

**Ofcom**

making communications work  
for everyone

# Ofcom's diversity and inclusion programme 2018-2022



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## About this document

Ofcom's Diversity and Inclusion Programme explains how diversity and equality are essential to how we operate, both as an employer and as the UK's communications regulator.

It sets out our objectives and actions for 2018-2022.

These are to:

- **build a diverse and inclusive workforce to better reflect the UK population we serve;**
- **ensure diversity and inclusion are central to our work practices and culture so everyone understands, supports and is accountable for diversity; and**
- **ensure the different needs and interests of all individuals are considered when carrying out our regulatory work.**

We held a public consultation on our plans between 23 January and 23 February 2018 to allow people to comment on them and respond to us. This statement includes an annex setting out how we have taken account of consultation responses.

A Braille copy of this statement is available on request and we welcome requests for formats other than print, for example an audio recording or a British Sign Language video.

Our Diversity and Inclusion Programme addresses our duties under the Communications Act 2003 to further the interests of consumers, as well as duties under equality legislation including as an employer.<sup>1</sup> We are also required to publish our equality objectives.<sup>2</sup>

1 We have duties under the Equality Act 2010 to promote equal opportunities. This means we have a responsibility to eliminate unlawful discrimination, harassment and victimisation; b) advance equality of opportunity between people in protected groups and people who are not; and c) foster good relations between people in protected groups and people who are not. In addition, Section 75 of the Northern Ireland Act 1998 requires us to promote good relations between people of different religious beliefs, political opinions or racial groups. The Equality Act 2010 covers a range of employment issues, such as providing training opportunities, ensuring fair access to our facilities, giving women and men a right to equal pay for equal work, maternity and paternity leave policies, and flexible working arrangements.

2 Under the Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017.

# Foreword

It is our pleasure to introduce Ofcom's diversity and inclusion strategy for the next four years. We are committed to ensuring that Ofcom is an organisation where our colleagues are treated with dignity and respect, building an inclusive culture that celebrates diversity.

Everyone at Ofcom should have the chance to succeed and develop, whatever their background. No one should ever be discriminated against because of their age, disability, ethnicity, gender, gender identity and expression, religion or sexual orientation.

Our fourth diversity and inclusion plan reflects this ambition. It brings together the collective ideas of colleagues from across our organisation, as well as feedback from the public. It builds on what we have already achieved in the past four years and sets out our firm commitments through to 2022.

We are aware that there is still much more to do, and the Ofcom Executive and Board are committed to ensuring that progress continues.

**Terry Burns, Chairman and  
Sharon White, Chief Executive**



Ensuring that Ofcom reflects the diverse make-up of the UK's population helps us to understand better the people we serve. By allowing a range of voices and viewpoints to inform our work and shape our policies, we can ensure that we benefit all consumers and citizens.

Putting a sharp focus on diversity and inclusion in all our work creates a culture where colleagues are valued on their merits and talents and makes us a more effective and responsible employer and regulator of the UK's TV, radio, telecoms and postal sectors.



# Introduction

As the Chair of Ofcom's Corporate Responsibility Steering Group, I'm over the moon to get to the stage of launching Ofcom's Diversity and Inclusion Action Plan for the next four years.



It has been a collective effort working with colleagues from across Ofcom to build the plan.

Putting diversity and inclusion right at the heart of everything we do is crucial to us achieving our goal to make communications work for everyone. We're striving to build a working culture where colleagues are valued above all on our merits and talents. Our four-year action plan sets stretching and ambitious objectives to guide us. I'm in no doubt that there is a lot more work to do, but I'm confident that with all of us working together across the organisation, we'll make progress.

Jane Rumble, *Chair of Ofcom's Corporate Responsibility Steering Group and Consumer Policy Director.*

***“Putting diversity and inclusion right at the heart of everything we do is crucial to us achieving our goal to make communications work for everyone.”***

It has been really exciting to lead the women's network this year. We have pushed ourselves to be more proactive and ambitious, moving our focus from awareness-raising and events to proposing changes that will help to attract, develop and retain female talent at Ofcom. Some highlights include returnships, a role model programme and an event aimed at attracting female engineers to Ofcom.

Sasha Magill, *chair of Ofcom's Women's Network, Strategy and Policy Group.*

We aim to provide a forum where parents and carers in the organisation can ask for advice and get support. Our senior sponsor and other senior managers have shared their own parenting and caring experiences with colleagues in the network, and we've had great sessions on flexible working. I'm particularly proud of the parental guidance that we published last year, which complements the information provided by our HR team. We have recently joined Carers UK and will promote the resources and advice they can provide, as well as looking at how we compare to other employers and how we might improve.

Kate Reeve, *chair of Parents' and Carers' Network, Consumer Group.*

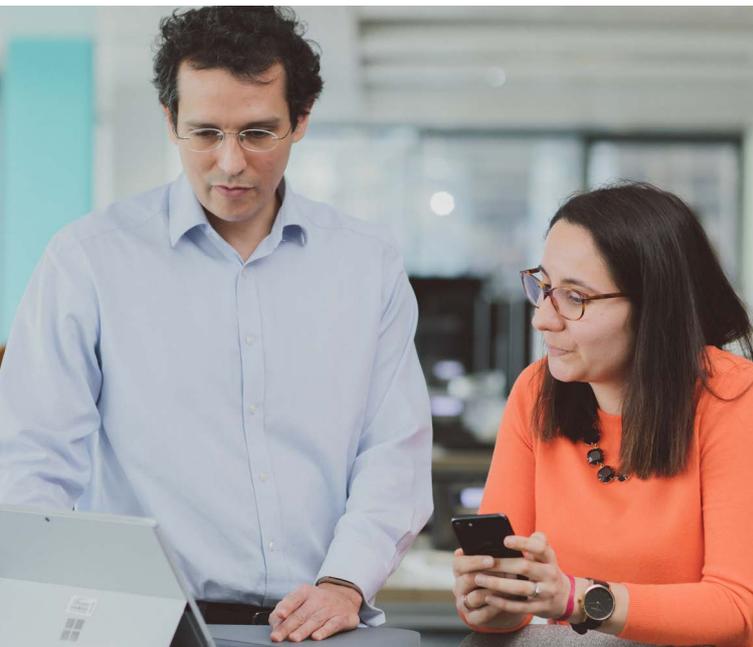
I'm really proud of what the RACE Network has achieved and I'm excited about our plans for the future. Members of the network have openly shared their personal experiences in the workplace and have helped us to develop a number of recommendations which we believe will have a positive impact. Our highlights last year include having Baroness Ruby McGregor-Smith talk to us about race in the workplace, our lunchtime movie session showing how representation and portrayal of ethnic minority people has changed over time and Sharon's inspirational talk to students at her former school.

**Ian Vaughan, chair of Raising Awareness of Culture and Ethnicity (RACE), Corporate Services Group**



Chairing the Affinity Network has been a great opportunity to get involved in shaping Ofcom's work on diversity and inclusion, and I'm really proud of what we've been able to achieve as a network. Our biggest single achievement has to be leaping 50 places up the Stonewall Workplace Equality Index in 2018, and getting Ofcom recognised as one of the top 150 LGBT-friendly employers for the first time. That's a great reflection on the work we've been doing, including a talk on the development of marriage equality in the UK and raising money for LGBT youth homelessness charity the Albert Kennedy Trust. We're looking forward to continuing to help shape Ofcom's work on LGBT inclusion in the years to come.

**Sam Ruiz, chair of the Affinity Network, Spectrum Group**



In 2017 Ofcom's Disability and Wellbeing Group, together with our HR team, began a review of Ofcom's disability and wellbeing policy and practices. Recommendations arising from the review will help Ofcom to become a Disability Confident Leader<sup>1</sup>. We also supported a disability access audit of Ofcom's buildings and physical work spaces. Alongside these reviews, we continued our rolling programme of events, learning and colleague communications to raise awareness and break down stigma. We support colleagues and champion disability and wellbeing issues from the grass roots up, and members have led their own wellbeing initiatives such as Knit and Natter, and mindfulness and yoga sessions. We're excited to see more of these!

**Hannah Priest, chair of Disability and Wellbeing Group, Competition Group**

<sup>1</sup> Disability Confident is a scheme that is designed to help organisations recruit and retain disabled people and people with health conditions for their skills and talent. The Disability Confident scheme is voluntary and was developed by employers and disabled people's representatives. The three levels are: Disability Confident Committed (level 1); Disability Confident Employer (level 2) and Disability Confident Leader (level 3). The scheme is voluntary and is run by the government

<https://www.gov.uk/government/publications/disability-confident-guidance-for-levels-1-2-and-3>

# Summary of our Diversity and Inclusion Plan 2018-2022

Our Diversity and Inclusion Programme for 2018-2022 has three main objectives. They cover our role as an employer and the UK's communications regulator.

Each objective has a comprehensive set of actions. They cover the make-up of our staff, the way that we work and the work that we do to make communications work for everyone. Our objectives are to:

- **Build a diverse and inclusive workforce to better reflect the UK population we serve;**
- **Ensure diversity and inclusion are central to our work practices and culture so everyone understands, supports and is accountable for diversity; and**
- **Ensure the different needs and interests of all individuals are considered when carrying out our regulatory work.**

Our action plan is intended to be flexible, and we will continue to review, adapt and add to it as we develop new initiatives and as new recommended practices are put forward by the advisory bodies with whom we work. We will report on our progress externally each year to 2022.

A summary of some of our key actions are explained below. The full list of our actions in section 3 sets out what we want to achieve, and how and when we will achieve them.

## Ofcom as an employer

### Build a diverse and inclusive workforce to better reflect the UK population that we serve.

It is important that our workforce reflects and is representative of the communities that we serve. Having a mix of diverse backgrounds and life experiences increases and widens our thinking, ideas and viewpoints to shape the policies and decisions that we make for the benefit of consumers and businesses who use services in our sectors.

#### Making the diversity of our workforce stronger

- a. Diversity workforce targets: We will continue to work towards the gender and ethnicity workforce targets we set ourselves three years ago, by 2020<sup>1</sup>. These are to have a 50% gender balance across Ofcom, for women colleagues to make up at least 40% of colleagues at a

senior level and for 13% of colleagues at a senior level<sup>2</sup> to be from a black, Asian or ethnic minority background.

- b. We will decide whether to set new diversity workforce targets on sexual orientation, disability, social mobility and religion during 2019/2020. Before then, our efforts will focus on capturing more internal data around these diversity characteristics including, for the first time, on socio-economic background<sup>3</sup>; strengthening our working culture and processes to further drive inclusion; and getting colleagues to be even more engaged with the issue of diversity and why it matters to Ofcom.

1 We will continue to work towards the gender and ethnicity workforce targets we set ourselves three years ago, by 2020. These are to have a 50% gender balance across Ofcom, for women colleagues to make up at least 40% of colleagues at a senior level and for 13% of colleagues at a senior level to be from a black, Asian or ethnic minority background

2 Colleagues at senior level are those who are Principals and Senior Managers and Specialists. They currently make up 25% of all Ofcom colleagues.

3 We introduced questions around socio-economic background for the first time in our annual colleague survey. Our survey captures how colleagues feel about a number of areas, to help us assess their engagement with us. We are working with external partners to help us measure social mobility as well as making it consistent with the broadcast and other industries, as we tackle the same issues. We want to reinforce our position as an inclusive employer that welcomes colleagues from all backgrounds and this step will help us to better understand our organisation's profile.

- c. Regular monitoring and reporting: We will continue to monitor and report on the diversity of our workforce and the impact our policies and processes have on colleagues who meet one or more of the diversity characteristics<sup>1</sup>. We are currently developing an internal reporting tool so that we can better monitor the make-up of individual teams. We are reviewing how to best report the data on colleague progression and performance, in a consistent, open and appropriate way.
- d. More comprehensive diversity data: We will further encourage colleagues to provide us with all their diversity information. This will be supported by an internal campaign to explain the importance of collecting diversity information.
- e. Ensuring we are disability confident in all we do: We are already a Disability Confident Employer 2. To build on this, we will provide mandatory disability awareness training for all colleagues, including line managers; introduce a system for recording disability-related absence; and make sure our recruitment, development and performance-management processes account for appropriate adjustments.

## Recruitment

We will put in place new recruitment and selection practices to attract talented people from diverse backgrounds:

- a. Further promoting ourselves as an inclusive employer: we will use a wider range of advertising platforms such as specialist press and websites and work with our recruitment partners to attract more under-represented groups. To make it clear that we welcome flexible working, we will change the working hours on all our job adverts from 'full time' to 'flexible'.
- b. Ensuring diversity in our interview panels and shortlisted candidates for all posts, for example by having a gender mix and ethnic minority

representation wherever possible.

- c. Reviewing the diversity of candidates before moving on to each stage of the recruitment process, from shortlisting applicants through to interviews and before final appointment.
- d. Introducing a returnship programme. A returnship programme offers paid internships alongside external coaching for people who are returning from an extended career break.
- e. For newly recruited disabled colleagues, we will ensure workplace adjustment agreements<sup>3</sup> are put in place in a timely way and recorded.
- f. We will continue to work with the Institution of Engineering and Technology (IET) to promote careers for women in engineering and to raise awareness about engineering roles at Ofcom.
- g. We are increasing our commitment to apprenticeships and internships to promote career opportunities, help social mobility, and to create a more diverse talent pool for the future. We plan to expand our apprenticeship scheme to offer a broader range of opportunities across our organisation and to pilot a new work placement and work experience scheme for secondary school children from diverse backgrounds.



<sup>1</sup> Our annual reports around diversity and inclusion at Ofcom can be found here

<https://www.ofcom.org.uk/about-ofcom/what-is-ofcom/corporate-responsibility/diversity-and-equality>

<sup>2</sup> Disability Confident is a scheme that is designed to help organisations recruit and retain disabled people and people with health conditions for their skills and talent. The Disability Confident scheme is voluntary and was developed by employers and disabled people's representatives.

The three levels are: Disability Confident Committed (level 1); Disability Confident Employer (level 2) and Disability Confident Leader (level 3). The scheme is voluntary and is run by the government

<https://www.gov.uk/government/publications/disability-confident-guidance-for-levels-1-2-and-3>

<sup>3</sup> Workplace adjustments are there to make sure workers with disabilities, or physical or mental health conditions, aren't substantially disadvantaged when doing their jobs. Examples include changing or providing adapted equipment such as a keyboard for people with arthritis or adjustable desks for people with medical back problems, allowing employees who become disabled (physically or mentally) to make a phased return to work, including flexible hours or part-time working.

## Ofcom as an employer

**Ensure diversity and inclusion are central to our work practices and culture so everyone understands, supports and is accountable.**

### **Empowering colleagues to succeed:**

To make sure our colleagues are empowered to succeed whatever their background we will support them in the following ways:

#### **Colleague development:**

We will be open and transparent about the routes to career progression and development. We will enhance leadership and management capability across the organisation with a focus on developing colleagues from under-represented groups into management and leadership positions.

- a. We will roll out our Future Leaders Programme<sup>1</sup> and monitor its effectiveness in developing colleagues from diverse groups.
- b. We will introduce a reciprocal mentoring programme where senior leaders are encouraged to pair with colleagues from diverse backgrounds who are in more junior roles. This will help senior leaders to better understand the positive impact that diversity has on our organisation, while more junior colleagues will have the opportunity to exchange skills and learnings with senior colleagues.
- c. We plan to roll out a role-modelling scheme to support women at Ofcom to maximise their potential. This will give our female colleagues the opportunity to explore a range of topics with Ofcom's role models.

#### **Pay:**

We will continue to ensure we have a fair and transparent approach to determining pay. We will monitor and address any unjustifiable pay gaps between colleagues. We will also continue to look at how performance bonuses and management rewards are distributed among colleagues. Our gender and ethnicity pay audits will continue to be published externally and communicated internally.

### **Disability and accessibility:**

We will make our work spaces in all our offices as accessible as possible for all colleagues and visitors. We are undertaking workplace access, diversity and inclusion audits of our buildings and will take action where appropriate. With the input of disabled colleagues and working with the Business Disability Forum, we will complete a disability and wellbeing review of our systems and processes.

### **Nurturing our diversity networks:**

Our thriving colleague networks take a leading role in our diversity work. We will continue to support these networks, all of which are open to all colleagues to join and support<sup>2</sup>. They provide support for colleagues, organise awareness-raising events and influence change by developing and delivering aspects of our diversity and inclusion agenda.

### **Strengthening our leadership and accountability:**

It is vital that our diversity and inclusion plan is driven from the top. Our Chief Executive, Sharon White, is leading the diversity and inclusion agenda across our organisation.

### **Governance and responsibility:**

Each of our senior management team is responsible for championing a diverse and accepting workplace culture and represents each of the protected characteristics<sup>3</sup>. Our Corporate Responsibility Steering Group<sup>4</sup>, made up of senior leaders, meets every month to share best practice and track progress against our plan. We will report every six months on progress to our Policy Management Board using a range of performance measures, as well as providing regular updates to all colleagues. The Ofcom Board holds overall responsibility and accountability for our Diversity and Inclusion programme, and our progress against it.

1 The programme is open to all levels from Administrator to Principal levels in a competitive process.

2 Ofcom Women's Network, Parents and Carers Network, Affinity Network for LGBT colleagues and allies, Raising Awareness of Culture and Ethnicity Network, Disability and Wellbeing Network and the Listening Network.

3 Our senior management diversity champions cover gender, ethnicity, sexual orientation, disability, age, religion and belief and parents and carers.

4 Annex 2 outlines our Corporate Responsibility work.

### **Accountability:**

We will make sure that our diversity and inclusion priorities are reflected in the annual measurable objectives of all people managers and senior leaders. They will be supported by mandatory diversity and inclusion training, including on disability and workplace adjustments, along with mandatory unconscious bias<sup>1</sup> training and an assessment of their unconscious bias. On top of this, online unconscious bias training will be made compulsory for all colleagues at least every twelve months.

- a. Diversity checks<sup>2</sup> will be built into performance discussions and moderation at end-of-year appraisals. Line managers and colleagues

chairing moderation sessions must undertake online unconscious bias refresher training.

- b. We will seek external benchmarking on diversity measures such as the Business Disability Forum's Disability Standard, Stonewall Workplace Equality Index (sexual orientation), Business in the Community's Opportunity Now (gender) and Race for Opportunity (ethnicity) and Social Mobility Foundation's Social Mobility Employer Index.

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1 Unconscious bias happens when our brains make quick judgements and assessments of people and situations without us realising it. Our biases are influenced by our background, cultural environment and personal experiences and what we read, hear or see from others or the media. In practice unconscious bias happens when people favour others who look like them and/or share their values or background. When biases cover any of the protected characteristics- age, disability, gender, gender identity (the wording in the Equality Act 2010 is gender reassignment), ethnicity, sexual orientation, religion or belief, marriage or civil partnerships, pregnancy and maternity – it can be discriminatory. Unconscious bias in the workplace can influence decisions in recruitment, promotion, staff development and recognition and can lead to a less diverse workforce and where talented people can be overlooked.

2 To guard against unconscious bias, an HR representative will review the spread of proposed performance ratings across diversity groups by inputting the data live during the management meeting as a check and balance to help moderate the ratings.

## **Ofcom as a regulator**

### **Ensure the different needs and interests of all individuals are considered when carrying out our regulatory work**

We recognise the importance of our external work in meeting the needs of a diverse society and so will focus on:

#### **Protecting vulnerable consumers:**

We aim to ensure all consumers do not face sharp practices and that we protect vulnerable people<sup>1</sup> from specific harms. We also ensure disabled and vulnerable consumers receive the additional support services to which they are entitled<sup>2</sup>. We monitor, through complaints and liaison with industry, how these services are provided and publicised. In October 2018 an additional, broader requirement for communications providers will come into force, to ensure the fair treatment of vulnerable consumers, along with new protections for mobile and broadband consumers in debt. We will work to ensure providers' policies and procedures are updated to fully comply with the new rules.

#### **Monitoring outcomes for vulnerable consumers:**

First published in 2017<sup>3</sup>, we will publish an updated access and inclusion report in 2019, looking at outcomes for consumers in vulnerable circumstances in the sectors we regulate – broadband, phones, television and postal services.

#### **Protecting consumers as voice services evolve:**

The way in which consumers use voice services will change substantially over the next decade. Traditional corded telephones are being replaced by new types of telephone (wireless handsets, devices which enable telephone calls over broadband), copper exchange lines are being replaced by fibre and mobile is now established as consumers' medium of choice for voice services. Ofcom will ensure vulnerable consumers are assisted and protected by communications providers as they migrate to these new services.

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1 Different circumstances may make people vulnerable, for example people with learning or communication difficulties or those suffering physical or mental illness or bereavement may be vulnerable.

2 Examples include having priority to have faults repaired, bills in accessible formats and having a nominated person to manage accounts for a vulnerable person.

3 <https://www.ofcom.org.uk/research-and-data/multi-sector-research/accessibility-research/access-and-inclusion>

**Promoting the availability of easy-to-use technology and accessibility of audio-visual services:**

Our programme recognises the importance of promoting the availability of easy-to-use technology. This includes working with industry to improve the performance of assisted listening devices to help those with hearing disabilities<sup>1</sup>, improving radio equipment specifications and making them less susceptible to interference, and working to improve the accessibility features of the electronic programme guide and working with stakeholders to support the continued improvement in the quality of live subtitles. We will continue to publish and maintain web resources about the usability of telecoms equipment and work with others to increase knowledge and good practice by, for example, taking part in research and events.

**Ensuring vulnerable consumers can access a basic universal postal service:**

Our current regulation, which provides price protection for second-class universal postal services, is due to expire in March 2019. We plan to review what price protection vulnerable consumers might need after this date.

1 Assisted Listening devices amplify sound and bring them directly into the ear. Devices include headphones, wireless TV listeners and induction loops.

2 Community radio stations usually cover a small geographical area and are run on a not-for-profit basis involving volunteers from the communities or interest groups that they serve. Community radio stations reflect a diverse mix of cultures and interests. For example, those that cater for urban or experimental music, or are aimed at younger people, religious communities or the Armed Forces and their families.

**Strengthening diversity and inclusion in broadcasting:**

We recognise that audiences expect programmes that reflect their lives and the diverse communities across all of the UK. We will work with television and radio broadcasters to improve the diversity of people working on and off screen and air, to better represent and portray modern life across the UK. We will also continue to license a range of restricted services and invite applications for community radio<sup>2</sup> to ensure services continue to serve a range of audiences. Furthermore, as the independent and external regulator of the BBC, we will monitor how the BBC fulfils its mission and public purposes to reflect, represent and serve all the diverse communities of all the UK's nations and regions.

**Ensuring our publications and external communications are accessible to all:**

We will continue to produce and publish content and communications that are clear, easy to understand and accessible to people with learning and other disabilities.



# Our full Diversity and Inclusion Programme 2018-2022

For ease of reference, this section contains each of our headline actions summarised as a list. Clicking on any of the objectives will take you to the detail in the table of all our actions.

## Ofcom as an employer

### **Build a diverse and inclusive workforce to better reflect the UK population that we serve**

1. Strengthen the diversity of our workforce: work towards our targets and take positive steps to attract colleagues from under-represented groups
2. Strengthen our approach to recruitment
3. Regular assessment and reporting on the diversity of our workforce and improve the quality of our diversity data

### **Ensure diversity and inclusion are central to our work practices and culture so that everyone understands, supports and is accountable for diversity**

4. Empower colleagues to succeed
5. Ensure a fair and transparent pay structure
6. Strengthen leadership accountability to champion a diverse and inclusive culture
7. Continue to benchmark ourselves against leading employers
8. Improve the accessibility of our premises and our processes for disabled colleagues and focus on wellbeing and mental health
9. Set targets to improve our colleague engagement scores and inclusivity measures across all groups of colleagues
10. Consider and reflect our equality objectives in our procurement practices
11. Support and nurture our colleague diversity networks
12. Promote LGBT inclusion



## Ofcom as a regulator

### Ensure the different needs and interests of all individuals are considered when carrying out our regulatory work

1. Protect vulnerable consumers
2. Promote the availability of easy-to-use technology and accessibility of audio-visual services
3. Consider the impact of our proposed policies on diverse groups as part of our policy development
4. Strengthen diversity and inclusion in broadcasting
5. License radio stations serving diverse audiences
6. Enforce our rules on harmful and/or offensive broadcast content, including potentially offensive material on the grounds of a protected characteristic
7. Monitor appropriate conditions for requiring the BBC to promote the fourth public purpose, which is to reflect, represent and serve the diverse communities of all of the UK's nations and regions
8. Consider how the public service broadcasting (PSB) system reflects the diversity of the UK, its cultural identity, and represents alternative points of view
9. Review Channel 4 Corporation's (C4C) delivery Corporation's (C4C) delivery of its media content duties across its services, including assessing its appeal to a wide variety of audiences and how it informs and motivates UK viewers
10. Review our made outside London programme-making guidance
11. Conduct consumer research and share the findings
12. Engage with consumer groups to understand consumer concerns consumer groups to understand consumer concerns and interests and explain the likely impact of our work
13. Promote diversity in our external engagements
14. Support people appropriately when they contact Ofcom
15. Ensure our publications and external communications are accessible to all
16. Publish a revised Northern Ireland Equality Scheme



## Table of all actions

### Ofcom as an employer

**Build a diverse and inclusive workforce to better reflect the UK population that we serve.**

How we will do it	When we will do it
<b>1. Strengthen the diversity of our workforce: work towards our targets and take positive steps to attract colleagues from under-represented groups</b>	
Continue to work towards our diversity targets <sup>1</sup> : <ul style="list-style-type: none"> <li>• a 50:50 gender balance across all colleagues;</li> <li>• 40% female representation at a senior level<sup>2</sup>; and</li> <li>• 13% black, Asian and minority ethnic colleague representation at a senior level.</li> </ul>	By 2020
Evaluate and decide on whether to set new diversity targets on sexual orientation, disability, social mobility and religion.	2019/2020
Develop a returnships <sup>3</sup> programme to attract people with professional skills and experience who have had time away from the workplace. This includes parents or guardians who may have taken time off to raise or care for children, people with other caring responsibilities or people who have taken a career break and who may value a supported return to work.	2018/2019
Widen pathways into the organisation by broadening the base from which we recruit to our graduate programme and increase our commitment to apprenticeships and internships to promote career opportunities, help social mobility and to create a more diverse talent pool for the future. Pilot a new work placement and work experience scheme to open up opportunities for secondary school children from diverse backgrounds.	2018/2019
2018 is the year of engineering. We will continue to promote careers for women in engineering, working with the Institution of Engineering and Technology (IET); we will raise awareness of our engineering roles and how engineering at Ofcom helps make communications work for everyone. As an employer with a significant engineering workforce we will define our strategy to promote diversity in this area, starting with understanding the diversity profile of our engineering workforce.	2018/2019
<b>2. Strengthen our approach to recruitment</b>	
Partner with our recruitment consultants so they are aware of our approach to diversity and inclusion and help to attract a more diverse range of applicants.	Ongoing
Promote Ofcom as an inclusive employer and use a wider range of advertising platforms such as specialist press and websites to reach under-represented groups, including the base from which we appoint to our boards and committees.	2018 /2019
Change the working hours on all our job adverts from 'full time' to 'flexible' to make it clear that we offer flexible working.	2018 /2019

1 When setting our targets, we took into consideration the profile of the UK workforce, the profile of our organisation and the level of staff turnover to set ourselves stretching, but achievable targets.

2 Colleagues at senior level refers to those who are Principals, Senior Managers and Specialists, which currently make up 25% of all Ofcom colleagues.

3 A Returnship programme offers paid internships alongside external coaching for people who are returning from an extended career break. It can be used to attract professional women (and sometimes men) at mid to senior levels. Returners can include women, parents, guardians and carers who may value a supported return to work.

How we will do it	When we will do it
<b>2. Strengthen our approach to recruitment (continued)</b>	
Ensure diversity in interview panels and shortlisted candidates for all externally advertised posts, including those for our graduate recruitment programme and senior positions, for example by having a gender mix and including more under-represented groups such as ethnic minority representation, where possible. We will apply the same principles of diverse shortlists and interview panels for internal progression including secondment opportunities, promotions and leadership development programmes, such as our Future Leaders initiative.	2018 /2019
Consider the diversity of candidates at each stage of recruitment from shortlisting applicants for interview, initial interview, second interview and assessment panels through to final appointment. This will help us identify whether any groups are being unfairly excluded and develop further actions to address any issues we find.	2018/2019
Recruiting managers, including those taking part in internal recruitment such as for secondments or leadership programmes must undertake refresher online unconscious bias training (including an assessment of an individual’s biases) not more than 12 months before taking part in any recruitment activity.	2018/2019
Ensure workplace adjustment agreements are in place for all existing and newly-appointed disabled colleagues and ensure workplace adjustments are consistently made in a timely way, with effective record-keeping and monitoring.	2018/2019
Take further steps to ensure that our internal and external recruitment and promotion processes are accessible to disabled applicants as part of our goal to become a Disability Confident Leader <sup>1</sup> . This includes an audit of our online recruitment system.	2018/2019
<b>3. Regular assessment and reporting: continue to measure on the diversity of our workforce and improve the standard and quality of our diversity data</b>	
Monitor and publish annually our progress against our diversity targets and the impact of our processes and policies on colleagues who meet one or more of the diversity characteristics.	Annually
Develop an internal tool to monitor the diversity of individual groups and teams. Review how we report the data on colleague progression and performance across Ofcom in a consistent, open and appropriate way.	2018/2019
Continue to encourage colleagues to provide us with diversity information, including a new initiative to collect information on socio-economic background to help us to understand our colleague diversity profile. We have started, and will continue, an internal communications campaign to achieve this.	2018/2019
Review and monitor the diversity profile of the executive and non-executive members of our boards, panels and committees.	2018/2019
Make recruitment consultants aware of our approach to diversity and inclusion and work with them to improve the quality of our information on diversity.	Ongoing

<sup>1</sup> Disability Confident is a scheme that is designed to help organisations recruit and retain disabled people and people with health conditions for their skills and talent. The Disability Confident scheme was developed by employers and disabled people’s representatives. The three levels are: Disability Confident Committed (level 1); Disability Confident Employer (level 2) and Disability Confident Leader (level 3). The scheme is voluntary. <https://www.gov.uk/government/publications/disability-confident-guidance-for-levels-1-2-and-3>

## Ofcom as an employer

**Ensure diversity and inclusion are central to our work practices and culture so that everyone understands, supports and is accountable for diversity.**

How we will do it	When we will do it
<b>4. Empower colleagues to succeed</b>	
Empower all colleagues to get the most out of development opportunities by being open about the routes to career development and progression such as internal and external secondment opportunities, acquiring or building on specialist skills and continuing professional development.	2018/2019
We will roll out our Future Leaders programme to enhance leadership and management capability across the organisation. The rolling annual programme, available to all colleagues from Administrator to Principal grade, is open to a competitive process. We will review the effectiveness of the initiative in attracting and developing colleagues from diverse groups that are currently underrepresented at senior and leadership level.	2018/2019
Start an initiative where colleagues are matched to projects based on personal career ambitions and development needs.	2018/2019
Introduce a reciprocal mentoring scheme where senior colleagues are encouraged to seek out mentoring opportunities with colleagues from diverse backgrounds who are in more junior roles. The emphasis is on an exchange of learning, in which senior managers and leaders can better understand the positive impact of diversity at Ofcom while more junior colleagues are able to benefit from the support, skills and learning offered by senior colleagues.	2019/2020
Our Women's Network will launch a role-model programme giving colleagues the opportunity to explore a range of topics with Ofcom's role models.	2018/2019
Offer colleagues at all levels the opportunity to be coached or mentored, or to become a mentor or to gain formal accreditation as an internal coach.	Ongoing
Ensure our performance and development processes take full account of workplace adjustments for disabled colleagues.	2018/2019
Further equip line managers with the skills and tools to have good quality conversations with colleagues about career development and progression.	2018/2019
<b>5. Ensure a fair and transparent pay structure</b>	
Carry out an annual equal and fair pay audit covering both gender and ethnicity across the organisation. We will publish a summary of our findings and any proposed actions externally and share results internally.	Annually
Monitor and address any unjustifiable pay gaps between colleagues and review and monitor how performance bonuses and management rewards are distributed among colleagues.	Annually
Use the findings to develop an action plan aimed at closing any unjustifiable pay gaps.	Annually

How we will do it	When we will do it
<b>6. Strengthen leadership accountability to champion a diverse and inclusive culture</b>	
Introduce, and measure performance against, diversity and inclusion priorities in the annual objectives of all people managers and senior leaders including new joiners and newly promoted colleagues. Ensure they are supported by mandatory diversity and inclusion training, including on disability and workplace adjustments.	Ongoing
Ensure all current, new and newly-promoted people managers, recruiters, and senior leaders are trained about unconscious bias and that they assess their own unconscious bias.	Ongoing
Ensure diversity checks <sup>1</sup> are built into colleague performance discussions and moderation. Colleagues involved in performance assessments and moderation must undertake unconscious bias refresher training.	Ongoing
Equip line managers to support staff going on and returning from maternity, paternity, shared parental and adoption leave.	2018/2019
Make online unconscious bias training mandatory for all colleagues at all levels, to be undertaken at least every 12 months.	2018 onwards
<b>7. Continue to benchmark ourselves against leading employers</b>	
Continue to participate in external benchmarking to continuously improve and develop our working practices:	
<ul style="list-style-type: none"> <li>• Stonewall Workplace Equality Index (sexual orientation)</li> </ul>	Annually
<ul style="list-style-type: none"> <li>• Social Mobility Foundation’s Social Mobility Employer Index</li> </ul>	Annually
<ul style="list-style-type: none"> <li>• Business Disability Forum’s Disability Standard</li> </ul>	Every two years
<ul style="list-style-type: none"> <li>• Business in the Community (BITC) Opportunity Now (gender)</li> </ul>	Every two years
<ul style="list-style-type: none"> <li>• BITC Race for Opportunity (ethnicity)</li> </ul>	Every two years
The findings and recommendations will inform our individual gender, ethnicity, sexual orientation and disability and wellbeing action plans.	

<sup>1</sup> To guard against unconscious bias, an HR representative will review the spread of proposed performance ratings across diversity groups by inputting the data live during the management meeting as a check and balance to help moderate the ratings.



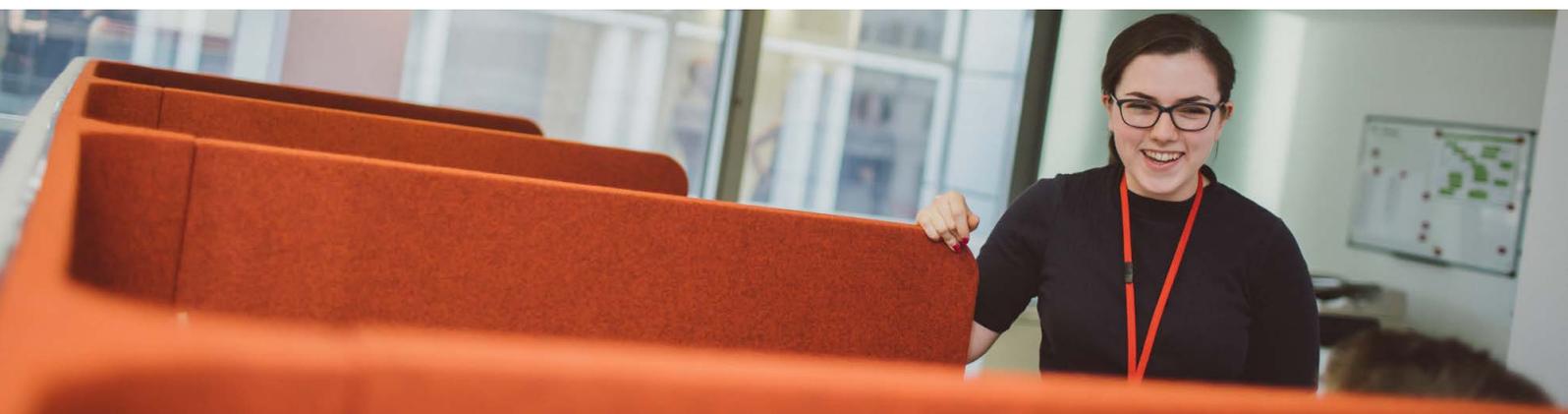
How we will do it	When we will do it
<b>8. Improve the accessibility of our premises and our processes for disabled colleagues and focus on wellbeing and mental health</b>	
Roll out mandatory disability training to all colleagues.	2018/2019
Ensure our facilities are accessible to all colleagues:	
<ul style="list-style-type: none"> <li>Audit our working environment plans for accessibility before rolling out full agile working<sup>1</sup> changes to our premises, including undertaking accessibility audits of our buildings;</li> </ul>	2018/2019
<ul style="list-style-type: none"> <li>Determine what accessibility recommendations we will implement, with a view to exceeding our legal obligations in providing accessibility for all. We will also track the implementation of agreed recommendations;</li> </ul>	2018/2019
<ul style="list-style-type: none"> <li>Update our workplace adjustments policy to reflect the move to agile working and improve record-keeping and monitoring, training colleagues on it and encouraging effective use of the process.</li> </ul>	2018/2019
Upgrade and build our internal information pages on disability and wellbeing and promote their use.	2018/2019
Act on feedback from colleagues and a Business Disability Forum engagement review of our policies and processes and the experiences of colleagues around disability and wellbeing.	2018/2019
Build on our Disability Confident Employer status (level 2) to become a Disability Confident Leader employer (level 3).	2019/2020
Sign up to the Business Disability Forum’s Accessible Technology Charter. This sets out ten commitments to good practice on ICT accessibility as part of an organisation’s ICT strategy, including executive sponsorship, and developing and buying accessible ICT systems.	2018/2019
Promote knowledge and understanding of accessibility options available within our information communications (ICT) systems and devices to all colleagues.	2018/2019
Ensure requests for workplace adjustments are formally recorded and centrally logged so we can better understand trends and speed of response.	2018/2019
Introduce a system to separately record disability-related absence.	2018/2019
Ensure our recruitment, development and performance appraisal processes make appropriate allowance for workplace adjustments.	Ongoing
Ensure line managers feel confident having disability-friendly and wellbeing conversations.	Ongoing
Continue to make resilience training available to all colleagues and mandatory for all people managers. We will also continue to promote our colleague-run Listening Network, which enables colleagues to have a confidential, non-judgmental chat with peers.	Ongoing

<sup>1</sup> We are currently transforming our offices so that we meet the needs of all colleagues and shape the way we work together in three key areas. i) People: the transformation supports our greater emphasis on colleagues working with other teams and groups, working in different locations and generally allowing colleagues to work in more flexible ways. ii) Place: making the best use of our space to provide stimulating, collaborative and adaptable working zones and areas and iii) Technology: investing in new, more flexible technology to enable us to work together more effectively. For example, our upgraded video conference facilities allow us to better interact with each other, no matter where colleagues are located.

How we will do it	When we will do it
<b>9. Set targets to improve our colleague engagement scores and inclusivity measures across all groups of colleagues</b>	
Use colleague survey results to help develop action plans and internal targets for increasing colleague satisfaction across the organisation	2018/2019
<b>10. Consider and reflect our equality objectives in our procurement practices</b>	
Continue to include supplier diversity assessments as part of our procurement procedures, engage with our suppliers on diversity issues and be clear on our expectations in this area.	Ongoing
<b>11. Support and nurture our colleague diversity networks</b>	
Continue to encourage colleagues to take an active part in our diversity and wellbeing networks <sup>1</sup> . The networks will be given time and resources to enable them to own diversity work plans, lead on specific initiatives and to drive forward the diversity and inclusion agenda, working with our HR colleagues.	Ongoing
Promote the existence and activities of our diversity networks and groups on our website.	Ongoing
Inform new recruits about our colleague networks and other support mechanisms <sup>2</sup> as part of their induction.	2018/2019
Provide our boards, committees and panels with opportunities to be involved in our diversity events led by our networks, as well other Ofcom-wide ones.	2018/2019
<b>12. Promote LGBT inclusion</b>	
Conduct regular reviews of HR policies to ensure these do not inadvertently discriminate on the basis of sexual orientation or gender identity, taking into account best practice advice from other organisations or advisory groups where appropriate.	2018/2019
Introduce specific policies to support transgender colleagues at work, including on transitioning at work.	2018/2019
Revisit existing coverage of LGBT issues in mandatory diversity training and unconscious bias training.	2018/2019
Follow best practice in monitoring trans and non-binary colleagues.	2018/2019

1 Our colleague networks are: the Ofcom Women’s Network, Parents and Carers Network, Affinity Network (supporting LGBT colleagues and allies), Raising Awareness of Culture and Ethnicity (RACE) Network, the Disability and Wellbeing online network, supported by the Disability and Wellbeing Group and our Listening Network (offering informal peer support to all colleagues).

2 These include our colleague-run Listening Network, where colleagues can have a confidential, non-judgmental chat on any wellbeing issues, our free employee support line where colleagues can access counsellors and medical professionals as well as get confidential advice and treatment for specific mental health concerns such as anxiety, stress or depression, and our wider HR policies.



## Ofcom as a regulator

**Ensure the different needs and interests of all individuals are considered when carrying out our regulatory work**

How we will do it	When we will do it
<b>1. Protect vulnerable consumers</b>	
Monitor how well the communications sector is meeting the needs of vulnerable consumers and ensure these customers have access to the additional services to which they are entitled <sup>1</sup> . We will do this through research, monitoring complaints and liaison with industry and stakeholder groups, including monitoring how the provision of the additional services is publicised.	Ongoing
Ensure that providers’ policies and procedures to protect disabled and vulnerable consumers are updated to comply with new Ofcom rules which come into force in October 2018.	2018/2019
Publish an updated access and inclusion report looking at outcomes for consumers in vulnerable circumstances in the sectors we regulate – broadband, phones, television and postal services.	2018/2019
Work with industry to improve the performance of equipment that uses radio waves, such as devices that amplify sound for people who are hard of hearing (known as assisted listening devices), to make them less susceptible to interference <sup>2</sup> .	2018/2019
Our current rules, which provide price protection for second-class universal post, will expire in March 2019. We plan to review what price protection measures vulnerable consumers might need after March 2019.	2018/2019
Ensure that vulnerable consumers are assisted and protected by communications providers as voice services such as the traditional telephone handsets are replaced by new technology such as wireless handsets, mobile phones and devices which enable telephone calls over broadband, and as copper exchange lines are being replaced by fibre.	Ongoing
<b>2. Promote the availability of easy-to-use technology and accessibility of audio-visual services</b>	
<p>We will work with a number of stakeholders including:</p> <ul style="list-style-type: none"> <li>• electronic programme guide (EPG) providers on improving accessibility features of EPGs for blind and visually impaired people, including text-to-speech functionality;</li> <li>• broadcasters, access services providers and groups representing the interests of access service users, to support the continued improvement of the quality of live subtitles, and to support a drive to increase consumer awareness of audio description;</li> <li>• industry and other groups, such as the Digital Production Partnership, to improve the audibility of dialogue on TV programmes, seeking to understand and address the causes of poor audibility, improve specifications and check on how products conform; and</li> <li>• government and stakeholders to ensure that regulations around accessibility of on-demand services are effective and result in measurable progress. When regulations have been finalised by Government, we will then draft, consult on and enforce a new code for the provision of accessible on-demand services.</li> </ul>	Ongoing
Work with industry on technical standards to promote assistive technologies in mobile handsets and other portable/mobile devices and publish information on developments in this area because of our actions.	Ongoing

1 Factors and circumstances that can make consumers vulnerable include age, disability, income, geographical location, and life events such as illness or bereavement.

2 Additional services to which vulnerable consumers are entitled to include priority fault repair, Next Generation Text Service (was text relay), free

How we will do it	When we will do it
<b>2. Promote the availability of easy-to-use technology and accessibility of audio-visual services (continued)</b>	
Publish and maintain information on the usability of telecoms equipment and work with others to increase knowledge and good practice.	Ongoing
<b>3. Consider the impact of our proposed policies on diverse groups as part of our policy development</b>	
Continue to ensure mechanisms are in place to challenge policy proposals on equality issues, including seeking input from consumer stakeholder bodies such as Age UK <sup>1</sup> .	Ongoing
Conduct and monitor equality impact assessments for all policy projects.	Ongoing
<b>4. Strengthen diversity and inclusion in broadcasting</b>	
<p>Audiences expect to see and hear programmes that reflect modern life across the UK and we will continue to build on our Diversity in Broadcasting programme of work. We will:</p> <ul style="list-style-type: none"> <li>• run the monitoring programme across the television broadcasters we regulate and publish our findings on an annual basis. We will look to develop the monitoring programme further to identify how data provision can be made easier and explore what new data can be provided, such as the social, geographical or educational background of employees;</li> <li>• launch the monitoring programme across the radio industry and publish the first annual report in 2018;</li> <li>• engage with those broadcasters who we consider have inadequate arrangements, to develop these;</li> <li>• take enforcement action against broadcasters who fail to provide information about the make-up of their workforce; and</li> <li>• encourage a strong industry-wide diversity and inclusion standard by encouraging broadcasters to work together, sharing initiatives and best practice.</li> </ul>	Ongoing
<b>5. License radio stations serving diverse audiences</b>	
<p>To encourage the radio sector to serve a diverse range of audiences we will continue to:</p> <ul style="list-style-type: none"> <li>• invite applications for community radio and ensure the licence decision process takes account of diversity issues where relevant and appropriate;</li> <li>• license restricted services, providing access to the broadcast platform to cover events, including a variety of religious festivals; and</li> <li>• ensure the licence decision process takes account of diversity issues.</li> </ul>	2018 onwards
<b>6. Enforce our rules on harmful and/or offensive broadcast content, including potentially offensive material on the grounds of a protected characteristic</b>	
<p>We will continue to:</p> <ul style="list-style-type: none"> <li>• seek a wide range of views when assessing broadcast complaints to ensure we consider the different needs and interests of audiences;</li> <li>• anonymise complaints before they are discussed in assessment meetings to remove the risk of any potential unconscious bias;</li> <li>• ensure all enforcement staff receive unconscious bias training;</li> <li>• protect audiences from harm from flashing images by requiring broadcasters to take precautions to maintain a low level of risk to viewers with photosensitive epilepsy; and</li> <li>• take account of our published research on offensive language.</li> </ul>	Ongoing

<sup>1</sup> We have removed the word “governance” before “mechanisms” and “advisory” to “stakeholder” compared to the consultation due to a drafting error.

How we will do it	When we will do it
<p><b>7. Monitor appropriate conditions for requiring the BBC to promote the fourth public purpose, which is to reflect, represent and serve the diverse communities of all of the UK’s nations and regions</b></p>	
<p>Under the BBC’s licence conditions, we require the BBC to:</p> <ul style="list-style-type: none"> <li>• report annually on how the UK public services have reflected, represented and served the diverse communities of the whole of the UK;</li> <li>• report annually on audience satisfaction in this respect;</li> <li>• report annually on the diversity profile of the UK public services workforce; and</li> <li>• have an Ofcom-approved diversity commissioning code of practice to cover on-screen portrayal and casting and workforce diversity.</li> </ul>	<p>The Operating Licence came into force on 1 January 2018, with some requirements applying from 1 April 2018.</p>
<p>We will do the following:</p> <ul style="list-style-type: none"> <li>• Report annually against performance measures on the BBC’s promotion of its public purpose on the diversity of its output, including specific requirements in consideration to the UK nations and regions.</li> <li>• Conduct a thematic review of the BBC, centred on how the BBC represents and portrays the diverse communities of the whole of the UK.</li> </ul>	<p>We will report annually on the BBC’s compliance from autumn 2018.</p>
<p><b>8. Consider how the public service broadcasting (PSB) system reflects the diversity of the UK, its cultural identity, and represents alternative points of view</b></p>	
<p>We will look at the available evidence to assess the extent to which the public service broadcasting (PSB) system represents and portrays people, places, cultures and communities across the UK.</p>	<p>During Ofcom’s fourth PSB Review (date to be confirmed)</p>
<p>We will carry out an analysis of the way PSB services are distributed, the devices the PSB services are distributed on and consider whether certain groups of people are disenfranchised by the PSB system by not having access to appropriate technology.</p>	<p>During Ofcom’s fourth PSB Review (date to be confirmed)</p>
<p><b>9. Review Channel 4 Corporation’s (C4C) delivery of its media content duties across its services, including assessing its appeal to a wide variety of audiences and how it informs and motivates UK viewers</b></p>	
<p>We will continue to carry out annual reviews in this area, as part of our response to Channel 4 Corporation’s (C4C) annual Statement of Media Content Policy. This will feed into a periodic review of C4C’s performance in this area.</p>	<p>Annual reviews, while the periodic review will be carried out alongside Ofcom’s fourth PSB Review (date to be confirmed)</p>
<p><b>10. Review our made outside London programme-making guidance</b></p>	
<p>The guidance is intended to help ensure that programme-making which qualifies towards the relevant nations or ‘outside the M25’ quotas supports and strengthens production in the UK’s nations and regions.</p> <p>We will review the current guidance, determine whether it needs amending to take account of recent and upcoming market developments, and review the current compliance and reporting regimes we have in place.</p>	<p>Commenced review in 2017/2018</p>

How we will do it	When we will do it
<b>11. Conduct consumer research and share the findings</b>	
We will conduct robust research among consumer groups where feasible, to increase awareness of the experiences, needs and media literacy among different groups of consumers, including minority groups such as ethnic groups and disabled people. We will publish the data and reports.	Ongoing
<b>12. Engage with consumer groups to understand consumer concerns and interests and explain the likely impact of our work</b>	
Engage with consumer groups including the Communications Consumer Panel/Advisory Committee on Older and Disabled People and the Consumer Forum for Communications. We will ensure that diversity groups are aware of our work and know how to engage with us, and when a project or policy may impact them.	Ongoing
<b>13. Promote diversity in our external engagements</b>	
Invite and consider requests for disability adjustments when we deal with external stakeholders.	Ongoing
Consider diversity, accessibility and equality when contributing to international policy debates.	Ongoing
Continue to integrate the Welsh language into our work on a daily basis, ensuring that it isn't treated less favourably than the English language and that those that wish to communicate with Ofcom in Welsh can do so easily.	Ongoing
<b>14. Support people appropriately when they contact Ofcom</b>	
<p>Continue to train our consumer contact team<sup>1</sup> (CCT) and spectrum licensing department colleagues to support the needs of all citizens, stakeholders and consumers, including that they:</p> <ul style="list-style-type: none"> <li>• complete disability training within the first two weeks of joining, and before they engage with consumers;</li> <li>• are given flexibility in how they respond to individual queries and complaints, to enable them to provide more tailored and helpful responses; and</li> <li>• know when to raise vulnerable consumers' complaints directly with the relevant provider (CCT only).</li> </ul>	Ongoing

<sup>1</sup> Our Consumer Contact Team who handle around 70,000 calls a year offer bespoke advice to consumers who need assistance with a wide variety of matters including complaints about TV programmes or advice on mobile phone and broadband services. Our Spectrum Licensing Department process around 100,000 applications and requests every year for permission to use our finite 'radio spectrum'. This is the invisible airwaves that underpin radio communications, and includes things like TV, radio and mobile.



How we will do it	When we will do it
<p><b>15. Ensure our publications and external communications are accessible to all</b></p> <p>We will produce clear, user-friendly communications and that are accessible to all people particularly those with disabilities.</p> <ul style="list-style-type: none"> <li>• Write our publications in plain English.</li> <li>• Publish 'easy-read' versions of guides and research that are particularly relevant to people with learning disabilities to make this information accessible to them.</li> <li>• Make publications available in alternative formats on request.</li> <li>• Ensure our consumer guides are kept up to date and are easy to understand.</li> <li>• Use social media to connect with a wider and more diverse audience.</li> <li>• Welcome communication in formats other than standard print, for example an audio recording or a British Sign Language video.</li> </ul>	Ongoing
<p><b>16. Publish a revised Northern Ireland Equality Scheme<sup>1</sup></b></p>	
<p>Our current Equality Scheme for Northern Ireland runs until January 2019. We will work with the Equality Commission for Northern Ireland to publish a draft revised Equality Scheme for consultation during 2018 and publish an approved scheme by the end of 2018.</p>	2018/2019

<sup>1</sup> This objective was incorrectly captured under our objectives as an employer in the consultation. We have moved it to our objectives as a regulator for our final statement.drafting error.





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