



Diversity Strategy

2007/08

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Section 1

Introduction

- 1.1 Ofcom is placing diversity at the heart of the organisation by developing and implementing an integrated Diversity Strategy.
- 1.2 We are committed to opposing and overcoming all forms of unlawful or unfair discrimination on the grounds of a person's age, disability, gender, race or ethnicity, sexual orientation or religion or belief in all aspects of our work.
- 1.3 In carrying out our statutory duties, including in respect of the industries we regulate, Ofcom will work to promote diversity in our policy development and encourage equality of opportunity. Ofcom will operate in an open and transparent manner and will seek to ensure its communications are as accessible as possible.
- 1.4 As an employer, our goal is to recruit, motivate, develop and retain outstanding people, reflecting the diverse communities we serve. We are committed to equality of opportunity in all areas of employment, including development and promotion. We aim to treat all colleagues fairly, with dignity and respect.
- 1.5 This Diversity Strategy looks ahead three years from 2007 to 2010. It sets out for the first time Ofcom's diversity commitments. These are underpinned by a series of strategic objectives which show what specific corporate action we will be taking to support the achievement of these commitments.
- 1.6 The strategy is aligned to Ofcom's Values, which articulate how we will behave in order to engender an inclusive working culture.
- 1.7 We have identified the following strategic aims to progress the diversity agenda across the organisation:
 - Fulfilling our legal duties as a public body
 - Embedding diversity and raising awareness
 - Building industry partnerships and consumer engagement
 - Recruiting and retaining a diverse workforce
 - Making a positive impact on our local community
- 1.8 This strategy incorporates the Diversity Action Plan for 2007/08, which details the actions that need to be undertaken to realise each strategic aim. The achievement of these actions will go some way to make Ofcom an organisation that truly values diversity and manages the agenda effectively.
- 1.9 The Diversity Strategy will be reviewed annually and include an updated action plan.

Section 2

Strategic context

- 2.1 Ofcom exists to further the interests of consumers and citizens in terms of electronic communications through a regulatory regime which, where appropriate, encourages competition.
- 2.2 Ofcom aims to lead by example in promoting diversity to ensure that it is credible in its role as the industry regulator, particularly concerning its role to affect fair access to communications services, monitor standards in broadcasting and encourage the promotion of equality of opportunity in employment and training amongst the industries we regulate.
- 2.3 As an employer, Ofcom is committed to creating inclusive employment policies which reflect and value diversity. We will work promote equality of opportunity for all colleagues in employment, training and progression.

Strategic Aims and Priorities

- 2.4 The Diversity Strategy highlights our strategic diversity aims and priorities which will provide the focus for how we will progress our statutory duties and commitment to promoting diversity across Ofcom in policy development, function delivery and employment.
- 2.5 The focus of our diversity work and the approaches that we adopt reflect our Values.

Fulfilling our legal duties as a public body

- 2.6 As a public body Ofcom has legal obligations to eliminate discrimination and promote equality of opportunity under various anti-discrimination legislation covering age, disability, gender, race, religion and belief and sexual orientation. Ofcom also has a general duty to promote equality of opportunity under the Communications Act 2003.
- 2.7 Although Ofcom only has legal obligations to promote equality of opportunity in access to services under race, disability and gender discrimination laws, we have made a decision to go beyond these requirements and ensure that we encourage age, religion and sexual orientation equality amongst the industries we regulate.

Embedding diversity and raising awareness

- 2.8 We are committed to placing diversity at the heart of what Ofcom does, in every part of our organisation. This will ensure success in promoting this agenda within the Ofcom, including in our decision making processes, policy development, function delivery, business planning and employment practices.
- 2.9 Raising awareness amongst colleagues will go a long way towards helping them to understand the issues that each diversity group faces. Understanding these issues and exploring how their work can affect outcomes will encourage colleagues to give due consideration to diversity when developing policy, engaging with consumers and citizens and interacting with each other.

Building industry partnerships and consumer engagement

- 2.10 Ofcom has a duty to promote equality of opportunity amongst the industries we regulate. Building effective industry partnerships and collaborative working will assist in our efforts to encourage good practice. Ofcom will also be able to learn from the good practice that already exists within the telecommunications and broadcast industries.
- 2.11 We work in the interest of consumers and citizens, so it is essential that we work to engage with all sectors of the UK population, particularly those diversity groups who tend not to engage with our policy agenda. In consulting with citizens and consumers, Ofcom needs to make the extra effort to reach those communities that are most likely to be affected by our policy decisions - not just through organisations that represent them, but through contacting consumers from those groups. For example, we are amending our approach to market research in relation to disability to ensure that we are able to be specific about impacts on different types of impairments, rather than treating disabled people as a homogeneous whole.

Recruiting and retaining a more diverse workforce at all levels

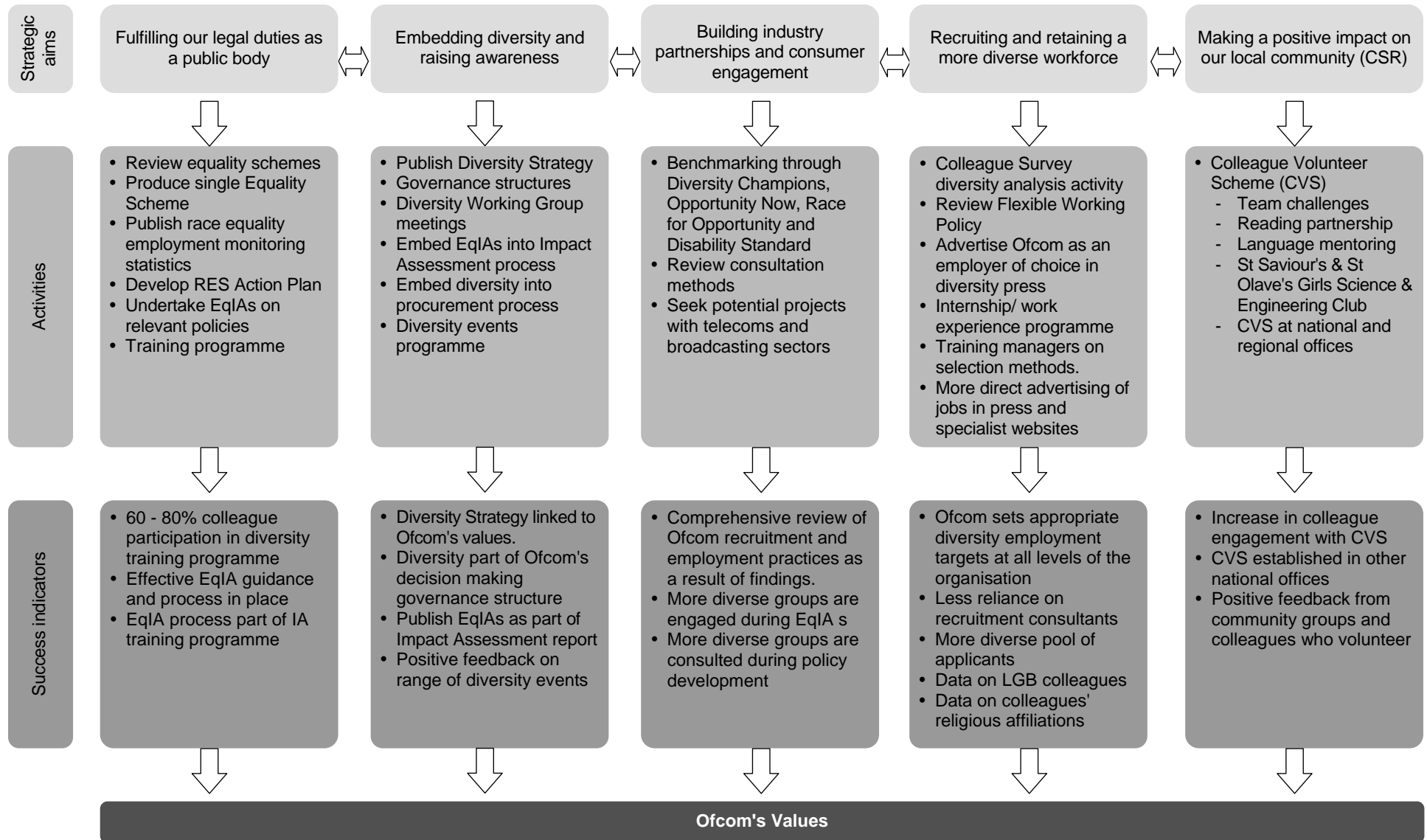
- 2.12 Ofcom has a workforce of approximately 800 people. Of these 39% are female, 15% are from ethnic minority backgrounds and 3% have declared that they have a disability. Our recent Colleague Survey results indicate that 3% of colleagues have said that they are lesbian, gay or bisexual (LGB) and 8% of colleagues are engaged in religious activities.
- 2.13 Ofcom is generally under representative of women, disabled people and LGB colleagues and needs to undertake activities to attract larger numbers of talented people from these backgrounds to be a true competitor in the ongoing 'war for talent'.
- 2.14 In terms of ethnicity, Ofcom's workforce is representative of the pool from which we recruit. We benchmark our ethnicity against the London, South East and East of England geographical region, which is 14%, because this is the area from which we recruit over 87% of our workforce.
- 2.15 Ofcom is particularly non-diverse at senior management level, with 21% of colleagues at this level being female, 4% from an ethnic minority background and no declarations of disability.
- 2.16 Diversity creates the right culture for talent to flourish. Managing diversity harnesses the differences between colleagues in Ofcom, creating a productive environment in which everyone feels valued, where talents are fully utilised and Ofcom's goals are met. Ofcom will review its employment processes on an ongoing basis to ensure that any barriers to our objective to recruit and retain a talented and diverse workforce are removed.

Making a positive impact on our local community

- 2.17 As part of our corporate social responsibility (CSR) agenda, Ofcom is moving beyond a base of legal compliance to integrating socially responsible behaviour into our core values, in recognition of the sound business benefits of doing so.
- 2.18 An effective CSR programme can be an aid to the recruitment and retention of diverse talent, particularly within the competitive graduate student market. Potential recruits are increasingly likely to ask about an organisation's CSR policy during an interview and having a comprehensive programme can give us an advantage. CSR

can also help to build a "feel good" atmosphere among existing colleagues, particularly when they can become involved through community volunteering.

Strategic framework



Ofcom Values

- 2.19 Ofcom's Values were developed to articulate how we as an organisation would like to evolve and develop over the coming years and came about as a result of the findings from our first Colleague Survey, carried out in 2005.
- 2.20 The purpose of the Values is to make Ofcom a better place to work and establish shared expectations amongst colleagues. The values are also consistent with our regulatory principles.
- 2.21 There are six Values that meet our need to be open, effective and people driven:
- **Communicating openly and honestly** - We work in an open and honest way to a clearly communicated agenda, proactively seeking and sharing information to achieve successful outcomes
 - **Listening with an open mind** - We listen with an open mind to different points of view and embrace a culture of giving and receiving feedback
 - **Making a difference** - We focus our energy on achieving real world outcomes and have confidence and optimism that Ofcom makes a difference in the public interest
 - **Empowering and prioritising** - We empower our people and allocate our time to clear priorities, making the choices and trade-offs those priorities dictate, and having the capacity to adapt when necessary
 - **Investing and supporting our colleagues** - We value, invest in and support our colleagues, recognising that this makes Ofcom a place where talented people want to come and stay
 - **Genuine collaboration** - We work in a respectful and collaborative way within teams, between teams and across all levels in Ofcom, in a way which demonstrates we value what each part of the organisation contributes to our success
- 2.22 Our Values are about respecting colleagues and valuing the different perspectives that they bring to the organisation. Diversity is, therefore, fundamental to the successful expression of these Values in our day to day activities and interactions

Section 3

Diversity Action Plan 2007/08

- 3.1 This plan outlines the agreed work on promoting diversity across the Ofcom. The strategic aims identified are aligned to Ofcom's aims and priorities identified in our race, disability and gender equality schemes. The actions are linked to Ofcom's Values and are, for the most part, focussed on internal activities to ensure effective management of diversity. Details on our externally facing diversity activities to are available in our Race, Disability and Gender Equality Schemes.
- 3.2 Progress on this action plan will be reported to the Executive Committee and the Board on a quarterly basis and reviewed annually. Ofcom will monitor the actions that have been identified for each year; what has been achieved and where there has been slippage or no progress has been made, understand the reasons for this and revise timescales.
- 3.3 The Diversity Working Group, which is made up of colleagues from across the organisation, will form sub-groups to monitor and review the implementation and effectiveness of activities under each strategic aim.

Strategic aim: Fulfilling our legal duties as a public body		
Action	Key dates	Desired outcomes
Publish race equality employment monitoring statistics, as required by the Race Relations (Amendment) Act 2000	May 07	Detailed data relating to ethnic minority colleagues working for Ofcom, enabling us to understand key messages emanating from analysis of the findings, issues arising and where there are shortfalls, how we intend to address them.
Diversity e-learning rollout	Sep 07	Colleagues understand their duties under anti-discrimination legislation
Develop Race Equality Scheme (RES) Action Plan	Oct 07	A plan that details Ofcom's activities to promote race equality in function delivery and employment.
Organise and roll out SMG diversity training	Oct 07	SMG is made aware of the behavioural and attitudinal issues that could adversely affect the effective management of diversity. Cultural change.
Review Disability Equality Scheme (DES) action plan	Nov 07	Receive feedback on Ofcom's performance on promoting disability equality in policy development and access to communications and employment.
Review Gender Equality Scheme (GES) action plan	Mar 08	Receive feedback on Ofcom's performance on performance in promoting gender equality in employment.
Produce single Ofcom Equality Scheme (OES) that complies with current legislation and in anticipation of forthcoming laws to outlaw discrimination based on religion, sexual orientation and age in the delivery of goods and services	Jul 08	Bring together all the disparate equality schemes and activities into one coherent document with action plan that also covers diversity strands not yet covered by law.
Ensure that effective Equality Impact Assessments (EqIAs) are undertaken on Ofcom's policies and projects.	Ongoing	Understanding the impact of policies on different diversity groups and being able to mitigate any negative impacts where possible

Strategic aim: Embedding diversity and raising awareness		
Action	Key dates	Desired outcomes
Produce Diversity Strategy, which outlines Ofcom's key diversity aims and actions to promote diversity in employment and function delivery. Will include Diversity Action Plan 2007/08.	Apr 07	A document that clearly articulates Ofcom's diversity priorities and sets out what the organisation will do over the next 12 months
Organise events for Silver Surfers' Day	May 07	Improve media literacy (specifically internet) of older people.
Comment on Big Brother racism decision	May 07	Receive colleague feedback on racism on television
Create a diversity wiki page on intranet to enable colleagues to comment on and discuss diversity issues	Jul 07	Colleagues have the opportunity to comment on diversity issues without fear of repercussions.
Include a Diversity Working Group page in new IC magazine	Jul 07	Raise colleague awareness of diversity issues.
Develop Equality Impact Assessment Toolkit and embed this into our existing Impact Assessment process	Sep 07	A practical guide to assist colleagues in assessing the impact of their work on consumers and citizens from different diversity backgrounds. This information can then be used to inform our policy decisions.
Develop Diversity Good Practice Protocols	Sep 07	Provide practical steps to help colleagues put our Values into practice and make our working culture more inclusive of difference.
Produce Diversity/CSR report	Mar 08	Raise colleagues' and stakeholder awareness of Ofcom's work to promote diversity
Organise events for Men's Health Week	2008	Raise male colleagues awareness of health issues relevant to them and improve take-up of the free health checks provided by Ofcom
Invite internal and external lunchtime speakers to raise awareness around diversity issues.	Ongoing	Raise colleagues' awareness and understanding of different diversity groups and the issues people from these groups might face.
Celebrate and mark key diversity days/ seasons including: - International Day for People with Disabilities - Black History Month - Holocaust Memorial Day - Lesbian & Gay History Month - International Women's Day - Diwali	Ongoing	Raise colleagues' awareness and understanding of different diversity groups and the issues people from these groups might face.
Diversity update to ExCo/Board	Ongoing	ExCo and the Board are informed on what Ofcom is doing to promote diversity.
Organise four Diversity Working Group meetings for 2007/08	Ongoing	A more co-ordinated approach to the promotion of diversity across Ofcom.
Strategic aim: Building industry partnerships and consumer engagement		
Action	Key dates	Desired outcomes
Undertake Employers' Forum on Disability Standard benchmarking to measure Ofcom's performance in promoting disability equality.	Apr 07	An objective measure of performance in promoting disability equality in the workplace and the ability to address any issues that are highlighted in the analysis of results
Report on results and trends from benchmarking surveys	Aug 07	A comprehensive baseline from which to plan a course for improvement in managing diversity where such action is required.

Undertake Stonewall's Diversity Champions benchmarking to measure Ofcom's performance in promoting equality for lesbian, gay and bisexual colleagues.	Sep 07	Objective measure of performance in promoting sexual orientation equality in the workplace the ability to address any issues that are highlighted in the analysis of results
Ensure diversity considerations integral to the way Ofcom consults stakeholders	Oct 07	Ofcom engages with more diversity groups beyond those traditionally consulted. Ofcom uses consultation methods appropriate to different diversity groups.
Undertake Business in the Community's Opportunity Now benchmarking to measure Ofcom's gender equality performance	Oct 07	Objective measure performance in promoting gender equality in the workplace and the ability to address any issues that are highlighted in the analysis of results
Seek potential projects with broadcasting sector	2007	Raise Ofcom's diversity profile amongst stakeholders within the broadcasting sector
Undertake Business in the Community's Race for Opportunity benchmarking to measure Ofcom's race equality performance	Mar 08	Objective measure performance in promoting race equality in the workplace and the ability to address any issues that are highlighted in the analysis of results
Seek potential projects with telecoms sector	2008	Raise Ofcom's diversity profile amongst stakeholders within the telecoms sector
Strategic aim: Recruiting and retaining a more diverse workforce		
Action	Key dates	Desired outcomes
Commission research into diversity press to understand the best publications to advertise Ofcom as an employer of that values diversity.	Jul 07	Understand the nature of the diversity press
Ensure diversity considerations are integral to Ofcom's Assessment and Reward project	Sep 07	An Assessment and Reward process that is fair and equitable.
Attend and review Ofcom's recruitment, selection and interview training for managers	Sep 07	Feedback on whether there is appropriate prominence given to diversity in this training.
Develop Colleague Survey Diversity Analysis Action Plan	Oct 07	Effective action to address the issues highlighted by particular diversity groups during the Colleagues Survey.
Train managers on selection methods to ensure equality of opportunity.	Ongoing	A more diverse workforce
Advertise Ofcom as an employer in diversity press	Ongoing	Raise Ofcom's profile amongst diversity groups as an employer of choice and improve the diversity of the pool of candidate from which we recruit ,leading to a more diverse workforce
Strategic aim: Making a positive impact on our local community		
Action	Key dates	Desired outcomes
Organise team challenges	Oct 07 Mar 08	Colleagues involved in improving the state of local facilities
Expand Colleague Volunteer Scheme activities	Ongoing	Colleagues engaged in social activities to improve the life chances of local residents
Renew communications activities to engage colleagues in St Mungo's monthly collections	Ongoing	Colleagues donate more articles in monthly collections

Section 4

Measuring success

- 4.1 To implement this Diversity Strategy effectively, Ofcom needs to be able to understand what success will look like for the organisation. The strategic aims describe what we are trying to achieve over the next year and provide a clear basis for assessing our performance.
- 4.2 In order to measure our progress and the success of this strategy, Ofcom has identified the expected outcomes for each aim. We will keep the strategy under review as we implements the Diversity Action Plan. The process involves:
- establishing a set of success indicators, which we can relate to the strategic aims; and
 - collecting sufficiently robust data that will allow us to reach conclusions about the direction and speed of change.

Strategic aim	Success indicator
Fulfilling our legal duties as a public body	<ul style="list-style-type: none"> • Feedback on implementation of Race, Disability and Gender Equality Schemes. • Completion of single Ofcom Equality Scheme • Significant colleague participation (60 - 80%) in diversity training programme • An ongoing and agreed programme of diversity training for all colleagues
Embedding diversity and raising awareness	<ul style="list-style-type: none"> • Diversity Strategy linked to Ofcom's Values. • Diversity part of Ofcom's decision making governance structure • EqlAs published as part of Impact Assessment reports • Improved ratings from colleagues from diversity backgrounds in next Colleague Survey • Positive feedback on range of diversity events
Building Industry relationships and consumer engagement	<ul style="list-style-type: none"> • Increased collaboration with a range of our broadcasting and telecoms stakeholders. • An increase in the diversity of consumers and consumer groups responding to Ofcom consultation.
Recruiting a more diverse workforce	<ul style="list-style-type: none"> • Ofcom sets appropriate diversity employment targets across all levels of the organisation • Statistical data on LGB colleagues • Statistical data on colleagues' religious affiliations
Making a positive impact on our local community	<ul style="list-style-type: none"> • Increase in numbers of colleagues participating in Colleague Volunteer Scheme (CVS) • Expansion of CVS activities • CVS established in other national offices • Positive feedback from community groups and colleagues who volunteer.

Section 5

Implementing the Diversity Strategy

Who is responsible for the Diversity Strategy?

- 5.1 The Ofcom Board is ultimately responsible for the delivery of the organisation's statutory responsibilities. Its role is to guide the organisation to ensure that its goals are achieved in the most effective and efficient manner.
- 5.2 Ofcom's Diversity Champion has responsibility for diversity issues and leads the agenda within the organisation. They will have responsibility for the operational implementation the Diversity Strategy and Action Plan.
- 5.3 The Equalities and Diversity Manager together with the Diversity Working Group, which sets Ofcom's diversity aims, will work to ensure that effective action is taken to promote diversity and equality of opportunity in function delivery, internal processes and employment practice.
- 5.4 The Diversity Working Group will form sub-groups centred on each of the diversity strategic aims. Each sub-group will review and evaluate the implementation of the activities that fall under that particular area of work.

Annual review and reporting

- 5.5 Ofcom will review progress on the Diversity Strategy and the activities in the Action Plan annually and provide a summary of work for inclusion in its Annual Report as well as a full document detailing the diversity and corporate social responsibility work undertaken each year.
- 5.6 An annual report on the Diversity Action Plan will be presented to the Executive Committee and the Board. A summary of this report will be included in Ofcom's annual Diversity Report.

Annex 1

Anti-discrimination legislation

A1.1 The table below sets out the legislative context in which Ofcom is publishing this Diversity Strategy.

Ofcom	<p>Communications Act 2003 The Act requires that Ofcom, in the performance of its duties, has regard to the needs of people with disabilities, older people and the different ethnic communities; ensure that there is equality in access to services and technology for disabled and older people and the general public; equality of opportunity in employment and training for Ofcom colleagues; and that Ofcom must promote equality and diversity in employment and training for the staff of our broadcast media stakeholders.</p>
Age	<p>Employment Equality (Age) Regulations 2006 Makes it illegal for employers to discriminate against a person in employment and the provision of vocational training because of their age. The regulations cover both young and older people.</p>
Disability	<p>Disability Discrimination Act 1995 Makes it unlawful to discriminate against anyone on the grounds of their disability. The Act covers employment, access to goods, facilities and services and the management, buying or renting of land and property. The Act gives a definition of disability.</p>
	<p>Disability Discrimination Act 2005 Amends the 1995 Act and imposes a general duty aimed at tackling systemic discrimination. Requires organisations to actively promote equality between disabled and non-disabled people, eliminate unlawful disability discrimination, harassment of disabled people that is related to their disability, promote positive attitudes towards disabled people and encourage participation of disabled people in public life. The Act differs from other anti-discrimination laws as it allows for more favourable treatment of disabled people. Requires public bodies to produce a Disability Equality Scheme by December 2006, stating how they will promote disability equality in service provision and employment over a three year period.</p>
Faith	<p>Employment Equality (Religion or Belief) Regulations 2003 Makes it illegal for employers to discriminate against a person in employment and the provision of vocational training based on their beliefs or lack of belief.</p>
Gender	<p>Equal Pay Act 1970 Makes it unlawful for employers to discriminate between men and women in terms of their pay and conditions where they are doing the same or similar work; work rated as equivalent; or work of equal value.</p>
	<p>Sex Discrimination Act 1975 Makes it unlawful to discriminate against women or men, of any age, on the grounds of their sex. The Act covers employment, education, goods, facilities and services and housing.</p>
	<p>Sex Discrimination (Gender Reassignment) Regulations 1999 Prevents discrimination against trans people on the grounds of their gender in pay and treatment in employment and training. The Gender Recognition Act 2004 provides trans people with legal recognition in their acquired gender.</p>

	<p>Equality Act 2006 Updates the Sex Discrimination Act and introduces a positive duty to actively promote equality of opportunity between women and men and eliminate sex discrimination. Requires public bodies to produce a Gender Equality Scheme by March 2007 that articulates how they will promote gender equality over a three year period.</p>
Northern Ireland	<p>Northern Ireland Act 1998 (Section 75) Imposes a general duty to promote good relations between people of different religions and political beliefs in Northern Ireland. Requires public bodies to produce an Equality Scheme. Ofcom has produced an Equality Scheme for its Northern Ireland functions.</p>
	<p>The Fair Employment and Treatment (Northern Ireland) Order 1998 Makes it unlawful to discriminate against someone on the grounds of religious belief or political opinion in employment in Northern Ireland. This includes a person's supposed religious belief or political opinion and the absence of any, or any particular, religious belief or political opinion.</p>
Race	<p>Race Relations Act 1976 Makes it unlawful to discriminate against anyone on grounds of race, colour, nationality (including citizenship), or ethnic or national origin. It applies to jobs, training, housing, education, the provision of goods, facilities and services.</p>
	<p>Race Relations (Amendment) Act 2000 Amends the 1976 Act and imposes a positive duty to actively eliminate unlawful racial discrimination, promote equality of opportunity and good race relations. Requires public bodies to produce a Race Equality Scheme stating how they will promote race equality over a three year period. Ofcom produced its Race Equality Scheme in 2005.</p>
Scotland	<p>Gaelic Language Act 2005 Recognises Gaelic as an official language of Scotland, commanding equal respect with English. Requires the publication of a Gaelic Language Plan.</p>
Sexual orientation	<p>Employment Equality (Sexual Orientation) Regulations 2003 Makes it illegal for employers to discriminate against a person in employment and the provision of vocational training based on their sexual orientation or perceived sexual orientation.</p>
Wales	<p>Welsh Language Act 1993 Imposes a public duty to put Welsh and English on an equal basis in Wales. Requires public bodies in Wales to produce a Welsh Language Scheme. Ofcom has produced a Welsh Language Scheme in relation to the services it carries out in Wales.</p>