks, the Mediterranean Network of Regulatory Authorities (MNRA/RIRM) has been a precursor in raising the awareness of media regulators and undertaking research on issues pertaining to gender representation on screen.²

Against this background, EPRA members decided to include in [EPRA's Work Programme for 2018](#) a biannual group exploring practical ways to encourage a better representation of society – on-screen and off-screen – by addressing the issues through the specific angles of gender representation (for the spring session in Luxembourg on 24 May 2018) and social, cultural and ethnic minorities (for the autumn session in Bratislava on 11 October 2018).

The purpose of this comparative background paper is to provide an overview of the different roles and approaches that national regulatory authorities have adopted in relation to promoting greater gender representation and portrayal both on and off screen and raising some points for regulators to consider.

This paper is based on the answers to a questionnaire³ circulated by the EPRA Secretariat. A total of 31 responses were received from the following regulatory authorities (23 of them originate from EU countries and 8 from non-EU countries):

¹ **Disclaimer: This document has been produced by EPRA, an informal network of 53 regulatory authorities in the field of broadcasting. It is not a fully comprehensive overview of the issues, nor does it purport to represent the views or the official position of EPRA or of any member within the EPRA network.**

² With reports on gender stereotypes in advertising and equality between men and women in the sport programmes, see Annex 2 for references.

³ You can consult the full list of responses to the questionnaire at the following link:

<https://www.epra.org/surveys/achieving-greater-diversity-in-broadcasting-special-focus-on-gender/results>
(EPRA members' only)

The Audiovisual Media Authority of Albania - AMA (“AL”), the Communication Regulatory Agency of Bosnia and Herzegovina - CRA (“BA”), the Conseil supérieur de l’audiovisuel of the French speaking Community of Belgium - CSA (“BE”), the Council for Electronic Media of Bulgaria - CEM (“BG”), the Swiss Federal Office of Communications - OFCOM (“CH”), Cyprus Radio-Television Authority - CRTA (“CY”), the Council for Radio and TV Broadcasting of the Czech Republic - RRTV (“CZ”), the Directors’ Conference of the State Media Authorities of Germany - DLM (“DE”), the Radio and Television Board of Denmark - RTB (“DK”), the Technical Regulatory Authority of Estonia - TRA (“EE”), the Catalan Audiovisual Council - CAC (“ES-CAC”), the National Authority for Markets and Competition of Spain - CNMC (“ES-CNMC”), the French Conseil supérieur de l’audiovisuel - CSA (“FR”), the National Council for Radio and Television of Greece - NCRT (“GR”), the Agency for Electronic Media of the Republic of Croatia - AEM (“HR”), the National Media and Infocommunications Authority of Hungary - NMHH (“HU”), the Broadcasting Authority of Ireland - BAI (“IE”), the 2nd Authority for Television and Radio of Israel - SATR (“IL”), the Icelandic Media Commission - IMC (“IS”), the Italian Communications Authority - AGCOM (“IT”), the Radio and Television Commission of Lithuania - RTCL (“LT”), the Independent Audiovisual Authority of Luxembourg - ALIA (“LU”), the Council for Coordination on the Audiovisual Activity in Moldova - CCA (“MD”), the Agency for Audio and Audiovisual Media Services of Macedonia - AAAMS (“MK”), Malta Broadcasting Authority - BAM (“MT”), the Dutch Commissariaat voor de Media - CvdM (“NL”), the Polish National Broadcasting Council - KRRiT (“PL”), the Regulating Entity for the Media of Portugal - ERC (“PT”), the Regulatory Authority of Electronic Media of Serbia - REM (“RS”), the Swedish Press and Broadcasting Authority - MPRT (“SE”) and Ofcom (“GB/UK”).

2. European and International Context

This section summarises high level developments within two key European institutions, i.e. the Council of Europe and the European Commission, as well as the United Nations.

2.1. Council of Europe

The Council of Europe has attached great importance to gender balance over the last few decades as gender equality is deemed a necessary condition for the full enjoyment of human rights as secured by the European Convention on Human Rights and a prerequisite for genuine democracy. Over the years, the Council of Europe has adopted a number of standards and instruments⁴ promoting gender equality, including the Council of Europe Gender Equality Strategy 2018-2023.⁵

From early on⁶, there has been acknowledgement that **media - and more generally the audiovisual sector - had a particular role to play** in relation to the achievement of these objectives. On the one hand, the audiovisual sector is well placed to shape and influence - in a positive or negative manner - perceptions, ideas, attitudes and behaviour prevalent in society. On the other hand, gender inequalities in society are reproduced in audiovisual content, but also within the audiovisual sector, notably women’s under-representation in the different professions and in decision-making roles.

Recent initiatives include notably:

- Committee of Ministers Recommendation [CM/Rec\(2013\)1](#) on gender equality and media
- Committee of Ministers Recommendation [CM/Rec\(2017\)9](#) on gender equality in the audiovisual sector.

⁴ For a list of reference instruments with links, see the *Appendix III to Recommendation [CM/Rec\(2017\)9](#)*

⁵ <https://www.coe.int/en/web/genderequality/gender-equality-strategy>

⁶ See the Recommendation of 1984 ([Rec\(84\)17](#)) ‘on equality between women and men in the media’

The two recommendations mirror and complement each other, with the recommendation of 2017 aimed at including a gender equality perspective in all branches and activities of the audiovisual sector to respond to issues such as the lack of awareness of the prevalence of gender inequality, gender bias, the unequal distribution of funding and investment, the lack of willingness to invest in financially-ambitious, female-created content, the unbalanced support for dissemination of female-created content, the low representation of women at key positions in the audiovisual sector, unequal pay, the failure to support parents and carers, and the unequal access to employment opportunities. The recommendation invites governments of Council of Europe member states to review their legislation and policies; collect, monitor and publish data; support research; encourage the ongoing development of media literacy and enhance the accountability processes.

More specifically, the appendices of both recommendations **address the role and responsibilities of regulatory authorities**. CM/Rec(2013)1 states that '*media regulators [should] respect gender equality principles in their decision making and practice*' and that '*media regulators [should be mandated] to include an assessment of the implementation of gender equality policy in the media in their annual reports*'.

With regard to monitoring methods, CM/Rec (2017)9 states that regulatory authorities are invited to '*contribute to the collection of data, commit to the publication of such data and adopt measures to achieve gender equality and visibility for women based on the findings*'. Performance indicators pertinent to broadcasting regulatory authorities include on-screen and off-screen indicators to assess gender disparities in the sector.

In parallel, the Parliamentary Assembly of the Council of Europe has adopted several recommendations on the image of women and on combatting sexist stereotypes in the media.⁷

2.2. European Union

Under the Treaties (Art. 19 [TFEU](#)), the European Union (EU) can enact legislation to combat gender-based discrimination, and is committed to upholding and promoting the principle [of gender equality](#) in all its actions (Art. 2 and 3(3) [TEU](#) and 8 TFEU). The European Commission's current priorities, set out in the [Strategic Engagement for Gender Equality 2016-2019](#), include tackling inequalities between women and men in decision-making and the labour market, combating [violence against women](#), and fostering gender equality and women's rights across the world.

Existing [EU legislation on equality in employment](#), which includes provisions on equal pay and protections against discrimination and harassment, applies to the workforce in the media and digital sectors. Recent European Commission proposals address some of the longstanding issues, including [the gender pay gap](#) and [unequal caring responsibilities](#).

When regard to gender balance and stereotypes in media content, the 2010 Audiovisual Media Services Directive requires media service providers to prohibit incitement to hatred based on sex

⁷ [Recommendation 1555 \(2002\) on 'The image of women in the media'](#); Resolution 1557 (2007) and [Recommendation 1799 \(2007\) on 'The image of women in advertising'](#); [Recommendation 1931 \(2010\) on 'Combating sexist stereotypes in the media'](#).

(Art. 6) in their content and the inclusion or promotion of sex-based discrimination in commercial communications (Art. 9, 1. (c) ii.). The revised Directive extends the scope to online video-sharing platforms and replaces the explicit mention of sex with a more general reference to [Art. 21 of the Charter of the Fundamental Rights](#) of the EU. Regulation of media content remains essentially decided at national level further to the principle of subsidiarity. The EU can, however, act to encourage good regulatory practices.

In the digital sector - although this is not the focus of the present document - the need to ensure inclusion and tackle access, skills, representation and safety barriers affecting women and girls is recognised globally in the Sustainable Development Goals and within the EU's Digital Single Market Strategy (Pillar 2). Key actions announced by the Commission include enhancing digital skills among women and girls, promoting female employment in the ICT sector (2016-2017) and awareness raising on education and vocational training options (2018-2019). The Bulgarian Council Presidency also made 'Women in the Digital World' one of its priorities.

On 19 June 2018, the European Commission organised a full day event, '[Digital4Her](#)', hosted by the Commissioner for Digital Economy and Society, Mariya Gabriel. The event was part of an initiative to foster women's participation in the tech sector, as a means to boost the economy and bridge gender gaps within society. The ways of combating gender stereotypes in the media was discussed in one of the panels, in the course of which the preliminary findings of the EPRA Working Group on gender were presented to the participants. The particular role that regulators can play in promoting gender equality was highlighted on that occasion.

Also of particular relevance to media regulators are the statistics produced by [The European Institute for Gender Equality](#) (EIGE), a Vilnius-based agency of the European Union, on the gender structure of Board/Council presidents and members of media regulatory authorities.⁸

The European Parliament has also produced a number of standards drawing attention to the need to eliminate gender stereotyping.⁹ The latest document is a resolution of 17 April 2018 on gender equality in the media sector in the EU ([2017/2210\(INI\)](#)) which contains several recommendations pertaining to women's presence in the media, as well as media content and women, and highlights examples of good practice, such as media campaigns, databases of women experts and training provision.

2.3. United Nations

At the UN level, the [fourth World Conference on women, held in Beijing in 1995](#), recognised the importance of the relationship between women and the media in achieving equality between women and men, and incorporated two strategic aims into the [Beijing Platform for Action](#) (BPfA):

- (a) to increase the participation and access of women to expression and decision-making in and through media and new technologies of communication;
- (b) to promote a balanced and non-stereotyped portrayal of women by the media.

On 15 March 2018, representatives of the regulatory authorities of the Mediterranean Network of Regulatory Authorities (MNRA), of the French speaking Media Regulatory Authorities Network (REFRAM), of the African Communication Regulation Authorities Network (ACRAN), of the Ibero-

⁸ http://eige.europa.eu/gender-statistics/dgs/indicator/ta_pwr_med_regat_wmid_media_regat/bar/chart

⁹ See notably the resolutions of [2013](#) (eliminating stereotypes), [2015](#) (focus on education) and [2016](#) (gender equality in the digital age)

American platform of Audiovisual regulators (PRAI), and the Platform of West African Economic and Monetary Union Regulators (UEMOA) met at a side event on freedom of communications and gender equality organised during the 62nd session of the Commission on the Status of Women to adopt a [joint declaration on the equality between women and men in the media](#).

3. Introduction to the survey results and research

Taking the survey as a whole, there seems to be a general consensus among European regulators that women are under-represented on screen in comparison to men. When women do feature on screen, it seems they are often presented in stereotypical or subordinate roles. In terms of off-screen representation, women are also significantly under-represented, especially when it comes to senior and/or technical positions.

Despite this general trend, the regulators differed in how they articulated and perceived the issue in their country. Some of the respondents based their claims on reports and research conducted on the subject, while others appealed to more general societal perceptions. Some respondents were reluctant at times to give a strong view on the subject, pointing either to a lack of concrete data on which they could base an opinion¹⁰, or the subject being out of their remit as a regulator.¹¹ Others believed their country did not have a particular problem with the representation of women on television and in the sector.¹²

Nevertheless, the vast majority of regulatory bodies (26 out of 31) either conduct or are aware of research on the representation and portrayal of women in broadcasting in their country (see Fig. 1 below). Of these 26, 15 regulators conduct research themselves¹³, with the remaining regulators drawing on research carried out by NGOs, universities, and other organisations.¹⁴

There are disparities in terms of the depth type and periodicity of research carried out. Some studies cited took the form of one-off information bulletins¹⁵ or surveys¹⁶, while many regulators pointed to focused content monitoring exercises.¹⁷ A smaller number of regulators conduct more consistent and comparative assessments, such as annual reports and diversity 'barometers'.¹⁸

Most of the research focuses on specific genres of programming such as sports, news and current affairs (see Fig. 1.1 below). There appears to be less research exploring representation and portrayal for a fuller range of genres, or for genres such as drama.

As a result of these differences, there seems to be a paucity of comprehensive data on the general level of representation of women on screen. There is even less data measuring the representation of women working in the broadcasting industry in an off-screen capacity, with only 10 out of 31 countries aware of, or conducting research on, the subject (see Fig. 1).

¹⁰ CZ, DE, MT.

¹¹ NL.

¹² AL, DK, EE, LT

¹³ AL, BE, BG, CZ, ES-CAC, ES-CNMC, FR, HR, HU, IL, MD, MK, PL, PT, RS.

¹⁴ BA, CH, CY, DE, GB/UK, GR, IS, IT, LU, NL, MT.

¹⁵ AL.

¹⁶ HR, MK.

¹⁷ BG, CZ, GR, MD.

¹⁸ BE, CAC-ES, CNMC-ES, FR, UK.

Fig. 1. Research conducted¹⁹

Name	Country	Have you conducted/is there research on the representation of women on screen ?		Have you conducted/is there research on the portrayal of women on screen ?		Have you conducted/is there research on the representation of women working off screen/working in media ?
		<i>TV</i>	<i>Advertising</i>	<i>TV</i>	<i>Advertising</i>	
AMA	AL	✓				
CRA	BA	✓				✓
CSA	BE	✓	✓	✓	✓	
CEM	BG	✓				
OFCOM	CH	✓		✓		
CRTA	CY	✓		✓		
RRTV	CZ	✓				
DLM	DE	✓		✓		
RTB	DK					
TRA	EE	No answer	No answer			
CNMC	ES	✓	✓		✓	✓
CAC	ES	✓	✓	✓	✓	
CSA	FR	✓	✓	✓	✓	✓
Ofcom	GB/UK	✓		✓	✓	✓
NCRT	GR	✓		✓		
AEM	HR	✓			✓	✓

¹⁹ As mentioned earlier, there are disparities in terms of the depth, type and periodicity of research carried out.

Name	Country	Have you conducted/is there research on the representation of women on screen ?		Have you conducted/is there research on the portrayal of women on screen ?		Have you conducted/is there research on the representation of women working off screen/working in media ?
		<i>TV</i>	<i>Advertising</i>	<i>TV</i>	<i>Advertising</i>	
NMHH	HU	✓	✓	✓	✓	✓ ²⁰
BAI	IE					
SATR	IL	✓		✓		
IMC	IS	✓				✓
AGCOM	IT	✓		✓	✓	
RTCL	LT			No answer	No answer	No answer
ALIA	LU	✓	✓	✓	✓	
CCA	MD	✓				✓
AAAMS	MK	✓	✓	✓	✓	✓
BAM	MT	✓		✓		
CvdM	NL	✓		✓		✓
KRRiT	PL	✓		✓		
ERC	PT	✓		✓		
REM	RS	✓		✓		
MPRT	SE					

²⁰ Though this research explores the public's perceptions of women's employment in the media sector, as opposed to data on the actual gender breakdown.

4. On-screen representation and portrayal

4.1. On-screen representation – perceptions and findings

When asked about the levels of representation of women in their country, the majority of respondents believed that there are too few women represented on television (17 responses).²¹ While no respondents believed that there are too many women on television, 12 respondents claimed that there are enough women represented.²² Nine out of the 31 regulators said they could not fully comment on this issue, pointing to a lack of comprehensive research, or a difference between genres of programme.²³

The research that has been conducted appears to indicate that on-screen representation of women is unequal to that of men. A study by the French CSA in 2017²⁴ showed that women were in a minority on screen at 42%, dropping to 29% during peak time programming. Research conducted by the Catalan CAC²⁵ highlighted that women accounted for only 27% of speaking time in the main news programmes, a decrease on the previous year's figure of 29%.

Research conducted by RRTV in the Czech Republic²⁶, focusing again on news and current affairs, monitored two months of footage of two PSB channels and two of their largest commercial channels. In a particular current affairs programme, 31 guests were logged, of which only one was a woman. In another current affairs programme, they logged 200 guest speakers, where only 10% were women. Similarly, the Global Media Monitoring Project²⁷ found that women are news subjects on television in 29% of the stories compared to 71% of men.

Monitoring conducted by Italian PSB channel Rai in 2015²⁸ of its own programming reported that women were rarely central in programmes, and the vast majority of programmes were unbalanced and in favour of male protagonists. They concluded that across the genres of fiction and non-fiction women were in the minority. This was also reflected in 2016 research conducted by Channel 4 in the UK, which showed disparities in gender representation across a range of genres (see Fig. 1.2 below).

The vast majority of the research cited did not explore the disparities which could be found within the categories of 'women' and 'men'. However, some studies did go further, most notably with regards to age. Ofcom in the UK found that women aged over 55 were seen less frequently on television²⁹, while research conducted in the Czech Republic found that the most frequently represented age group for women is 12-19 years old.³⁰ In Hungary, the number of female presenters or programme hosts decreases by more than 60% above the age of 40. Research by the Macedonian

²¹ BE, ES-CAC, ES-CNMC, FR, GB/UK, HR, HU, IE, IL, IS, LU, MD, MK, MT, PL, PT, RS.

²² BG, CH, CY, EE, GR, HU, HR, IT, LT, PL, MK, RS. Note that some respondents chose more than one answer depending on the genre of programmes concerned.

²³ AL, BA, CZ, DE, DK, GB, MT, NL, SE.

²⁴ <http://www.csa.fr/Etudes-et-publications/Les-autres-rapports/La-representation-des-femmes-a-la-television-et-a-la-radio-Exercice-2017>

²⁵ 'Presence and representation of women in information programmes', published by CAC in March 2018: <https://www.cac.cat/actualitat/les-dones-suposen-273-del-temps-paraula-els-informatius-les-radios-i-les-televisions>

https://www.cac.cat/sites/default/files/2018-03/Dones_8_mar_.pdf

²⁶ <http://en.genderstudies.cz/>

²⁷ www.whomakesthenews.org

²⁸ http://www.rai.it/dl/docs/MONITOR_DONNE_ANNO_2015.pdf

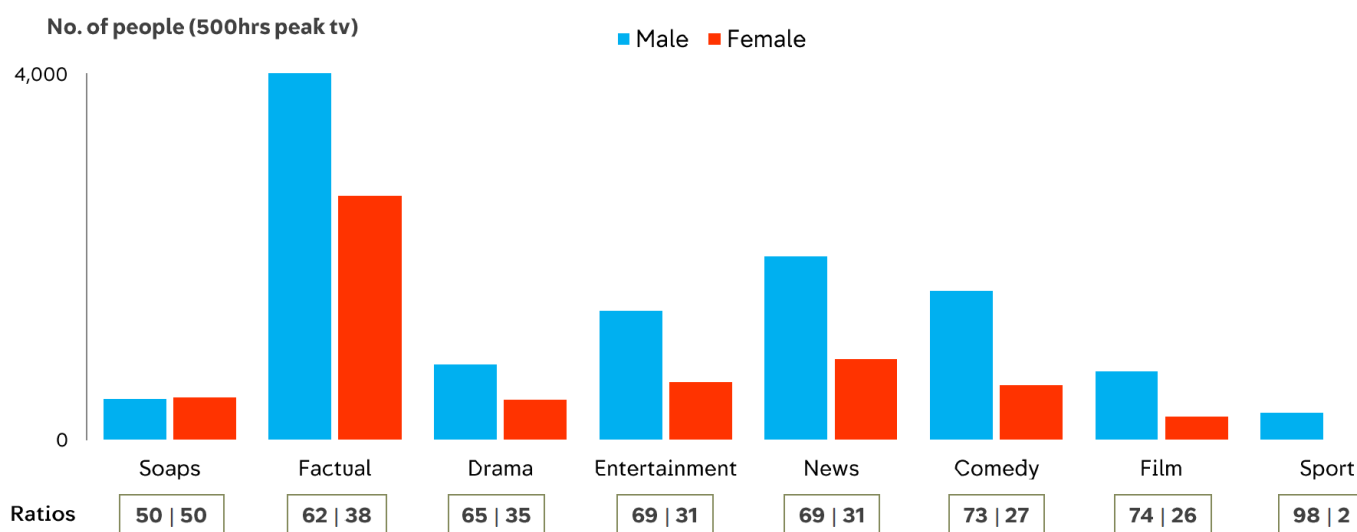
²⁹ https://www.ofcom.org.uk/data/assets/pdf_file/0023/59333/psb_diversity_report.pdf

³⁰ Research commissioned by the organisation Gender Studies and undertaken in cooperation with Czech television (PSB). See <http://en.genderstudies.cz/>

regulator found a similar trend in advertising, where 18-30 was the most common age category for women in 2017, with women (and men) above 45 rarely represented in commercials.³¹

Fig 1.2. UK Public service broadcaster Channel 4 research into gender representation by genre

The ratios change significantly by genre



Source: *Treating Men and Women Equally on TV, C4 Gender Research, 2016*³²

³¹ <http://avmu.mk/wp-content/uploads/2018/04/Collecton-2012-2016.pdf>

³² http://www.channel4.com/media/documents/corporate/C4GENDERRESEARCH_2016.pdf

Fig. 1.1. Of those that conduct research into representation and/or portrayal, which genres are included?

		News (10)	Current affairs/talk shows/magazine programmes (6)	Sports (4)	Programmes addressed to women (2)	Elections/politics (5)	Other genres (including fiction, animation, entertainment) (7)	Other/not specified (8)
AMA	AL							✓
CRA	BA					✓		
CSA	BE	✓	✓	✓	✓	✓	✓	✓ ³³
CEM	BG				✓			
OFCOM	CH					✓		
CRTA	CY					✓		
RRTV	CZ	✓	✓					
DLM	DE						✓	
CNMC	ES			✓			✓	
CAC	ES							✓
CSA	FR	✓		✓			✓	✓ ³⁴
Ofcom	GB/UK	✓					✓	✓
NCRT	GR				✓			
AEM	HR			✓				
NMHH	HU		✓				✓	
SATR	IL							✓
IMC	IS	✓	✓	✓				✓
AGCOM	IT		✓				✓	

³³ All genres of programmes are included in the Barometer on Diversity and Equality. It is not focused on a specific genre.

³⁴ Reality shows.

		News (10)	Current affairs/talk shows/magazine programmes (6)	Sports (4)	Programmes addressed to women (2)	Elections/politics (5)	Other genres (including fiction, animation, entertainment) (7)	Other/not specified (8)
ALIA	LU	✓						
CCA	MD	✓				✓		
AAAMS	MK	✓						
BA	MT	✓						
CvdM	NL		✓					
KRRiT	PL	✓				✓	✓	
ERC	PT	✓						✓
REM	RS			✓				✓

4.2. On-screen portrayal – perceptions and findings

When asked about the portrayal of women on screen in their respective countries, the majority of respondents believed that women were portrayed either neutrally (14 responses³⁵) or fairly positively (11 responses³⁶). Only four respondents believed that women are portrayed fairly negatively³⁷, with one respondent also choosing the ‘portrayed very negatively’ option.³⁸ Seven regulators did not comment on this issue.³⁹

Despite this, 18 out of 31 regulators either conduct, or are aware of, research into the portrayal of women on television (see Fig. 1 above).

Most of the research conducted into portrayal focuses on the stereotypical depiction of women. Research conducted by the Rai (Italian PSB) showed that women were portrayed stereotypically in 16% of the content they monitored.⁴⁰ Focusing on one genre, the KRRiT in Poland commissioned a study into the portrayal of women in programmes about relationships and dating.⁴¹ They found that women were depicted as more family-oriented and more concerned about finding a relationship than men. The presentation of women’s sexuality was also found to be very traditional, with far more judgement and discipline associated with their behaviour compared to the men who take part.

The reliance on stereotypes appeared even more pronounced in the realm of advertising, with several regulators citing relevant qualitative research. According to the CSA in Belgium, women in adverts could be associated with a stereotype nearly 42% of the time (see Fig. 1.3. below).⁴² The AEM in Croatia conducted a survey into advertising, in the framework of a joint study for the Mediterranean Network of regulatory authorities, which found that women tended to appear as housewives, caregivers and mothers, while men tended to introduce or present the products.⁴³ Similarly, qualitative research conducted by the Hungarian regulator concluded that women in advertising often fell into one of two categories: the housewife or the supermodel.

³⁵ BG, CH, CY, EE, ES-CAC, ES-CNMC, FR, GB, GR, MK, MT, PL, PT, RS (the respondents were able to choose more than one option).

³⁶ AL, CZ, EE, FR, GB, HR, IE, IL, IS, LT, MD.

³⁷ BE, FR, GB, IT.

³⁸ FR.

³⁹ BA, DE, DK, HU, LU, NL, SE.

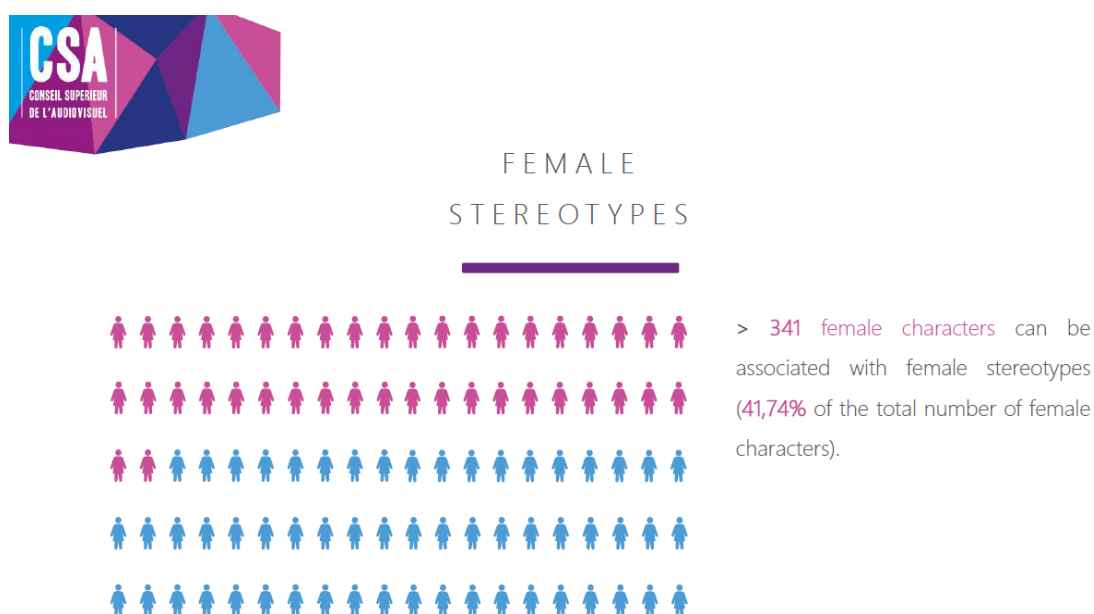
⁴⁰ http://www.rai.it/dl/docs/MONITOR_DONNE_ANNO_2015.pdf

⁴¹ <http://www.krrit.gov.pl/krrit/aktualnosci/news,2133,wizerunek-kobiet-w-audycjach-typu-reality-show.html>
www.krrit.gov.pl/Data/Files/_public/Portals/0/komunikaty/wizerunek-kobiet/wizerunek-kobiety-w-audycjach-reality-show.pdf

⁴² Recent research published by ASA (Advertising Standards Authority) explored stereotyping in advertising and found that the evidence suggests that a tougher line needs to be taken on ads that feature stereotypical gender roles or characteristics which, through their content and context, may be potentially harmful to people. This includes ads that mock people for not conforming to gender stereotypes. See <https://www.asa.org.uk/genderresearch.html>

⁴³ Sexist stereotypes in adverts in the Mediterranean area; summary report: Andalusia, Catalonia, Croatia and Morocco, March 2016, Mediterranean Network of Regulatory authorities (MNRA/RIRM) – in French: www.rirm.org/wp-content/uploads/2018/02/Etude-stereotypes-de-genre-PUBLICITE-2016_FRANCAIS_FRENCH-1.pdf

Fig. 1.3. Stereotyped female characters in advertising



Source: 'Gender Diversity in the Wallonia-Brussels Federation Television Programmes', Conseil supérieur de l'audiovisuel (CSA), presentation to EPRA, May 2018

The existence of stereotypes was also identified in research examining the kinds of topics women are called upon to talk about, as well as the weight their views are given. Content analysis research conducted in the Czech Republic (see footnote 20) showed that the way women are portrayed in the media reinforces the idea of women as subordinate. The survey conducted by Rai (Italian PSB) found that women were more likely than men to express a more simple and uncontroversial opinion on television.

In general, women are less likely to appear as experts⁴⁴, or in scientific roles. Research from Poland in 2014 showed that the lack of women experts perpetuates the stereotype that some fields of knowledge are more appropriately suited to men. The fields of science, technology and sport were identified as particularly dominated by men in this regard. A report published by the Catalan CAC in March 2018, 'Presence and representation of women in information programmes'⁴⁵, highlighted that while women were afforded significantly less speaking time in news and current affairs across all thematic areas⁴⁶, they were afforded the least time in the categories of science and technology, at just over 17%.⁴⁷

Relatedly, the CSA in Belgium found that women speaking on screen appear more frequently than men without any mention of their identity (surname and/or name and/or profession). Similar results were found by the organisation Equalisters in Sweden, which revealed that men were more than twice as likely than women to be presented in a professional capacity on the news (see Fig. 1.4.).

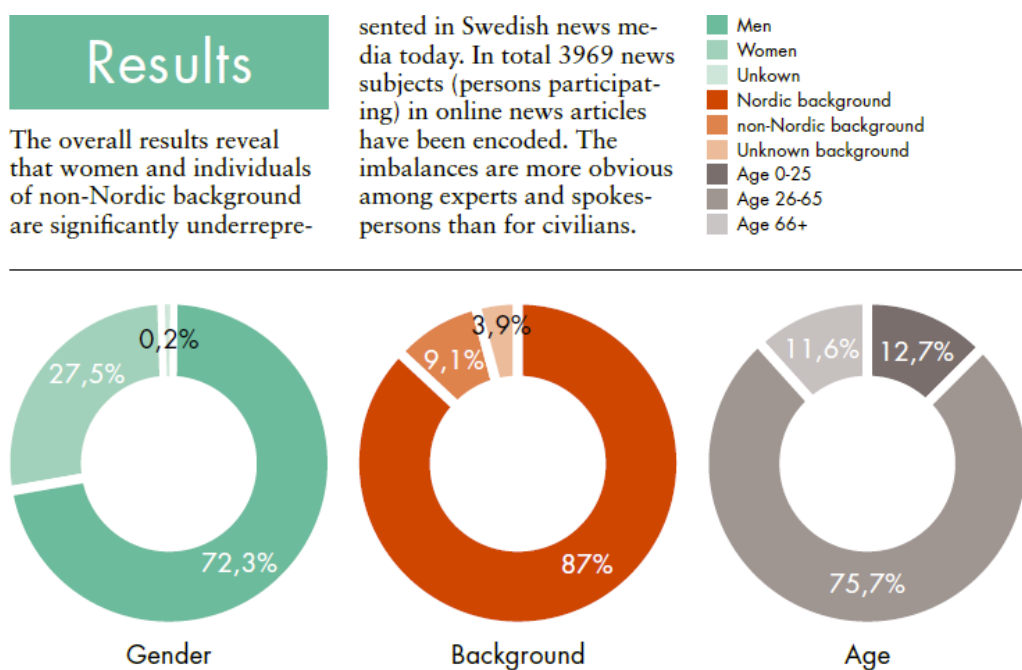
⁴⁴ Research conducted by the CSA in France showed that the vast majority (65%) of experts were men compared to only 35% who were women, and in terms of political guests only 27% were represented by women: <http://www.csa.fr/Etudes-et-publications/Les-autres-rapports/La-representation-des-femmes-a-la-television-et-a-la-radio-Exercice-2017>

⁴⁵ https://www.cac.cat/sites/default/files/2018-03/Dones_8_mar_.pdf

⁴⁶ Including health, politics, social conflicts, economics, media, society and culture.

⁴⁷ Only in the field of education did women get a percentage (48%) comparable to that of men (52%).

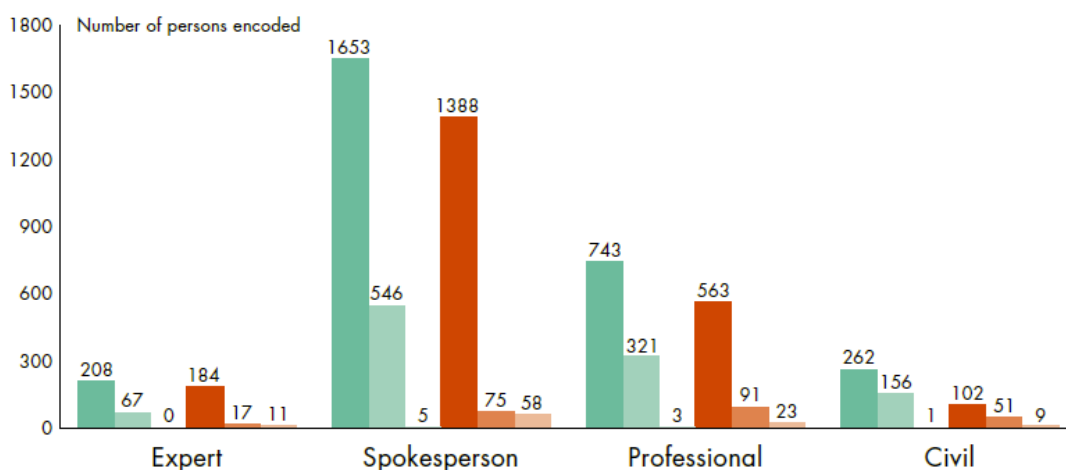
Fig. 1.4. Proportion of men and women in Swedish news media



The representation of women in the media has not improved since year 2000, when a global survey showed that 68 percent of news subjects in Swedish media were men.¹

By 31st December 2014, 18 percent of Sweden's population were of non-Nordic origin according to Statistics Sweden, a Swedish administrative agency.

Youth and seniors are underrepresented. When present, they are often civilians.² Individuals under the age of 25 are also often visible as athletes.



¹ <http://www.alltarmojligt.se/images/aam/publikationer/raknamedkvinnor10.pdf>.

² Since there was no information about age available for more than half of the persons encoded, the result for age is less certain than the results for gender and background.

Source: Equalisters/Rättviseförmedlingen report⁴⁸

Finally, there seems to be an emerging trend of research exploring the topic of violence against women on television. The NCRT in Greece is about to conduct a three-month monitoring programme to track the frequency of scenes of violence against women in TV programmes. The ERC in Portugal is also finalising the results of a study into the representation of domestic violence in prime-time

⁴⁸ <https://rattviseformedlingen.se/wp-content/uploads/2015/12/Rattvisaren-in-English.pdf>

news. In Hungary, a significant number of respondents to a questionnaire noted the high proportion of news stories about women and violent crime, with the portrayal of women as victims increasing during the last two years. The Mediterranean Network of Regulatory Authorities (MNRA/RIRM) is also currently working on a study on the treatment of information on television related to gender-based violence.⁴⁹

5. Off-screen representation

The responses given regarding off-screen representation revealed that this topic has so far been given less attention than the issues of on-screen representation and portrayal. There seems to be few regulatory bodies that have carried out specific research on the off-screen presence of women in media organisations (see Fig. 1.).

Nonetheless, the studies conducted reveal a disparity between men and women working in creative roles. For example, data from the Spanish public Radio and Television Corporation (CRTVE) reveals the ratio of workers in both 2015 and 2016 was 60% men and 40% women, reflecting the general under-representation of women in off-screen roles.

However, when it comes to certain positions, namely senior and technical roles, this imbalance becomes even more significant. In 2018, research was conducted by the Mediacentar Sarajevo in Bosnia and Herzegovina into 50 media companies⁵⁰, which found that only one in ten television stations employ women at director level. Similarly, the Swiss regulator OFCOM referenced the negative press coverage aimed at the main Swiss PSB (SRG SSR) for having very few women on its management boards, despite a very high percentage of female employees.

In the UK, women make up 38% of senior management roles in media organisations, and only 26% of technical and engineering roles.⁵¹ This is reflected in the gender pay gap figures in the industry, which ranges from 8% (Sky) to 24% (Channel 4).⁵² The regulator in FYR Macedonia, which collects data on the ownership structures of commercial TV stations, found that there were nearly five times more men than women who were managers (see Fig. 1.5). They also found that technical and production staff⁵³ had the most dramatic imbalance of men and women in the sector (see Fig 1.6).

In the absence of concrete research into the subject, some regulators offered views on the causes and reasons behind these disparities. The BAI in Ireland referenced the often-unconscious beliefs and biases which lead people to believe that women are less skilled than men in these creative roles⁵⁴, as well as the lack of family-friendly work policies⁵⁵ in the sector (such as paid maternity

⁴⁹ <http://www.rirm.org/en/jd/>

⁵⁰ <http://media.ba/bs/magazin-novinarstvo/zene-na-samo-30-posto-rukovodecih-pozicija-u-bh-medijima>

⁵¹ This is from an annual report carried out by Ofcom called 'Diversity and Equal Opportunities in Television', which includes data on 78 broadcasters employing just under 50,000 people in the television industry. This report, and the upcoming report on the radio industry, can be found on Ofcom's Online Diversity Hub: <https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/guidance/diversity>

⁵² Compared to an 18% pay gap across the country as a whole.

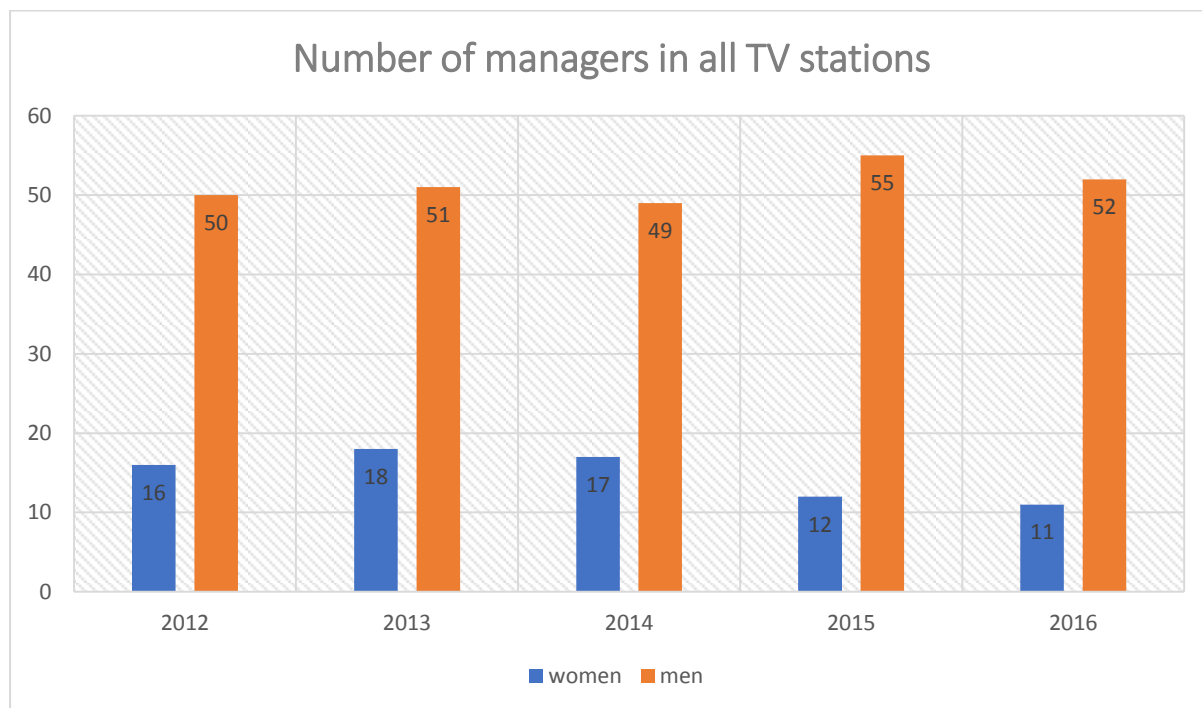
⁵³ Technical staff refers to engineers and technicians, whereas production staff refers to directors, camera workers, sound recordists, editors and so on.

⁵⁴ The BAI points out later in the survey that women directors and writers find it extremely difficult to get funding either for development or production, compared to their male counterparts.

⁵⁵ The comments made by the BAI in this section directly reference the Council of Europe Recommendation in its Appendix 1 as it outlines the context for the Recommendation. Obstacles for women, such as unconscious bias, lack of family-friendly policies, etc., are taken from 2016 research by the European Women's Audiovisual Association (EWA): http://www.ewawomen.com/uploads/files/MERGED_Press-2016.pdf

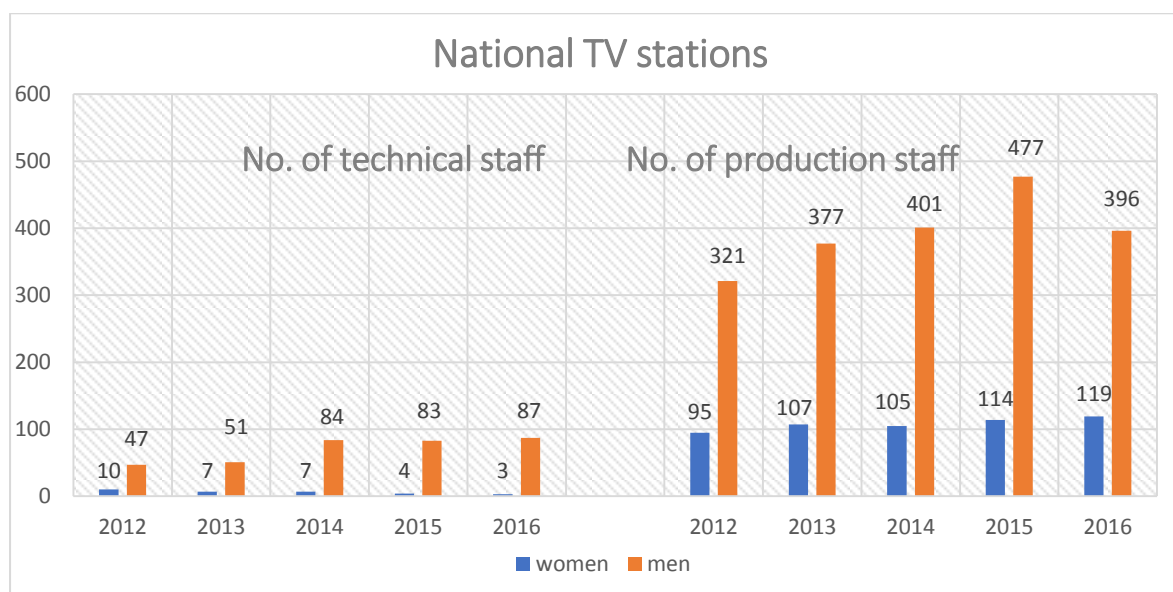
leave and breastfeeding facilities) which disproportionately affect women’s access to the industry. They also pointed to issues of hate speech and harassment facing women who are seen to be occupying a traditionally male role, which could have a negative impact on retention and career progression. Finally, the CNMC in Spain discussed the existence of a ‘glass ceiling’ which prevents women from accessing especially technical and decision-making areas.

Fig 1.5. Managerial staff in FYR Macedonia split by gender



Source: ‘Gender on television’, Agency for Audio and Audiovisual Media Services, FYR Macedonia, 2012-2016⁵⁶

Fig. 1.6. Technical and production staff in FYR Macedonia split by gender



⁵⁶ <http://avmu.mk/wp-content/uploads/2018/04/Collecton-2012-2016.pdf>

Source: 'Gender on television', Agency for Audio and Audiovisual Media Services, FYR Macedonia, 2012-2016⁵⁷

6. Role of the regulators - legal obligations and powers

There appear to be significant differences in the regulatory responsibilities that regulators across Europe have in relation to improving gender representation in the media sector, and how those responsibilities are addressed.

When asked whether they had any legal obligations or powers in this domain, the majority of respondents (19 out of 31) cited national provisions (derived from the transposition of Article 6 of the Audiovisual Media Services Directive - AVMSD), relating to the portrayal of women on television, which prohibit material that incites hatred or discriminates based on race, sex, religion or nationality (see Fig. 1.7). However, this is a high bar to reach and as such does not cover more subtle forms of gender discrimination which are arguably more prevalent in television programming.⁵⁸ There are some potential exceptions to this, for example the Law on Electronic Media in Serbia, which is said to allow the regulator to ensure programmes do not contain information that 'overtly or covertly' encourages discrimination, hatred or violence based on gender.

Some regulatory authorities appear not to have any competence in relation to improving gender representation in the media sector. As an example, in Lithuania, issues of equal opportunities for women and men in all spheres of life are regulated by the Law of Equal Opportunities for Women and Men and the Equal Opportunities Ombudsperson of the Republic of Lithuania is responsible for implementation of the law. Any complaint on the issues related to the portrayal, inclusion, etc. of women on screen received by the Lithuanian regulator are forwarded to the Ombudsperson for investigation.

In terms of representation and portrayal in on-screen advertising, 13 out of 31 respondents cited having in place national provisions which prohibit discrimination based on sex, directly transposed from the AVMS Directive (Article 9). Again, the issues of more subtle forms of gender inequality which are not overtly discriminatory⁵⁹ are therefore unlikely to be subject to these provisions.

While some of the legislative provisions mentioned by respondents do not refer to gender specifically, this does not mean that gender issues are side-lined as a result. For example, some of the national provisions cited by respondents included some reference to maintaining 'cultural pluralism' and 'pluralistic expression', but without an explicit reference to gender. This was the case with the ERC in Portugal and the Catalan CAC, the latter being required to produce monthly reports of political pluralism in the media. However, the CAC does go further to specifically address gender in this report, indicating the presence of women politicians and women representatives in news and current affairs programmes.⁶⁰ Also, in Portugal, ERC 'shall ensure the protection of personal rights

⁵⁷ <http://avmu.mk/wp-content/uploads/2018/04/Collecton-2012-2016.pdf>

⁵⁸ For example, research by Channel 4 in the UK found that while explicit sexism appears to be largely eradicated on British TV, more 'casual' or low-level sexism is still significant. They found that there are approximately five sexist incidents per hour on every channel in peak time, and the vast majority (72%) are targeted at women, with sexual/physical objectification being the most frequent case.

⁵⁹ Such as the prevalence of stereotypes discussed above.

⁶⁰ Similarly, Ofcom in the UK has a duty to assess how the public service broadcasters deliver against their public service purposes, which include the requirement to 'reflect cultural identity and represent diverse and alternative viewpoints'. In assessing this, Ofcom measures the consumption of BBC's services by a range of audience groups, broken down by characteristics including gender.

where disrespected by media operators operating within its jurisdiction' [Article 7, (f)] as well as 'guarantee the respect for rights, freedoms and guarantees' [Article 8 (d)] (ERC's Statutes). In both articles are comprised equality and non-discrimination principles in what regard sex and sexual orientation, among others as stated in the Portuguese constitution. On the other hand, sectoral legislation also highlights the principle of non-incitement to hatred based on sex and sexual orientation.

However, some regulators appear to be vested with more specific and wide-ranging powers than the majority of their counterparts.

For example, the CSA in France referenced the act of 1986 on Freedom of Communication and the Equality Act of 2014⁶¹ which require the French regulator to ensure a fair representation of women and men in programmes, as well as fighting against stereotypes and degrading images of women. This law also states that broadcasters must provide the CSA with quantitative and qualitative indicators of the representation of women and men in their programmes, which the CSA publishes annually. The CSA set the details of how media service providers should comply with the legal provisions in a decision published in 2015⁶² after consulting broadcasters. The CSA has the power to sanction providers if they are found in breach of the legal provisions. On 18 June 2018, the Highest Administrative Court⁶³ upheld a decision of the CSA of June 2017⁶⁴ consisting of a two-week ban to broadcast any advertising spots around and during a particular programme which was considered to be 'degrading the image of women'.

Similarly, in Belgium, the CSA is in charge of monitoring the application of the rules contained in the coordinated decree on audiovisual media services and in the (PSB) RTBF management contract. Since 2016 a new provision has been introduced in the Decree: programmes and commercial communication that undermine respect for equality between man and woman are prohibited. The scope of this provision is broader than incitement to discrimination, hatred or violence. It enables the regulator to impose sanctions in case of non-compliance. The first decision of the CSA⁶⁵, a warning for an advertising spot containing sexual stereotypes, was issued on 5 October 2017. In addition, further to the changes in the legal framework introduced in 2016, the CSA is required to '*participate in a periodic analysis of the balanced representation of women and men, encourage the dissemination of good practices in the fight against sexist stereotypes and issue, where appropriate, specific recommendations*'. Concretely, the regulator is required to report, on a yearly basis, on the implementation of measures to promote gender balance and to submit, every two years, an analysis on the state of gender representation in the French-speaking Belgian audiovisual landscape.

The CNMC in Spain is also required to play a key role in promoting gender equality barriers by monitoring programmes for their gender representation and publishing the results.

⁶¹ LOI n° 2014-873 du 4 août 2014 pour l'égalité réelle entre les femmes et les hommes,

<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000029330832&categorieLien=id>

⁶² <https://www.csa.fr/Arbitrer/Espace-juridique/Les-textes-reglementaires-du-CSA/Les-deliberations-et-recommandations-du-CSA/Recommandations-et-deliberations-du-CSA-relatives-a-d-autres-sujets/Deliberation-n-2015-2-du-4-fevrier-2015-relative-au-respect-des-droits-des-femmes-par-les-societes-mentionnees-a-l-article-20-1-A-de-la-loi-n-86-1067-du-30-septembre-1986>

⁶³ <http://www.conseil-etat.fr/Decisions-Avis-Publications/Decisions/Selection-des-decisions-faisant-l-objet-d-une-communication-particuliere/Conseil-d-Etat-18-juin-2018-Societe-C8-412071>

⁶⁴ https://www.epra.org/news_items/sanctions-the-french-csa-imposes-an-original-sanction-to-the-tv-channel-c8

⁶⁵ A first decision of the CSA Licensing and Supervision Board was issued on 5 October 2017 on this legal basis introduced in 2016: <http://csa.be/breves/1170>

It is important to note that a lack of formal powers or obligations in this domain is not necessarily a predictor for how much action is taken in the country. For example, while the Macedonian AAAMS has no legal obligation to collect or prepare data on representation, they explained in their response the way in which they use the results from their annual surveys on representation and portrayal to debate and raise awareness of this issue with the media, NGOs and other stakeholders. Similarly, the BAI in Ireland has recently developed a Gender Action Plan as a policy initiative to fulfil one of its key strategic objectives in its 3-year Statement of Strategy: 'Promoting Diversity and Plurality'. A stated outcome for the BAI is that *'Irish audio-visual media is more diverse in terms of its content and those involved in its production'* by the end of 2019. The Gender Action plan is clearly positioned within the framework provided by a soft law instrument, the Council of Europe Recommendation on gender equality in the audio-visual sector.

On the other hand, some regulators who do have some formal powers or obligations do not report any specific initiatives designed to improve representation and portrayal (see Figs. 1.7 and 1.8).

With regard to off-screen representation, the majority of respondents stated that they do not have explicit powers in this area, and instead rely on general Equality Law provisions (see Fig. 1.7), which do not apply specifically to the media sector. Ofcom in the UK is an exception to this, as the Communications Act 2003⁶⁶ gives Ofcom the duty to take *'all such steps as they consider appropriate for promoting equality of opportunity in relation to the employment by those providing television and radio services'*. As a result, Ofcom produces an annual report on the industry's compliance with this obligation, as well as publishing updated guidance on how licensees should promote equal opportunities. The CNMC in Spain has a similar obligation to *'adopt all the necessary measures so that audio-visual media service providers comply with the legal framework'*, which includes gender equality obligations concerning employment. The CNMC publishes an annual report on the fulfilment of the public service obligations of the Spanish Public Radio and Television Corporation (CRTVE)⁶⁷.

Finally, several respondents emphasised the specific, and generally more stringent, requirements to improve gender representation that apply to public service broadcasters in licence conditions and contracts. There are examples of this applying to both on-screen and off-screen representation. The Swiss regulator OFCOM discussed the introduction of a new licence condition for the national PSB (SRG SSR), which states *'SRG SSR strives to fairly present and represent gender in its editorial offerings'*. This will come into force in early 2019. In terms of off-screen representation, the CSA in Belgium mentioned the management contract of their public service provider RTBF, which requires RTBF to ensure that it is promoting and raising awareness of diversity and gender equality, both in terms of recruitment and career management, in particular to increase the presence of women in managerial positions. This article of the contract includes the obligation to establish a plan for diversity in staff and gender equality, which is evaluated annually along with staff diversity statistics. In Spain, the Spanish PSB (RTVE) adopted an internal 'Equality Plan' in 2012 and thus committed to *'establish and develop policies that integrate equal treatment and opportunities between women and men, without direct or indirect gender discrimination, as well as to promote measures to achieve real equality in the CRTVE organisation'*.

⁶⁶ <https://www.legislation.gov.uk/ukpga/2003/21/contents>

⁶⁷ Informe sobre el cumplimiento de las obligaciones de servicio público por la Corporación Radio y Televisión Española y su financiación. Años 2015 y 2016. <https://www.cnmc.es/expedientes/mspcnmc00116>

Fig. 1.7. Legal obligations and powers

Name	Country	Do you have legal obligations or legal powers in relation to on screen representation and/or portrayal of women?		Do you have/are there legal obligations and legal powers in relation to off screen representation of women in media organisations (excluding general equality/employment laws)?
		TV	Advertising ⁶⁸	
AMA	AL	✓	✓	
CRA	BA	✓	✓	
CSA	BE	✓	✓	✓ ⁶⁹
CEM	BG	✓	✓	No answer
OFCOM	CH	✓		
CRTA	CY	✓		
RRTV	CZ	✓		
DLM	DE	✓		
RTB	DK	✓	✓	
TRA	EE			
CNMC	ES	✓	✓	✓
CAC	ES			No answer
CSA	FR	✓	✓	
Ofcom	GB/UK	✓	✓	✓

⁶⁸ It is important to note that the Audiovisual Media Services Directive provides that audiovisual commercial communications shall not include or promote any discrimination based on (among others) sex.

⁶⁹ For the public service broadcaster.

		Do you have legal obligations or legal powers in relation to on screen representation and/or portrayal of women?		Do you have/are there legal obligations and legal powers in relation to off screen representation of women in media organisations (excluding general equality/employment laws)?
Name	Country	TV	Advertising ⁶⁸	
NCRT	GR			
AEM	HR	✓		
NMHH	HU	✓		
BAI	IE		✓	
SATR	IL			
IMC	IS	✓	✓	
AGCOM	IT	No answer	No answer	No answer
RTCL	LT	No answer	No answer	No answer
ALIA	LU	✓	✓	
CCA	MD			
AAAMS	MK	✓	✓	
BAM	MT			
CvdM	NL			
KRRiT	PL	✓	✓	
ERC	PT	✓		
REM	RS	✓		
MPRT	SE			

7. On-screen and off-screen initiatives

7.1. Overview of initiatives

Around half of the respondents stated that they were aware of, or had in place, some sort of initiative to improve on-screen representation and portrayal of women (see Fig. 1.9 below). These varied in scale from initiatives designed to promote awareness of the issue of gender representation and portrayal, to having in place gender targets as part of well-developed diversity action plans.

The CSA in France stated that the audiovisual public services (TV and radio) have set themselves **quantified commitments** with regard to the representation of women. For example, France Télévisions, the main French PSB, has pledged to reach **50% representation of women experts by the year 2020**. In 2015, the Icelandic PSB (RÚV) implemented gender targets for the representation of women in news and current affairs, which involves publishing gender ratios every three months on their website.

Some respondents discussed the creation of **diversity databases** as a way to improve representation of women in their country. The CSA in Belgium mentioned a database called **'Expertalia'**, created by the Association of Professional Journalists, which 'aims to make other people visible in the media field, and to ensure more gender equality and ethnic and cultural diversity in news'.⁷⁰ Ofcom in the UK also mentioned the **BBC's 'Expert Women' database**, which is used by producers to find more diverse guests (see Fig. 1.8).⁷¹

In terms of awareness-raising, some regulators mentioned the **use of campaigns** as a way to highlight certain issues. The Macedonian regulator launched a video and radio campaign against sexism in the media in March 2018, which has since been aired by various broadcasters. Also in 2018, the Agency for Electronic Media in Croatia launched a campaign in collaboration with the Government and Olympic Committee, which promoted the media coverage of women's team sports. The CNMC in Spain highlighted the use of advertising campaigns to promote gender equality initiatives introduced by the Spanish Public Radio and Television Broadcaster (RTVE).⁷²

Finally, some regulators spoke about the **use of guidelines and policies** as a way to improve on-screen representation and portrayal. The CNMC in Spain explained that just over a quarter of both public and private media organisations have gender equality plans, diversity policies and codes of conduct. The Maltese regulator said it had published media guidelines in 2006 on representation and portrayal in relation to gender, which also involved giving basic training to broadcasters. AGCOM in Italy discussed its participation in drafting a self-regulation code for promoting respectful and fair representation of persons, including non-stereotypical and fair depictions of women.⁷³ Finally, the CSA in Belgium has published its **'Panoramas of Good Practices'**, which aims to relay examples of good practice in terms of equality and diversity, as well as being a space to share experiences and ideas.⁷⁴

⁷⁰ <http://www.ajp.be/expertalia-un-repertoire-dexperts-issus-de-la-diversite/>

⁷¹ The Italian regulator mentioned two databases launched by other organisations, one of which focuses on women experts in science, mathematics, technology and engineering. The regulators in Israel and Malta also mentioned how they have each helped build databases of women experts and women who could participate in panels/discussion programmes.

⁷² There are also examples of awareness-raising projects focusing on portrayal. An organisation called WOMEN Inc. in the Netherlands has launched an initiative to prevent stereotyping over the next two years, and promote awareness about the existence and effects of stereotypes.

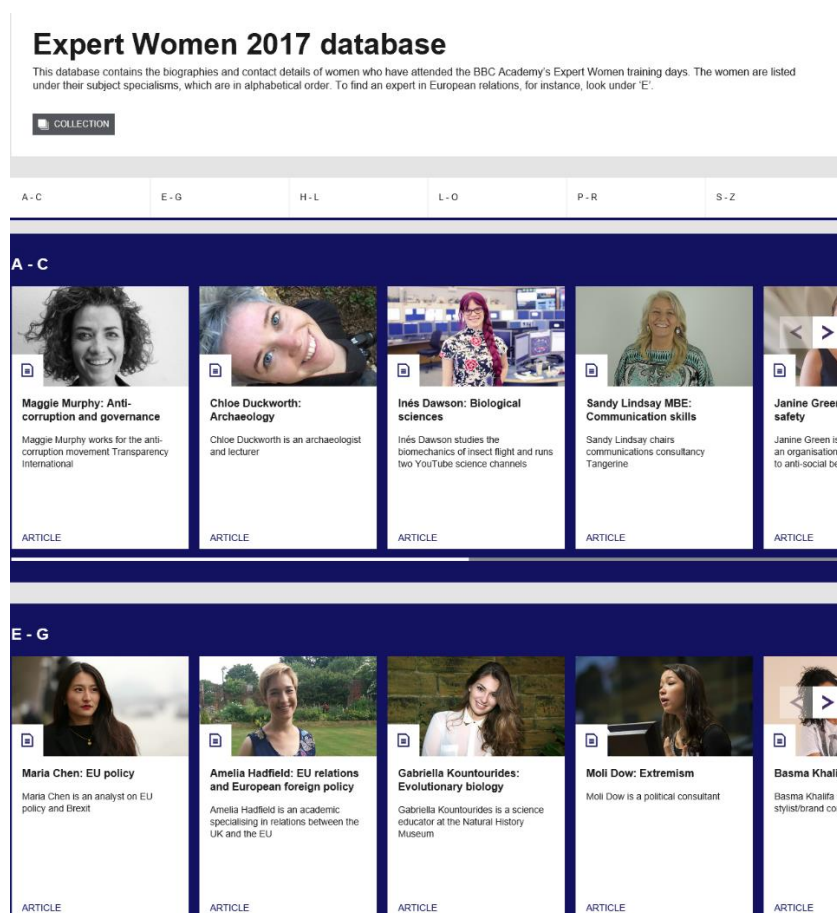
⁷³ This work was affected by the political crisis in Italy and so could not be concluded. However, AGCOM is continuing to use elements of the guidelines in its recommendations to PSBs.

⁷⁴ <http://www.csa.be/diversite/ressources/1999>

Very few respondents (5 out of 31) were able to cite examples of similar initiatives in place to encourage representation off screen in creative roles. One exception is the BAI in Ireland which, as part of its **Gender Action Plan**, set an objective to encourage the development of gender initiatives internally, and with stakeholders both on and off screen.⁷⁵ The CNMC in Spain also pointed to the **Association of Women Filmmakers and Audiovisual Media**, which aims at promoting an equal presence of filmmakers and professionals in the media sector.⁷⁶

The BBC in the UK links its off-screen targets to its efforts to improve on-screen portrayal. Their diversity and inclusion development plan includes a ring-fenced £2.1 million fund which exists to develop and accelerate projects with diverse content or talent attached. They refer to this fund as a practical resource which also helps the BBC meet its on-screen portrayal targets, by developing diverse production staff and therefore encouraging more diverse and authentic stories to be told.

Fig. 1.8. BBC Academy Expert Women database



Source: BBC Academy website⁷⁷

⁷⁵ BAI Gender Action Plan:

http://www.bai.ie/en/media/sites/2/dlm_uploads/2018/04/20180423_BAI_GenderActionPlan_vFinal_AR.pdf

⁷⁶ <https://cimamujerescineastas.es/tag/cima-mentoring/>

⁷⁷ <http://www.bbc.co.uk/academy/en/collections/expert-women#>

7.2. Assessment of the initiatives

While it appears that many respondents cite a variety of initiatives in place to promote the representation of women, the levels of measurement and evaluation of these initiatives is very varied. Where respondents state that they are required to produce strategies, publish annual reports, or set targets, they appear to conduct some monitoring of results to a degree.⁷⁸ However, in the majority of cases there appears to be little real measurement of the effectiveness of these initiatives (see Fig. 1.9). Some regulatory authorities, such as in FYR Macedonia, said it was too early to assess the latest initiatives, with others (such as in Croatia) saying their assessments were due to start next year. This lack of assessment is even more pronounced in the case of off-screen initiatives, though some regulators expressed a commitment to develop this going forward.⁷⁹

For those that have carried out some measurement, it seems the successes of the various initiatives also varied, with some regulators citing improvements, and others pointing to a decrease in representation.⁸⁰ For example, as mentioned in section 3.1 above, the report issued by the Catalan CAC in March 2018 found a decrease over the course of a year in the amount of speaking time afforded to women in newscasts (29% compared to 27%). On the other hand, research conducted by RÚV (Icelandic PSB) in 2017 to track the success of their gender targets shows a 3% improvement in the gender ratio of their TV and radio programmes (excluding news).⁸¹

⁷⁸ For example, in France and Iceland (see above).

⁷⁹ Ofcom in the UK said while there has so far been limited assessment of the effectiveness of off-screen initiatives, they are keen to develop this area of work with the upcoming second edition of their television report. Similarly, BAI in Ireland said that while it is too soon to have reliable data on the effectiveness of their Gender Action Plan, ongoing assessments and reviews are essential parts of it.

⁸⁰ There is also a lack of a clear definition of 'what success looks like', which seems especially true when it comes to initiatives designed to improve the portrayal of women.

⁸¹ Excluding news and current affairs, the gender ratio of RÚV's TV and radio programmes in 2017 was almost equal at 51% men and 49% women. Taken on their own, news and current affairs programmes had a ratio of 64% men and 36% women. The gender ratio of all TV and radio programmes, including news and current affairs, is 58% men and 42% women – which is the same as in 2016.

Fig 1.9. On-screen and off-screen initiatives

Name	Country	Are there specific initiatives designed to improve representation of women on screen ?		Was there any assessment of the success of these initiatives?		Are there specific initiatives designed to improve representation of women off screen ?	Was there any assessment of these initiatives?
		TV	Advertising	TV	Advertising		
AMA	AL					No answer	No answer
CRA	BA						
CSA	BE	✓	✓ ⁸²	✓		✓	✓ ⁸³
CEM	BG						No answer
OFCOM	CH						
CRTA	CY						
RRTV	CZ			No answer	No answer		No answer
DLM	DE						
RTB	DK						
TRA	EE						
CNMC	ES	✓		✓		✓	
CAC	ES	✓	✓	✓	✓ ⁸⁴	No answer	No answer
CSA	FR	✓	✓	✓		✓	No answer
Ofcom	GB/UK	✓		✓		✓	✓
NCRT	GR						
AEM	HR	✓					

⁸² Meetings with the advertising sector are underway.

⁸³ The assessment is included within the annual supervision of the public service broadcaster.

⁸⁴ The initiatives are too recent to answer this question.

Name	Country	Are there specific initiatives designed to improve representation of women on screen ?		Was there any assessment of the success of these initiatives?		Are there specific initiatives designed to improve representation of women off screen ?	Was there any assessment of these initiatives?
		TV	Advertising	TV	Advertising		
NMHH	HU						
BAI	IE	✓				✓	
SATR	IL	✓				No answer	No answer
IMC	IS	✓		✓			
AGCOM	IT	✓					No answer
RTCL	LT	No answer	No answer	No answer	No answer	No answer	No answer
ALIA	LU						
CCA	MD	✓					No answer
AAAMS	MK	✓					
BAM	MT						
CvdM	NL	✓	✓	✓	✓	✓	
KRRiT	PL	✓	✓				
ERC	PT	✓					
REM	RS			No answer	No answer	No answer	No answer
MPRT	SE	✓		No answer	No answer		No answer

8. Summary

Across Europe, there are disparities between the representation of men and women both on- and off-screen. Women appear less on screen across a range of genres and are typically subject to more stereotypical and degrading portrayal than men. In off-screen creative roles, women are also generally under-represented, but most significantly in senior and/or technical positions.

It was evident from the survey results that there was a general perception that there are too few women represented on screen. In terms of portrayal, the respondents were more positive, with the majority believing that women were portrayed either neutrally or fairly positively.

Some regulators have legal obligations and powers which require them to achieve a more equal gender balance on screen. As a result, many regulators are conducting monitoring exercises and producing annual reports to track the gender ratios in television programmes, and hold broadcasters to account.

The research cited in the responses revealed some common trends in the sector, which are being addressed to varying degrees by the different regulators in their countries. In terms of representation, women appear less on screen and are afforded less speaking time than men. The strongest examples of this were in news and current affairs programmes.

In terms of portrayal, the existence of stereotypes and the related issue of a lack of women experts seemed to dominate the research and discussions. Women are confined to roles which portray them as less authoritative and less multi-faceted, which does not reflect the diversity of women which programmes and adverts seek to depict. To address this issue, many regulators are raising awareness of the way women are portrayed in the media, and in some cases are creating tangible resources to help programme makers redress the balance (for example, databases of women experts). Some regulators also rely on more general equality provisions, and/or on specific legal competences prohibiting discriminatory treatment of women on-screen to address issues of portrayal when they occur.

The topic of off-screen representation has so far not had the same level of recognition – and, therefore, response – with fewer regulators conducting research, and even less conducting ongoing assessments or creating initiatives to improve the situation of women behind the scenes. It seems that off-screen representation is currently treated as a distinct issue, as there was little mention of the ways that an increased presence of women in a creative sense can directly impact how women are represented and portrayed on-screen.

9. Conclusion

Reflecting on the outcomes of the EPRA questionnaire, as well as on the deliberations in the EPRA Working Group in Luxembourg, it is evident that there is an appetite and energy among many broadcasting regulators to address issues of gender representation both on- and off-screen in the European audiovisual sector. This can be demonstrated by the proactive way in which many regulatory authorities have acted to date, unbidden, and notwithstanding that many do not have a specific statutory remit in this regard.

However, given that ensuring diversity is an almost universal theme in the remit of regulatory authorities, it also begs the question as to whether it is desirable to increase the competences of European regulators to ensure a more formal role, grounded in law, in achieving greater gender representation in the broadcasting organisations under their remit, as well as in the content available to European audiences.

Amongst respondents to the questionnaire and amongst participants in the EPRA Working Group, there was general agreement on the need for more complete and comprehensive data. There is potential for a Europe-wide initiative to co-ordinate the production and publication of comprehensive, consistent and streamlined data that would deliver a more complete picture of both the challenges and progress in this area and allow for a comparative assessment of the position across jurisdictions.

Subject to the willingness of regulators to collaborate further, there is also potential for greater co-ordination and co-operation in the activities that regulators undertake and for a greater sharing in the experience gained and lessons learned. Guidance and support on the development of good regulatory practice might also be helpful in bringing on board regulatory bodies that have not been active in this field to date.

Against this background, there is potential for the development of a framework for regulatory activities, at national and European levels, which could reflect, and give structure to, the range of actions currently undertaken by regulatory authorities in Europe for improving gender equality in the audiovisual sector. The appendices of Recommendation **CM/Rec (2017) 9** of the Council of Europe on gender equality in the audiovisual sector already provide useful guidance with regard to measures for implementation as well as on **recommended monitoring methods and performance indicators**. Such a framework could for instance involve the following elements: development of guidelines on policy formulation and structure; agreement on a structure for data gathering; development of a portal for sharing research and for sharing the learning acquired in implementing and reviewing initiatives; collaboration on the most appropriate and efficient monitoring methods etc.

It may be worth acknowledging the relationship between the policy goals of achieving better gender representation on-screen and off-screen and media literacy in general, as gender-sensitive media literacy may help audiences to decode gender stereotypes. Recent EPRA research⁸⁵ has also shown the proactive way in which many regulatory authorities have acted to promote media literacy to date, and notwithstanding that many do not have a specific statutory remit in this regard. In order to be effective, gender equality policies - just as media literacy policies - need to be based on a multi-stakeholder approach. Effective cooperation and coordination at national and European levels is an important pre-requisite in this regard.

Finally, there is a potential role for networks of media regulatory authorities, such as EPRA, ERGA, MNRA and REFRAM, in developing and supporting this area of work further and in agreeing a tentative orientation for the future that would reflect their own specificity.

⁸⁵ <https://www.epra.org/attachments/vienna-wg-i-media-literacy-focus-on-the-role-of-regulators-background-document>

Annex 1: Summary of discussions in Working Group 2 in Luxembourg of 24 May 2018

WG2: ACHIEVING GREATER DIVERSITY IN BROADCASTING: FOCUS ON GENDER

Chair and EPRA Board sponsor: Celene Craig, EPRA Chairperson

Content Producers: Leila Kurnaz and Natasha Connors, Ofcom (UK)

EPRA's 2018 Work Programme includes a biannual working group exploring practical ways to encourage a better representation of society by addressing the issues through the specific angles of gender representation (in spring in Luxembourg) and social, cultural and ethnic minorities (in autumn in Bratislava). The spring session was two-fold, covering on-screen gender representation and portrayal and off-screen representation (behind the camera and in the workforce). It was clear from the discussions that these are closely linked.

Celene Craig reported on the preliminary findings of the questionnaire which had been circulated to EPRA members. Five members then shared their experiences with the participants of the group and highlighted the nature and scope of the challenge:

- Emilija Petreska-Kamenjarova, Head of Human Rights and Media Literacy Unit (AAAMS-MK)
- Joëlle Desterbecq, Head of Research and Studies (CSA-BE)
- Estela Jiménez Luna, Deputy Head of Unit Audiovisual Department (CNMC-ES)
- Stephanie Comey, Senior Manager (BAI-IE)
- Vikki Cook, Director of Standards and Audience Protection (Ofcom-UK).

Overall, there seems to be a consensus that women are under-represented compared to men on-screen and off-screen, in programming and in advertising. Key themes coming out of the discussions included:

- Monitoring is key:

Having data is very important: this is the starting point for regulators in tackling underrepresentation in order to understand the scope and scale of the issue. Once the gaps are identified, it is easier to create focussed strategies and initiatives to help address them, because 'what gets measured gets managed'. But it is not only important to collect data and to monitor the make-up of the industry that audiovisual regulators regulate and hold to account, NRAs also need to monitor the make-up of their own organisations, ensuring that they reflect the diversity of society.

Participants discussed the kinds of initiatives that could be employed to target underrepresentation, such as creating databases of experts, which can then be used by industry as a resource to improve on-screen representation, or setting targets particularly in the off-screen environment to improve representation.

- Statutory powers:

Several members reported that while they were doing good work and conducting comprehensive research, they have only limited regulatory powers to make change happen.

In terms of representation and portrayal in on-screen programming, many NRAs rely on more general national provisions which prohibit incitement to hatred based on race, sex, religion or nationality, but which does not cover more subtle forms of gender discrimination.

With regard to off-screen representation, members mostly rely on national equality or employment law in their countries or laws prohibiting hate speech, but powers giving regulators a specific role in promoting equal opportunities are limited.

The advice given by those who are working in this area is to encourage broadcasters and other AVMS providers, to make them aware of the research and to keep working and discussing the problems around the lack of women or stereotyped portrayal in the industry.

The Council of Europe Recommendation on Gender Equality in the Audiovisual Sector was noted as an important reference document, echoing many of the key themes mentioned in the session such as collecting data and sharing information.

- Accountability - leading from the top:

Regulators have a role to play and should consider the work they can do to ensure that women are represented generally and in senior positions in their own organisations.

An important part of making this work effectively is ensuring that the work is driven from the top of an organisation. Change is unlikely to happen if the CEO, board or senior leadership of a regulator or stakeholder company is not committed to promoting gender equality and giving support to the work. A good demonstration of leading from the top is EU Commissioner Mariya Gabriel's interest in gender diversity.

Next steps:

A final version of the EPRA background paper based on the responses to the questionnaire and on findings from the session is to be produced in summer 2018. It was considered very positive that many more discussions are planned or are in process to continue the sharing of data, conversations and lessons learned, such as the *Digital4Her* event organised by the European Commission on 19 June 2018 in Brussels; the findings of the EPRA Working Group will be shared with the participants on that occasion.

Annex 2: References to other relevant upcoming or completed research

Representation of women on screen

- *'Barometer on Diversity and Equality 2017'*, published by the Belgian CSA, 2018 ([see here](#))
- *'Report on the portrayal of women on television and radio'*, published by the French CSA, 2018 ([see here](#)), Barometer produced yearly since 2007
- *'Treating Men and Women Equally on TV'*, research by UK broadcaster Channel 4, 2016 ([see here](#))
- *'Gender on television'*, research by Macedonian AAAMS, 2012-2016 ([see here](#))
- Monitoring by the Italian PSB Rai of its own programming, 2015 ([see here](#))
- *'PSB Diversity Research Summary'*, research by Ofcom, 2015 ([see here](#))
- *'Diversity and Equality on television'* published by the Catalan CAC, 2017 ([see here](#))

Representation of women in news/current affairs

- *'Presence and representation of women in news (January-September 2017)'* published by the Catalan CAC, 2018 ([see here](#))
- *'Gender equality and social justice in public media'* published by the Polish NBC, 2015 ([see here](#))
- Research by 'Equalisters' in Sweden into representation of women in the news, 2015 ([see here](#))
- *'Who makes the news'*, Global Media Monitoring Project, 2015 ([see here](#))
- *'Study on the presence of women in information programmes'* by the French CSA, 2013 ([see here](#))

Representation of women in drama/fiction

- *'Place and representation of the women in fiction'* published by the Belgian CSA, 2017 (joint project with Tunisian HAICA) ([see here](#))
- *'Study on female stereotypes in fiction series'*, published by the French CSA, 2014 ([see here](#))
- *'Study on women's speaking time in TV magazines'*, published by the French CSA, 2013 ([see here](#))
- *'The place of women in TV drama'* published by the French CSA, 2013 ([see here](#))
- *'Analysis of the broadcasting on TV of films made by women in 2011 and 2012'*, published by the French CSA, 2013 ([see here](#))

Representation of women in sport

- *'Equality between men and women in the sport programmes through audiovisual media services'* published by Mediterranean Network of Regulatory Authorities (MNRA/RIRM), 2017 ([see here](#))

Representation of women in advertising/stereotypes

- *'Diversity and Equality Barometer 2017: Commercial Communication'*, published by the Belgian CSA, 2018 ([see here](#))
- *'Gender Research'*, research published by the Advertising Standards Authority in the UK, 2017 ([see here](#))
- *'Representation of women in television advertising'*, published by the French CSA, 2017 ([see here](#))
- *'Sexist stereotypes in adverts in the Mediterranean area; summary report: Andalusia, Catalonia, Croatia and Morocco'*, March 2016, Mediterranean Network of Regulatory authorities (MNRA/RIRM) ([See here](#))

Producing content – women off screen

- *'Where are the women directors? 2006-2013, Report on gender equality for directors in the European film industry'* published by European Women's Audiovisual Network ([see here](#))

Gender in radio

- *'Hearing Women's Voices'*, published by National Women's Council of Ireland and Dublin City University, 2015 ([see here](#))

Violence against women

- Upcoming survey on the presentation of violence against women in Greek programmes – NCRTV (Greece), in collaboration with the Centre for Gender Equality (KETHI), intends to monitor and analyse programmes of selected AVMS providers over three months to find out how violence against women is presented in news programmes
- Upcoming results of a study by the ERC (Portugal) into the representation of domestic violence in prime-time news
- Upcoming study about the media treatment of gender violence in the Mediterranean broadcasting area (MNRA)

Representation of women in the media industry

- Research by the Mediacentar Sarajevo in Bosnia and Herzegovina into 50 media companies, 2018 ([see here](#))
- *'Diversity in broadcasting guidance: Arrangements for the promotion of equal opportunities in the broadcasting industry,'* Ofcom 2017 ([see here](#))
- *'Analysis of employee structure in the audio visual industry'* by AAAMS in FYR Macedonia, 2015 ([see here](#))

Media, Elections and Gender

- *'Study on media coverage of elections with a specific focus on gender equality'*, Council of Europe 2017 ([see here](#))
- *'Representation of the women in French speaking Belgium pre-electoral television debates'*, published by the Belgian CSA, 2014 ([see here](#))