

Consultation title	Ofcom Diversity and Inclusion Programme 2018-2022
Organisation name	British Film Institute

Your response

Question 1: What are your views on Ofcom's Diversity and Inclusion Programme?	The BFI welcomes Ofcom's recognition of the importance of diversity and equality in its work, and the principles on which it has built its 2018-2022 Action Plan. There are some clear similarities in both the task and in the actions both Ofcom and the BFI are undertaking to lead on improving diversity and inclusion for the screen sector. We have already begun to lead the charge for film, and see real value in sharing the work we have done with Ofcom to inform its thinking. We want to work closely with Ofcom to make real change.
Question 2: To what extent do you believe that our approach will promote diversity and inclusion within Ofcom and in the sectors we regulate?	N/A.

Question 3: Are there any additional objectives that you feel Ofcom should include in its Diversity and Inclusion Programme?

We have already begun to lead the charge on improving diversity and inclusion for film, and see real value in sharing the work we have done with Ofcom to inform its thinking. We want to work closely with Ofcom to make real change.

We feel we can offer particular insight in developing policy aim A2.9, 'Strengthen[ing] diversity and inclusion in broadcasting', including 'encourag[ing] a strong industry-wide diversity and inclusion standard by encouraging broadcasters to work together, sharing initiatives and best practice'. Our Diversity Standards and Guidance and principles on bullying and harassment are excellent examples of how this can be achieved, and we would like to take the opportunity to talk Ofcom officials through these initiatives in more detail.

We also think that we could take a joined-up approach on informing industry of the needs and interests of the UK's diverse audiences (policy A2.9), through the consumer and industry research we undertake, and would welcome further discussions with Ofcom on these aims.

We have provided further information below on the initiatives the BFI already undertakes and look forward to future discussions on how we can work with Ofcom to improve diversity and inclusion in the screen sector and wider media.

British Film Institute (BFI) Response to Ofcom Diversity and Inclusion Programme 2018-2022 Consultation

About the BFI

The BFI is the lead organisation for film in the UK. For the BFI, film means anything that tells a story, expresses an idea or evokes an emotion through the art of the moving image. The BFI's ambition is to create a flourishing film environment in which innovation, opportunity and creativity can thrive by:

- Connecting audiences to the widest choice of UK and world cinema
- Preserving and restoring the most significant film collection in the world for today and future generations

- Championing emerging and world class film makers in the UK - investing in creative, distinctive and entertaining work
- Promoting UK film and talent to the world
- Growing the next generation of film makers and audiences

The BFI is a Government arm's-length body and distributor of National Lottery funds for film. It serves a public role which covers the cultural, creative and economic aspects of film in the UK. It delivers this role:

- As the UK-wide organisation for film, a charity core funded by Government
- By providing National Lottery and Government funds for film across the UK
- By working with partners to advance the position of film in the UK

To these ends, the BFI helps ensure that public policy supports film and, in particular, UK film.

Founded in 1933, the BFI is a registered charity governed by Royal Charter.

The BFI Board of Governors is chaired by Josh Berger.

Response

1. The BFI welcomes Ofcom's recognition of the importance of diversity and equality in its work, and the principles on which it has built its 2018-2022 Action Plan. These chime with our own goals in this area, particularly building a diverse and inclusive workforce to better reflect the UK population which we serve, ensuring diversity and inclusion are central to work practices and culture and ensuring the needs and interests of all individuals are considered when carrying out our public functions.
2. As the lead body for film, and in our role as a public funder and a National Lottery distributor, it is essential that the BFI represents a contemporary Britain – in the films we fund and show, the audiences who watch them, and the filmmakers, actors and crews who make them. In each of the key strands of work set out in the BFI 2022 strategy¹ – Future talent, Future audiences, and Future learning and skills – we have placed diversity and inclusion at the heart of our objectives².

Future Talent

3. The BFI's world-first **Diversity Standards**³ have led global change in improving diversity and inclusion in the screen sector. As a National Lottery distributor and public funder, the BFI seeks to reflect the public in the films we fund, the programmes we support, the audiences who watch them and the filmmakers, actors and crews who make them. We insist that the projects we support must embrace these Standards and help those we fund identify how they can improve diversity and inclusion in their activity. The Standards focus on disability,

¹ <http://www.bfi.org.uk/2022/>

² <http://www.bfi.org.uk/about-bfi/policy-strategy/diversity>

³ <http://www.bfi.org.uk/about-bfi/policy-strategy/diversity/diversity-standards>

gender, race, age and sexual orientation where there is significant under-representation. We also seek to ensure that people from lower socio-economic groups are better represented.

4. Applicants for funding are expected to meet the criteria of at least two of four Standards and actively encouraged to pursue at least three. These categories cover on-screen representation, themes and narratives; project leadership and creative practitioners; industry access and opportunities; and opportunities for diversity in audience development. The screen diversity mark of good practice is awarded to projects that achieve the Standards in at least three categories to use in the end roller credits on films billing blocks and paid advertising or other promotional or printed materials.
5. Under BFI leadership, Film4 and BBC Films have both signed up to the Diversity Standards and BAFTA has committed to add them to the eligibility criteria for the Outstanding British Film and Outstanding Debut by a British Writer, Director or Producer categories from 2019. This demonstrates BFI's collaborative leadership role with the wider screen sector.
6. The BFI has led the charge – in consultation with leading sector organisations including unions, guilds, industry member bodies and key agencies as well as employees and freelancers across all roles – to adopt the world-leading set of **principles and guidelines to tackle and prevent bullying and harassment** for the screen sector⁴. Developed in partnership with BAFTA, the principles take a zero-tolerance policy on bullying and harassment, and include a recognition of the value of inclusivity, appreciating difference and considering people equal without prejudice or favour. The BFI will maximise the leverage we have as a funder to ensure anyone who secures BFI funding is contractually committed to adhere to these principles by incorporating them into the Diversity Standards.
7. Specific measures will be recommended including appointing two designated workers on and off set to be trained to handle issues and allegations, ensure workers understand their rights and know how to seek help and support. We will work with partners to offer training and advice for those with this designated responsibility.
8. From April, a new Film and TV Support Line will be set up by industry charity the Cinema and Television Benevolent Fund and supported by the BFI, offering a free of charge service for anyone working in the film and television industry. It will be operated 24/7 by professionally trained staff with expertise and experience in supporting people affected by a range of issues.
9. We have set **targets**⁵ across our talent development work (through BFI NETWORK), our development funding and our production funding. We are aiming for a 50-50 gender balance in our supported filmmakers; for 20% of our supported filmmakers to come from Black, Asian and Minority (BAME) groups; 9% of our supported filmmakers to be LGBTQ-identifying filmmakers; and 7% of our supported filmmakers to be filmmakers with a disability. We will monitor and report our decisions annually across the writers, directors and producers of supported projects. We have long been guided by these principles, but we will put these in place formally from April 2018, in tandem with our new funding year. We believe these targets can help to drive real diversity and inclusion in the films we support, which is vital to ensuring more cultural vibrancy, relevance and commercial growth in our sector.

⁴ <http://www.bfi.org.uk/news-opinion/news-bfi/announcements/new-anti-bullying-harassment-principles>

⁵ <http://www.bfi.org.uk/news-opinion/news-bfi/features/bfi-film-fund-changes>

10. Our experience in leading the charge on diversity and inclusion in the screen sectors would be valuable in the development of Ofcom’s diversity and inclusion policies as a regulator, particularly in developing the policy aim A2.9, ‘Strengthen[ing] diversity and inclusion in broadcasting’, including ‘encourag[ing] a strong industry-wide diversity and inclusion standard by encouraging broadcasters to work together, sharing initiatives and best practice’⁶. Our Diversity Standards and guidance and principles on bullying and harassment are excellent examples of how this can be achieved, and we would like to take the opportunity to talk Ofcom officials through these initiatives in more detail.

Future Learning and Skills

11. Our 2022 Strategy sets out our ambition to set out clear progression paths, both for future audiences as they develop a passion for film and for talented young people who will be the future of the film industry. As promised in our strategy, in partnership with Creative Skillset, we have produced a **10 point action plan**⁷ to tackle the skills shortages the industry is facing. The lack of diversity in our industry is its single biggest challenge. Women, Black, Asian and Minority Ethnic (BAME) groups and disabled people are significantly under-represented and those from disadvantaged backgrounds experiencing significant barriers to entering and progressing in the screen sectors. Our action plan recognises that more work is needed at all stages of a person’s career – from education, to recruitment and beyond – and is designed with inclusion at its heart to address key barriers those from underrepresented groups face.
12. Our 2022 Strategy also commits to build and further professionalise the Department for Education-backed **Film Academy**⁸, which offers the opportunity for 16-19 year olds to develop specialist film-making skills – no matter where they are from or what their background is. We ensure that participants are from a range of diverse backgrounds as an essential part of our programme of work to create a more diverse workforce for the future. Additionally, we support **Into Film**⁹ to deliver schemes that promote the watching, making and understanding of films, and inspire young future film-makers of all backgrounds and in all areas of the country.

Future Audiences

13. Audiences across the UK love film, and we believe that everyone, everywhere in the UK, should have the opportunity to enjoy and learn from the richest and most diverse range of great UK and international filmmaking. Our strategy sets out our promise to offer unmatched diversity in our public **programming** to reflect the diversity of the UK and of our audiences. Previously, we have delivered the Black Star season, dedicated to celebrating the range, versatility and power of black actors and last year we ran an ‘India on Film’ season to coincide with a major cultural collaboration between the two countries. We run the BFI’s annual Flare Festival – the largest LGBT film event in the UK, and we have further committed

⁶ Ofcom Diversity and Inclusion Plan Consultation Document, p. 24 -

https://www.ofcom.org.uk/__data/assets/pdf_file/0019/109711/consultation-diversity-inclusion-plan.pdf

⁷ <http://www.bfi.org.uk/sites/bfi.org.uk/files/downloads/future-film-skills-an-action-plan-2017.pdf>

⁸ <http://www.bfi.org.uk/education-research/5-19-film-education-scheme-2013-2017/bfi-film-academy-scheme>

⁹ <https://www.intofilm.org/>

to work with partners to ensure that all audiences have the opportunity to enjoy a diverse range of culturally rich material, both in our venues and on demand.

14. In terms of **audience development**, our strategy places our focus firmly on the future; specifically engaging 16-30 year olds, who hold the keys to the future of film culture. When attracting new audiences to both the programming we offer and through our education and skills development, we are taking the opportunity to ensure that a diversity of film culture is available to audiences across the UK. We have committed to lead audience engagement and gather data to help us understand 16-30 year old audience's tastes and viewing habits and in turn use this information to encourage this group to explore a wider and more diverse range of film.
15. There is a clear opportunity for Ofcom and the BFI to work together in providing an evidence base for industry to increase awareness of the needs and interests of the UK's diverse audiences. We would like to work with Ofcom in their policy aim A2.8, to 'Conduct and share the results of [its] consumer research [...] to increase awareness of the experience, needs and media literacy among different groups of consumers, including minority groups such as ethnic groups and disabled people'¹⁰. We would welcome further discussions with Ofcom as to how we can take a joined-up approach on these aims.

Conclusion

16. We recognise that there is still a great deal of work to do, and strive for representativeness in our own workforce and that of the wider industry. We believe that stronger and better representation of the whole of the UK both on and off screen will lead to a much greater diversity of stories being told through the moving image. This in turn will increase participation and engagement of all audiences. Film has the power to engage all sections of society, and we must harness that power.
17. There is a clear leading role for the BFI in making a diverse and inclusive screen sector a reality – and we cannot and do not want to do it alone. There are some clear similarities in both the task and in the actions both Ofcom and the BFI are undertaking to lead on improving diversity and inclusion for the screen sector. We have already begun to lead the charge for film, and see real value in sharing the work we have done with Ofcom to inform its thinking. We want to work closely with Ofcom to make real change.
18. As above, we feel we can offer particular insight in developing policy aim A2.9, 'Strengthen[ing] diversity and inclusion in broadcasting', including 'encourag[ing] a strong industry-wide diversity and inclusion standard by encouraging broadcasters to work together, sharing initiatives and best practice'. Our Diversity Standards and Guidance and principles on bullying and harassment are excellent examples of how this can be achieved, and we would like to take the opportunity to talk Ofcom officials through these initiatives in more detail.
19. We also think that we could take a joined-up approach on informing industry of the needs and interests of the UK's diverse audiences (policy A2.9), through the consumer and industry research we undertake, and would welcome further discussions with Ofcom on these aims.

¹⁰ Ofcom Diversity and Inclusion Plan Consultation Document, p. 24 - https://www.ofcom.org.uk/__data/assets/pdf_file/0019/109711/consultation-diversity-inclusion-plan.pdf

20. We welcome the principles set out in Ofcom's Diversity and Inclusion Plan and our grateful for the opportunity to respond. We look forward to further discussions with Ofcom on diversity and inclusion in the coming weeks.