



Broadcasting Public Notice CRTC 2007-122

Ottawa, 2 November 2007

Canadian Association of Broadcasters' Best Practices for Diversity in Private Radio; Reporting requirements on cultural diversity for commercial radio operators

In this public notice, the Commission adopts a revised version of the Canadian Association of Broadcasters' (CAB's) Best Practices for Diversity in Private Radio.

The Commission also adopts a modified version of the CAB's approach to diversity for small commercial radio operators as it pertains to reporting requirements. Specifically, large commercial radio operators – with revenues above \$50 million – will be required to report annually on diversity; medium-sized commercial radio operators – with revenues of more than \$20 million and up to \$50 million – will be required to report on diversity every five years; and small commercial radio operators – with revenues of up to \$20 million – will be exempted from reporting requirements.

In regard to a proposal by the CAB to exempt small commercial radio operators from the Commission's new Canadian content development policy, as set out in its Commercial Radio Policy 2006, the Commission considers that sufficient time should be given for the new policy to be implemented and for the parties involved to assess its results before considering whether certain commercial radio operators should be granted exceptions to that policy.

Introduction

1. In the context of the Commission's review of its 1998 Commercial Radio Policy¹ (the Commercial Radio Policy 1998), the Canadian Association of Broadcasters (CAB) recommended that the Commission's approach to cultural diversity in television be extended to radio. The Commission's approach for diversity in television has been two-fold: (a) it requires all broadcast groups to file corporate plans at the time of their licence renewals, as well as annual progress reports, and (b) it directed the creation of an industry / community Task Force for Cultural Diversity on Television (the Task Force) to undertake research and develop best practices and industry initiatives. The results of the Task Force's research, along with the Commission's response, are set out in Broadcasting Public Notice 2005-24.

¹ Public Notice 1998-41

2. As part of the public review of the Commercial Radio Policy 1998, the CAB filed two documents with respect to cultural diversity:
 - a set of Best Practices for Diversity in Private Radio (Best Practices), which is discussed below; and
 - a general reporting template to be used by radio licensees to implement the Best Practices and to report on their activities that foster cultural diversity in their radio operations.
3. In Broadcasting Public Notice 2006-158 (the Commercial Radio Policy 2006), the Commission requested that the CAB file a revised version of its Best Practices so as to include the role of emerging artists and persons with disabilities. This revised version was filed on 15 March 2007.
4. Also in the Commercial Radio Policy 2006, the Commission stated that, for radio licensees, the CAB's best practices on cultural diversity and the general template for reporting annually to the Commission represent effective tools for improving diversity in commercial radio. However, given concerns that the CAB's reporting approach would be too onerous for all radio licensees – in particular, small commercial radio operators with their specific circumstances and challenges related to limited human and financial resources –, the Commission directed the CAB to develop a specific approach for small commercial radio operators, to be filed with the Commission no later than six months from the publication of the Commercial Radio Policy 2006. The CAB filed its proposal for an approach for small commercial radio operators on 6 July 2007.

The CAB's Best Practices

5. The CAB's Best Practices are composed of principles – accompanied by examples of exemplary actions / initiatives – that can guide broadcasters in developing and implementing their individual approach to diversity. The Best Practices are designed to assist radio broadcasters in building on innovative and successful measures already put forward by other broadcasters in the field of cultural diversity, so as to improve their own efforts to more accurately reflect diversity in their programming. The Commission notes that the CAB has included, in its set of Best Practices, a specific reference to the use of Canadian content development (CCD) contributions towards advancing diversity within the radio sector, which satisfies the Commission's expectation that the CAB make specific reference to the role of emerging artists. The Commission also notes that the CAB's definition of diversity, as used in its Best Practices, includes a reference to ethnocultural minorities, Aboriginal peoples and persons with disabilities. In order to situate private radio's best practices within the operational and market realities of the sector, the CAB organized the Best Practices within nine distinct areas. This set of Best Practices, in

its revised version, is set out in the appendix to this public notice. In regard to references in the Best Practices relating to funding for music and spoken-word talent from diverse backgrounds (Best Practice 6.4), the Commission notes that the Radio Starmaker Fund and Fonds Radiostar are only eligible to receive CCD contributions in the context of ownership transactions.

Filing requirements for private radio broadcasters

Categories of private radio broadcasters

6. The CAB did not specify in its submission the criteria it used to distinguish between large commercial radio operators and small commercial radio operators. However, in its proposed approach, the CAB noted that small commercial radio operators would include all commercial radio operators with the exception of those owned by Astral Media (Astral), CTVglobemedia (CTVgm), Corus Entertainment (Corus), Rogers Communications (Rogers) and Standard Radio (Standard)², which would represent over half of the approximately 600 radio programming undertakings in Canada.
7. The Commission notes that the CAB's approach would represent considerable administrative and cost burdens for both the industry and the Commission, due to the large number of radio corporate groups that would be required to report on diversity. In the Commission's view, commercial radio operators' annual revenues would provide an equitable means of determining those that should be required to report on their implementation of the Best Practices. After assessing the breakdown of radio revenues per company, the Commission considers it appropriate to establish, based on revenues, three categories of commercial radio operator – large, medium-sized and small –, with reporting requirements commensurate with their size.
8. The Commission defines “large commercial radio operators” as those with annual revenues above \$50 million. The Commission notes, however, that the CAB's proposed definition of small commercial radio operators would include two large corporate groups: Newfoundland Capital Corporation Limited (Newcap) and Jim Pattison Broadcast Group (Pattison). In 2006, Newcap's revenue was \$80.4 million and Pattison's revenue was \$51.4 million.³ As such, both Newcap and Pattison should be considered large commercial radio operators.
9. The Commission defines “medium-sized commercial radio operators” as those with annual revenues above \$20 million, but no more than \$50 million. As of the date of this public notice, this category consists of the following commercial radio operators: Cogeco, Elmer Hildebrand, Maritime Broadcasting (Maritime) and Rawlco Radio (Rawlco).

² In Broadcasting Decision 2007-359, the Commission approved the acquisition of the radio and television undertakings owned by Standard by Astral Media Radio (Toronto) Inc. and 4382072 Canada Inc., partners in a general partnership, carrying on business as Astral Media Radio G.P.

³ The revenue figure for Pattison includes the 2006 revenue for radio stations that it acquired from O.K. Radio Group Ltd. (see Broadcasting Decision 2006-639).

10. Finally, the Commission defines “small commercial radio operators” as those with annual revenues below \$20 million. This category includes all commercial radio operators not mentioned above.

Reporting requirements for different categories of commercial radio operators

11. The Commission expects large commercial radio operators to file their first annual diversity reports no later than 31 January 2009. As the Commission currently requires television licensees to file their annual diversity reports on 31 January each year, this deadline for large commercial radio operators would harmonize the timing of filing of annual reports for the private broadcasting industry as a whole, especially given that several licensees to which this deadline would apply hold both television and radio licences.
12. The Commission considers that medium-sized commercial radio operators, like large commercial radio operators, have the capacity (both in terms of financial and human resources) to develop corporate strategies to advance diversity. However, the Commission is also aware of the considerable gap between medium-sized commercial radio operators and large commercial radio operators in terms of revenues, number of radio programming undertakings and number of employees. In its proposed approach for small commercial radio operators (which would include what the Commission has defined as medium-sized commercial radio operators), the CAB proposed a five- to seven-year reporting period, depending on the number of undertakings owned and the size of staff employed by the operator, a strategy that the Commission agrees with in principle. In recognition of the differences between large and medium-sized commercial radio operators, the Commission considers that medium-sized commercial radio operators should be required to report every five years. Accordingly, to ensure that progress is being made by medium-sized commercial radio operators in terms of their implementation of the CAB’s Best Practices, the Commission requires that these commercial radio operators submit their first reports on diversity for the broadcasting years 2008 to 2012 on 2 November 2012.
13. In recognition of their limited resources, small commercial radio broadcasters, as defined by the Commission, will be exempted from the requirement to file reports on diversity. Nevertheless, the CAB should ensure that small commercial radio operators, as well as large and medium-sized commercial radio operators, be aware of their diversity responsibilities and follow the Best Practices, as required by the Commission in the Commercial Radio Policy 2006. In addition, small commercial radio operators should be prepared at licence renewal to describe their efforts to implement the Best Practices.
14. The Commission expects large and medium-sized commercial radio operators to apply the Best Practices in a way that is relevant and suitable to their business operations, in order to develop diversity-related initiatives appropriate to their services, and to provide explanations in their reports to the Commission as to why any particular Best Practices have not been pursued. The Commission also expects

large and medium-sized commercial radio operators to use the CAB's reporting template as a tool to report to the Commission on their progress in improving diversity.

15. In its proposal, the CAB also submitted that small commercial radio operators, as defined by the CAB, be required to submit a plan setting out how each corporate group would implement the Best Practices. This implementation plan would consist of a general commitment to adhere to Best Practices 1 and 2; the identification of three other Best Practices that would be implemented during the first reporting term, as well as an explanation as to how they would be implemented; and a commitment to eventually implement all of the Best Practices, to be set out in the implementation plan filed for the second reporting term.
16. The Commission recognizes that this proposal constitutes an attempt by the CAB to ensure a minimum level of commitment to diversity, commercial radio all the while limiting the potential administrative and cost burdens for smaller operators, both in terms of implementing and reporting on their initiatives. However, the Commission considers that this proposal would create differing expectations in terms of commitments or responsibility for improving the reflection of diversity in radio, and is concerned that picking and choosing from among the Best Practices could risk leaving out important elements. The principles of diversity enshrined in the Best Practices are necessary in their entirety; therefore, all licensees will be expected to adhere to each principle in a manner best suited to their operations.
17. With respect to the CAB's proposal that small commercial radio operators, as defined by the CAB, file an implementation plan on cultural diversity with the Commission, the Commission is of the view that the use of the CAB's Best Practices would suffice for the purpose of broadcasters planning their initiatives. Moreover, the Commission considers that it is important to harmonize, to the extent possible, the filing requirements for the radio industry. Consequently, the Commission is of the view that no radio operator should be required to file an implementation plan.

Canadian content development policy

18. As part of its submission of 15 March 2007, the CAB proposed that, in order to better direct CCD contributions to local diversity-related music and spoken-word initiatives, small commercial radio operators should be exempted, upon application, from the Commission's new Canadian content development policy (the CCD policy), set out in the Commercial Radio Policy 2006. According to the new CCD policy, to ensure continuity of assured funding, radio licensees are required to allocate no less than 60% of their basic annual CCD contributions to FACTOR or MUSICACTION, with the remaining amount to be directed to any eligible CCD initiative, at the discretion of the licensee. Under previous policies, it was not compulsory for commercial radio operators to fund these national organizations.

19. The Commission notes that a major objective of the new CCD policy is to stabilize funding for FACTOR and MUSICACTION, which are mandated to fund emerging artists nation-wide, including talent from a variety of backgrounds. The Commission also notes that the policy already allows commercial radio operators to spend up to 40% of their contributions in a discretionary fashion for parties or initiatives eligible for CCD funding, including initiatives for the production and promotion of local music and local musical artists.
20. While the Commission has the ability to grant exceptions to individual licensees, it grants these only upon application and on an exceptional basis. The Commission considers that the CAB's justification for redirecting funding from FACTOR/MUSICACTION to diversity-related initiatives is not exceptionally persuasive. Furthermore, the Commission is of the view that sufficient time should be given for the new CCD policy to be implemented and for the parties involved to assess its results before considering broad exceptions based on the size of the broadcaster.

Conclusions

21. The Commission adopts the CAB's revised Best Practices for Diversity in Private Radio, as set out in the appendix to this public notice, and expects all radio licensees to adopt these Best Practices, as required by the Commission in the Commercial Radio Policy 2006.
22. In regard to the CAB's proposed approach to diversity for small commercial radio operators, submitted 6 July 2007, as it pertains to reporting requirements, the Commission adopts a modified version, according to which:
 - large commercial radio operators, with annual revenues above \$50 million (Astral, Corus, CTVgm, Newcap, Pattison and Rogers), shall adhere to the CAB's Best Practices and use the CAB's general reporting template to report annually on their diversity initiatives, with the first report due no later than 31 January 2009;
 - medium-sized commercial radio operators, with annual revenues above \$20 million and no more than \$50 million (Cogeco, Elmer Hildebrand, Maritime and Rawlco), shall adhere to the CAB's Best Practices and use the CAB's general reporting template to report on their diversity initiatives every five years, with the first report due 2 November 2012; and
 - small commercial radio operators, with annual revenues of \$20 million or less, shall adhere to the CAB's Best Practices, but be exempted from reporting on their diversity initiatives to the Commission.

23. The Commission notes that should any commercial radio operator enter into a different reporting category due to a change in its annual revenues, it is the responsibility of that commercial radio operator to comply with the corresponding obligations set out above by the time of filing its next annual return. Further, that commercial radio operator shall file its report on diversity initiatives in the next reporting year as determined by the commercial radio operator's new reporting category. Accordingly, should a small or medium-sized commercial radio operator become a large commercial radio operator, it must begin filing annual diversity reports by the second 31 January following the change in reporting category, as indicated by its annual returns. Should a large or small commercial radio operator become a medium-sized commercial radio operator, it must begin filing reports by the fifth 2 November from the date it becomes a medium-sized commercial radio operator, as indicated by its annual returns.
24. Finally, in regard to the CAB's proposal that small commercial radio operators be exempted, upon application, from the Commission's new CCD policy, although the Commission can grant exceptions to individual licensees in exceptional circumstances, it is not prepared to do so in this instance.

Secretary General

Related documents

- *Acquisition of assets*, Broadcasting Decision CRTC 2007-359, 28 September 2007
- *Commercial Radio Policy 2006*, Broadcasting Public Notice CRTC 2006-158, 15 December 2006
- *CKKQ-FM Victoria, CKKQ-FM-1 Sooke and CKKR-DR-1 Victoria; CJZN-FM Victoria, CKXM-FM-1 Sooke and CJZN-DR-1 Victoria – Acquisition of assets*, Broadcasting Decision CRTC 2006-639, 24 November 2006
- *Commission's response to the report of the Task Force for Cultural Diversity on Television*, Broadcasting Public Notice CRTC 2005-24, 21 March 2005
- *Commercial Radio Policy 1998*, Public Notice CRTC 1998-41, 30 April 1998

This document is available in alternative format upon request, and may also be examined in PDF format or in HTML at the following Internet site:
<http://www.crtc.gc.ca>

Appendix to Broadcasting Public Notice CRTC 2007-122 (Provided by the Canadian Association of Broadcasters)

Diversity in Private Radio

Private radio broadcasters are committed to advancing diversity, including diversity related to ethnocultural groups, Aboriginal peoples and persons with disabilities, within the sector. Many private radio operators, at both the station and corporate levels, have already brought forward innovative approaches to engaging diversity in the workplace and on-air.

The Business Case for Diversity in Radio

Private radio respects its obligations to reflect the diversity of Canada in its programming and operations and recognizes that changes to the demographics of Canada's population also represent a very strong business case for diversity in radio.

In a major change from its demographics a generation ago, Canada's diversity has grown dramatically. Many businesses within the Canadian economy – from financial institutions to high-tech companies to private broadcasters – are keenly aware of these demographic realities, and recognize that major transformations in the population inevitably drive change in the economy as a whole. Consumer patterns of behaviour change, workforce compositions are altered and the base of human capital, driving a knowledge-based economy, broadens.

The business community is also aware that a more diverse customer base means they must change, adapt and create in order to remain competitive in the products and services they offer. In other words, within many of Canada's economic sectors there is a broad recognition that diversity can mean strong business opportunity and business success. Companies that do not recognize the relationship between growing diversity and business success run the risk of losing out on potentially lucrative markets.

The private radio industry is very much aware of the opportunity and success that harnessing diversity can represent. There is a very strong business rationale that underlies the case for diversity in private radio: the creation of more dynamic diverse programming and the development of diverse workforces can attract larger listening audiences, enhance already strong relationships in local communities and generate additional or new advertising revenue.

For individual radio stations, building and pursuing a business case for diversity will be largely dependent on and driven by the level of diversity present within their local markets. With a wide variation across markets throughout Canada, individual radio companies and/or stations will need to determine those strategies that will best suit both business and community relevance.

Best Practices for Diversity in Private Radio

Private radio's strategy to advance the reflection and promotion of talent from diverse backgrounds including ethnocultural groups, Aboriginal peoples and persons with disabilities is based on the development and implementation of a wide range of best practices with an emphasis on music and spoken-word programming, human resource initiatives, community outreach, and accountability and measurement.

Private radio broadcasters are committed to achieving high standards for their broadcasts and were among the founding members of the Canadian Broadcast Standards Council (CBSC). As members of the CBSC, radio broadcasters adhere to a number of industry content codes relating to programming and advertising material including the *CAB Code of Ethics*, the *RTNDA (Journalistic) Code of Ethics* and the *CAB Equitable Portrayal Code*⁴, and regularly review these codes to ensure they meet evolving community standards and expectations for programming, including the fair and accurate portrayal of ethnocultural minorities, Aboriginal peoples and persons with disabilities.

In addition, the music content provided by a majority of private radio broadcasters is very racially and culturally diverse, with most radio stations providing a rich menu of racially and culturally diverse music programming in a multitude of formats.

Notwithstanding, private radio broadcasters recognize that the continued selection and promotion of music and spoken-word talent/programming from ethnocultural minorities, Aboriginal peoples and persons with disabilities contribute to the better reflection of diversity in commercial radio. Private radio broadcasters also recognize that Canadian content development contributions can have a positive impact on the advancement of diversity in private radio. For these reasons, the private radio broadcasters also encourage other industry stakeholders including regional and national music associations, guilds, unions and music funding agencies to develop strategies for talent development in ethnocultural, Aboriginal, and disability communities.

In order to situate private radio's best practices within the operational and market realities of the sector they are organized in the following nine areas:

1. Industry Commitment
2. Application and Implementation
3. Corporate Accountability
4. Recruitment, Hiring, Retention
5. Internship, Mentoring and Scholarships
6. Programming
7. News and Information Programming
8. Community and Industry Outreach
9. Internal Communications

⁴ The CAB's proposed Equitable Portrayal Code is still under consideration by the Commission.

1. Industry Commitment

Best Practices

- 1.1 Canada's private radio broadcasters recognize the importance of the provision of programming at the local and network level that responds to listeners' needs and interests and includes the reflection of Canada's diversity on-air.
- 1.2 Canada's private radio broadcasters are committed to achieving diversity both on-air and within the industry's workforce by:
 - (a) creating best practices and practical initiatives to improve the representation and ensure the fair, accurate and non-stereotypical portrayal and reflection of Canada's diversity on radio;
 - (b) ensuring an accepting, respectful and inclusive work environment, a representative workforce and a workplace where all employees experience fair treatment and equal opportunity for career advancement;
 - (c) identifying and removing barriers to access and employment within the broadcasting system; and
 - (d) identifying the business opportunities associated with fostering an inclusive and diverse workforce and airing programming that attracts diverse audiences.

2. Application and Measurement

Given the diversity of the private radio broadcasting industry itself, it is incumbent upon individual radio broadcasters to develop the tools that will be most relevant for them, and to determine the most appropriate and effective ways to use these tools.

Best Practices

- 2.1 Private radio broadcasters will measure progress in achieving their diversity objectives.

3. Corporate Accountability

In order to ensure corporate commitment to diversity, this commitment must become an integrated part of corporate governance that is clearly evident to all employees.

Best Practices

- 3.1 A private radio broadcaster will formally articulate and demonstrate a corporate commitment to developing and maintaining an inclusive corporate culture that fosters and promotes diversity both on-air and within the broader workforce.
- 3.2 A private radio broadcaster will develop and implement internal communication practices to ensure that all diversity policies and plans are communicated to management and staff.
- 3.3 A private radio broadcaster will ensure that all employees, both management and staff, agree to adhere to diversity policies and practices.
- 3.4 A private radio broadcaster will appoint or designate a senior executive to be responsible for the development, implementation and evaluation of diversity practices and initiatives for stations and/or services within their corporate group.
- 3.5 A private radio broadcaster will, where possible, incorporate diversity objectives within its business plans, at the departmental, divisional and/or corporate level.
- 3.6 A private radio broadcaster will, where possible, make accessible information on the implementation of diversity practices by posting on its Web site the company's corporate diversity plan.

4. Recruitment, Hiring and Retention

In matters relating to human resources, including policies/programs relating to recruitment, hiring and retention, it is imperative that human resource staff be trained and educated on techniques that address cultural diversity.

Best Practices

- 4.1 A private radio broadcaster will ensure that all human resource policies clearly articulate its commitment to diversity.
- 4.2 A private radio broadcaster will review and eliminate on an ongoing basis all human resource policies and practices relating to recruitment, hiring and retention that act as systemic barriers.
- 4.3 A private radio broadcaster will develop and implement mechanisms that foster an inclusive and accepting work environment aimed at increasing workforce retention.
- 4.4 A private radio broadcaster will develop tactics and implement mechanisms aimed at attracting and recruiting a diverse employee base.

- 4.5 A private radio broadcaster will, where possible, place advertisements for employment opportunities beyond mainstream media by placing advertisements in media targeted to diverse communities.
- 4.6 A private radio broadcaster will ensure that employees responsible for hiring and managing staff are provided with training on systemic barriers.
- 4.7 A private radio broadcaster will monitor progress and assess the effectiveness of policies and initiatives in furthering diversity objectives.

5. Internship, Mentoring and Scholarships

Educational programs can be both local and national in scope, as a means of attracting maximum participation from the broadest range of Canada's diversity.

Best Practices

- 5.1 A private radio broadcaster will incorporate diversity plans into its internship programs where available.
- 5.2 A private radio broadcaster will clearly articulate its diversity practices and policies to educational institutions with which it has existing relationships.
- 5.3 A private radio broadcaster will examine internship, mentorship and other recruitment programs both for systemic barriers and effectiveness. Specifically, broadcasters will review selection criteria, outreach initiatives and communication tools for accessibility.
- 5.4 A private radio broadcaster will, where possible, work with industry associations and agencies to identify programs for training and recruitment to meet diversity objectives.

6. Programming

Private radio broadcasters recognize that the selection and promotion of music and spoken-word talent/programming from ethnocultural minorities, Aboriginal peoples and persons with disabilities can contribute to the better reflection of diversity in commercial radio.

Best Practices

- 6.1 A private radio broadcaster will endeavour to fairly and accurately reflect the diversity of the audience and/or communities it serves in the programming offered within its format.

- 6.2 In the commissioning, acquisition and/or development of programming, a private radio broadcaster will ensure, where possible, that programs reflect the diversity of the audiences to which the programming is directed.
- 6.3 A private radio broadcaster will, where possible, reflect the unique perspective and cultural background that on-air talent/producers bring.
- 6.4 A private radio broadcaster will support music and spoken-word talent from diverse backgrounds using regulated financial contributions to Canadian content development initiatives and music funding agencies such as FACTOR, MUSICACTION, Radio Starmaker Fund and Fonds Radiostar.

7. News and Information Programming

In bringing the realities of community, country and the world to Canadians, news and information programming presents potentially the most sensitive of all Best Practices initiatives focusing on diversity in private radio.

It is pivotal that all newsroom professionals not only commit to diversity in the workplace, but also develop means for ensuring accurate reflection and portrayal of diverse groups. This means that newsroom culture must become well-versed in cultural diversity, and in understanding vocabulary, culturally unique behaviours and other methods of communication.

Best Practices

- 7.1 A private radio broadcaster will commit to fair and accurate reflection and portrayal on-air by reviewing, developing and maintaining an editorial perspective and/or policy that advances its diversity objectives.
- 7.2 A private radio broadcaster will diversify its use of experts on-air to include individuals from a broad range of diverse backgrounds.
- 7.3 A private radio broadcaster will ensure that experts and other on-air guests from diverse backgrounds are interviewed on-air with respect to a wide-range of public issues.
- 7.4 A private radio broadcaster will ensure that on-air news and information programming staff from diverse communities are assigned to a wide range of public issues.
- 7.5 A private radio broadcaster will develop and implement outreach initiatives to foster a better understanding among news and information programming staff about diverse communities.
- 7.6 A private radio broadcaster will ensure that news and information programming staff participate in the outreach initiatives of diverse communities.

- 7.7 A private radio broadcaster will consult with community leaders and issues experts, where appropriate, on issues such as ethnic or racial conflict and other diversity-sensitive issues.

8. Community and Industry Outreach

Connecting with a community is an extremely important measure in advancing diversity on private radio.

Best Practices

- 8.1 A private radio broadcaster will review, develop and implement community outreach and consultation practices as applicable (local, regional) to inform and be informed regarding issues concerning the representation, reflection and portrayal of diverse communities.
- 8.2 A private radio broadcaster will review its communications with its audiences with a view to eliminating systemic barriers.

9. Internal Communications

Best Practices

- 9.1 A private radio broadcaster will inform and communicate, on an ongoing basis, to management and staff, all diversity policies and practices adopted by its station(s).