Designing Monitoring to Promote Cultural Diversification in TV

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Abstract: This article reviews key international and national precedents in democratic media monitoring of race relations at the height of concern about interracial and intercultural security after 9/11, primarily between 2001 and 2004. None of these studies has received much academic or policy attention. The history, context, politics, and methods of media monitoring of race and representation are reviewed in the Canadian context. Four options are set out for developing continuous monitoring of media content of the type established in other countries. The article argues for an independent institute for media monitoring in Canada involving racial equity-seeking groups, scholars, media professionals, and students in the production of empirical research to promote cultural diversification in Canadian TV.

Keywords: Media analysis; Media monitoring; Broadcasting policy; Cultural diversity


Mots clés : Analyse des médias; Veille médiatique; Politiques de radiodiffusion; Diversité culturelle

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While it is important that discussions of race and representation do not neglect the crucial issues of material conditions—who gets to produce and on what terms—that does not displace the need to evaluate what is produced, the strategies employed, and the meanings embedded in the vocabulary of sound and image that we draw upon in the creation of our new visions (Fung, 1996).

The need to monitor media coverage of ethnic relations and symptoms of intolerance such as xenophobia or hate crimes against Muslims framed as suspected terrorists has been widely recognized by politicians and professionals since global attention shifted to security after 9/11. Few mainstream news or entertainment organizations in the West featured Muslim or Middle Eastern specialists commenting on international terrorism and the related wars in Afghanistan and Iraq, and complaints of inadequate coverage and bias abounded. The rise of Al Jazeera in audiences attracted, perceived editorial quality, and availability in North America since then shows the importance of “material” representation of “others” in positions of editorial and creative control, as discussed by noted Canadian videographer Richard Fung (1996). As he argues, the emergence of such new sources and new talent (still marginal in 2001-2004) does not displace the need to evaluate the meanings embedded. Is all such responsibility for evaluation and prosecution of offence up to the individual? This article argues that it is not.

Systems to monitor racial representation and mediate interracial conflict and negotiation can be designed to promote cultural diversification. Clearly, such systems cannot directly involve the state; they require new forms of media governance. Even in the high-water era of social responsibility and public regulation of the media, when governments consistently regulated them for social or economic motives, what was produced, the strategies employed, and the meanings embedded were rarely directly monitored.

Media monitoring generally refers to independent observation, analysis, evaluation, and criticism of practices and products of the media and media workers, with the aim of improving the democratic quality of media coverage (Nordenstreng & Griffin, 1999). The problem of “accountability” for content was compounded by the 1990s neo-liberal policy paradigm for global communication. The scope of direct national government regulation and control over media was reduced. Responsibility for designing performance standards and monitoring compliance was devolved to industry or civil society groups that were ill prepared for the challenge during times of crisis. Such “policy by stealth,” as Canadian social-policy analyst Michael Prince (1996) has called the shift to co-management and self-regulation¹, compounded the theoretical and practical problems in democratic monitoring of TV that faced researchers, social activists, and policy analysts of race and representation (Coulter & Murray, 2001; Gallagher, 2001; Senden, 2005). As a consequence, when the “crisis” after 9/11 seemed to provoke the need for civil society to “monitor” TV content using a badly designed and ad hoc self-regulatory system, mistakes were made, and insufficient change was obtained.

This article explores two cases in monitoring race on mainstream Canadian TV.² After reviewing the policy framework and politics of cultural diversity, it explores the specific Canadian conditions in which a professional code of prac-
tice on representation of race might have a chance of being effective. It addresses important questions about the design of new arm’s-length public institutions to provide effective policy monitoring to ensure the racial diversification of mainstream TV. In conclusion, it argues for immediate action to develop an independent institute for media monitoring in Canada, perhaps in concert with the wider media democracy movements that have not yet themselves embraced the politics of cultural diversification.

Global developments

European analysts have called since 1983 for multilateral attempts to mount a global race and representation media monitoring project, but their efforts have proved fruitless. Some progress is being made at the regional level, as the notable effort by the European Commission (2002) entitled “Tuning into Diversity” attested; it explored unacceptable levels of representation of minorities, guidelines for offensive content, and dialogues to promote intercultural understanding. A pilot media-watch project called the “European Day of Monitoring” began in 2003 and was repeated annually until 2005. It enabled migrant and refugee organizations to collect credible data to exert pressure on the media to change. BBC Monitoring also stepped into the vacuum, entering into partnerships with the Programme of Comparative Media Law and Policy at Oxford University to search for instances of media hate around the globe, leading not to “shaming and blaming” but to dialogues over mutual correction. The contributions of the International Federation of Journalists (especially its working group on racism and xenophobia) and the European Commission against Racism and Intolerance are also significant in advancing intercultural learning. Advisors have called for research and development of intercultural quality criteria with which to evaluate programming. Some have gone so far as to suggest the development of an anti-discriminatory international ISO standard: a set of criteria by which a media company or training institute could obtain an international quality mark to aid foreign export, which could be monitored every year (European Commission, 2002). The proposal is interesting, since it tries to monetize the value of good compliance. Despite three conferences, however, little progress has been made.

A pragmatic, locally developed approach may be more workable and more sustainable. A study under the direction of Charles Husband and Yunis Alam (2002) at the University of Bradford in the U.K. found more than 100 relevant local codes of media practice around the world that cover race and representation. Such codes contain prescriptive policy rhetoric that often presents the “collectively imaginable,” says Husband, not the “collectively attainable.” Unlike the majority opinion in the European Commission study “Tuning into Diversity” (2002), Husband & Alam (2002) concluded that a blueprint ISO approach is inadvisable: codes should not be taken off the shelf to obviate the democratic dispute and deliberation that must go into the drafting and interpretation of them. Husband & Alam identified conditions in which a specific code of practice might have a chance of being effective, the most important being that good codes for fair racial portrayal require effective monitoring and enforcement. To this end, several countries have designed permanent institutions for media monitoring; one of the most interesting models is in Britain, where the Commission for Racial
Equality, academics, and what was then the Broadcasting Standards Council (now folded into Ofcom) collaborated on systematic monitoring of race relations and regular educational sessions with industry leaders. Around the world, there have been a number (certainly more than six) of excellent studies that anticipate the kind of evaluation demanded by Richard Fung.

**The Canadian policy framework**

Whatever model for monitoring is developed, it is dependent on the path of policy in the country involved. Regulation of the cultural industries, and TV in particular, has been undergoing a rapid paradigm shift in both ideas and instruments. In the cultural field of ideas, the 1996-2001 trend toward cultural diversity as a conceptual policy frame put a new face on the social responsibility theory of electronic media. The concept of cultural diversity has been in play in international cultural debate for many years, often used interchangeably with, or as a synonym for, multiculturalism. The two concepts are not the same. In contrast with multiculturalism’s emphasis on a national culture composed of “different cultures existing side by side,” cultural diversity responds to “the intersections and inter-mixings of, and cross-overs between, different cultural perspectives and traditions” (Bennett, 2001, p. 22). If this suggests something of a “critical multiculturalism,” it is based on more than a liberal notion of cultural tolerance (Cottle, 2002; Henry & Tator, 2000; Mader & Kirpitchenko, 2002) and calls for more than a neo-liberal view that differences can add value in social capital or social productivity (Weiner, 1997). Instead, understanding differences is valued for promoting social tolerance, intercultural capital, community dynamism, and social well-being.

In the late 1990s, Canada took the initiative in development of a draft convention “on the protection of the diversity of cultural contents and artistic expressions,” which was finally passed by UNESCO in 2005. Among its main objectives are “to facilitate the development and adoption of cultural policies and appropriate measures for the protection and promotion of the diversity of cultural expressions.” Canada also participated in an international working group that considered issues of cultural diversity, TV, and globalization. While both initiatives show that “diversity” became a fashionable Canadian policy term—with notoriously ambiguous meaning—under the former federal Liberal government well before 9/11, the minority Conservative government elected in 2004 suspended any international follow-up.

Just as ideas have changed, so have theories about the appropriate role of policy instruments in the context of the rise of neo-liberal approaches to more competition and “lighter” regulation. The past two decades have seen a shift from constitutional to legal to regulatory and then to self-regulatory policy instruments to achieve the same ends. How does this relate to race and representation in the regulation of offensive media content? In Canada, the notion that no one is to be discriminated against and that everyone is therefore equal before the law, regardless of race or ethnicity, is clearly stated in section 15(1) of the Canadian Charter of Rights and Freedoms (1982). Commitment to affirming the democratic values of multiculturalism and ethnic diversity is recognized in section 27, which states that the Charter shall be used to reflect, conserve, and promote our nation’s multicultural status. Judicial and social discourses on security of groups and individu-
uals and the need to resist incitement to hate, prejudice, violence, or war are relatively well developed in Canada, even if they must be socially re-negotiated time and time again (Peterson & Hutchinson, 1999). Any absolute right to freedom of expression is rejected when harm to others may be proved. Supreme Court precedents such as *R. v. Keegstra* or *R. v. Butler* have established that patently offensive hate material with no offsetting literary, esthetic, or other value is against the law. If the purpose of repeating racist/hate remarks is to draw attention to something for educative purpose, or if the remarks are believed to be true, an exception may be found.

Multiculturalism in section 27 of the Charter was further consolidated when the government in 1988 revised the *Canadian Multiculturalism Act*, which ensures each citizen the right to maintain his or her culture and language (Department of Justice Canada, 2001). Parliament reinforced this commitment, as shown in section 3(1)(d)(iii) of the 1991 *Broadcasting Act*, which states that the Canadian broadcasting system should:

> through its programming and the employment opportunities arising out of its operations, serve the needs and interests, and reflect the circumstances and aspirations, of Canadian men, women and children, including equal rights, the linguistic duality and the multicultural and multiracial nature of Canadian society and the special place of aboriginal people within that society.

Despite this backdrop of escalating affirmative social policy, in the 1990s Canada, like many other nations, began to devolve the actual responsibility for developing and monitoring standards of content in general—and racial content in particular—to the private or public sector separately, under a model of industry self-regulation that stepped back from the hoary old myth of a “single broadcast system.” In 1990, the Canadian Radio-television and Telecommunications Commission (CRTC) compelled the Canadian Association of Broadcasters (CAB) to establish the quasi-public, not-for-profit Canadian Broadcast Standards Council (CBSC). The CBSC is an arm’s-length body now representing some 75% of the private industry. It involves selected citizens drawn from the community or public-interest groups, with broadcasters in the majority on any panel that adjudicates complaints. The Canadian Broadcasting Corporation (CBC), by contrast, has its own internal ombudsman system. In theory, the outcomes of both complaint adjudication procedures are to be reported to the CRTC, which may rule on any dispute not settled at the lower level, but in practice, complaints are rarely reported on in its’ annual reviews.

At the time the CBSC was set up with a general code of standards, only feminist equity-seeking groups were successful in obtaining a separate code of sex-role portrayal, with a code on violence added later. The CBSC developed an elaborate website, delivered loosely related or organic rulings (where one refers to another in a chain of reasoning), and issued annual reports in a reasonable concession to public transparency, showing steadily increasing numbers of complaints received and garnering positive international recognition (Gallagher, 2001). However, the CRTC adopted a very hands-off role in supervising CBSC complaint disposition (not acknowledging this lack of co-ordination until its 2003
strategic plan). It was criticized by equity-seeking groups for its failure to supervise compliance with standards in an effective way. In general, the CBSC and CRTC have inadequate sanctions in the form of fines or other tools to enforce their decisions.

The first political frame the CRTC put on the policy to diversify the reflection of Canada’s multiracial heritage was linguistic. The intent here is not to discuss this “segregated” policy to diversify third-language ethnocultural contents, although the uneven development of licensing and application of the Ethnic Broadcasting Policy within major metropolitan centres with burgeoning immigrant groups precipitated a range of appeals to cabinet, successive applications, and deepening controversy (for a definitive historical overview, see Roth, 1998). What is at issue in this paper is the treatment of matters of integration, inclusion, and racial representation in mainstream, conventional television. Coinciding with the 1999 CRTC review of its TV policy, two objectives were set for conventional broadcasters:

- The broadcasting system should be a mirror in which all Canadians see themselves fairly portrayed, accurately and without stereotypes.
- The broadcasting system should allow the participation of producers, writers, technicians, and artists from different cultural and ethnic perspectives.

The CRTC spent much more time on the second objective. Coincidentally, mergers and acquisitions and consolidations in ownership were effectively bringing other networks under the ambit of federal equity legislation on the employment side. The Commission required CTV, Global, and TVA to submit diversity compliance audits in the context of their licence renewals. The CRTC chairman at the time, Charles Dalfen, indicated that Commission staff would work with the licensees behind the scenes to ensure that corporate diversity plans were sufficiently comprehensive and results-oriented. The preferred mechanism to ensure compliance is bilateral private consultations, and there is no mechanism between licence renewals for citizen groups to intervene or comment on the progress in diversification. Second-tier broadcasters such as Corus and CHUM (still independent at the time) were slowly brought under the same obligation. The CRTC compelled the national public broadcaster, the CBC, to report annually on this issue. But how would escalating public concerns about racial representation after 9/11 be accommodated under the first objective?

**Canada’s code of ethics in racial portrayal**

Developing standards for content is a complex social process of negotiation among regulators, policymakers, industry stakeholders, and social groups (Purchase, 1996). Following the 1991 revision to the *Broadcasting Act*, the decade-long battle for the “right to receive and transmit an ethnically balanced depiction of Canadian society within all public and private broadcasting channels” (Roth, 1998, p. 495) began. Insistent interventions before the CRTC by a number of ethnocultural groups criticized the absence of visible minorities as appointees to the CRTC or the CBSC, their low representation in the senior management of major broadcast undertakings, and inadequate programming (complaints that were anecdotal and rarely based on systematic evidence).
Despite widespread pressure in the 1990s from equity-seeking groups dissatisfied with misrepresentation, the CAB consistently resisted the idea of a targeted, vertical approach or a separate dedicated code on race portrayal consistent with the Sex-Role Portrayal Code established in 1992 after pressure from feminist groups (but since abandoned). The CAB maintained that a code on race portrayal was not widely supported by ethnocultural groups in Canada. A sampling of Web-based postings and examination of all public interventions in 2005, at the height of this activity, appears to support this contention. Nonetheless, a separate code has been explicitly endorsed by the activist Centre for Research-Action on Race Relations (CRARR) and found salutary in other places around the world as a way to combat media sexism and racism (Gallagher, 2001).

As part of the federal interest in cultural diversity initiatives, and further propelled by the events of 9/11, pressure to revise the CBSC’s general Code of Ethics produced clearer prohibitions of offensive racial comment. The new code (ratified by both the CAB and the CRTC in 2002) states that every person has the right to full and equal recognition and to enjoy certain fundamental rights and freedoms and that broadcasters shall ensure their programming contains no abusive or unduly discriminatory material or comment that is based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, or physical or mental disability. To prevent irrelevant or gratuitous racialization of content, the CBSC Code of Ethics instructs television and radio directors and broadcast journalists to report factors such as race, national or ethnic origin, colour, religion, sexual orientation, marital status, and physical or mental disability only when they are relevant (CBSC, 2002). Broadcasters are further expected to resist offensive language and stereotypical material, with the concession that such use may be acceptable if it is relevant to the context, integral to the program theme, and/or has educational or social value. Appropriate viewer advisories should be placed on racially offensive programming. The Code of Ethics, then, strives to balance freedom of expression and responsibility.

**Politics of race and media representation in Canada**

Taken together, this constitutional and legal scaffolding for diversity is stronger than that of many other countries (Banting, Courchene, & Seidle, 2007). As a consequence, Canadian media theory about racial representation is based on a tacit liberal-democratic principle of proportionality, which can be loosely defined to cover access, participation, and representation. Such representative expectations are inherently quantitative, rooted in liberal-democratic theory but occasionally diluted by market realism, with demands for representation to reflect the supply of qualified minorities in the labour force. Nonetheless, a widespread resistance to such “representative” approaches to diversity in the media persists among industry professionals around the world. Program-makers talk about “political correctness,” “programs becoming boring,” news codes being more important than diversity codes, and that there are already too many codes to little effect (European Commission, 2002).

To be fair, such dissensus is not typical solely of industry professionals. Canadian Civil Society Organizations (CSOs) have chosen not to mobilize widely to advance racial representation on television as the National Association
for the Advancement of Colored People (NAACP) in the United States did, threatening media boycotts or a diversity quota approach.\(^7\) In the 1990s, the priority for most Canadian racial equity-seeking groups seemed to be to play the regulatory game of obtaining ownership of third-language undertakings under the so-called access policy. Few direct calls emerged for a code of racial portrayal to hold mainstream English-language broadcasters to account. Why? There are three likely reasons. The first is that many CSOs resisted the delegation of authority over substantive content to the CBSC from the CRTC. The views of Dr. Anu Bose, then executive director of the National Organization of Immigrant and Visible Minority Women of Canada, were typical. Dr. Bose stated:

I am against self-monitoring because I do not trust industry. We need monitoring by a well-resourced independent or ‘arm’s-length’ body as in the British case. I should like to see more portrayal of immigrants’ home situations, the conflict between cultures, more ‘ethnic comedy’—and the kind of incisive humour that Meena Syal has been known to do. I would like to see a more level playing field for the technical end of things.

(Murray, 2002)

By “the technical end of things,” Bose meant the (as yet unsuccessful) efforts under now-deceased Liberal Senator Sheila Finestone to revise the Broadcasting Act to include public payment of interveners’ costs in broadcasting, as is available to interest groups on the telecommunications side. The basis for technical scepticism also resides in a strong preference for strengthening public-broadcasting and public-interest regulation. Despite repeated pressure, for example, the CBC has lagged behind the BBC in hiring minorities and has not followed other public broadcasters in establishing special programming units such as those of the BBC. Nor has the CRTC established regulatory quotas for multicultural programming similar to NPS in Holland or those called for by the NAACP in the U.S., even though the outcome of the quota approach may not be clear (European Commission, 2002).

The second reason that no political pressure has arisen for a Canadian code on race portrayal is because of the argument, advanced by broadcasters and not often refuted, that their general code of ethics—prohibiting abusive or unduly discriminatory material based on matters of race, national or ethnic origin, colour, religion, age, or other grounds—is strong enough. And, indeed, it has caught the occasional racist comment.\(^8\) In the years 2001 to 2003, the CBSC reported that it received just four complaints on race out of 1,000—and none of them about racist English TV drama. Indeed, a fuller search of the CBSC website (www.cbsc.ca) in 2005 found just 34 complaints about racism, mostly due to talk radio, with a mix of White backlash complaints and outrage expressed about shock jocks. Only a few decisions explored racism on TV news. Complaints are increasing, largely due to offensive content on talk radio. But on the whole, it cannot be denied that the incidence of complaints on racial matters is relatively low in the history of the CBSC, compared with a wave of outrage against Howard Stern’s sexism, for example. There is a good reason for this. Public-opinion surveys have indicated quite low public awareness of racial equity standards in particular and broadcasting standards in general, as well as low faith that anything will come of com-
plaints. Rogers Multicultural Channel has earmarked a large translation grant to the CBSC as part of its public benefits process specifically to improve CBSC education and outreach services for minorities.

The final—and toughest—conceptual reason explaining a lack of co-ordinated pressure on standards from racial equity-seeking groups may be that voluntary standards are puny in the face of structural or systemic racism, since they are typically based on “soft power” or lack of explicit sanction. Politically, then, the argument can be made that self-regulatory codes actually divert attention away from social responsibility and diffuse political opposition—by substituting a reactive complaints-based regime for a proactive one; by requiring individuals and not third-party agencies to trigger complaints, effectively privatizing such complaints doubly (by individuals to the private sector); and by allegedly co-opting some of the intended constituency in deliberative bodies.

These are difficult arguments, and they have split the CSO community’s consensus on political strategy. MediaWatch Canada (since defunct), the Chinese Canadian National Council, and the Centre for Research-Action on Race Relations agreed at the time that self-regulation has not challenged systemic racism, sexism, or homophobia. Can it? Not alone. For this reason, MediaWatch on the whole, supported the institution of the Canadian Broadcast Standards Council, which is cited as an international leader by some monitoring experts (Gallagher, 2001), while pressing for its reform in representation, composition, governance, and accountability. By contrast, the more oppositional CRARR has argued that the correct strategy is to boycott the CBSC as irrelevant. It has also argued that equity-seeking groups are better served by directing their efforts to legal appeals to the Federal Court regarding the CRTC’s failure to exercise properly its authority over complaints in the system—for allowing far too much devolution to the private sector, for example. Others have from time to time questioned the bifurcation of public and private broadcasters, arguing for an integrated standards system.

Nonetheless, the CRTC was able to induce at least some modicum of innovation in media monitoring of racial portrayal, which really had not been used since feminist disputes in the 1980s caused a report on gender representation. In that case, it directly commissioned the study and held a policy hearing. On race, it used soft power to have the private industry review itself, failing to follow up with any public-policy hearing.

CRTC “soft power” for inducing industry self-monitoring

The CRTC was not happy with the CAB’s reluctance to include ethnocultural groups in its development of self-regulatory standards over a period of years and continually pressured it to actually conduct research on cultural diversity in Canada and repeatedly consult in the development of its guidelines. The CRTC encouraged the CAB to set up a community advisory task force with some notable cultural-minority leaders (not aligned with any equity-seeking group). For a time, the CAB made it appear that a public-private partnership might emerge— involving public agencies (universities), public institutes (Pearson-Shoyama), a number of CSOs, and private broadcasters in conducting the study. Indeed, similar to the process of public benefits in which possible public interveners are lined up, the CAB’s legal advisors could have solicited multiple proposals
from all sectors. Instead, realizing the cost and complexity of such a process, the CAB opted for a one-time task force, which negotiated some editorial independence but retained majority control for broadcasters. The actual conduct of the research was then subcontracted from the task force to a commercial private-sector partnership between a marketing research firm (Solutions Research Group) and a leading legal company with a history of representing Rogers Multicultural Channel (Johnston & Buchan). Since the design of public consultation implies some sort of social status, it is interesting to examine who the task force privileged: notably absent were the more conflict-oriented CRARR and the more experienced feminist or gay-rights groups with racial-equity interests (MediaWatch or L’Égale).

Not reflecting Canadians

The CAB’s Cultural Diversity Task Force produced a surprisingly tough report that argued decisively that private broadcasters were not sufficiently reflecting visible minorities in Canada or taking advantage of the talent “out there.”

It is important to note the breadth and sampling sophistication of the CAB’s cultural-diversity study, which contribute to its overall statistical validity. Using the 2001 census to establish proportional representation benchmarks for visible minorities in Québec and English-speaking Canada (6.9% and 15.3% respectively), the report, called “Reflecting Canadians: Best Practices for Cultural Diversity in Private Television,” finds

• too few visible minority decision-makers and experts in English news;
• acute underrepresentation of (East) Asian and South Asian Canadian peoples
• zero visibility for Aboriginal peoples in conventional and specialty TV outside of, the Aboriginal Peoples Television Network (APTN);
• “presence gaps” in three of six English genres tested: news, other information, children’s drama;
• similar gaps in two of six genres in French-language programming: news and other entertainment; and
• close to the national average (actually 13.5%) representation in speaking roles for English drama, dropping to 10% when leads alone are considered (Canadian Association of Broadcasters, 2004).

“Reflecting Canadians” sets out an incremental and pragmatic business philosophy for managing diversity, arguing that diversity in portrayal is good business (citing the Conference Board human-capital argument with only anecdotal proof) and that the key to its advancement is senior management buy-in, clear delegation of diversity responsibility within the firm, compensation tied to goals, and continuous commitment to employee learning with round tables and councils. The task force again rejected any target- or quota-based approach for improving racial representation (CRARR’s consistent refrain before the CRTC), since it finds them ineffective at bringing about social change, as they are imposed from above. It also rejected any one-size-fits-all model of corporate implementation.
“Reflecting Canadians” argues that broadcasters should update their lists of visible minority experts monthly; co-ordinate with other key stakeholder groups to create a database of visible minority producers, actors, and directors; and compel independent producers working with them to keep a “character count.” It recommends community connections, strategic alliances, and traditional industry stop-gaps such as mentoring, editorial forums, job fairs, and so on. It also calls upon the Commission to relieve its current reporting requirements in favour of a best-practices approach—effectively a call for longer reporting cycles. But the bottom line is that the task force recommended monitoring again in 2006—sadly not taken up—and suggested that the CRTC should do so at public expense or at least shared expense (an eminently sensible call since ignored).

Released in the summer of 2004, the CAB study received only perfunctory public attention. While the report was presented to the CRTC, it did not occasion a policy hearing. No post-report consultations were held by the CAB or CRTC, and the association has not publicly addressed its report in subsequent CRTC interventions, although it remains prominent on the CAB website. “Reflecting Canadians” was a casualty of the time required for extensive consultation, conflict over methods in media monitoring, and a shift in political stakes.

As audience viewing shifted increasingly to specialty channels and young viewers were diverted to online or interactive entertainment, the relevance of mainstream conventional entertainment came into question. A catastrophic drop in production levels for indigenous drama in English-Canadian markets from 2002 to 2004 reflected a worldwide weakening of export markets and a trend toward licensing reality-TV formats such as Canadian Idol for youth audiences, which offer other opportunities for minority inroads in new forms of cultural representation. Such a cyclical industry downturn reduces the pressure on industry to comply with community demands for greater representation of ethnic diversity in the high-value stakes of dramatic production and shifts attention to infotainment markets. But there was also an exogenous political shock to the system after 9/11, focusing political discourse on hate and xenophobia in news and other genres and drawing attention to the change in Canadian news culture underway with the importation of the Al Jazeera and Fox News networks. Yet audiences continue to spend most of their time with entertainment. This makes it essential for CSOs, citizens, academics, through pilot projects such as SFU’s or the CAB’s to persist in lobbying for full independent audits of media performance on important social issues. To quote Richard Fung, “Lobbying efforts must be shrewd enough to avoid racial equity being used as an excuse for defunding (creative production) altogether” (Fung, 1996, p. 3)—or, I would add, to avoid becoming an excuse for diverting attention from the need for systemic diversification to extreme cases of hate discourse under the ambit of the Charter.

It is impossible in the scope of this paper to examine closely the report’s findings in all genres and languages. Arguably it is in the dramatic genre that broadcasters have more direct control over the creative elements in racial portrayal, and it is drama that still accounts for the majority of audience TV viewing. So can it be said that English-Canadian conventional TV drama achieves cultural diversity in representation? Yes, initially. The track record on diverse physical depiction of
visibility minorities in English-Canadian TV drama would appear to be in rough approximation of national realities (but not of the realities in the major metropolitan markets that drive most TV viewing, and not in proportions that reflect ethnocultural realities outside Toronto). This finding was confirmed by the earlier Simon Fraser University study “Silent on the Set,” as well as by research on CBC representation conducted by Karim H. Karim (2004), which both found that approximately 15% of individuals portrayed were members of visible minorities. Such levels are higher than are found in U.K. content analyses, but not as high as in the United States, where segregation of new types of ethnocultural productions (reality TV or dramedy) dominates conventional prime-time TV. Simple theses on invisibilization, then, have not been found to apply—with the crucial exception of Canada’s Aboriginal people in English-Canadian drama for the 2000-2001 or 2002-2003 seasons on mainstream channels. So, on the surface, Canada’s broadcasters would seem to get a good report card for diverse faces on the screen in a turbulent time.

Nevertheless, the “Silent on the Set” pilot study (Fleras, 2003), which was picked up at a panel in Innoversity in 2003 and the occasion of a Policy Research Initiative Roundtable the same year, argued that further analysis would show that the letter, but not the spirit, of the obligation to reflect cultural diversity was being met. It is this deceptive finding that allows critics such as Frances Henry and Carol Tator (2000) to apply a model of democratic racism to the drama output of Canadian broadcasters in 2001 (Cottle, 2002). How can equity groups and analysts dig below such crude arguments about seeming compliance with proportionality in representation of people of colour or other ethnocultural groups with empirical evidence to challenge fundamental questions about interpretation of equity and social justice in media contents?

The politics of measurement and meta-analysis

Before turning to this, several observations must be made on the CAB’s Task Force for Cultural Diversity in Television. First, comparative data are provided only for foreign regimes, but the appendices do represent a valuable input on policy learning for broadcasters and analysts in this country. Second, no individual sector (conventional or specialty) is addressed, although the content analysis has sufficient sample size to enable such assessment. Finally, no single network licensee or program is ever singled out. In short, the report provides an overview of the system, but not of the performance of its players. Weakest of all are the measures on qualitative performance in fair racial portrayal.

Perhaps two of the simplest organizing principles of quantitative and qualitative measurement to look for are underrepresentation or misrepresentation. Strategically, the thesis of underrepresentation is first of all liberal: count how many people are on screen and who is prominent. The problem with counts is that they imply universes of people: a kind of census of all who appear. That universe can be based on the program as a whole, on the number of characters who appear, and it may be adjusted for the multiple subplots appearing in any show. The first decision to be made is what constitutes sufficient appearance. The decision taken in the CAB precedent is to report multiple characters (a standard convention) and count any talking role (however long). By contrast, “Silent on the Set” constructed
a measure called “share of screen time.” Actual speaking time is an even better test of dramatic salience than role (leading, supporting, and so on) and was recorded and found to be much weaker than overall counts of presence would suggest.

The next main axis of representation is, of course, coding ethnic origin, which requires a leap of inferential faith. Not surprisingly, given the ethnocultural composition of the dominant English-Canadian production centre (Toronto), most visible minorities are Black. South Asians, Asians, Muslims, and Arabs are less likely to be seen in Canadian drama, since they tend to cluster in markets with weaker TV production centres.

What do viewers learn about visible minorities in Canadian drama? Not much. Details of personal history, such as country of origin or time of immigration to Canada, are not explicitly developed for any visible minority characters in the task force sample of 330 hours of programming, also borne out by the Simon Fraser University “Silent on the Set” study (Murray, 2002). Another, more objective measure is how patterns of racial interaction are enacted visually. “Silent on the Set” found that the main axis of interaction was between minority and majority cultures, a profile significantly different than that found in other countries. In the United States, casts tend to be segmented, with more limited interracial mixing. In Britain, the incidence of mixed-race interaction, while measured somewhat differently, is not as high. Patterns of race/role interaction were not measured by the CAB’s task force.

Tackling allegations of hollow representation or flat-out biased misrepresentation requires much more sophisticated qualitative and subjective forms of measurement. For effective monitoring, it is important to devise critical safeguards to probe for misrepresentation and second-order invisibilization.

To get at this, “Silent on the Set” defined cultural context of representation. Racial diversity is almost exclusively an urban phenomenon in Canadian TV, with the exception of CBC’s Little Mosque on the Prairie, discussed below. The workplace is also a safer sphere for creative depiction of diversity. Like “Fall Colours 2001” (from www.childrennow.org), “Silent on the Set” found little interaction of visible minorities with families or friends. Such narrow patterns of social interaction are not as rounded as depictions of White majority characters.

What else do we find out about the visible minority characters’ everyday lives? Cultural indicators of difference are mostly avoided, according to the task force report. Nine in ten visible minority characters identified speak with a recognizable English-Canadian accent. Distinctive clothing or music markers were present just 12% of the time; food indicators, 3%; articles, 4%; other cultural indicators, such as religious custom, roughly 7%. “Reflecting Canadians” cites the finding of “Silent on the Set” that distinct food customs are often linked to negative depiction.

To use Stuart Hall’s idea, many visible minorities who walk on Canadian dramatic sets are “pure form” devoid of meaning (Hall, 1992). They are silent on the set, without place or history. Such shallow or token dramatic representation falls squarely within the dramatic technique sociologist Augie Fleras and Jean Kuntz (2001) have dubbed “normalization.” Race becomes an oddly neutral, placeless, rootless (or perhaps politically correct) territory.
I have argued elsewhere (Murray, 2002) that the dominant dramatic approach of shallow normalization as discovered in “Silent on the Set” represents the perverse and unanticipated outcome of social pressure for responsibility in industry self-regulation. Like the recent Commission for Racial Equality survey of drama in the U.K. (which is identified by some experts as producing better and more complex interracial dramas than Canada), these findings seem to suggest that broadcasters are at fault for stereotyping, but equally damned for counterstereotyping with unconvincing, rootless portrayals. They may strategically withhold from taking risks as a consequence (Commission for Racial Equality). Counterstereotyping in Canadian TV scripts appears to be less risky in a White minority story pretext (e.g., Drop the Beat) that follows the American model for segregated casts or when based on an adaptation of a well-known character (e.g., Hakim Jinnah in Jinnah on Crime). This is a controversial finding that needs some development to determine its implications for policy and creative initiatives.

These negative results cannot be overstated. If 2002 and 2003 were not good years for cultural diversity in Canadian TV drama, the picture is somewhat different in Canadian film. In 2002, Telefilm celebrated Atanarjuat: The Fast Runner, written by Paul Apak Angilirq and directed by Zacharias Kunuk, and Bollywood/Hollywood, written and directed by Deepak Mehta, as two of the three films that grossed more than $1 million in box-office revenues, a benchmark of Canadian film success. Both are creative tours de force in representing cultural diversity authentically and with humour. Moreover, second-order impacts may be found over time. Force Four, the Canadian production company behind Jinnah on Crime: Pizza 911, completed the sequel after initially encountering problems raising money, and they went on to produce Human Cargo, a docudrama based on Canadian immigration that received positive reviews. Indeed, the achievement of Zarqa Nawaz of FUNdamentalist films in the runaway success of Little Mosque on the Prairie (more than three years in development) may temptingly suggest to screen cultural analysts that the troublesome findings of media monitoring that prompt us to continue to press for social change in racial representation may be set aside. The temptation should be resisted.

Certainly, it is easy to refute the typical argument from private producers and broadcasters that cultural non-specificity is what TV audiences want. To the contrary, a poll produced by Decima Research around the time suggests a large majority (86%) of Canadians are interested in seeing arts from another culture—and more than half have attended a live ethnocultural event. If so, Canadian broadcasters are clearly not giving audiences (especially youth audiences) what they say they want. But they may be doing so because of a lack of capacity, not a lack of will. Creative decisions to depict difference go right to the heart of the politics of representation—colour blindness or normalization. Augie Fleras and Jean Kuntz challenge:

Should minority differences be ignored to ensure the normalization of minorities in Canadian society, or should ethnic differences be highlighted to ensure identity—even at the risk of marginalizing or othering minority women and men? . . . Should minority differences be taken seriously and be taken into account as part of Canada’s multicultural com-
Academics, citizens, and expert studies are negotiating the dichotomies of integration and assimilation, cultural separateness and authenticity in new ways. The assimilationist model is very much what May, Flew, and Spurgeon (2002) has identified as dominant in the U.K., Australia, New Zealand, and Europe, where portrayals of cultural diversity are washed into an everyday multiculturalism and creative depiction does not feature distinctiveness. And generally, the Canadian pilots identified in the SFU and CAB studies suggest a similar representative strategy on the part of the mostly White creators. Former director-general of the BBC Greg Dyke celebrated this everyday multiculturalism as part of a postmodern blending and hybridization of a new cosmopolitan identity among youth. The integration model, by contrast, seeks understanding of the intersections of gender, age, socio-economic status, and race in Canadian society, celebrating differences—not masking conflicts, but communicating across them. The method employed by the CAB’s Task Force for Cultural Diversity on Television did not allow it to open up any of these questions in its analysis. The existence of such dichotomies is bracketed as “contentious” and is not examined.

“Reflecting Canadians” acknowledges that the citizens consulted for the report believe high-quality reflection of cultural diversity is a matter of self-esteem, validation, and a sense of belonging for minorities, but the authors underline that there is no consensus on what constitutes accurate or compelling portrayal even among the White and visible minority citizens they consulted. Of course, for the CAB, this lack of consensus leaves it blame-free. Such a lack of consensus has three possible explanations: an underdeveloped literacy or discourse on the matter; a vague, non-text-specific context for discussion; or a strategic “lurking” on the part of the authors, who may not have wanted to produce a political problem for their sponsors.

The subtext of the citizen discussion in the transcripts of the focus groups for the study in fact reveals quite another interpretation. In the context of discussion about colour-blind casting (largely a construct of the White professionals consulted in the task force), Arab, Muslim, and Aboriginal groups kept referring to an idea that it is “not about being diverse but about being deeply diverse” (CAB, 2004, p. 5), thereby revealing a dialogue of the deaf. But there is a larger, more important reason for this lack of consensus (which of course acts as a useful political rationale to do nothing). Lack of citizen consensus is actually an artifact of the research design: citizen focus groups were never asked to judge a specific media text or race relations treatment—no effort was made to use this venue as a form of deliberative democracy, reconciling divergent views.

Perhaps the biggest epistemological break from policy positivism in content analysis used in media monitoring is to use citizen juries in reconciling differences in interpretation and open up content analysis to broader questions of the evaluation of narrative and discourse. Such innovations were rejected by the CAB but embraced for “Silent on the Set.” Student viewing juries for the “Silent on the Set” study chose shows that were best and worst at representation, based
on repeated viewing and narrative text summaries of the episodes. Discussions over dramas that were deemed to have racial depiction that was negative or anti-social in its potential consequence and to show poor techniques of dramatization led to tough questions about whether the story pretext could be used to excuse cliché presentation of spiritual custom and “barbaric” cultural practices. The citizen jury thought not, in this case. But under what test and what creative circumstances could this be said to challenge, rather than stimulate, racial preconceptions? At Vision TV, anti-social or negative stereotyped content is presented with a wrap-around panel discussion, perhaps with the addition of a narrator. The need for such contextualizing of negative stereotyping is underlined by disturbing findings from the U.K.’s Commission for Racial Equality that suggest that audiences do not understand satiric intent underlying racism and are unlikely to read it (Cumberbatch, Gauntlett, Richards, & Littlejohns, 2001).

Both the CAB’s citizen focus panels and deliberative student audience jury for “Silent on the Set” suggest that authenticity of dramatic execution is the most important element in the test for deciding whether overall narrative context may represent minorities pro-socially, excuse racism, or otherwise rationalize weak or negative depiction. Authenticity as a desired category of portrayal and as an aesthetic—and creative—category in assessing cultural diversity recurs again and again in comments from viewers around the world.

Authenticity suggests three main features. Portrayal should be diverse—people of colour should have the same probability as White actors of being shown in various contexts in daily life. Portrayal should be balanced. This is not a plea to whitewash or suppress racial conflict, as was done in Tagged: The Jonathan Womback Story, examined in the “Silent on the Set” study, but to show it in all its complexity. To quote a group of European producers, “Multiculturalism is a lifestyle: make use of it” (European Commission, 2002, p. 215). Thirdly, authenticity is born out of compelling narrative. There is no substitute for good scriptwriting, and this observation speaks to a need for more diverse representation in positions of creative control on conventional TV production sets, as story advisors, and as competitors. Narrative analysis of “authentic” or “negative” or “empathetic” depiction of conflict and representation of interaction offers much rich potential to advance intercultural understanding, but to be influential in empirical interventions in policy circles, it has to be grounded fully in research design. In English-speaking Canada, where there is neither the canon of TV criticism (although it is emerging: see Druick & Kotsopoulos, 2008) nor the public media dialogue to warrant discussion of such aesthetic criteria of representation and race-based narratives, meaningful standards of diverse racial portrayal and the means to assess compliance with them are harder to develop. The question is how a deliberative and (somewhat) public representative body like the CAB’s Task Force for Cultural Diversity on Television might have achieved the same end in fusing traditional content analysis and more reflexive discursive criticism. My argument is that by including parallel peer juries of both citizens and TV professionals—writers, directors, and critics—interacting in judgment of specific TV texts (not some vague memory), it would be possible to simulate deliberative democratic reasoning in any media-monitoring exercise.
Building a community of practice

What has been done since the report of the Task Force for Cultural Diversity on Television to build a community of practice—dialogue between professionals and citizens—around the ideals of cultural diversity in Canadian TV? “Reflecting Canadians” opened the door on several Canadian firms with best practices in other sectors and made a range of practical managerial recommendations to “walk the talk” of cultural diversity for Canadian media companies, contributing to the CRTC’s audit process of diversity plans. A summit of practitioners called Innoversity (a not-for-profit group aiming to increase cultural diversity) was created in 2000, with a mandate to sponsor conferences and create internships, scholarships, and awards. It and the National Film Board’s “Reel Diversity” competitions are two examples of small new sources of support for young minority documentary artists in pitching, discussing, or evaluating their work. Policy focus has shifted to marketing and promotion of creative opportunities for visible minority actors, writers, and producers.

In June 2003, the Department of Canadian Heritage, Telefilm Canada, the National Film Board, and the Canada Council for the Arts announced the Spark Initiative to accelerate the inclusion of culturally diverse filmmakers and producers in Canada’s audiovisual landscape. Selected broadcasters (Rogers, CHUM) have made significant contributions to race and representation under the public-benefit procedure attached to the purchase of broadcast stations. One problem is that Canada has no organization ranking companies on diversity-friendliness on the order of DiversityInc (www.diversityinc.com). A number of experts have speculated on how the Gemini Canada Award, which recognizes outstanding multicultural representation, could be more effectively converted into a solid asset for later raising of equity, perhaps with guarantees from banks like the Bank of Montreal that are recognized in “Reflecting Canadians” for their social leadership. Visible minority directors and writers have argued that the point-count system determining eligibility for public funding from Telefilm or the Canadian Production Fund could be re-assessed and amended for bias against lesser-known, lesser-established minorities in casting. More work on analyzing the voluntary equity plans filed by broadcasters is needed before the massive round of upcoming licence renewals.

Finally, as a last nostalgic tribute to the flawed but pro-diversity era of the Liberal regime in cultural policy, it is important to note that previous minister Sheila Copps aggressively argued for creation of a permanent office of Commissioner for Cultural Diversity and longer-term sustainable funding for cultural diversity initiatives in the arts and cultural industries. Her unceremonious ejection from Paul Martin’s government indicated the political vulnerability of such a strategy, and although the February 2005 budget signalled increased funding for the Department of Canadian Heritage, election of a Conservative minority government meant scorched earth for any cultural diversity initiatives in its first parliament (including budget cuts to arts diplomacy) and in the ensuing three years. It cannot be said that Canada is advancing dialogue or any community of practice in promoting cultural diversity on Canadian TV, despite a strong start.
Designing institutions for media monitoring

It is encouraging that media monitoring is becoming more widely accepted around the world as an important form of policy evaluation, but it requires a theory of political action involving policy ideas and instruments. A consensus is needed over societal norms against which to evaluate media production (Mulgan, 1994). This may be painful to produce, but as the citizen participants in the CAB’s Task Force for Cultural Diversity on TV indicated, citizens are ready to rise to the challenge. The procedure (and instruments) for development and ratification of the consensus must be duly representative, balancing majority and minority rights. The design of the three phases of media monitoring—planning, implementation, and enforcement (with positive or negative sanctions)—needs to be clearly addressed.

In his analysis of ways to challenge media discourses in the (re)production of power, van Dijk (1999) suggests that elites (media producers, writers, and directors) play a special role. It is therefore no surprise that he argues that effective monitoring can only be realized politically if media professionals are fully committed. For van Dijk, the world of media monitoring to combat racism does not involve any professional-amateur coalition. The logical problem he sees in the contemporary politics of race is to update the creaking and largely ineffective models of old guild councils. Media-monitoring agencies must diversify representation in some way. He takes special care to avoid advocating any form of direct control of content for such new hybrid bodies, stressing that the aim should not be to impose prohibitions but to persuade. Minority ethnic groups, academic researchers, media professionals, broadcast owners, and other interested parties are all potential partners who may enable a media-monitoring system consistent with self-regulation to demonstrate a credible openness and democratic responsiveness. The call increasingly is for new models of deliberative democracy—including citizens on juries to adjudicate content—and widening media education so that citizens are equipped with the capacity to make complex ethical judgments on disputed racist content.10

Recent studies in the EU (2002) on the sustainability and effectiveness of monitoring in a self-regulatory regime identify several factors that predispose it to success and suggest the following recommendations:

• Use a few units of assessment that are stable over time and sensitive;

• Make sure the evaluation of monitoring data is systematic, balanced, and owned by the industry sponsors and stakeholders;

• Sustain a climate of trust with professionals (so individual creators are not brutalized or exposed) by maintaining clear lines of public versus private intelligence;

• Ensure the process of change driven by codes of practice pivots on how feedback on performance sustains the momentum of progressive positive change;

• Have appropriate mechanisms for sanctioning the performance of individuals and communities of practice;
• Specifically, include positive rewards for improvement and negative sanctions for failure; and,
• Ensure adequate resourcing and auditing, as they are essential.

Policy implications
Despite silence from the academic sector of policy studies in Canada, there is a strong social consensus among citizens and CSOs on the need for independent monitoring of media performance. The majority (69%) of Canadians in surveys conducted for MediaWatch in 2002 (Coulter & Murray, 2002) agree (34% strongly and 35% somewhat) that “Canada needs an independent citizen organization that upholds and monitors community standards and values in the media.” A number of options exist for designing such a system. First, in interpreting its mandate on supervision without legislative change, the CRTC could revive its 1980s practice of monitoring the media using commissioned content analyses of the kind produced by Erin Research in consultation with feminist groups early in the decade. But these studies are reminiscent of an earlier, more authoritarian and top-down regulatory regime. It is notable that they were rarely discussed by policy interveners in open forum, and the social change they produced was painfully slow. For the CRTC to retain any qualitative monitoring role would require regulatory innovation, designing and conducting “open”—that is, peer-reviewed—research and a policy hearing that allowed public interveners to reply. Second, the CAB could, at the invitation of the CRTC in a selective case of co-regulation, regularly monitor on the model of its ad hoc Task Force. But despite that body’s efforts to exert some independence, the report ended up being a captive of the conservatism of the private sector. Third, the CBSC, already active in deliberation over ethics of content, could in concert with broadcasters, creators, academic researchers, and CSOs establish a regular program of research to update its read on community values and standards of taste, as well as enforce media compliance with standards (contingent on some reforms much like the model in Britain).

The CBSC could issue full annual reports and appear before both the CRTC and parliamentary committee, discussing its decisions and reasons for them. Such reforms are clearly needed, and they set important contexts for the CBSC’s growing body of decisions interpreting media racism. But the fact that most CBSC decisions find in favour of the licensee is hard for more oppositional groups to swallow. The system of appointment to the CBSC and scrutiny of length of appointment would have to be reviewed. It is unlikely that vesting sole authority for race monitoring in the CBSC could work. Finally, equity-seeking groups could lobby for the creation of an independent media-monitoring institute separate from the CRTC and CBSC and centrally involving representatives from them, independent citizens, creators, academics, policymakers, and a wide range of disinterested industry stakeholders. Independent institutes (such as the Pew Charitable Trusts’ joint venture with Annenberg) are more often a feature of media policy debates in the U.S. and Europe, and they are as yet underdeveloped in Canada.11 It is this option that has the best possibility of forging effective intercultural dialogue on the standards of cultural diversity in Canadian TV.
The overriding policy objective of all racial equity–seeking groups must be to forge coalitions between and among them on appropriate standards for racial representation and their interpretation and monitoring. Links to academics, unions, professional groups, industry bodies, and other civil society organizations are needed to broaden the lobby for change to the current system of closed self-regulation of media standards in this country and around the world. Canada needs an independent media-monitoring institute. More debate over standards of fair portrayal and training seminars for majority and minority screenwriters, producers, directors, actors, and equity-seeking groups are critically needed to clarify standards in ethnic portrayal and boundaries to creative liberty. Standards are not inimical to creative freedom. Understanding them may even advance the quality of creative depiction of diversity. While the call from the CAB’s task force for another full-scale monitoring in 2006 was missed, the opportunity for a public coalition around the next broadcast license renewals in 2009—now delayed to 2010 given the financial crisis in advertising for the sector—remains. Whatever the outcome of the negotiated fee-for-carriage for CTV and Global from the cable sector in the recent CRTC decision, it is important that the issue of promoting cultural diversification of our TV landscape is not set aside. What is needed is a public, multilateral effort by communication advocates to assert an independent institute for media monitoring. Such an institute can only work if it includes methods of monitoring that accommodate deliberative democracy, operating within a fully accountable system of co-regulation. It must join largely White leftist media and democracy movements in new coalitions with equity-seeking NGOs. There is much to learn.

Notes
1. Liora Salter (Salter & Salter, 1997) is one of the first scholars to have argued that “regulation” is a misnomer, because much of the contemporary system of media policy intervention is voluntary. There is a complex, decentralized system of interlocking parts, some public and some private; denoting a regime in which a broader array of interest groups, including industry associations, not-for-profit agencies, and civil society organizations, prevail. The rules of the game are actively negotiated and re-negotiated over time, with a loose state presence. The term “co-regulation” is perhaps better to define this new complexity, and it is now widely used in Europe.

2. Two initiatives to develop systems of monitoring race and representation on Canadian TV have been undertaken. In 2001, the then Strategic Research and Analysis Directorate of the Department of Canadian Heritage commissioned a survey of drama on Canadian conventional television, to join the Eurofiction 2000 project of the European Commission, under the auspices of its audiovisual observatory. A pilot study to develop cultural indicators to monitor race was included, which was published in 2002 in a report called “Silent on the Set” (Murray, 2002). Also in 2001, the CRTC called on private broadcasters to create a task force, consult widely on the design of a study to monitor racial diversity in TV, develop appropriate standards for race portrayal, and report on their compliance. The Canadian Association of Broadcasters process, by contrast, took longer than three years.

3. The women’s movement has co-ordinated volunteers to monitor portrayal in two global projects (1995, 2000), with assistance from the World Association for Christian Communication, UNESCO, the Canadian government, and more than 70 other countries. The Global Media Monitoring Project consistently has found significant gender differences in the portrayal of women and men and disturbing treatment in news commentary of women of colour as victims. Women’s groups continue to use the study to lobby their local regulators for change, as Margaret Gallagher (2001) outlines in “Genderssetting,” the best review of these efforts available. “Tuning into Diversity” (European Commission, 2002) argues for a global project of a similar sort. The chair of the most recent European Commission conference on the issue, in 2004, expressed disappointment that little of the 2002 report had been acted upon.
4. The Broadcasting Act invests the minister of Canadian Heritage with the power of ministerial directive. The contentious politics around access and licensing third-party stations has led to an unprecedented degree of intervention, with Orders-in-Council reviewing comments in the Greater Toronto and Vancouver and instructing the Commission to re-consider decisions not to award entry (PC 2000-1464 and PC 2000-1551) and concerning world TV carriage in the digital tier (PC 2002-230 and 2002-33) as well as to re-consider decision CRTC 2001-757. There is no sign that ministerial intervention is diminishing. The report to the minister of Canadian Heritage of the Panel on Access to Third-Language Public Television Services entitled “Integration and Cultural Diversity” argued that the CRTC’s present process for considering third-language programming did not appropriately consider the cultural interests of third-language groups. (Canadian Heritage, 2004). The report also recommended creation of a third-language production fund available to Canadian third-language services (Department of Canadian Heritage, 2004). The September 2004 report was never acted upon.

5. A sample plan filed by Corus in 2004 (available on the CRTC website) reviews the following: dual human resource (HR) and general counsel responsibility for equity; two internal committees which are regionally based; programs for training equity-designated groups for managerial positions in programming; a respect-at-the-workplace policy to target harassment and discrimination; the start of something called “Corus U.”; and a $2 million grant to the Ivey School of Business to develop a Chair in Women in Management (finishing the obligations on the wind-up of the WTN Foundation, after the purchase of the network from Randy Moffat). It also undertook to review recruiting methods. The model of reporting on cultural diversity is a straight HR format with a focus on culture and no specifics on actual numbers hired. Notably absent is a statement of disposition on number of complaints received, matter, number referred to the CBSC, or outcome. Other CRTC reporting segments require efforts to diversify news sources, stories, and on-air personalities and hire minority actors in leading and recurring roles. Corus rounded off its initiatives in an anecdotal manner, reviewing the staff in YTV programs, for example, and its efforts in development. Specifically, Corus-owned CHEX-TV in Peterborough added Caribbean programming. Equity-seeking NGOs need to review these reports to analyze their impact. They are not easy to read, but there are terrific insights into corporate culture. For example, Corus states: “Given the cultural landscape of Canada, often a gentle, rather than an overpowering, integration of different cultures enriches a show and increases its authenticity” (CRTC, 2001). Corus goes on to discuss the importance of traditional dress and meal representation in two of its leading children’s shows, Tipi Tales and Wumpa the Walrus. Not mentioned is whether diversity recruiting targets are tied to executive compensation for senior management, something many experts see as important.

6. In 2003-2004, the CBC launched new diversity strategies to reflect better the multicultural diversity of the Canadian experience on both radio and television. They sought more:

- On-air hosts who are visible minorities;
- News items featuring the diverse cultures of Canada’s communities;
- Radio programming reflecting a wide range of cultural interests. For example, CBC Montréal’s Studio Free Fridays broadcast programs from new immigrant communities in Côte des Neiges, Asian communities in Brossard, and the Italian community in Laval, and Sounds Like Canada ran a two-week series exploring racism in Canada;
- Diversifying TV presence, with new programs such as Culture Shock, which portrays Canada’s multiculturalism through the eyes of young, bilingual video-journalists traveling across the country. Second Regard examines the diverse religions of Canadians. The documentary Entre voile et mini-jupes explored the issue of women torn between Western and Muslim traditions. Additional examples from the 2003-2004 season include Jinnah on Crime, Virginie, Tag, Mon meilleur ennemi, Da Vinci’s Inquest, Wonderland, ZeD, China Uncensored, Taina, and Canada Now; and,
- Diversity planning: independent producers developing television projects must now include a diversity plan in their proposals.

7. Such proposals are based on the U.S. precedent for children’s television, which sets aside a certain number of hours a week for broadcasts relevant to “special” populations. CRARR has suggested a quota and, backed by academics such Karim Karim (Karim, 2004). Dr. Karim has further suggested that a diversity index of cultural indicators would be a feasible undertaking to guide media monitoring.

8. Several such decisions include: jokes demeaning muslims (CBSC, 2004a) and egregious stereotyping (CBSC, 2004b).
9. Before discussing their measurement, it is worthwhile to recall what the late Roger Silverstone (2006) has called the “monochrome” of much content analysis. Ill-suited to complex ideological criticism, content analysis was early appropriated by liberal strategists calling for more jobs or more access to broadcast licenses. It has been used by regulators such as the CRTC to monitor social progress in the representation of women in news or other genres and by progressive second-generation-feminist organizations such as MediaWatch or the U.K. Commission for Racial Equity as a means to set the agenda for its interventions in anti-racist professional development. As commentators have noted, content studies, while numerous worldwide, rarely replicate or standardize measures and are generally very difficult to compare. There are few longitudinal precedents over sufficient time to measure social change in race portrayal. Increasingly, content analysis of representation is just one part of multimethod media research. When teamed with industry surveys of creative staff to allow inferences to be made about the backgrounds of the creators and their representations (May, Flew & Spurgeon, 2002), multigenre studies of race in informational programming or more intensive work on interracial comparison of White and non-White character development (Children Now, 2002), the method’s validity is enhanced. It should be noted that neither Canadian pilot study employed this type of design triangulation. Content analysis is currently undergoing rehabilitation. Contemporary applications move beyond crude conceptions stereotypes to develop Erving Goffman’s idea of “framing” (Schröder, Drotner, Kline, and Murray, 2003), which reckons with the narrative purpose of the story, and practices of discourse analysis. Frames dwell at a larger unit of analysis. Instead of an item-by-item identification of, say, explicit visual elements of physical dominance in a TV scene as a way of encoding power, attention may shift to the narrative context for the character, in relationship with the culminating event. Studies dealing with the representations of racialized minority groups consistently point to the ways in which the mainstream media frame them (Fleras & Kuntz, 2001; Henry & Tator, 2001; van Dijk, 1999).

10. There have been few comprehensive national and provincial studies of media literacy to combat racism in Canada, although there has been an avalanche of initiatives. The conclusion of a report done by the Media Awareness Network (MAN) is typical: commenting superficially that there is the occasional unit in media education texts, and a few National Film Board (NFB) productions which were produced in the early nineties, but there is only one video specifically about minorities in the media, called “A Voice to Be Heard,” produced by the Canadian Council of Christians and Jews (CCCJ). The MAN editorial team of teachers found it inadequate at the time, even in the opinion of the CCCJ’s director. Canadian Heritage’s extensive 1996 teaching kits for elementary and secondary teachers, entitled “Racism: Stop It!,” makes only brief mention of the influences of the media (Media Awareness Network, 1998).

11. However, there are two important recent additions to the Canadian media-politics monitoring scene. The first is the McGill Observatory on the Media and Public Policy (now called the Media Observatory), which together with the Institute of Research on Public Policy mounted an election coverage monitoring project [website]. The second is an industry-financed Canadian Media Research Consortium, which has produces reports on Canadians and their news, the first report card on the Canadian media, available at [website]. Neither group reports on race.

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Content analyses of race on TV


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