

Ofcom - Diversity in Broadcasting: *Included* Report



CLIENT	Ofcom
PROJECT	Diversity in Broadcasting: Learning from the Past, Creating a More Inclusive Future
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DATE	July-September 2021

Executive Summary (1)

What we did

Since 2017, Ofcom has gathered data from qualifying UK Television broadcasters about the diversity of their employees. In 2018, this project expanded to include 15 UK Radio broadcasters. These broadcasters reported data across 3 mandatory categories (Gender, Racial Group, and Disability) and 3 voluntary categories (Age, Sexual Orientation, and Religion)*. Each year, Ofcom has published a report on this diversity data.

For 2021, *Included* is collaborating with Ofcom to add a 5-year progress report (4 years for Radio) to take stock of how diversity in the broadcast industry has changed. We mapped this industry-wide progress against annual benchmarks, against progress among senior managers, and against major events over the last 5 years.

Additionally, *Included* has used the past 5 years of data to build projection models to see how the diversity of the TV and Radio industries might change over the next 5 years. Those models also indicate how more efforts into diverse recruitment or inclusion initiatives might affect industry diversity over time.

Finally, *Included* spoke to a number of key stakeholders across the broadcasting spectrum, exploring their motivations, priorities, and general outlook on diversity and inclusion progress in their industry.

As a result of this analysis, broadcasters and regulators will have a better understanding of where to prioritise efforts, energy, and resources to make real progress. This includes understanding the key interventions that will be most efficient for change. This will not only save time and money around how D&I resources are used, but will also be more likely to increase effectiveness, and accelerate progress for the groups who need it most.

*Mandatory categories are sets of diversity data that broadcasters are required to report on, whereas voluntary categories are sets of diversity data that broadcasters are encouraged to report on as part of the Equality Act, but not required to report on by mandate.

Executive Summary (2)

What we found

- TV and Radio have made different progress when it comes to diversity, with TV improving on disability, race, and sexual orientation, while Radio has improved on religion and race diversity – but there is still much more to do.
- For both TV and radio, gender gaps generally have closed, including at senior manager level. However, for both racial groups and disabled employees this gap has not changed in TV and worsened in radio. This suggests that diversity improvements are being made in more junior roles, rather than diversifying the senior, decision-making levels.
- For almost all groups, the most effective way to improve diversity is increasing inclusion of traditionally marginalised groups. In many cases, this means a focus on retention and promotion, over just (often junior) recruitment.
- The broadcasting industry compares well with other sectors in terms of gender diversity, however, it is slightly worse in terms of minority ethnic representation. Overall, it could be argued broadcasting should perform significantly better, given the important role it plays in our culture and society.
- The interviewees largely corroborated the quantitative findings and gave additional insight. Positive changes seen over the last 5 years included: open discussion on D&I; improvements in safeguarding and thoughtfulness; as well as tangible improvements in on-screen diversity and portrayal.
- We identified six key drivers of change to date: social pressure and movements, including the pandemic; creative and digital change; commercial pressures; regulation and data requirements; moral pressure, often from the workforce; and changing audience expectations.

Executive Summary (3)

What we found continued...

- There remain six key barriers to further inclusion: a lack of focus on senior progression; the need for more targeted regulation; a lack of industry collaboration; an unclear commercial imperative; often narrow definitions of content; and senior accountability.
- CEOs had a generally more positive view than D&I professionals, with regard to progress on diversity at senior levels, data collection and target setting. There was broad agreement on the need to be more entrepreneurial and creative with solutions going forward.
- Key solutions cited by participants included: industry collaboration with an increased role for Ofcom; more data transparency and detail, including broadcasters setting ambitious targets and public commitments; and greater financial incentives.
- The pandemic has resulted in positive changes in terms of greater support for staff, a renewed focus on D&I programmes and the emergence of coalitions for change. Negative changes included a severe impact on freelancers and minority groups and the entrenchment of some working practices and networks. However, flexible working, the value of public service broadcasting and a focus on mental health and wellbeing are potential legacies of the pandemic.
- There is an important role for Ofcom to play in terms of authority and setting the standard, breadth and depth of data collection and instilling a sense of collaboration, manifested through its convening power.

included.

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Glossary

- **Mandatory characteristics** – sets of diversity data broadcasters are required to report on (gender, ethnicity, disability)
- **Voluntary characteristics** – sets of diversity data broadcasters are encouraged, but not required, to report on (age, sexual orientation, and religion)
- **Benchmark** – target number based on proportion of people from that group in the UK workforce (based on ONS data)
- **Diversity Projection Model** – statistical model using past data to identify how the diversity of the industry may change in the future. The models here are based on joiner and leaver data since 2018 across the TV and Radio industries.
- **Visible data** - all data where an individual has declared their identity along a specific characteristic. This set of data omits those who chose not to state their identity. This is in contrast with "All data" or "Overall data", which includes those who did not state their identity when performing calculations and statistical analyses.

included.

1. Quantitative Data



Technical Notes and Assumptions

Using visible data

- Past Ofcom Diversity in Broadcasting reports have been focused on overall data. However, for this report, we are focusing on visible data – that is, we have omitted individuals who did not state their demographic characteristics from our analysis.
 - This has a minimal effect on mandatory characteristics that have high levels of visible data, but may have a real effect on voluntary characteristics
 - We made this choice because by using all data, when calculating the proportions of marginalised groups, we assume that all those who opted out of reporting their identities are from the majority group, (which is usually not far off as those who do not fill out their diversity information are often from majority groups and don't see the importance of doing so). By using just the visible data, we instead assume that the data we do have is roughly representative of the organisation as a whole (which is also usually not far off, but in the other direction, as sometimes those from marginalised backgrounds are hesitant to disclose that information)

Terminology

- When collecting diversity data, terminology is critical and can lead to different interpretations that could affect the data
 - “Disability” is defined by individuals responding to these surveys, which may lead to differences in interpretations of what constitutes a “disability”. As such, disability data here may be under-reported.

Scope

- While the data was collected from individual organisations reporting to Ofcom, the analysis performed here is industry-wide. As such, no particular analysis has been done on any individual broadcaster.

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THE TV INDUSTRY

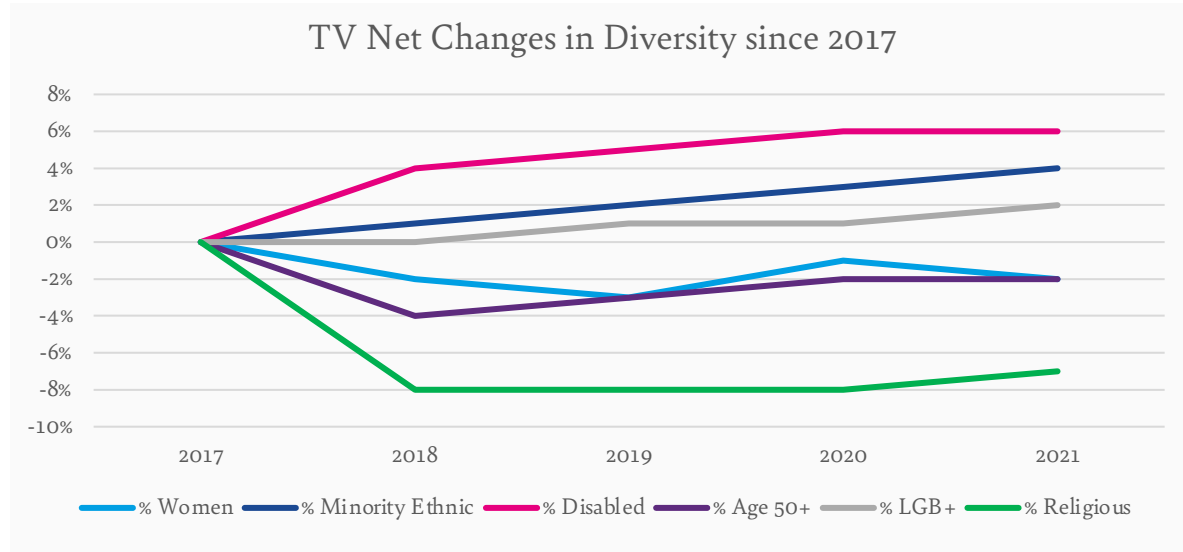


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TV: Looking Back



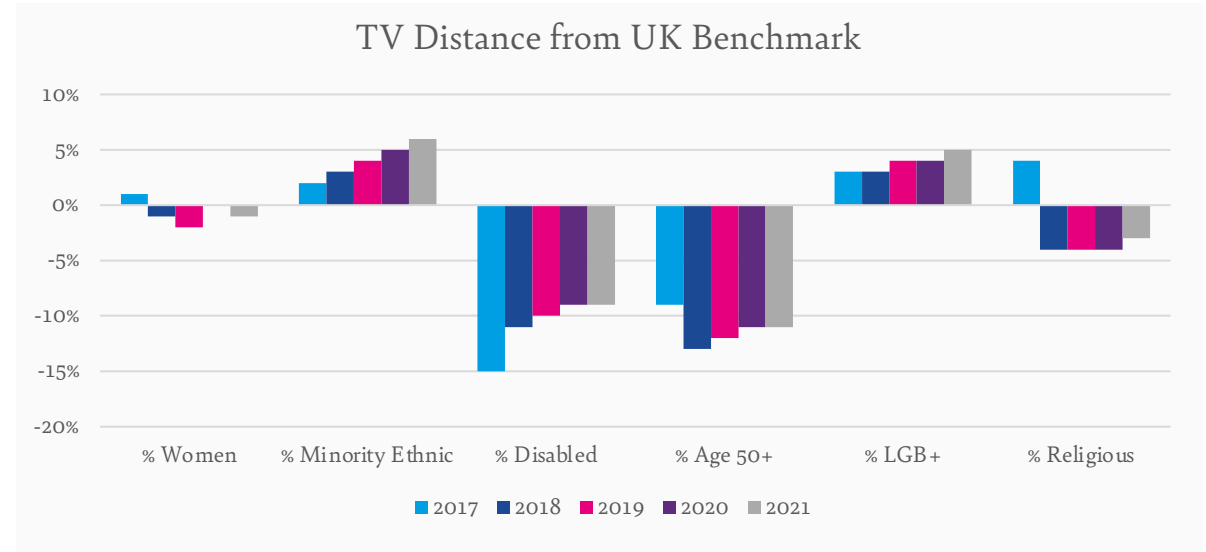
Overall Net Changes in Diversity



- TV broadcasters have become more diverse across disability, racial group, and sexual orientation over time.
- However, these same broadcasters have become less diverse across gender, age, and religion in the same time frame.
- When comparing these changes in diversity to changes in disclosure rates, no patterns emerged, indicating that these changes in diversity are coming from actual changes in employee makeup (as opposed to more people just telling us their identities)

2021 status:

- % Women = 46%
- % Minority Ethnic = 18%
- % Disabled = 10%
- % Age 50+ = 21%
- % LGB+ = 9%
- % Religious = 45%

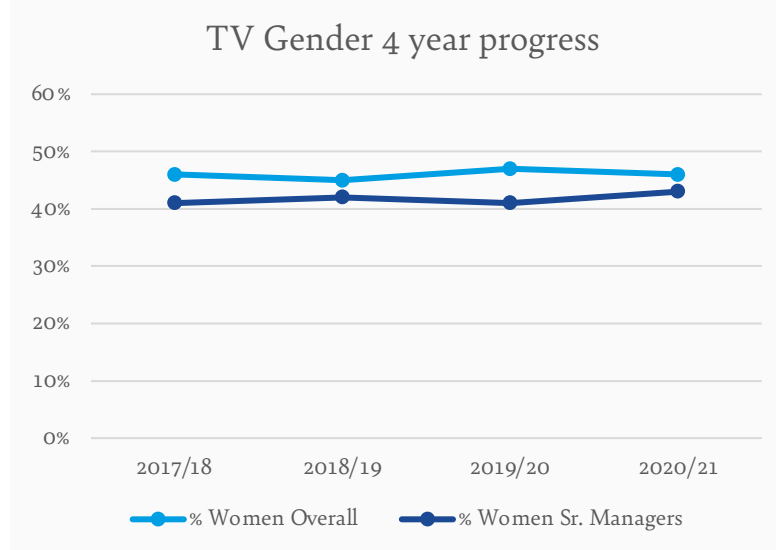


- Although there has been a net decrease in proportion of women and religious employees over time, the industry is not far from the benchmark across these characteristics (-1% and -3%, respectively).
- The industry is also outperforming the UK benchmark for Minority Ethnic and LGB+ employees, and that outperformance has grown over time
- However, the industry still lags far behind on diversity for disabled and age 50+ employees

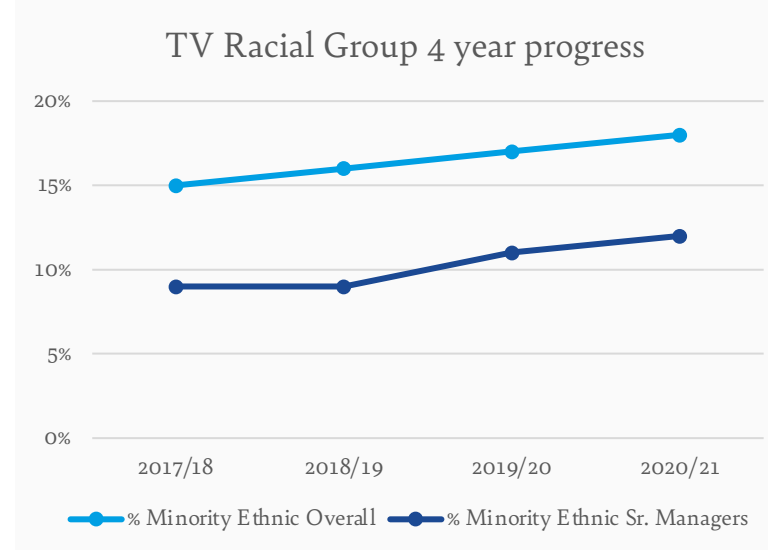
Diversity in Senior Management

Notes:

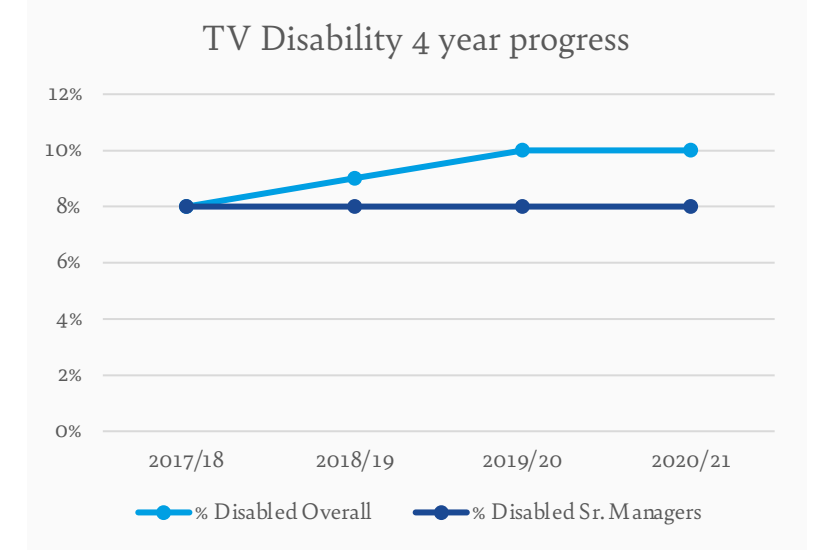
- Data from 2017 was gathered using a different methodology than other years, and so that year's data is not included as it may not be directly comparable
- Due to data quality and availability, diversity among senior managers for Age, Sexual Orientation, and Religion is not available



- The gap between overall gender diversity and that of senior managers has decreased from 5% in 2018 to 3% in 2021.
- While 2% is progress, it is marginal considering the 4-year time period, and is still below the UK benchmark at SM level. This indicates a need for more concerted effort on closing the gender gap in management.



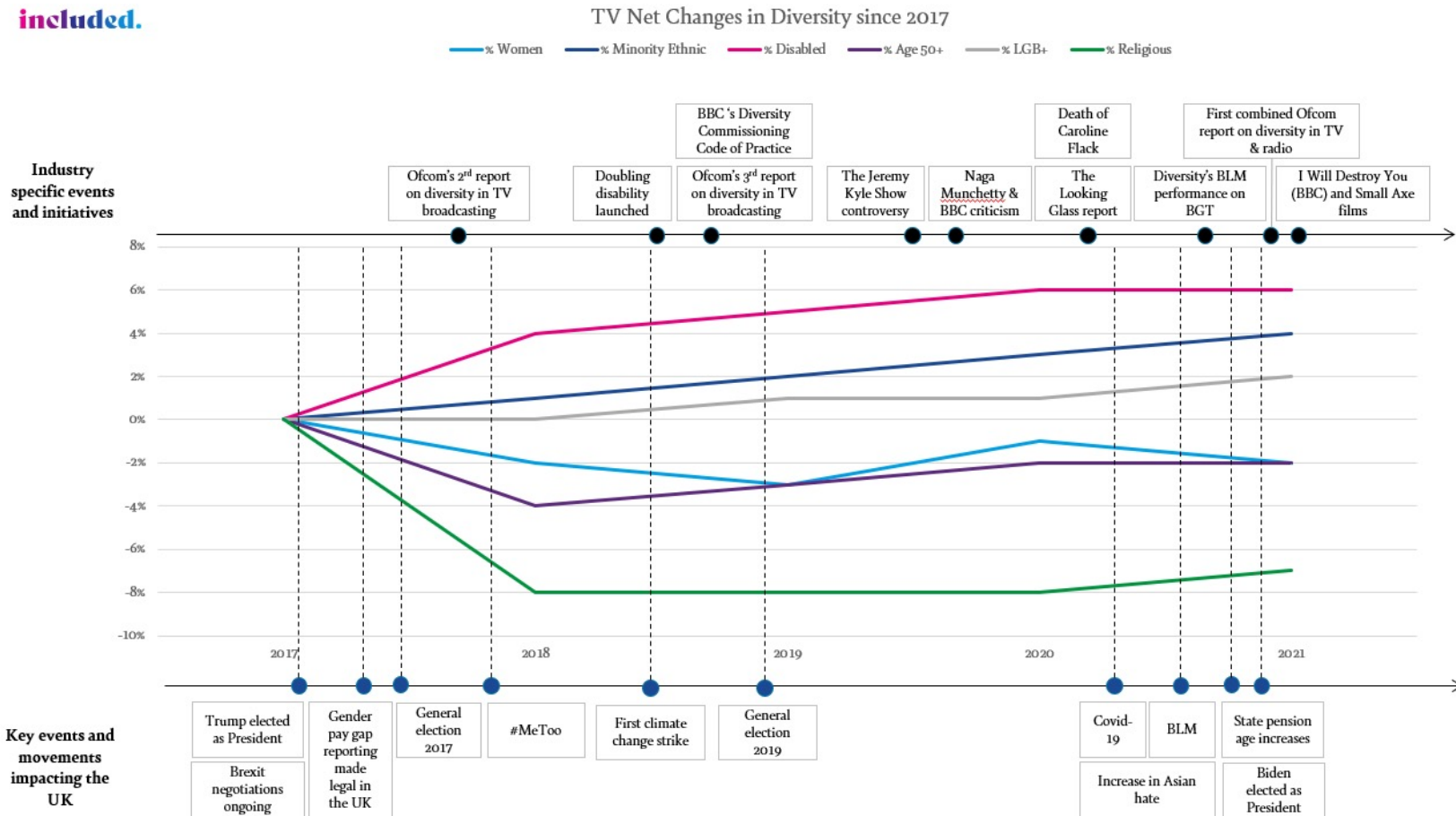
- The proportion of minority ethnic employees in senior management positions has increased overall over time – a good marker of progress.
- However, the gap between overall racial diversity and that of senior management has not changed indicating more effort is needed to increase diversity at upper levels.



- The proportion of disabled senior managers has not changed since 2018 (and remains below the UK benchmark), despite the overall increase in disabled employees.
- The gap in disability representation overall vs. in senior management has actually increased from 0% to 2% since 2018, indicating that disabled hiring has been disproportionately at lower levels.

Mapping diversity against key events

The purpose of this exercise was to view data on TV net changes in diversity against more contextual information about both the UK and the broadcasting industry. By doing so, we can assess any potential correlations between trends in specific demographic groups, and key events and initiatives identified during interviews with key industry stakeholders.

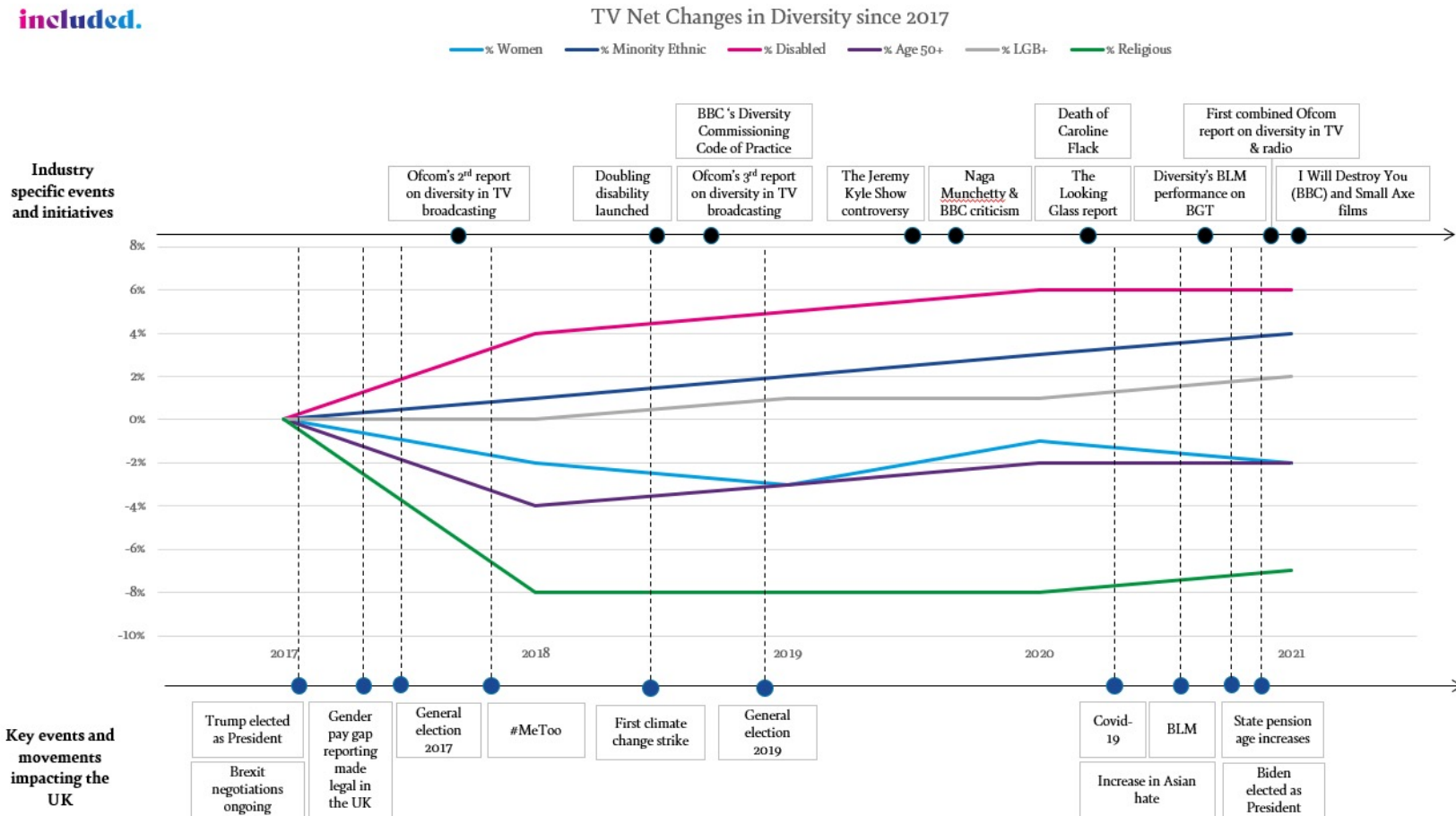


- As we can see from the graph to the left (see next page for larger image), it's difficult to draw direct causal conclusions between key global events and progress on diversity.
- However, we might deduce that:
 - The decrease in proportion of women in TV after the global #MeToo movement could be driven by women feeling more empowered to stand up for themselves and leave an organisation if they were being treated poorly. Moreover, there is [evidence](#) that #MeToo backlash could lead to a *decrease* in hiring women in some cases.
 - Since companies knew that the Doubling Disability initiative was launching, they were likely preparing for it already, hiring more disabled people right away in 2018. This initiative may have spurred on – and maintained – the hiring of more disabled employees.
 - COVID preceded an immediate decrease in the proportion of women but prompted increases or no change for other groups. This aligns with data from other industries; in part because many women left work to care for family at a much higher rate than men.

Mapping diversity against key events

Alongside key global, national and industry events, there are a number of individual initiatives taken by broadcasters over the last few years. Whilst we cannot conclusively link these to the variations in industry-wide data, this analysis explores some of the key initiatives that may have contributed towards change.

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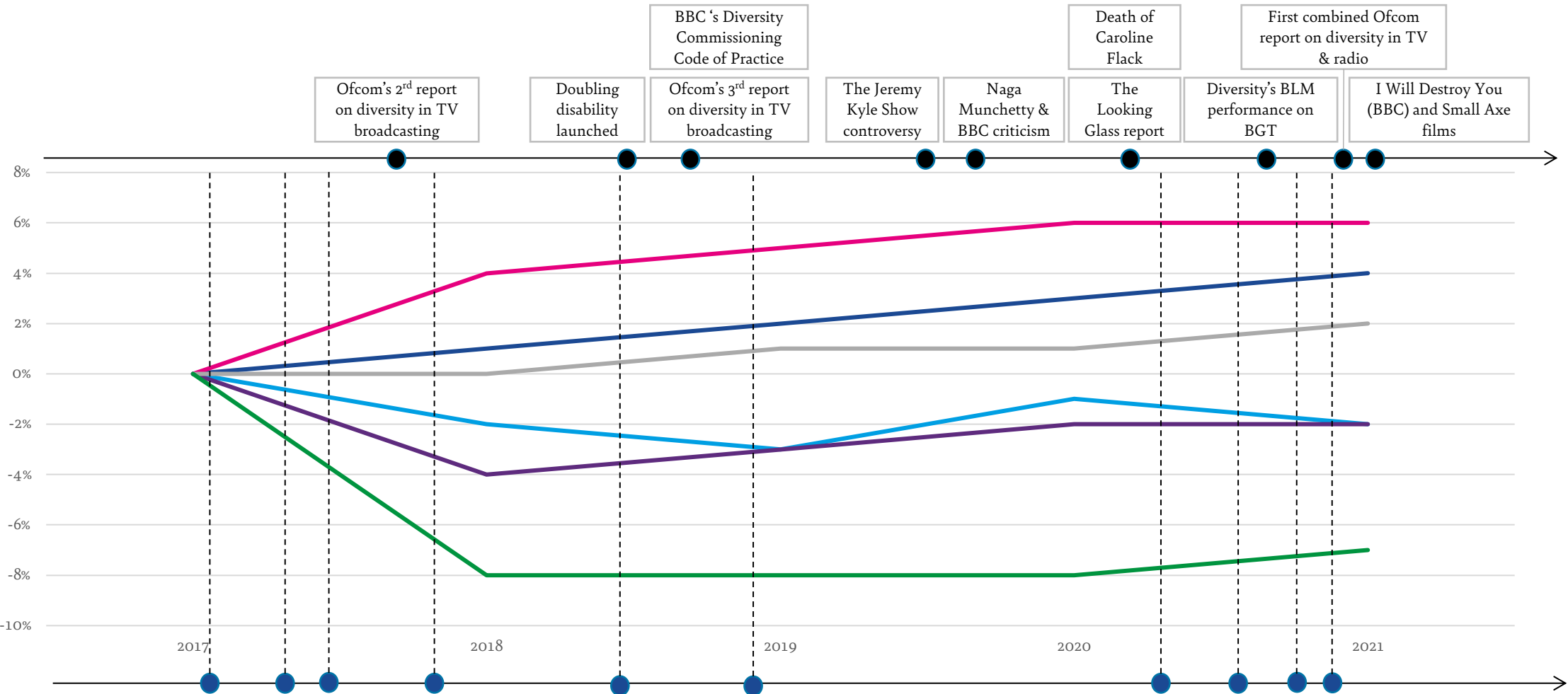


- The 5 main broadcasters signed up to Creative Diversity Network's Doubling Disability initiative in 2018
 - This has been supported by a range of training initiatives and qualifications, such as the BBC's Disability Confident training, or Channel 4's Disability Confident Leader (Level 3) status
- There has also been a large focus on improving inclusion for minority ethnic groups:
 - ITV carried out a recruitment review which saw a 33% increase since Jul 2020 in the number of lead roles featuring ethnic minority groups
 - Since gender pay gap reporting was made a legal requirement in 2017, some broadcasters have voluntarily published ethnicity pay gaps alongside this.
 - Progress has been made on growing ERG's, such as BBC and ITV's 'Embrace'.
 - Several commitments have been made following the Black Lives Matter movement, such as Channel 4's launch of [Indie Accelerator](#), ViacomCBS Networks' ["no diversity, no commission"](#) policy, and Sky's [£30m commitment](#) to fight racial injustice.

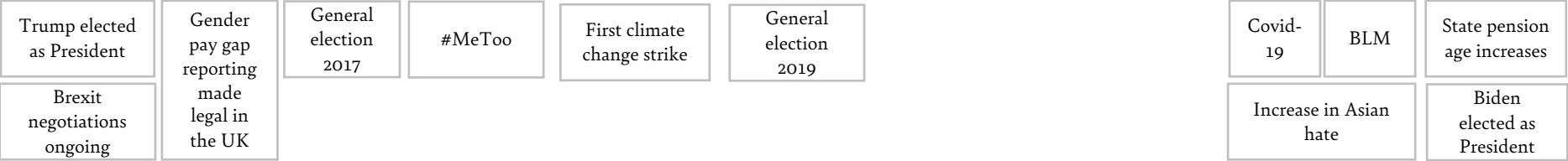
TV Net Changes in Diversity since 2017

% Women % Minority Ethnic % Disabled % Age 50+ % LGB+ % Religious

Industry
specific events
and initiatives



Key events and
movements
impacting the
UK

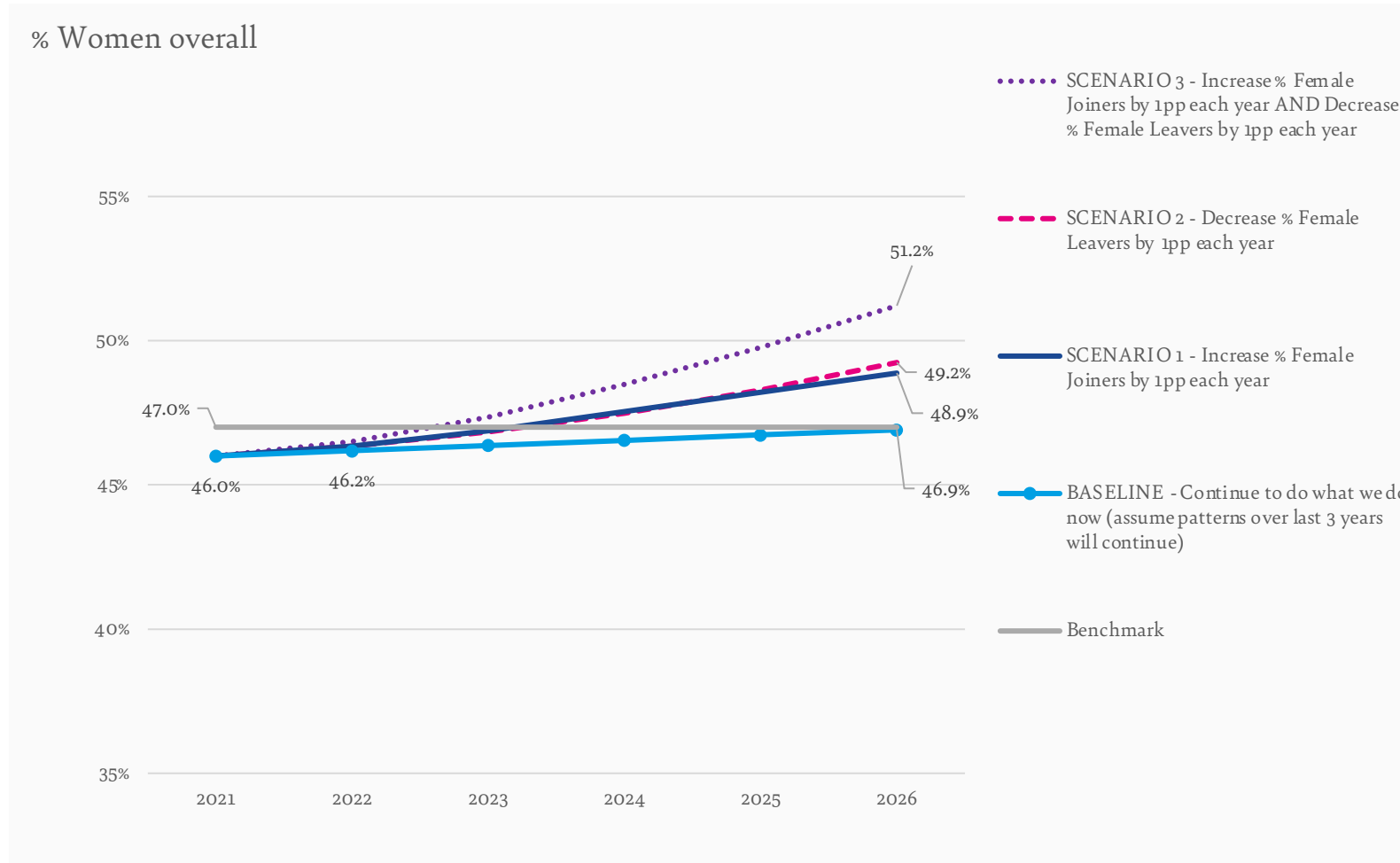


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TV: Looking Forward



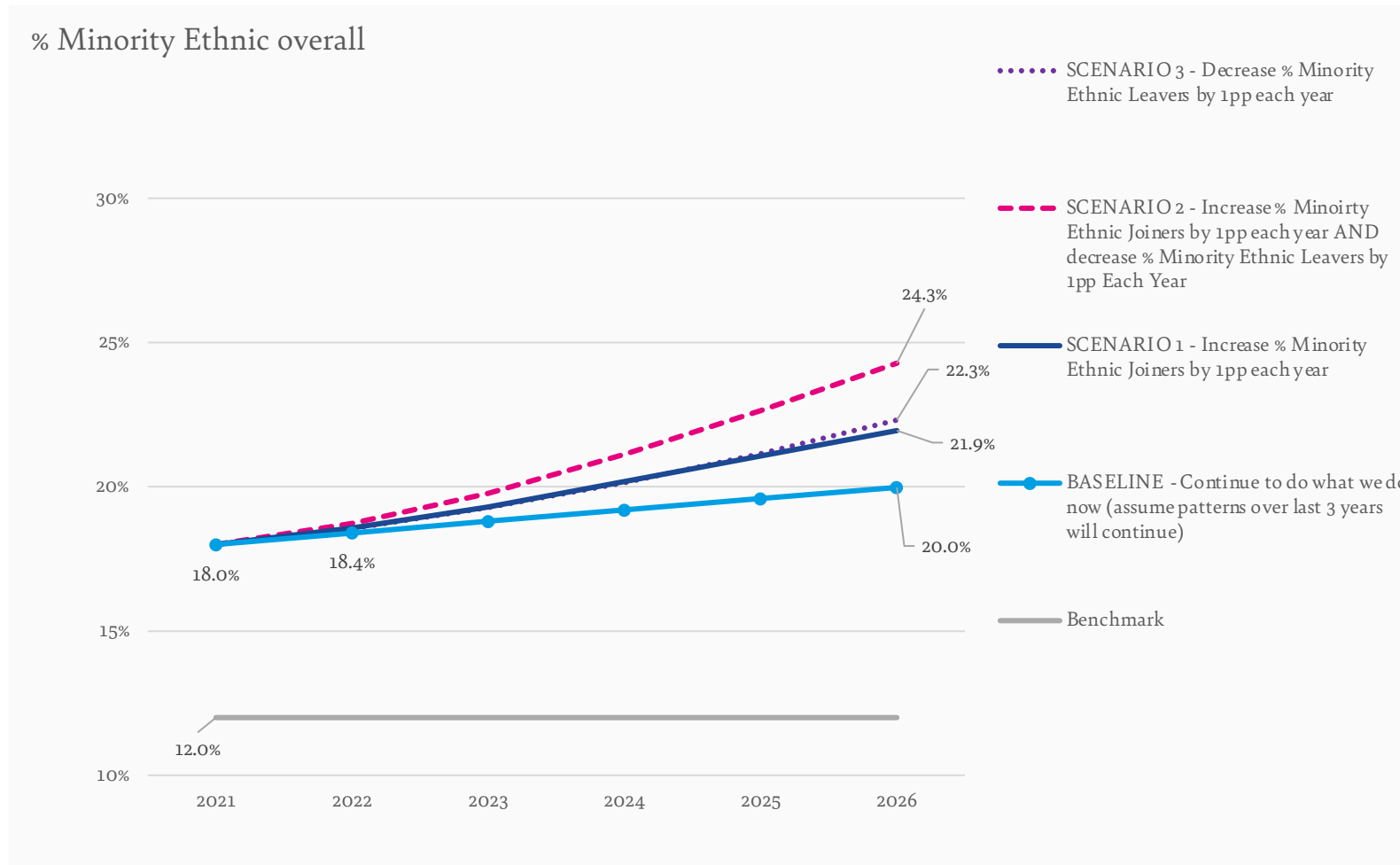
Gender projections



Note: Due to data quality and availability, diversity projections for senior managers is not available

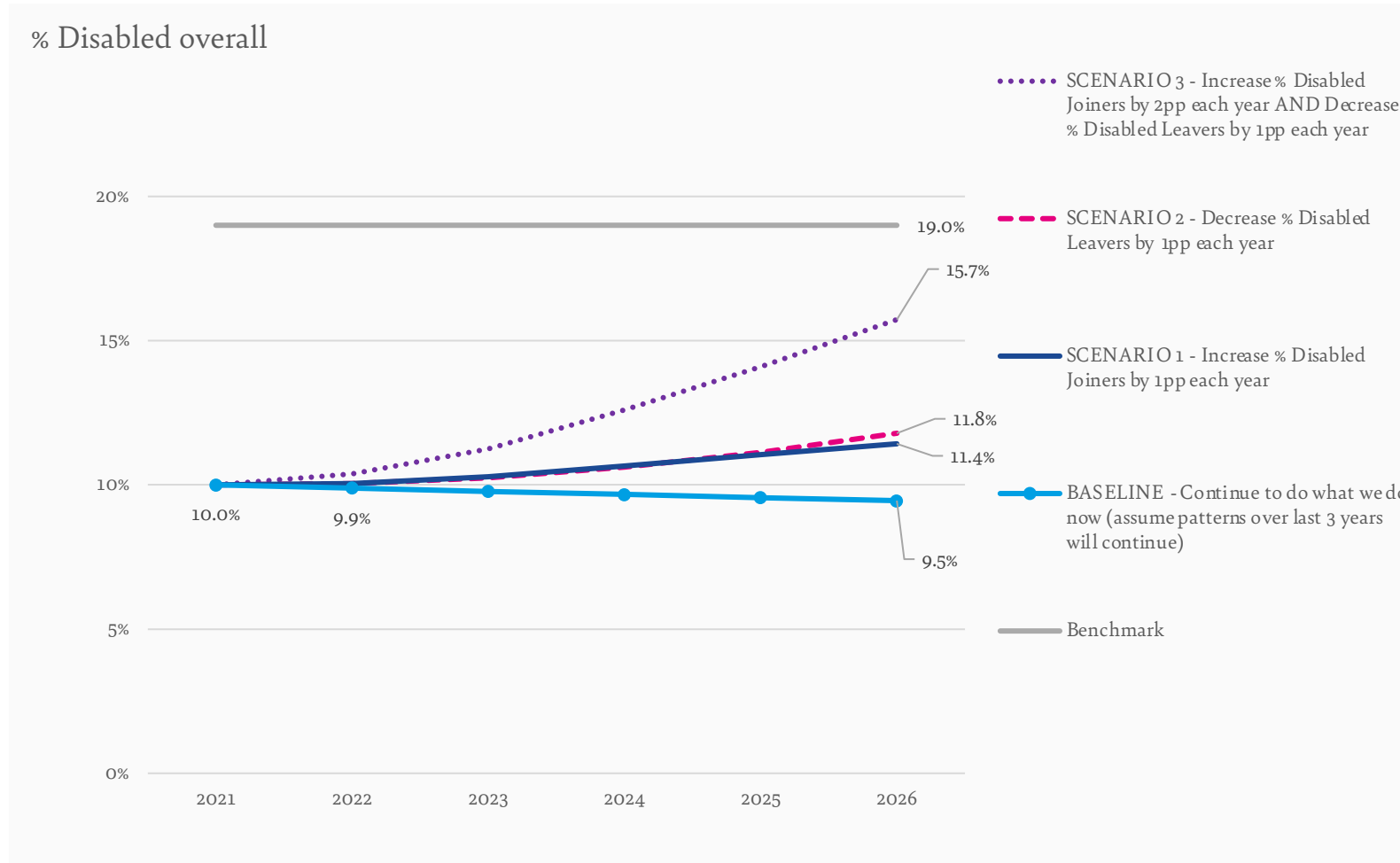
- Over time, the proportion of women overall is likely to remain relatively stable if current trends hold and no additional effort to increase the proportion of women in the industry (or individual organisations) is made.
- We can see that small changes in the proportion of female joiners could have significant effects (as shown by Scenario 1), nearly reaching a 50-50 gender split in 5 years.
- However, we can also see that increasing inclusion of women, and so reducing the proportion of female leavers, could have an even greater effect on gender balance than changing hiring rates (Scenario 2).
- Therefore, while recruitment of women is still critical, the inclusion of women who are already there may be even more important to improve gender diversity long-term.

Racial group projections



- Over time, the proportion of minority ethnic employees is likely to continue to increase steadily if current trends hold.
- We can see that small changes in the proportion of minority ethnic joiners would be useful for increasing the overall proportion of minority ethnic people in the industry (as shown by Scenario 1).
- However, we can also see that, like with women, increasing inclusion of minority ethnic people, and so increasing retention, has a similar effect on overall ethnic diversity long-term (As shown by Scenario 2).
- Combining efforts on both the diverse recruitment and the inclusive retention sides will lead to an even better rate of change for increased racial diversity (as shown by Scenario 3).

Disability projections



- Over time, the proportion of disabled employees is likely to decrease slightly if current trends hold. This is the only group projected to decrease in diversity across all projections in TV and Radio.
- Given that the UK benchmark of 19% disabled employees is so far from the current state, significant effort should be made to improve disability representation.
- We can see that increasing the proportion of disabled joiners by 1 percentage point each year will only have a net 1.9% increase in representation by 2026 (Scenario 1). Working just on inclusion doesn't do much better (Scenario 2).
- However, combining increasing disability recruitment with disability inclusion efforts has a multiplicative effect, leading to an accelerated curve. This will allow the industry to more quickly approach the UK benchmark (Scenario 3).

THE RADIO INDUSTRY

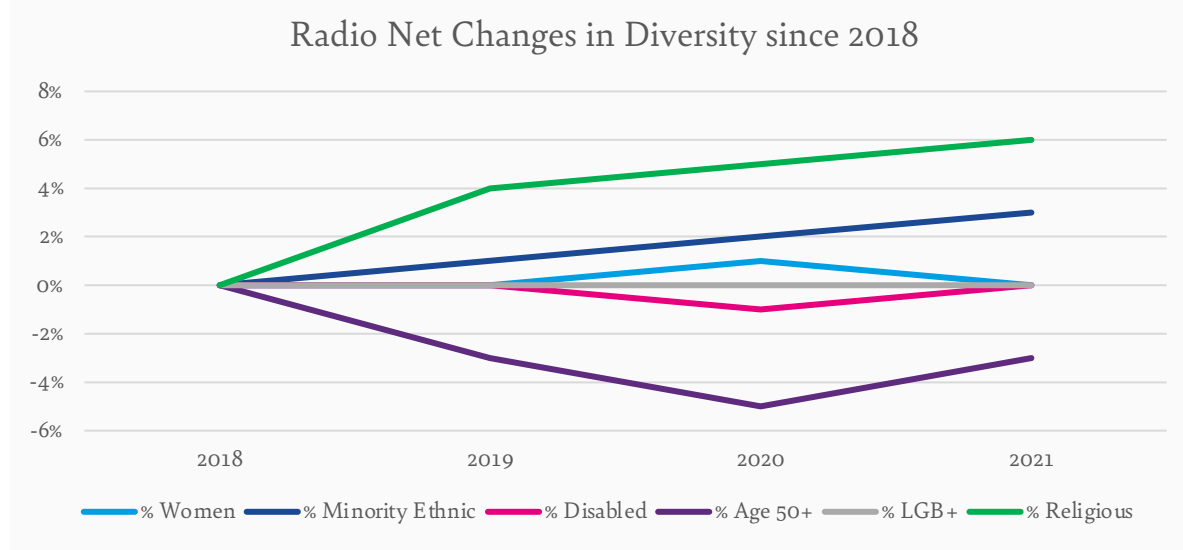


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Radio: Looking Back



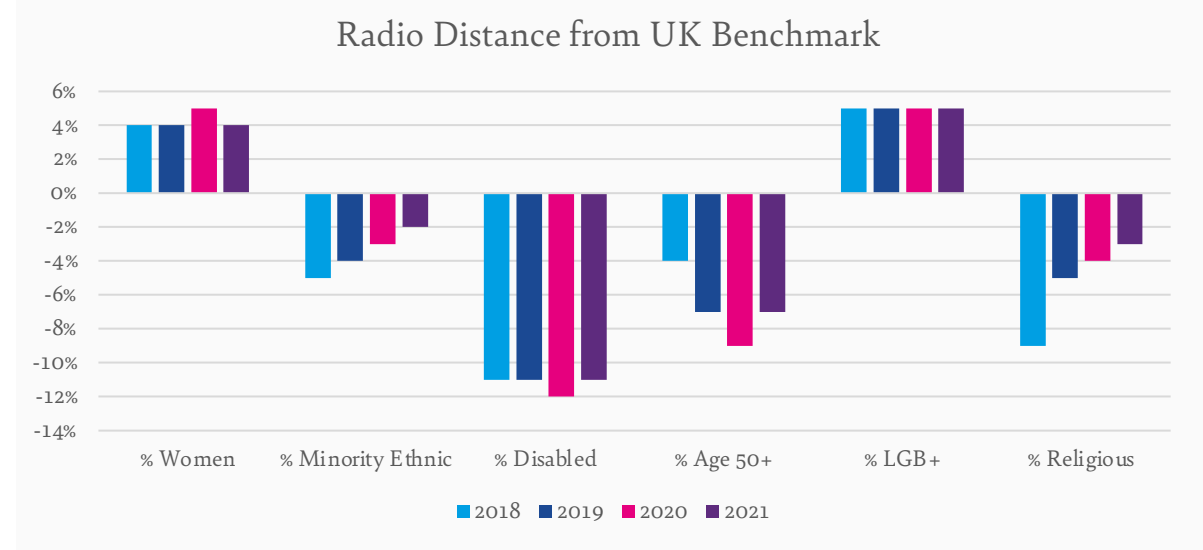
Overall Net Changes in Diversity



- Radio broadcasters have become more diverse across religion and racial group over time.
- However, these same broadcasters have become less diverse on age, and have had no net change in diversity across gender, disability, and sexual orientation in the same time frame.
- When comparing these changes in diversity to changes in disclosure rates, no patterns emerged, indicating that these changes in diversity are coming from actual changes in employee makeup (as opposed to more people just telling us their identities)

2021 status:

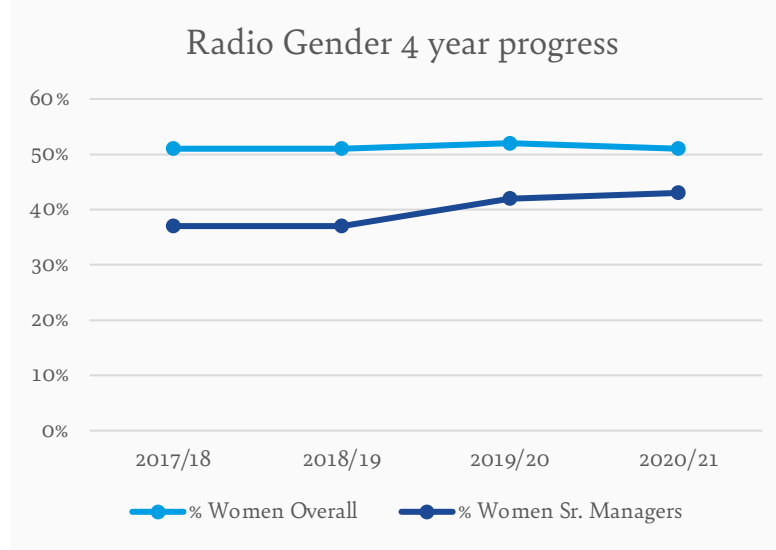
- % Women = 51%
- % Minority Ethnic = 10%
- % Disabled = 8%
- % Age 50+ = 25%
- % LGB+ = 9%
- % Religious = 45%



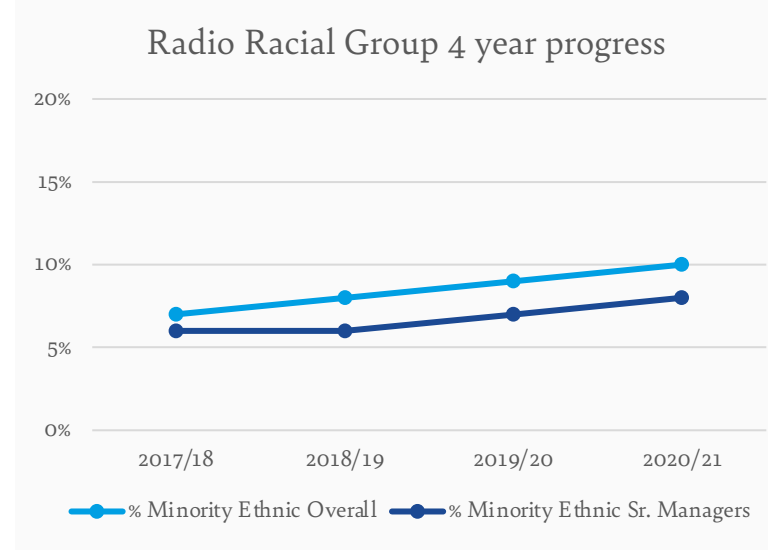
- Despite that there has been no net change in proportion of women and LGB+ people over time, the industry is outperforming the UK benchmark across these characteristics.
- There has also been clear progress on racial diversity as well as for religious employees, getting them close to reaching the UK benchmark.
- However, the industry still lags far behind on diversity for disabled and age 50+ employees

- Due to data quality and availability, diversity among senior managers for Age, Sexual Orientation, and Religion is not available

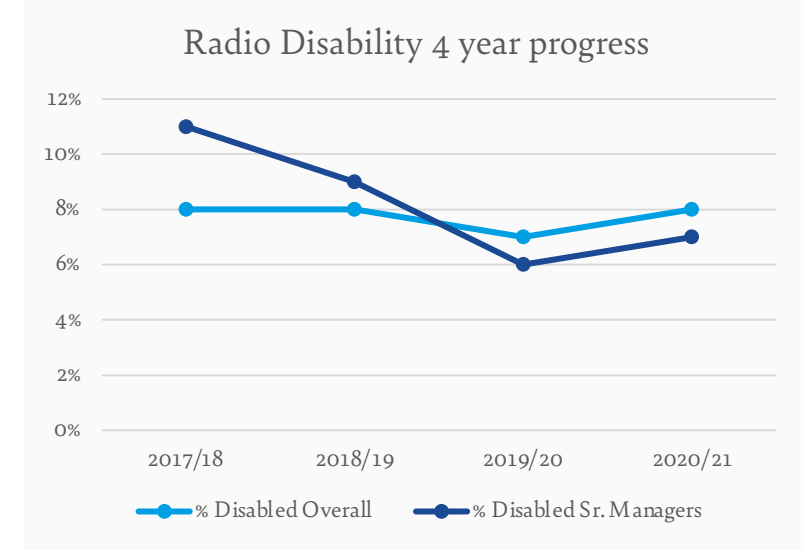
Diversity in Senior Management



- The gap between overall gender diversity and that of senior managers has decreased from 14% in 2018 to 8% in 2021.
- This is significant progress, most of which happened between 2019 and 2020. Our qualitative work suggests this may in part be due to the #MeToo campaign, as well as regulatory motivators such as Ofcom's work and gender pay gap reporting requirements.



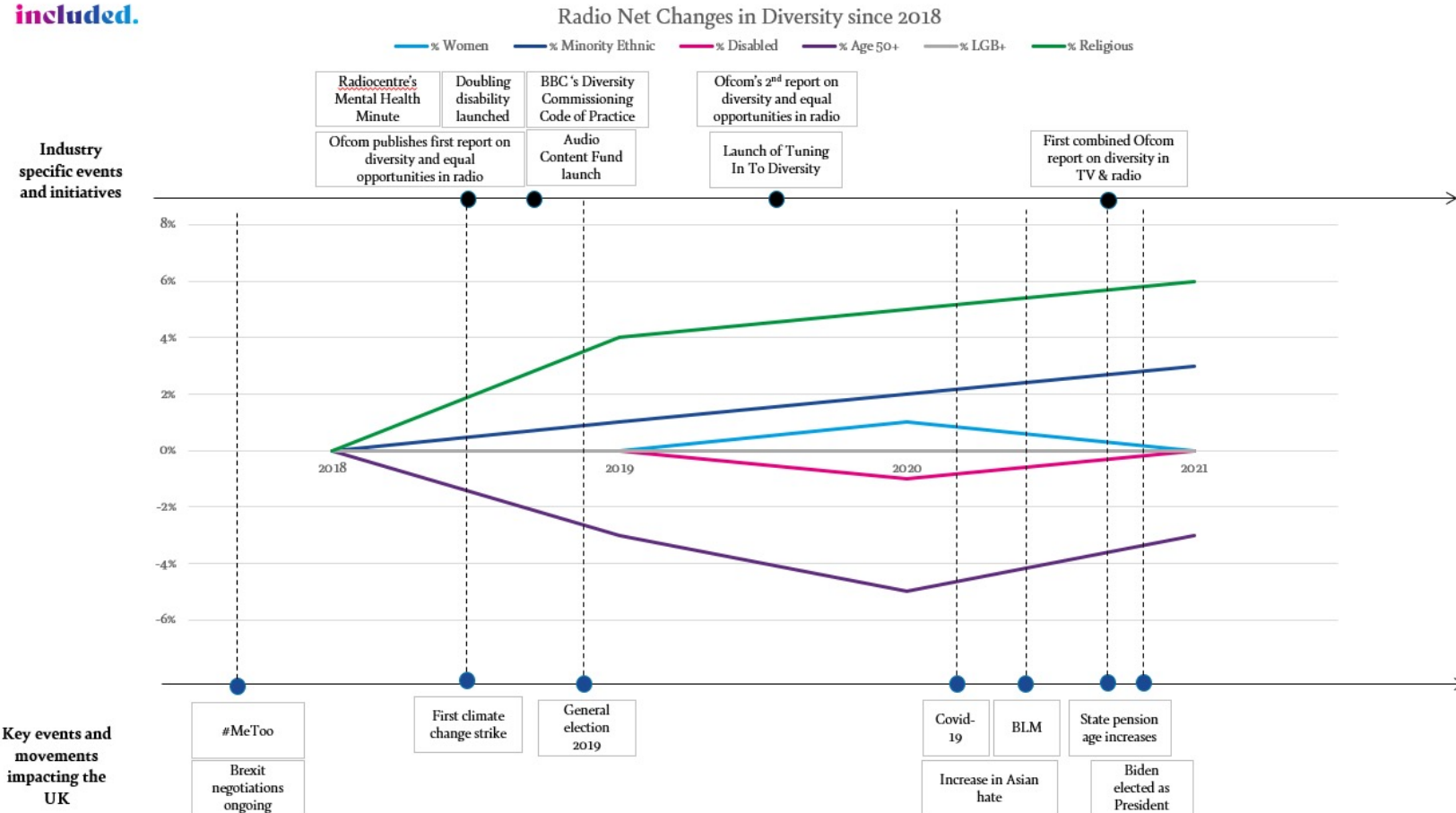
- The proportion of minority ethnic employees in senior management positions has increased steadily over time – a good marker of progress.
- However, the gap between overall racial diversity and that of senior management has slightly increased, indicating that more effort is needed to increase diversity at upper levels



- The proportion of disabled senior managers has decreased significantly since 2018, with the biggest drop occurring between 2018 and 2020.
- This net decrease has led to a gap between disability representation overall vs. at senior levels, which didn't exist in 2018.

Mapping diversity against key events

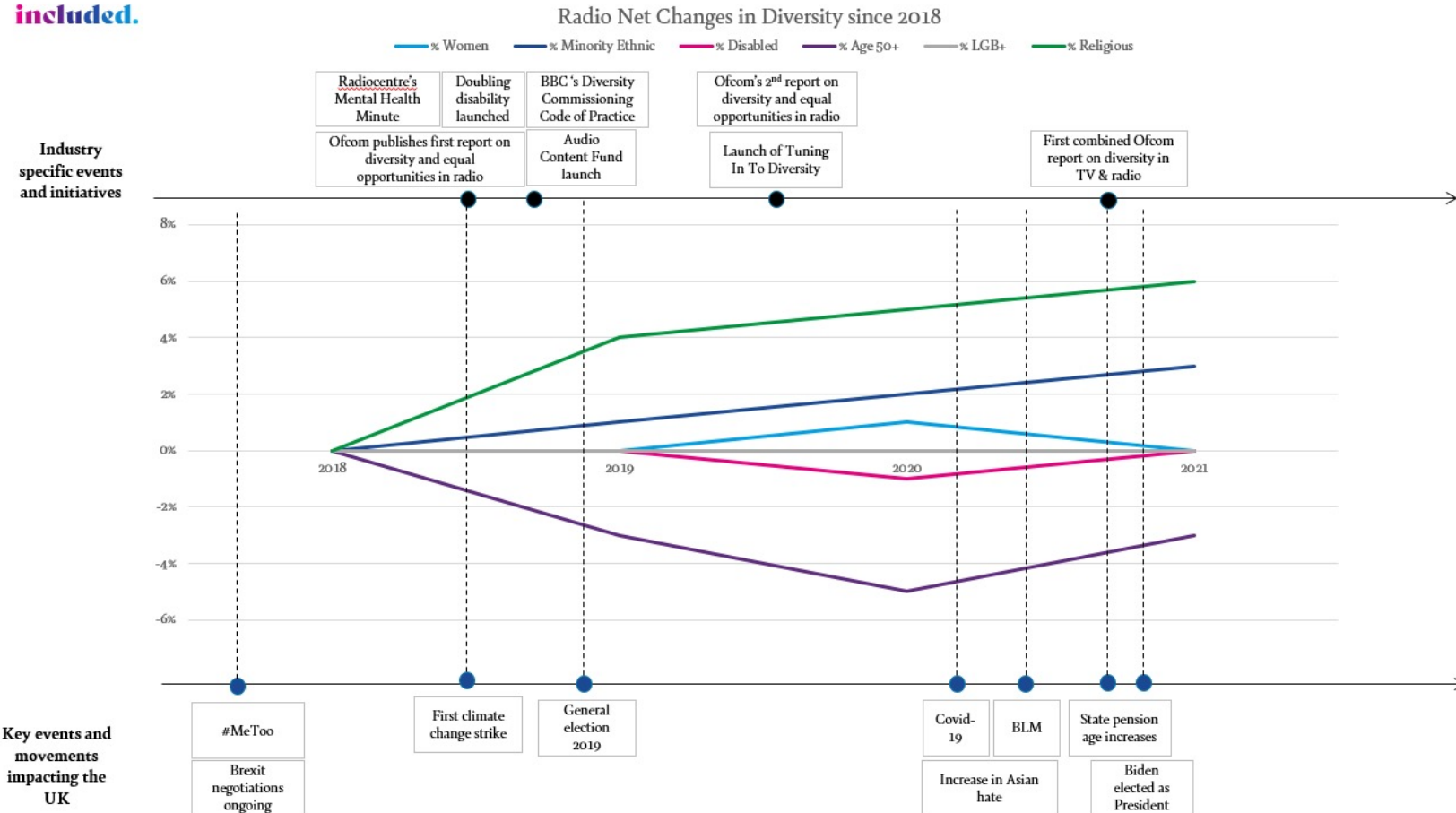
The purpose of this exercise was to view data on Radio net changes in diversity against more contextual information about both the UK and the industry. By doing so, we can assess any casual correlations between trends in specific demographic groups, and key events and initiatives.



- As we can see from the graph to the left (see next page for larger image), it's difficult to draw direct causal conclusions between key global events and progress on diversity.
- However, we might deduce that
 - COVID preceded an immediate decrease in the proportion of women but increases or no change for other groups. This aligns with data from other industries, in part because many women left work to care for family at a much higher rate than men.
 - The pandemic could also be linked to the 2020-21 rise in employees aged 50+. There is evidence that more employees are delaying retirement [due to financial setbacks](#). The introduction of remote and more flexible working could also be an influence here: [an ONS survey](#) found that 11% of those aged 50+ working entirely from home were planning to retire later compared with 5% of those not working from home.

Mapping diversity against key events

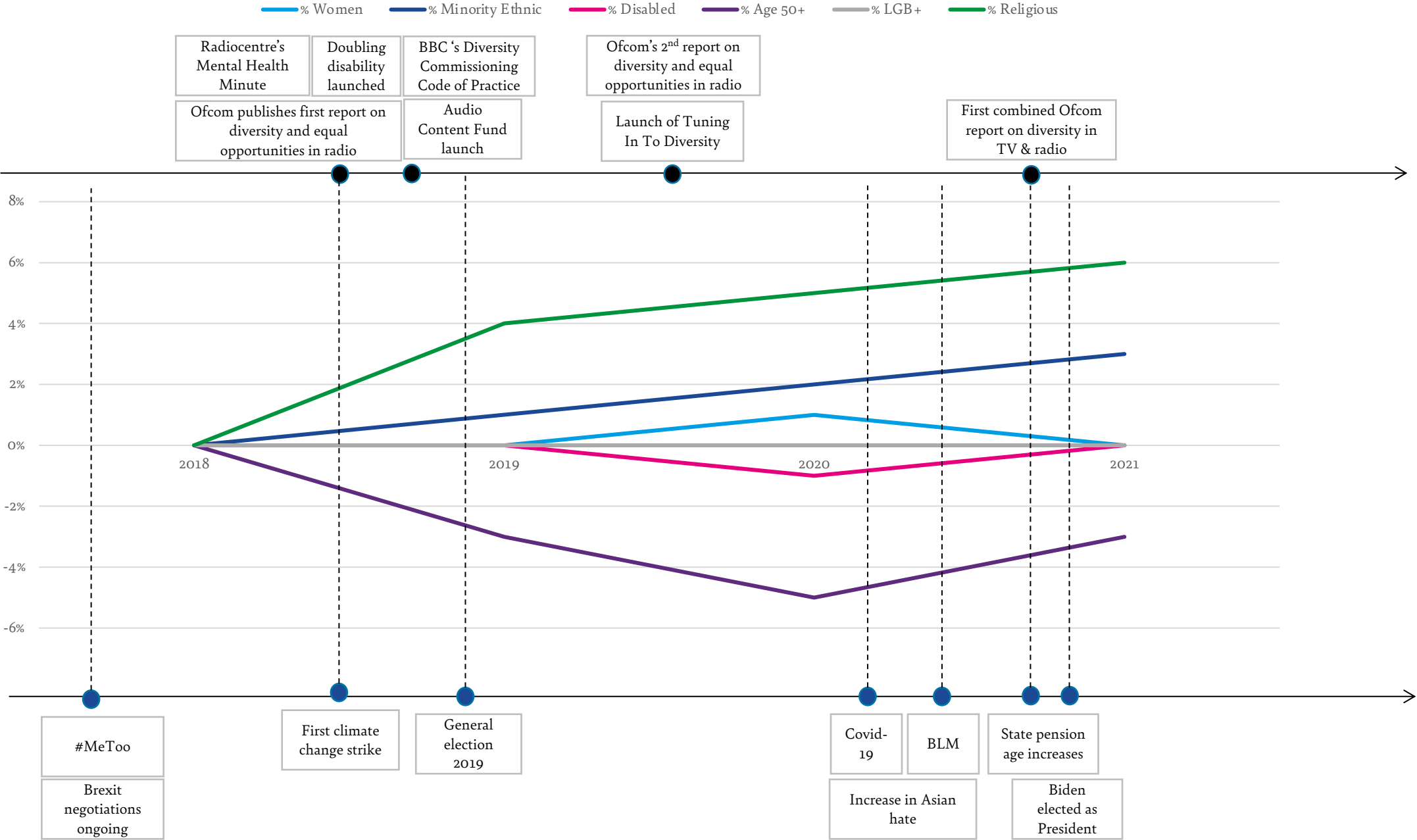
Alongside key global, national and industry events, there are a number of individual initiatives taken by radio broadcasters over the last few years. Whilst we cannot conclusively link these to the variations in industry-wide data, this analysis explores some of the key initiatives that may have contributed towards change.



- Bauer Radio introduced unconscious bias training for their leadership team, and mandatory training for all hiring staff
- The Audio Content Fund which launched in 2018 has also supported several broadcaster initiatives, such as:
 - Wireless' talkSPORT programme, which has a new minority ethnic-led roundtable football discussion
 - Bauer's Absolute Radio, who created 'Time to Listen', a series featuring musicians and comedians promoting positive mental health.
- Gender has also been key focus areas for radio broadcasters over the last few years:
 - Global Radio has focused on improving female representation across junior roles through apprenticeships and mentoring
 - Wireless talkSPORT has increased the number of female presenters, which has also led to changes in its audience composition

Radio Net Changes in Diversity since 2018

Industry
specific events
and initiatives



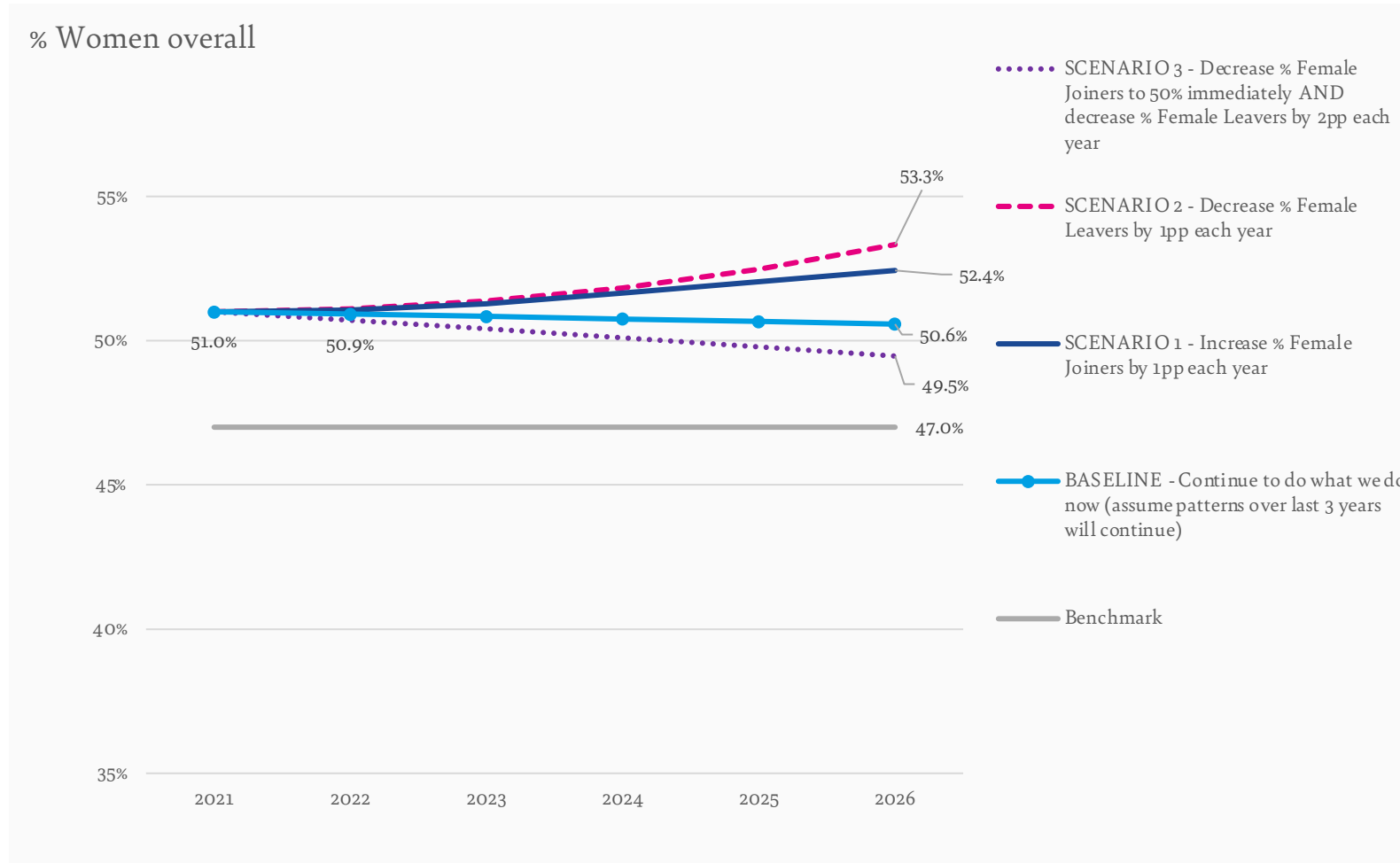
Key events and
movements
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included.

Radio: Looking Forward

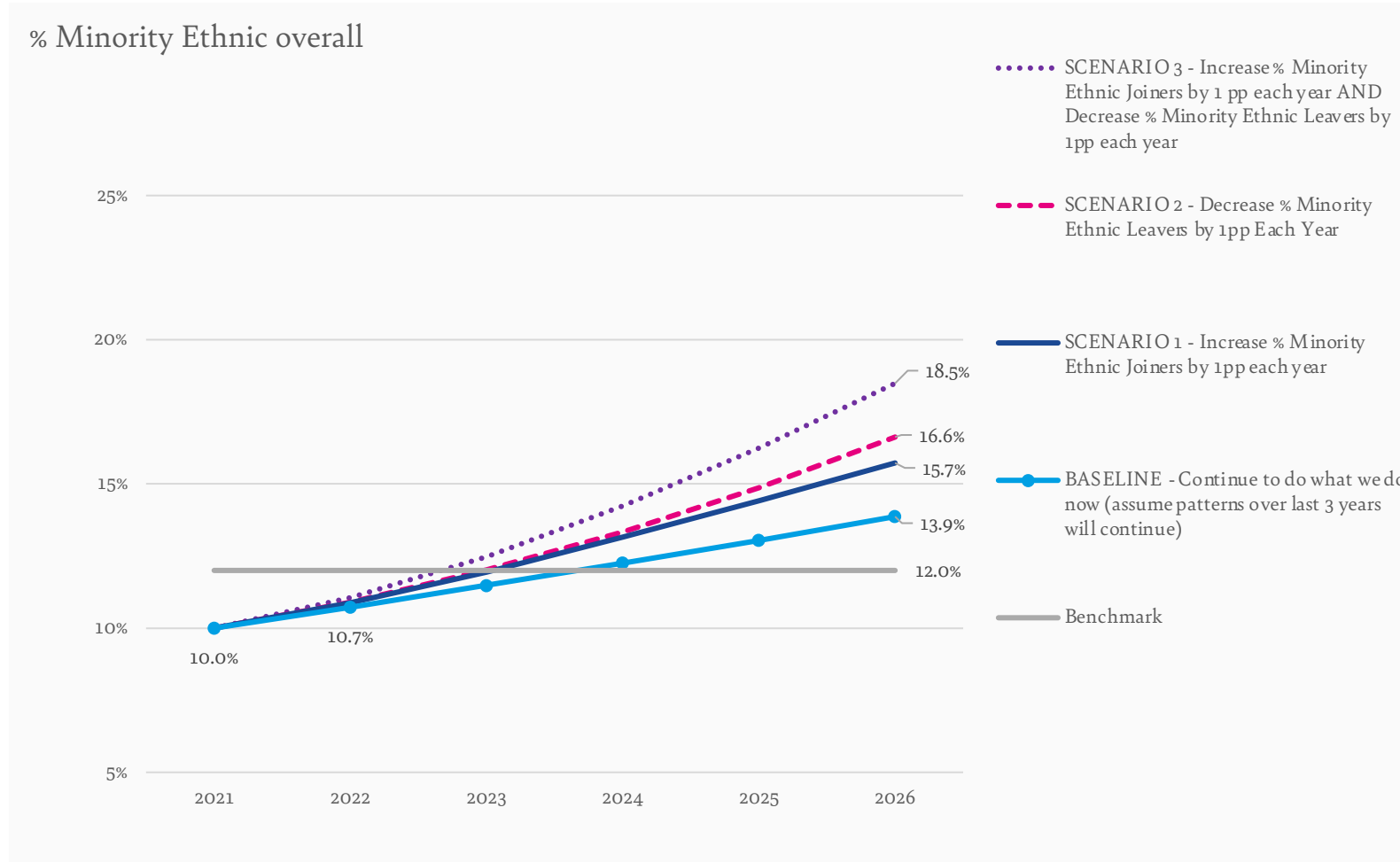


Gender projections



- Over time, the proportion of women is likely to remain relatively stable if current trends hold and no additional effort to increase the proportion of women in the industry is made.
- We can see that small changes in the proportion of female joiners would likely lead to an even greater female majority (as shown by Scenario 1).
- However, we can also see that increasing inclusion of women, and so reducing the proportion of female leavers, have an even greater effect on the gender imbalance in the industry (as shown by Scenario 2).
- Therefore, if we set a target of gender balanced recruitment, but combine that with a focus on increased female inclusion, we are likely to maintain gender balance (roughly 50-50 split) while also increasing retention, which will likely lead to increased progression for women.

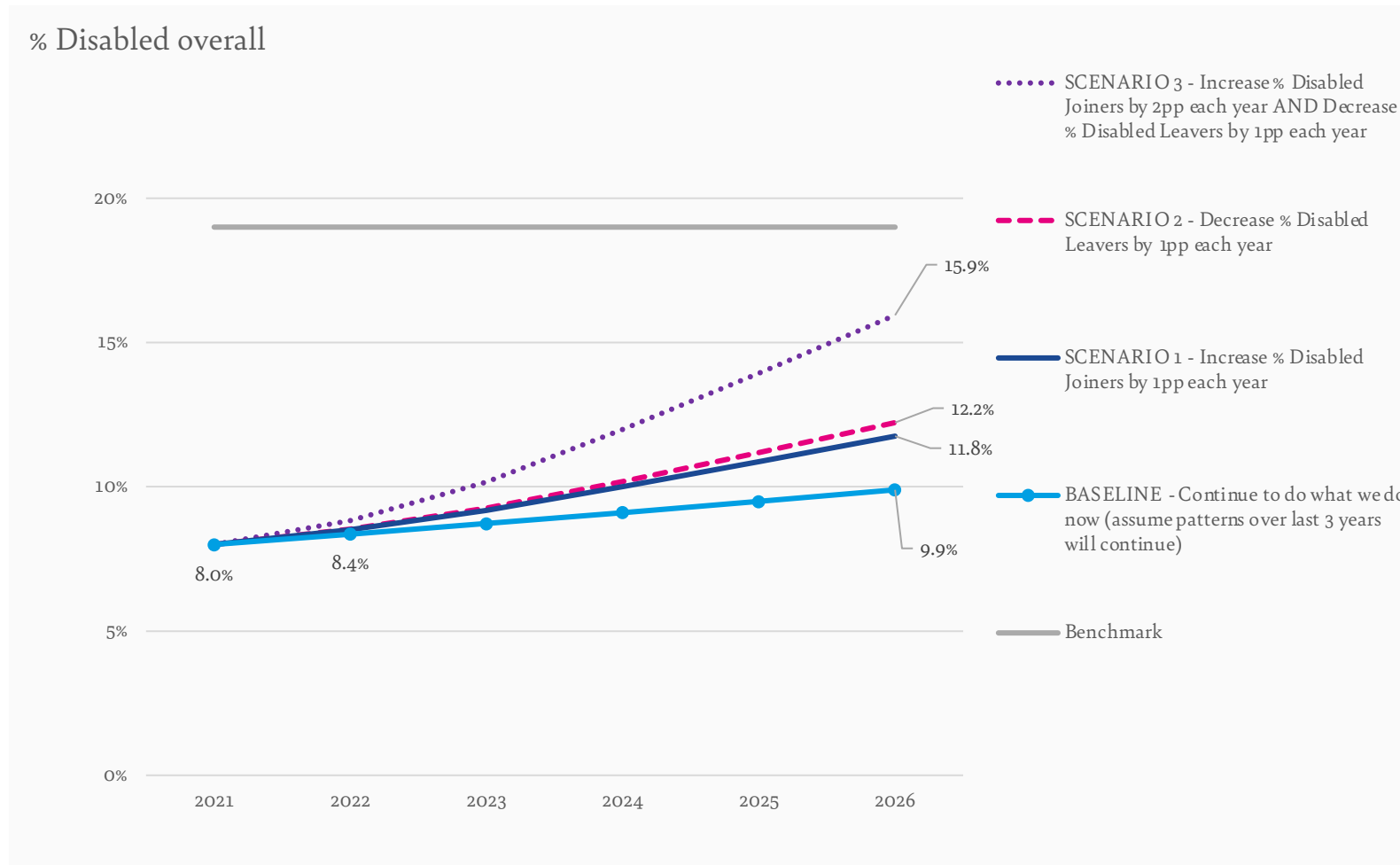
Racial group projections



Note: Due to data quality and availability, diversity projections for senior managers is not available

- Over time, the proportion of minority ethnic employees is likely to continue to increase steadily if current trends hold.
- We can see that small changes in the proportion of minority ethnic joiners would be useful for increasing the overall proportion of minority ethnic people in the industry (as shown by Scenario 1).
- However, we can also see that, like with ethnicity in TV, increasing inclusion of minority ethnic people, and so reducing the proportion of leavers, has a greater effect on overall ethnic diversity long-term (As shown by Scenario 2).
- Therefore, simply focusing on increased inclusion of minority ethnic employees may be enough for increasing racial diversity in Radio, but a combination of both inclusion and diverse recruitment (Scenario 3) would likely have the greatest effect.

Disability projections



- Over time, the proportion of disabled employees is likely to increase overall if current trends hold.
- However, this increase would still leave the industry 9 percentage points below the UK benchmark of 19% disabled employees. Significant effort should therefore be made to improve disability representation.
- We can see that increasing the proportion of disabled joiners by 1 percentage point each year will only improve on the baseline by 1.9% by 2026 (Scenario 1), and just focusing on inclusion doesn't do much better (Scenario 2).
- However, like with TV, combining increasing disability recruitment with disability inclusion efforts has a multiplicative effect, leading to an accelerated curve. This will allow the industry to more quickly approach the UK benchmark (Scenario 3).

Quantitative Data: Key Takeaways



Key Takeaways (1)

1. TV and Radio have had different progress when it comes to diversity, with TV improving on disability, race, and sexual orientation, while Radio has improved on religion and race diversity.
 - a. However, even where there has been improvement, these have been marginal overall – between 2% and 4% since 2018 for everything other than religion in Radio.
 - b. For both TV and Radio, neither industry has improved on age diversity since 2018; employees over 50 are still 11% and 7% below the benchmark [\(see slide 6 glossary\)](#) in TV and Radio, respectively.
2. Gaps between overall diversity and diversity among senior managers has closed for gender in TV and Radio, but for both racial group and disability this has not changed in TV, and worsened in Radio
 - a. This is an important caveat for the progress made, as it shows that increases in diversity have been mostly at lower levels that have less strategic input.
 - b. The past 4 years of data show that this is particularly critical for disabled and minority ethnic employees
 - c. It is also important that we are able to disaggregate the data for senior managers across all characteristics (including voluntary data) to understand if similar patterns exist for all diverse groups.
 - d. If possible, future data collection should attempt to collect data on promotion into senior management positions – if we know this demographic breakdown, we can build projection models to help identify how to more effectively close these gaps in the future.

Key Takeaways (2)

3. For almost all groups, the most effective way to improve diversity is increasing inclusion of traditionally marginalised groups.
 - a. Improving diversity of recruitment is a useful tool for increasing overall diversity, and projections show that this could help with long-term overall diversity in broadcasting.
 - b. Diversity in promotion will also be critical. This will help to close the gap between senior manager diversity and overall organisation diversity. This is a key marker of an organisation being viewed as seeing diversity as critical to better decision-making, rather than simply a marketing initiative.
 - c. However, retention is also a critical component of long-term diversity (particularly among certain under-represented groups), and projections show that this is likely to be even more important than diverse recruitment for diversity in broadcasting.
 - d. Inclusion – creating a space where people feel their diversity is valued, their voice is heard, and they are seen for who they are – is a critical factor for increasing retention of traditionally marginalised groups. This means organisations focusing on improving psychological safety within teams and with leaders (ability to disagree, make mistakes, take measured risks without a fear of unreasonable backlash), increasing transparency in decision-making, and addressing, reducing micro-aggressions and improving internal processes for handling discrimination.
 - e. Given the data of the last 4-5 years, it will be particularly important to focus on retention of disabled and female employees as a start (as progress for minority ethnic employees overall has been steady).
 - f. As such, now may be the right time for “Diversity in Broadcasting” to refocus to “Diversity & Inclusion in Broadcasting” as measuring inclusion of these groups will be critical moving forward to ensure diverse voices are heard and even better programming is offered to the diverse UK population.

Benchmarking and other reports of note



Other Relevant Reports

A range of other reports also explore some of the areas covered by this review. Here is a small indicative, rather than exhaustive, sample.

The Best Places to Work Study and Report 2021

<https://screen-network.org.uk/wp-content/uploads/2021/02/Equality-Diversity-and-Inclusion-in-the-Screen-Industries.pdf>

The Looking Glass – Mental health in the UK film, TV and cinema industry

<https://filmtvcharity.org.uk/wp-content/uploads/2020/02/The-Looking-Glass-Final-Report-Final.pdf>

Equality Diversity and Inclusion in the Screen Industries

<https://screen-network.org.uk/wp-content/uploads/2021/02/Equality-Diversity-and-Inclusion-in-the-Screen-Industries.pdf>

ScreenSkills Assessment 2021

<https://www.screenskills.com/media/4587/2021-06-08-screenskills-assessment-2021.pdf>

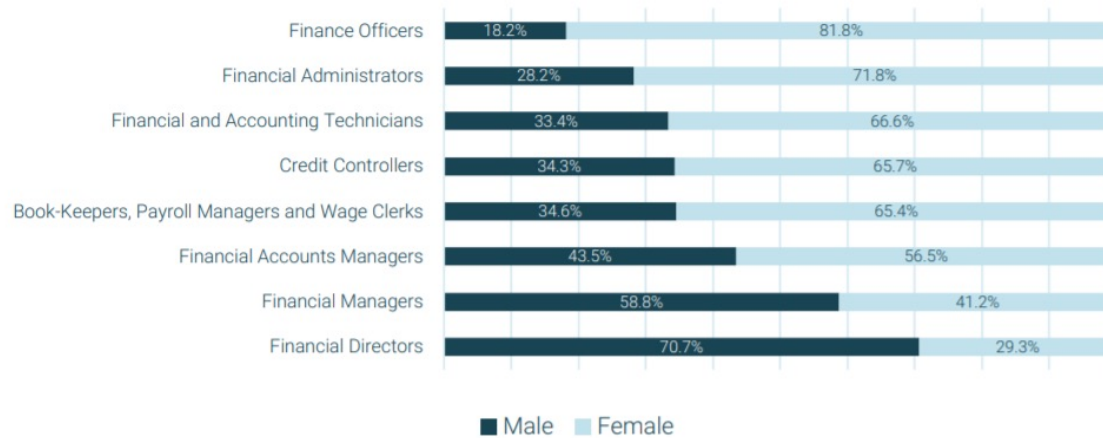
Topics addressed include:

- identifying the organisations where voices are heard and employees, no matter their backgrounds, are engaged
- insights into adaptations to working practices that could remain longer-term (post pandemic) and the window of opportunity to build a fairer working culture
- the difficulty in finding data about the screen industries in order to do comparisons over time and between places.
- limited evaluation of equal opportunities initiatives and diversity interventions how experiences of inequality and discrimination threaten the mental health and creative work of those in the industry
- that two thirds of film and tv workers have experienced depression compared to two in five people nationally and 66% of freelancers have considered leaving the industry because of mental health issues

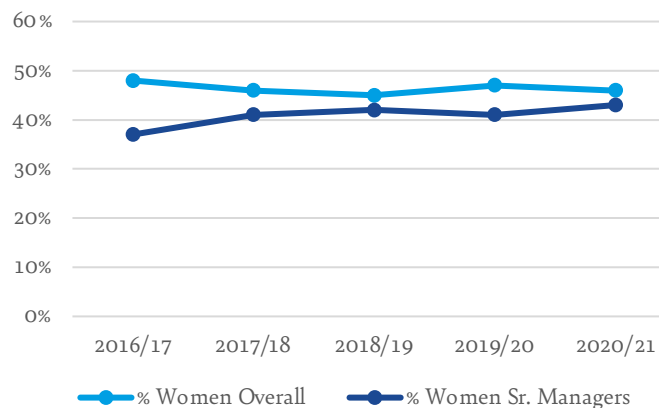
How broadcasting compares to other industries: gender

Graph 1:

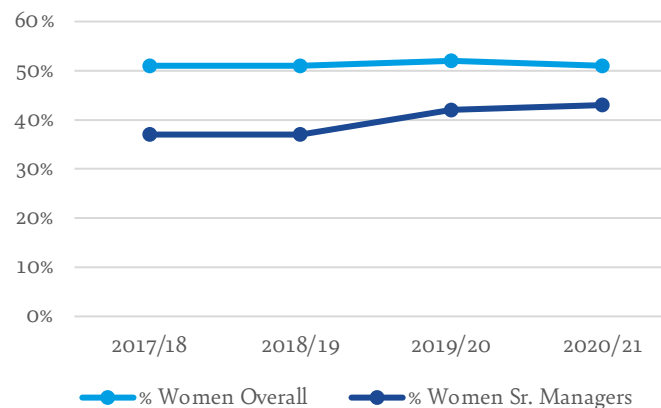
Breakdown of Financial Roles by Gender - EMP04 - Employment by Occupation & Sex (August 2017) (UK)



TV Gender 5 year progress



Radio Gender 4 year progress



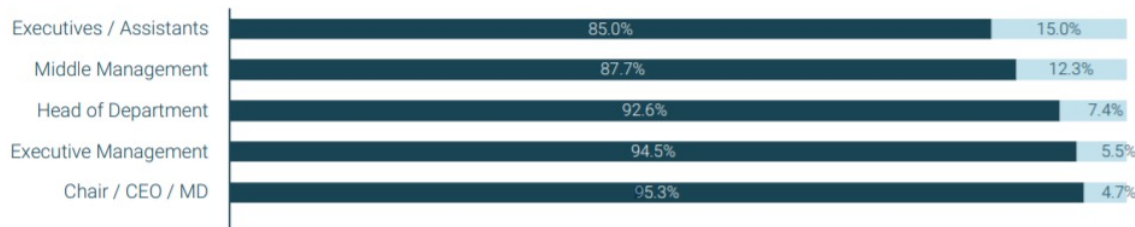
- The below analysis is not exhaustive, but provides some references for comparison with other industries beyond the UK benchmarks outlined in previous slides. Exact data collection methods will also differ.
- When compared to the global proportion of women in senior management roles (29% in 2020), **both TV and radio have significantly higher proportions at 41% and 42% respectively.**
- For [the UK in particular](#), the proportion of women in senior management roles is much higher, at 37.6% in 2020.
- If we look at the Finance industry in particular, Graph 1 shows that whilst the gender split is fairly equal overall, there is a decrease in the % of women as seniority increases - with just 29.3% of women as Financial Directors. (Source: [RTM Diversity Report](#))
- Another report by Deloitte shows that in 2019, the [proportion of women in leadership roles within financial services firms](#) stood at 21.9% and is expected to increase to over 30% by 2030.
- Findings across [multiple industries](#), including Technology, Marketing, HR, and Legal all indicate that senior management representation for women is consistently an issue. This is also in line with [Ofcom's previous findings](#) that whilst some of the largest broadcasters outperform national benchmarks for the representation of women overall, there is still room for improvement in the proportion of this group rising to senior roles.

How does broadcasting compare to other industries: ethnicity

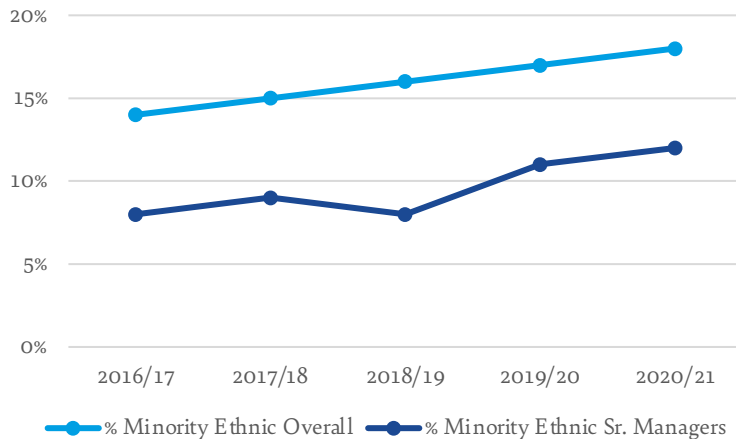
Graph 2 showing a decrease in % of BAME employees as seniority increases in the Marketing industry.

Source: [RTM Diversity Report](#)

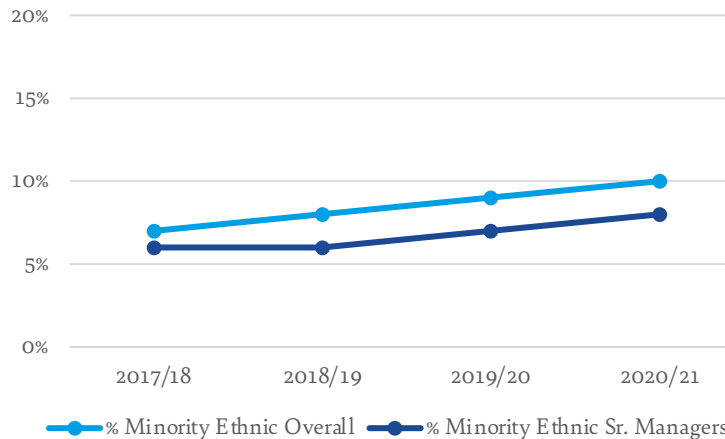
BAME Breakdown by Agency and Position - (2017) - IPA Gender and
BAME Survey - UK



TV Racial Group 5 year progress



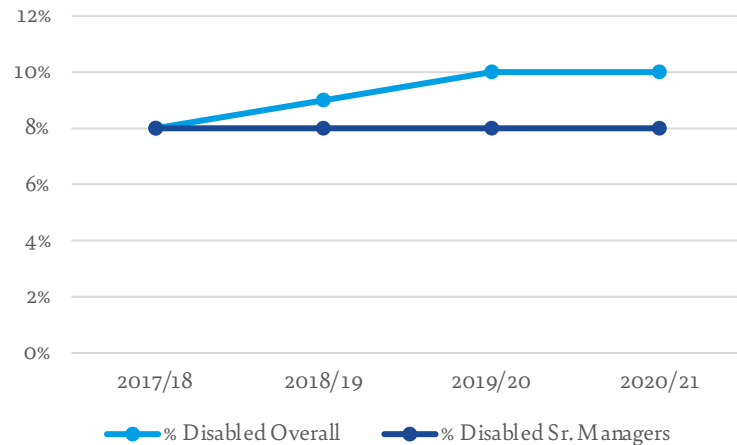
Radio Racial Group 4 year progress



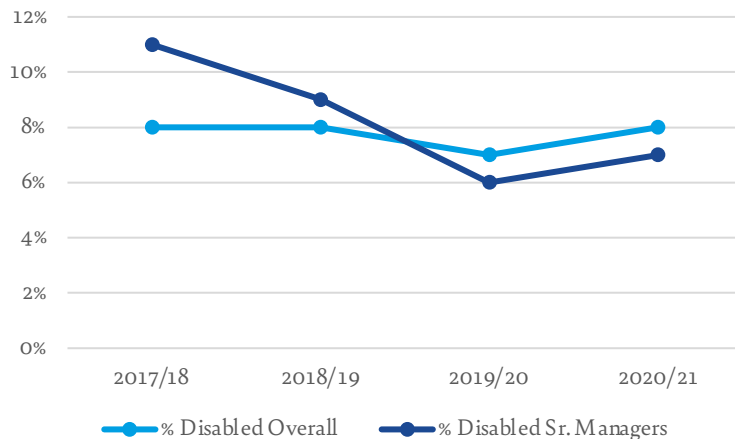
- There has been little progress in ethnicity over the last few years. In [the private sector](#), BAME employees held 10.3% of top senior roles in 2020, rising from 9.2% in 2014. **In TV, this figure stood a little higher, at 11%, but lower in radio at 7% in 2020.** For Black employees specifically, this figure was just 1.5% in 2020.
- Underrepresentation of minority ethnic groups in senior roles is a common theme across many industries; Graph 2 shows an example of the Marketing industry in which 15% of Executives/Assistants are BAME, with this figure decreasing at every increase in seniority until at Chair/CEO/MD level, only 4.7% are BAME professionals. **This is consistent with Ofcom's data that also shows a gap between the % of minority ethnic employees overall and % of minority ethnic senior managers across both TV and radio.**
- In UK financial services, members of the BAME community held fewer than one in ten management jobs in 2018 ([Ranstad, 2018](#)).

How does broadcasting compare to other industries: disability

TV Disability 4 year progress



Radio Disability 4 year progress



- Figures from the [Office for National Statistics](#) show that just over half of disabled people (52.1%) were employed in 2020, significantly lower than a figure of 81.3% for non-disabled people.
 - Further differences and lack of representations were highlighted when it came to employment in professional occupations, as well as senior management positions.
- According to the [Annual Population Survey in 2018/19](#):
 - The human health and social work activities industry had the highest % of disabled employees, at 16.2%
 - The financial and insurance industry stood at 2.7% of disabled employees, education at 10.6%, and arts, entertainment and recreation at 2.8%
 - Comparatively, TV and radio figures stood at c. 10% and 8% respectively.**
- For [FTSE 100 companies in particular](#), representation has been more of an issue with just 3.2% of all employees identifying as disabled. This figure is worse at senior management levels, with [zero executives or senior managers disclosing a disability](#).

included.

2. Qualitative Data: interviews



Methodology (1)

Overview

In order to add depth and explanatory context to the quantitative analysis, we conducted a series of interviews with individuals from the television and radio industries. The main goals were to delve more deeply into concepts of D&I change, explore drivers and barriers, to understand the impact of the pandemic, and to look to the future.

Categorisation

Ofcom and *Included* invited interviewees from one of three ‘categories’ to participate in the interviews:

- CEOs or senior executives
- D&I practitioners
- Independent production company representatives

This was designed to allow the most diverse range of experiences and opinions possible to come through, including strategic oversight, creative, operational delivery, and lived experience.

Selection of interviewees

Interviewees were drawn from a combination of Ofcom’s industry network and *Included*’s network, on the basis of voluntary participation. 45 interviewees were approached in total, with 28 agreeing and participating. CEOs of major public (e.g. BBC, Channel 4) and commercial broadcasters (e.g. ITV) were approached and agreed to participate. For a full list of participants see [Appendix page 131](#).

Methodology (2)

Selection of interviewees (cont'd)

It was discussed and understood between Ofcom and *Included* at the outset that time of year, the timeframe and the voluntary nature of the request to participants, together with the overarching effect of the pandemic, might negatively impact take-up. In the event, for a variety of reasons including people being on holiday, logistics of synchronising calendars, difficulties in making contact and some non-responses of the original list of 45 did not participate in the interviewee process. Freelancers and independent companies were disproportionately amongst those who were not involved.

Methodology (3)

Question design

Four key considerations were applied to the question design:

- the motivators for engagement with D&I
- any key changes relating to D&I that have been observed in the last five years, and what changes should come next
- the drivers for those changes
- perceived barriers to change

Different question sets were devised depending on the category of interviewee (CEO, D&I practitioner, Indie). These question sets can be found in the appendix.

Included employed a structured interview methodology, with each interviewee within each category responding to the same question set as far as possible. However, space was also given to participants to raise any further issues or questions that were important to them.

We also included quantitative scoring aspects on a 1-10 scale on issues such as regulator effectiveness and perceptions of change. The findings from these quantitative aspects can be found in the [Solutions – Delivering enhanced D&I section](#).

Methodology (4)

Interview format and logistics

The interviews took place across July and August 2021. They were scheduled for either 45 minutes or 1 hour. Each one was led by an *Included* consultant and conducted virtually over MS Teams. It was made clear to participants that the report may feature attributable quotations. Where requested by participants, it was agreed that these would be run by the participants for approval/confirmation ahead of publication.

Analysis and synthesis

Several qualitative methodological frameworks were considered for the analysis, including [qualitative content analysis](#), [grounded theory](#), [narrative analysis](#), and [thematic analysis](#).

We utilised a combination of qualitative content analysis and thematic analysis, enabling us to:

- Identify emergent themes from the respondent interviews
- Identify key patterns amongst the responses
- Include aspects of quantitative analysis, such as highlighting the frequency with which key ideas arose (and tagging them to particular interviewee categories)

Key findings were determined as a combination of number of times cited as an issue and the depth of discussion, with the top six presented for each of the qualitative research considerations.

Following the analysis, the findings were synthesised and written up into this report.

Snapshot of key themes

Research Lens	Theme 1	Theme 2	Theme 3	Theme 4	Theme 5	Theme 6
Why D&I? Understanding the motivators for engagement	The social imperative	The creative imperative	The commercial imperative/competition	The regulatory imperative	The moral imperative	Audience pressure
What now? What next? Leading change from the present to the future	Open discourse	Reframed attitudes and embedded change	Better safeguarding and policy	More diversity in content	Visibility on representation	More diversity in workforces, commissioning and leadership
Drivers What has effected change?	Social movements	Pandemic	Data: measurement and reporting	Effective regulation	Safeguarding failure examples	Online, digital and on-demand growth
Barriers What hinders D&I progress	Lack of focus on minorities at senior levels	Regulation	Siloes, arrogance, and lack of collaboration	Commercial pressures	Narrow content focus	Lack of senior accountability

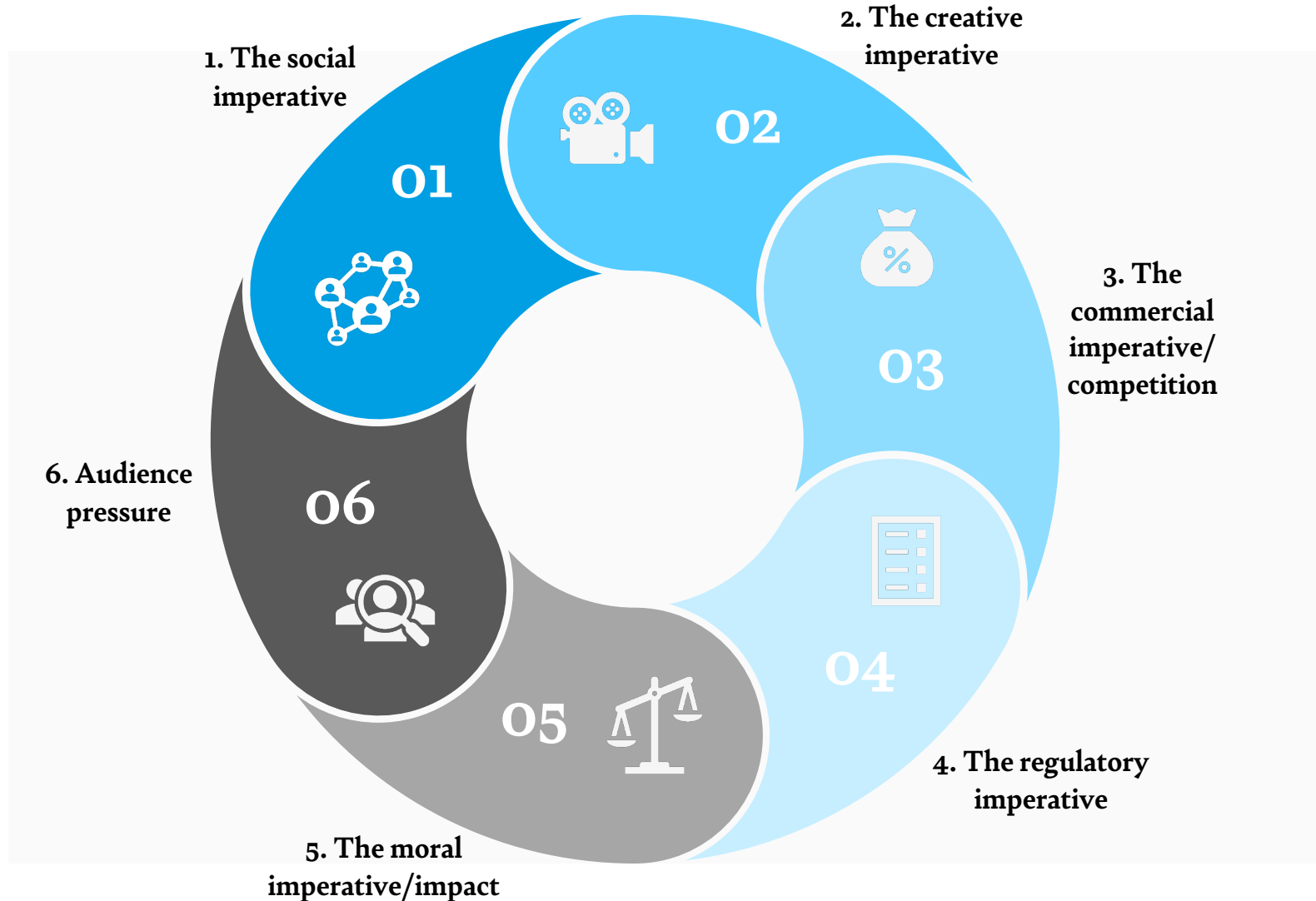
included.

Why D&I?

Understanding the motivators for engagement



Motivators for D&I engagement (1)



Introduction

During the qualitative research phase, *Included* asked each interviewee for their views on and experiences of what motivates engagement with D&I.

Included prompted by using example categories such as commercial/competition, creative excellence, regulatory imperative, CSR, and external societal pressures (#MeToo, Black Lives Matter).

We analysed responses and present the six key motivators in descending order of importance, determined as a combination of number of times cited as an issue and the depth of discussion.

Other items less frequently cited included Corporate Social Responsibility (CSR) and reputational motivators.

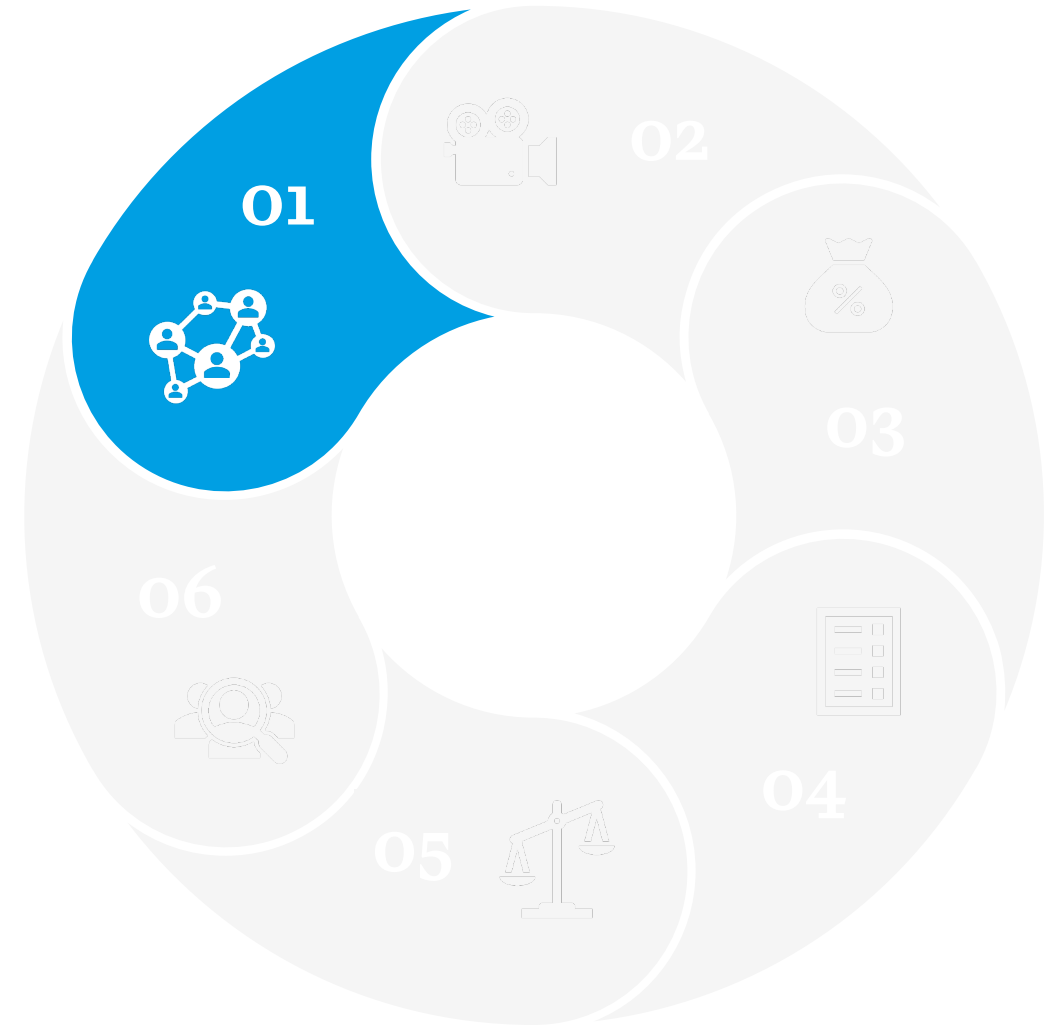
Motivators for D&I engagement (2)

1. The social imperative

External social pressures were the most cited motivator for engagement with D&I. One respondent told us that without reactions to prominent examples of damaging behaviour (relating to sexual violence and poor working practices), the sector may have gone back to where it was many years before.

Social movements such as #MeToo and then Black Lives Matter were catalytic, creating motivation and pressure for change both externally through protest movements and within organisations, driven by employees and resource groups. This led to D&I jumping up the corporate agenda.

Several others mentioned that whilst societal pressure was the most prominent motivator, they would prefer that D&I were driven by commercial and competitive factors.



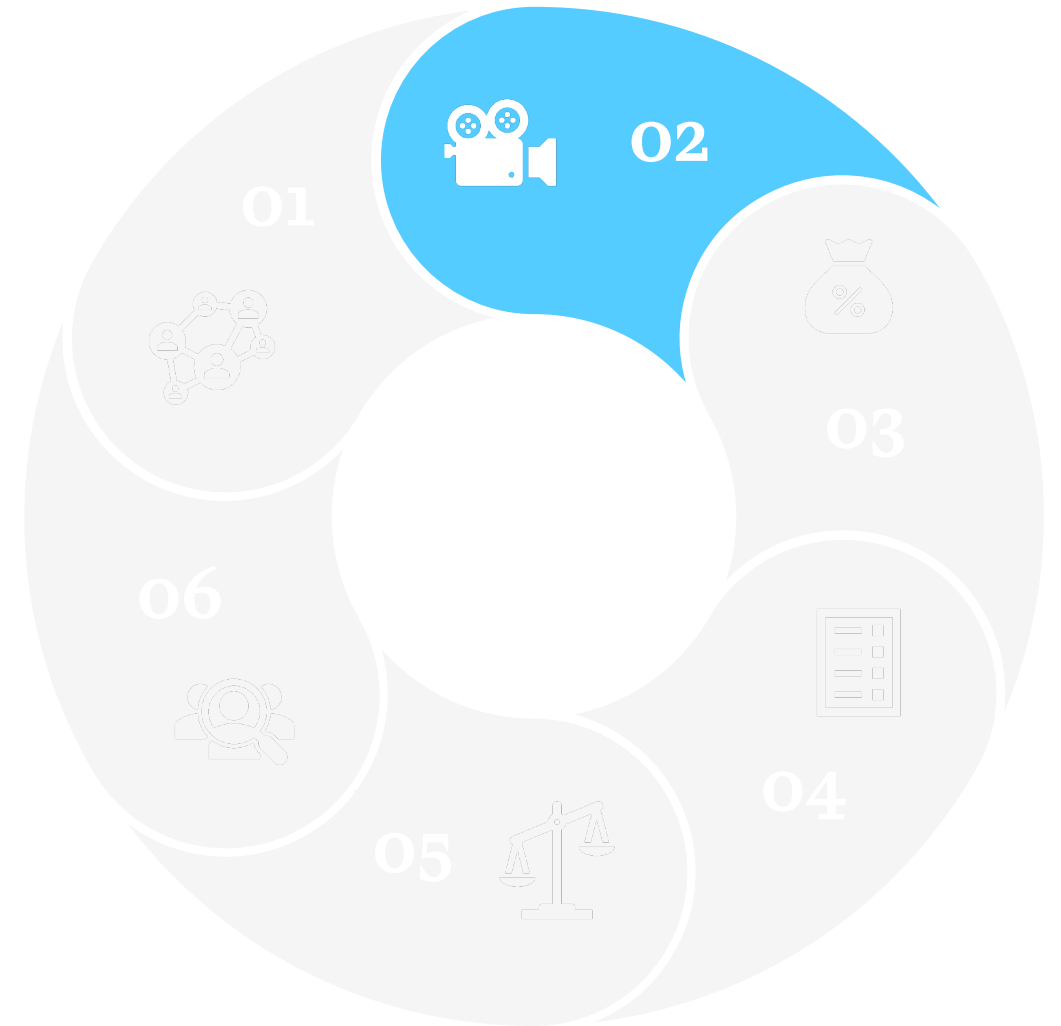
Motivators for D&I engagement (3)

2. The creative imperative

Many interviewees agreed that diversity was essential for creative excellence. Diversity leads to good decision making, critical thinking, and creativity of thought. Creativity had suffered due to groupthink in recent times.

However, there was also some concern about the ongoing lack of diverse representation amongst senior commissioners and leadership teams, meaning the creative imperative has been attenuated.

The potential future appointment of a non-white controller of a major broadcaster was cited by some as being a possible turning point here.



included.

“It’s a no-brainer that diversity is good for creativity as it allows for the full spectrum of humanity to be explored. But how can you access the diverse spectrum of creative storytelling if every person is not given the opportunity to tell their story?”

Melanie Hoyes, Industry Inclusion Executive, BFI

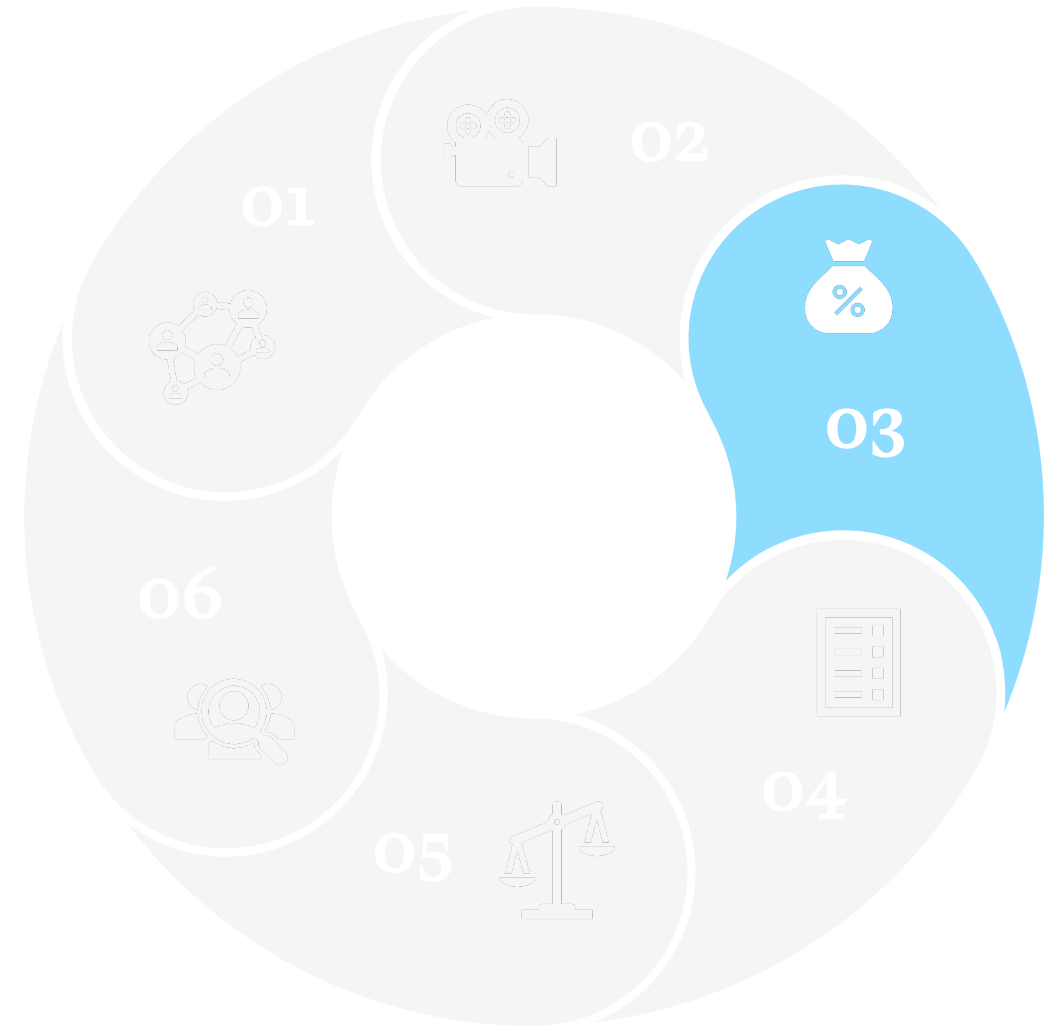
Motivators for D&I engagement (4)

3. The commercial imperative/competition

Many representatives felt that D&I was a big part of the search for competitive advantage, particularly amongst major broadcasters. This meant appreciating the increasing diversity of UK audiences, and reflecting their lives on screen.

Several interviewees commented that SVODs and digital unregulated organisations were leading the way in representing minority audiences in innovative ways and were reaping the commercial benefits. The regulated entities are becoming alive to this challenge.

Despite this, a handful of interviewees felt that the commercial imperative should be stronger, but wasn't. One respondent argued that the commercial or 'business' case for D&I was 'esoteric', and that a more effective way to create motivation was to help leaders draw emotional and personal connections.



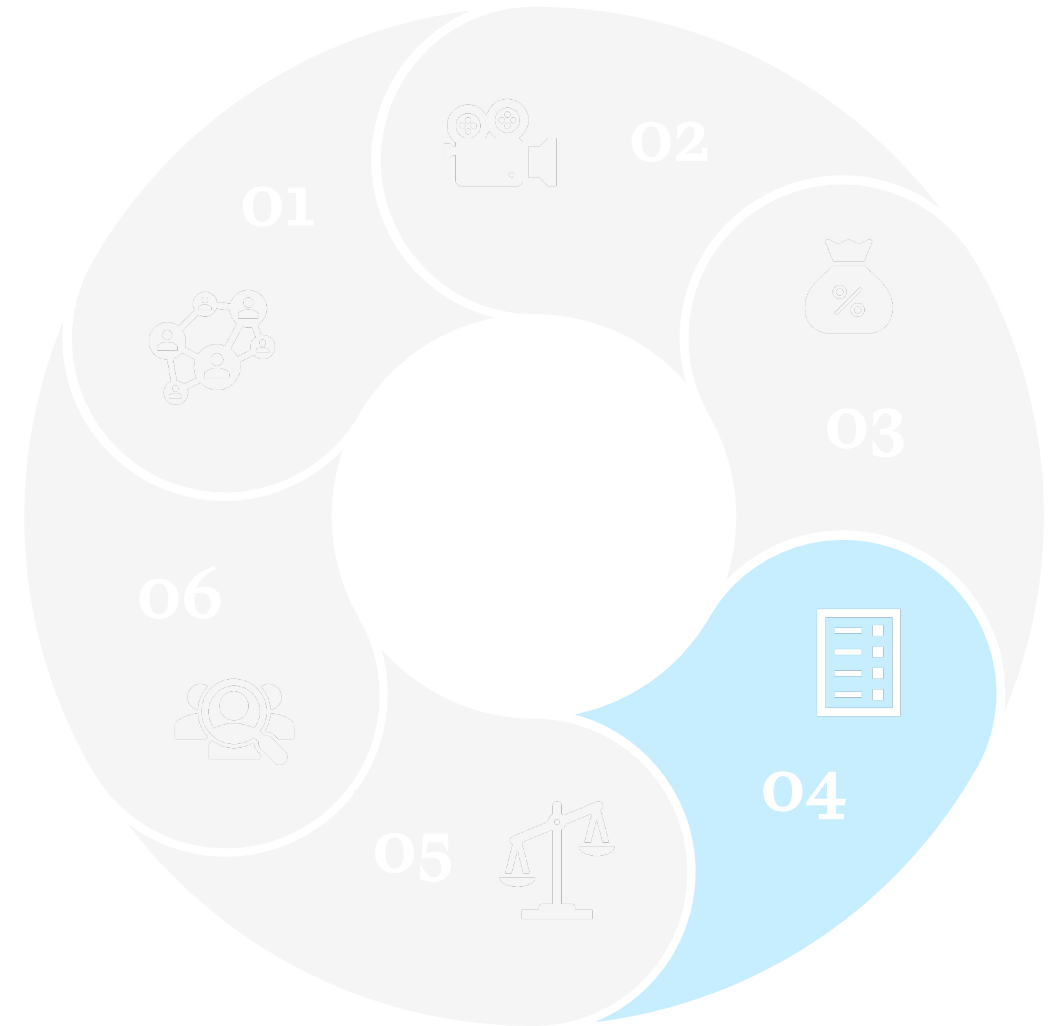
Motivators for D&I engagement (5)

4. The regulatory imperative

Regulatory pressure was called out by many respondents as an important motivator. [Ofcom's work done on data](#) in the television sector in particular had driven improvements according to some respondents.

However, a perceived lack of pressure on radio, correlated with an un-diverse radio sector, showed the comparative impact. The [Hampton Alexander Report](#) and [gender pay gap reporting](#) were also called out multiple times as helpful instruments.

Some interviewees framed the regulation/motivation issue a little wearily, feeling that organisations act just to 'get over the line' in terms of regulation, and that they are only interested in being 'performative' for the D&I agenda.



Motivators for D&I engagement (6)

5. The moral imperative/impact

Some organisations, according to one respondent, had been ‘horrified’ at the gaps that existed and were accordingly spurred by the moral imperative for change.

A handful of respondents spoke about D&I being ‘morally the right thing to do’. However, whilst it was felt that there was generally (though not universally) a consensus on the moral argument, some felt that the problem was that the levers for change were not there. i.e. we are not advancing quickly enough from moral or theoretical understanding of the issues through to effective action.



Motivators for D&I engagement (7)

6. Audience pressure

Some respondents (largely D&I practitioners) called out the changing demography and [changing attitudes](#) of audiences as a direct driver for motivation. There is not one homogenous group, so ensuring diversity in programme making is critical for the industry.

As consumers, subscriber-audiences to SVODs were noted by a few respondents as having a very high direct influence on digital organisations' programming strategy. The regulated entities, some felt, need to catch up with this in order to meet the needs and desires of audiences.

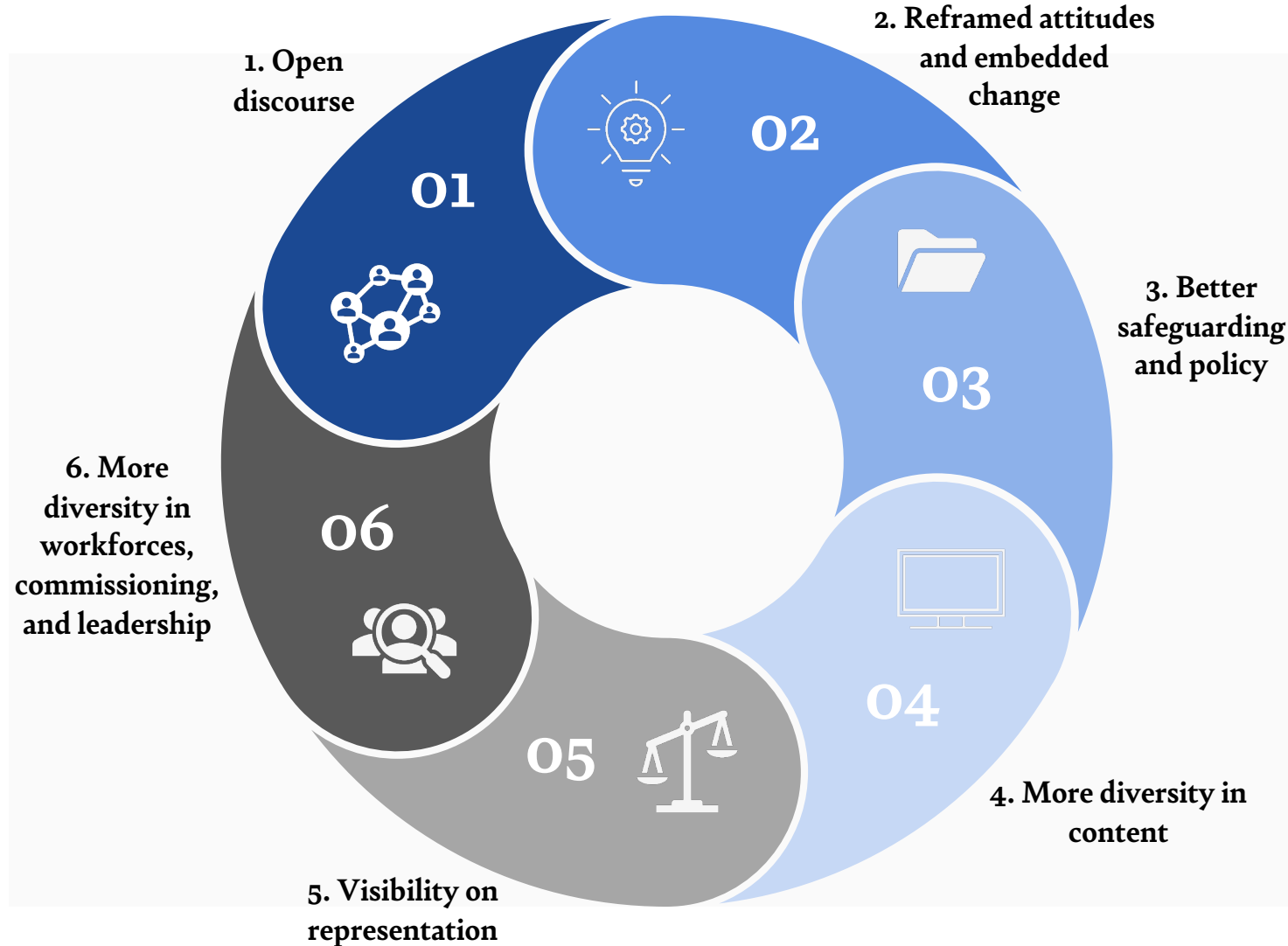


included.

What now? What next?
Leading change from the present to the future



Impact changes (1)



Introduction

As part of the qualitative research, *Included* asked each interviewee for their views on the most impactful changes in D&I in the last 5 years.

The most prominent cited D&I changes were a renewed openness and honesty in conversations, a reframing of attitudes towards embedding inclusive change, better safeguarding and policies, greater visibility on representation figures, and greater diversity in content production, the workforce, and leadership teams. These are presented in descending order of importance, determined as a combination of number of times cited as an issue and the depth of discussion.

In the analysis, *Included* has indicated where respondents had noted contributing causal factors for these changes.

Other changes less frequently cited included an increase in female empowerment and awareness around issues such as menopause and pregnancy loss; clearer leadership and accountability from people in top positions on D&I; and more industry-wide collaborative working between organisations.

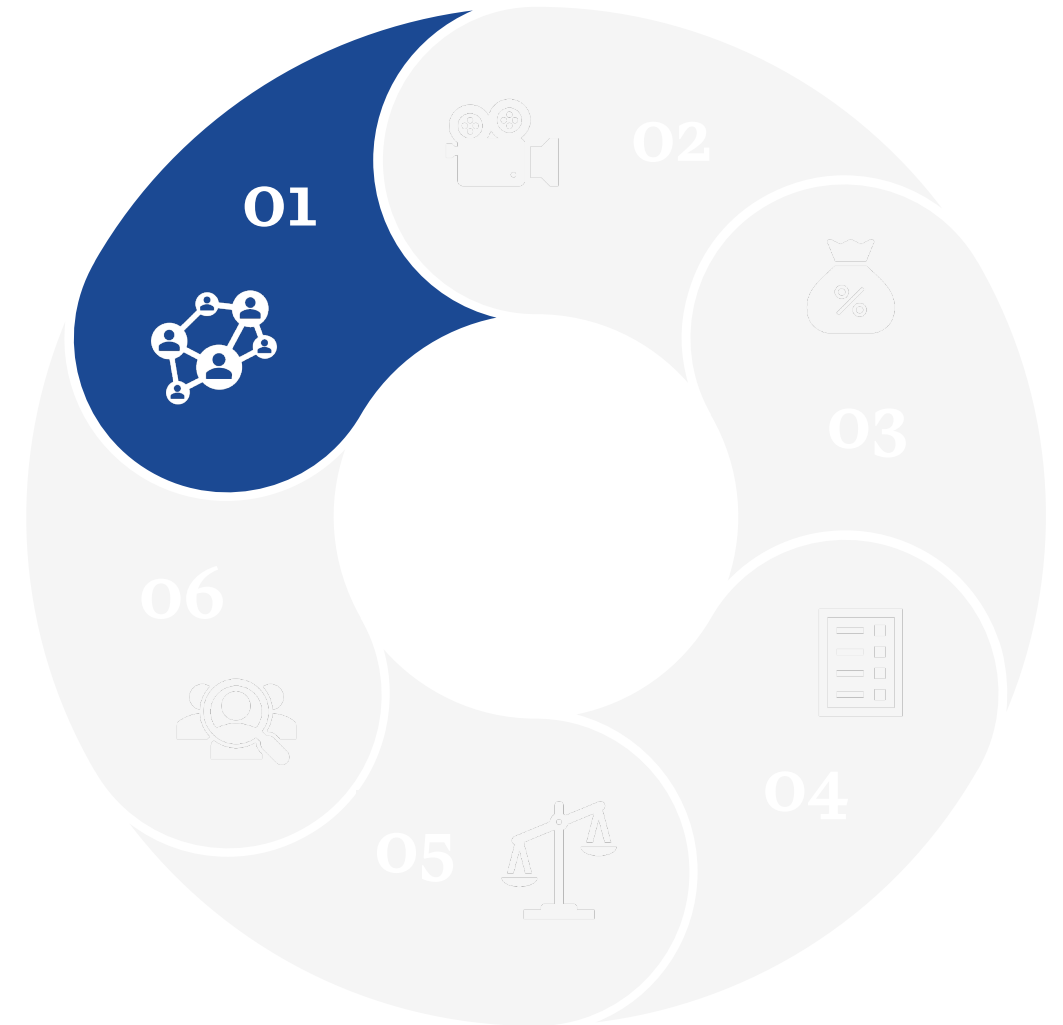
Impact changes (2)

1. Open discourse

Many respondents felt that there has been a dramatic, positive change in the number, nature, and depth of conversations – both public and private – about D&I. This is particularly true of the representation and experiences of underrepresented and marginalised ethnic groups in broadcasting. Many respondents commented on an increasingly open atmosphere of humility, authenticity, and recognition for action.

Colleagues are increasingly sharing experiences without the fear of retribution. Others noted that the language, vocabulary and level of discourse around topics such as race, gender and disability has become more sophisticated. On an organisational level, this has manifested in highly visible public statements, with examples cited by respondents including anti-racism manifestos ([see for example Channel 4](#)) and action plans ([see for example ITV](#)) following the murder of George Floyd.

- *Contributing factors cited for this change included social movements such as Black Lives Matter and #MeToo, data requirements and reporting, safeguarding failure examples, and more effective regulation.*



Impact changes (3)

2. Reframed attitudes and embedded change

Several respondents noted that where previously D&I had tended to be an isolated consideration, led by distinct D&I teams or departments, in recent years it has become more of an embedded structural issue. Several respondents also noted that D&I was now a critical leadership topic that was threaded through all the activities of an organisation, such as commissioning, policies, recruitment, and storytelling.

A number of D&I professionals who responded said that the scope of their role had shifted; they no longer held the full burden of D&I work, but spent more time facilitating and supporting the D&I work of other departments.

- *Contributing factors cited for this change included social movements such as Black Lives Matter and #MeToo, and data requirements and reporting.*



included.

“One of the great things about last year was the **energy that was released**, which was a mixture of **embarrassment, and anger and frustration**, depending on who you are and what your perspective is. But that that was all like **kinetic energy**, and we are trying to use it to change.”

Anon

Impact changes (4)

3. Better safeguarding and policy

A few interviewees felt that there have been advances on industry-wide and institutional safeguarding and guidelines. One example of this given was the cross-sector bullying, harassment and racism prevention [guidelines](#) developed by the British Film Institute and BAFTA. The #MeToo movement in particular was cited as a critical driver for such change. Several individuals commented that within their individual broadcasters and production companies there has been a renewed focus on creating effective policies to tackle bullying, harassment, and discrimination.

- *Contributing factors cited for this change included social movements such as Black Lives Matter and #MeToo, safeguarding failure examples, data requirements and reporting, and the pandemic.*



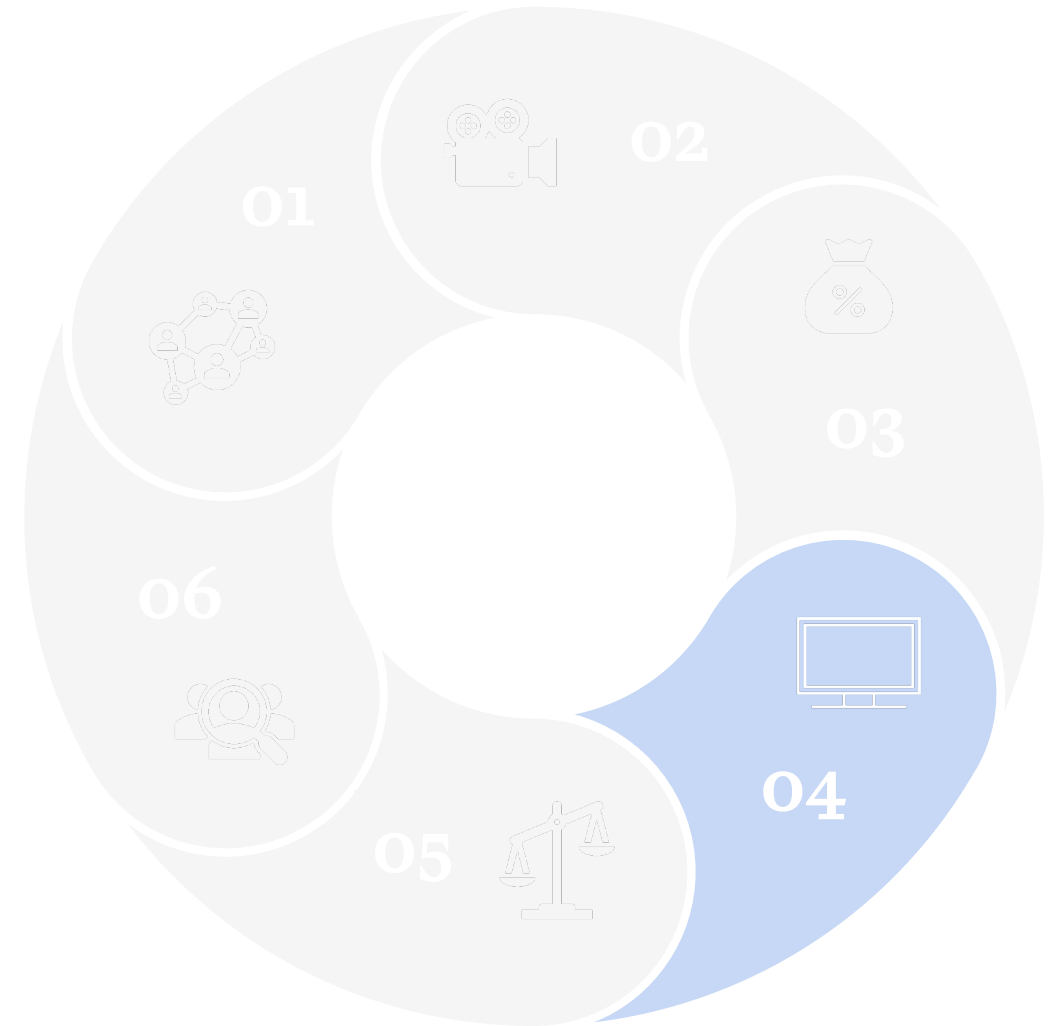
Impact changes (5)

4. More diversity in content

A few interviewees noted that whilst progress on diverse representation behind the screen still left a lot to be desired, there had been positive movements within the television sector in on-screen content. This manifested in highly successful examples such as Michaela Coel's [*I May Destroy You*](#), Steve McQueen's [*Small Axe*](#), and [*Bridgerton*](#) by Netflix.

It was felt by some that the rise of online and on-demand production had created a greater demand, and therefore mandate, for diverse content. However, the same was not necessarily true of radio, which more than one respondent noted continued to hold a very narrow content lens.

- *Contributing factors cited for this change included online, digital and on-demand growth, Brexit and political upheaval, and effective regulation.*



Impact changes (6)

5. Visibility on representation

Overall, it was felt by respondents that the broadcast sector is holding up the mirror to itself more closely than ever before. Both on a sector-wide and organisational level, recent years have seen a much clearer picture emerge on representation and the demographic makeup of the television sector – although less so in radio. Many respondents felt their organisations were showing more of a ‘true’ picture and participating in a conversation about successes and challenges, rather than massaging their diversity data for PR purposes.

A few respondents felt that there are still many unacceptable gaps where data are missing, such as on inclusion, disability, socio-economic class, and ‘invisible’ ethnic groups including South-East Asians and East Asians, as well as on the intersectionality of various characteristics and groups. However, there was a general sense of progress on data overall, and the [Creative Diversity Network’s Diamond](#) reporting mandate was called out several times as an effective driver.

- *Contributing factors cited for this change included data requirements and reporting, safeguarding failure examples, and effective regulation.*



included.

“The biggest thing that’s happened is that data is being collected and there is a clear understanding of where the progress has not been made – where will alone won’t ensure progress.”

Deborah Williams, Executive Director at Creative Diversity Network

Impact changes (7)

6. More diversity in workforces, commissioning, and leadership

One respondent felt that the ‘room has changed’, citing the exciting level of diversity now visible in broadcast workforces and industry events. Others noted that whilst there was still much progress to make, there had been an increase in diversity in their workforces, such as [ITV](#) (where in the senior leadership team of ~180, 11.2% were from an ethnic minority, 46.4% were female, and 5% identified as LGBT).

It was noted by one interviewee that there had been an increase in the diversity of commissioning teams and that this had the potential to have an outsized positive impact on the sector; commissioners decide what goes on television and having more commissioners of colour would help diversify the industry.

The CEO of [Bauer Media](#), Dee Ford, noted that across their radio stations, ethnic minority workers numbered above the national average. However, as the quantitative analysis earlier in this report show, others pointed out that minority ethnic individuals are still mainly distributed within more junior, rather than senior, levels. Indeed, many respondents lamented the lack of diversity in the most influential positions in both television and radio, particularly in ‘high-end’ television.

- *Contributing factors cited for this change included programmes and schemes.*



included.

“Our sector has the most extraordinary breadth of job opportunities...it’s potent in terms of how it captures imagination, shapes lives. And I feel the opportunity for everyone to be part of painting that picture is extraordinary.”

Seetha Kumar, Chief Executive at Screenskills

included.

Drivers
What has effected change?

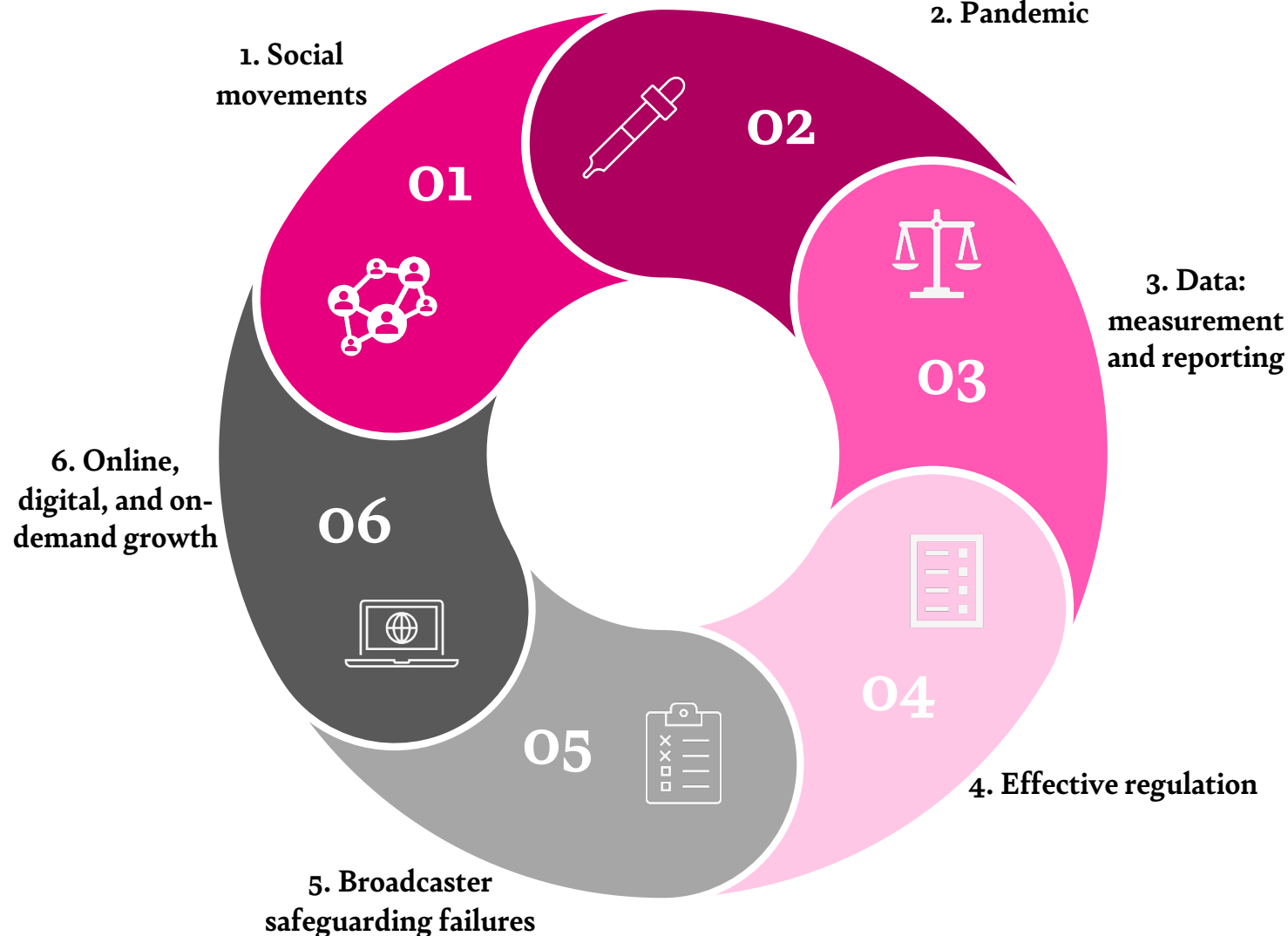


included.

“So, what drives change? Individual leaders have **purpose and belief**, the **external environment**, and finally the **social movement** involving staff, customers, brand.”

Sally Cairns, Chief People Officer, Global

Impact drivers (1)



Introduction

Throughout the interviews, *Included* explored the impact changes cited by interviewees in more detail, to better understand their thoughts on what was driving these changes.

The most cited drivers were social movements such as Black Lives Matter and #MeToo which had created powerful mandates for change. The pandemic was flagged in almost every conversation as having an influential effect on D&I. Another major factor, cited by many as a force for good, is the increased requirement on institutions to report on their data, driven by campaigns such as CDN's Diamond, and Ofcom's reporting requirements. Other factors included effective regulation, high-profile examples of industry safeguarding failings, and digital growth. These are presented in descending order of importance, determined as a combination of number of times cited as an issue and the depth of discussion.

In the following slides, each key driver also contains a list of the various changes attributed to this particular factor.

Other drivers less frequently cited included Brexit and political upheaval causing an upsurge in 'British'-focused content; the positive and lasting impact of coverage of the London Paralympic Games in 2012; climate action causing a more thoughtful approach to corporate administration; and recruitment/talent programmes and schemes which helped to increase diversity in workforces.

Impact drivers (2)

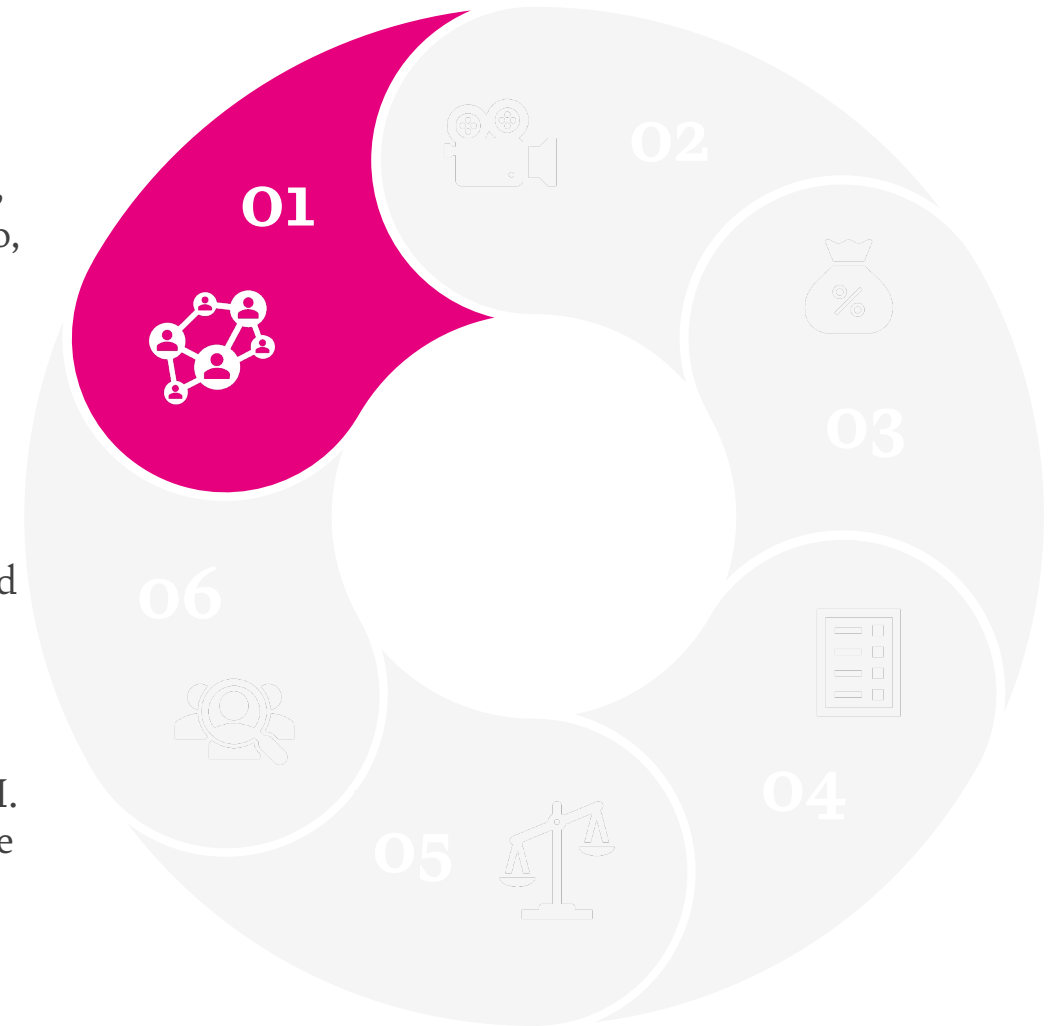
1. Social movements

Nearly every interviewee referenced the profound impact of social movements, most notably on race (Black Lives Matter, 2020-) and sexual violence (#MeToo, 2017-). Black Lives Matter was considered a major catalyst for change which awakened and challenged the industry to re-evaluate its attitudes, behaviours and actions. This led several respondents to identify the last 12 months (since summer 2020) as a particularly critical time.

The #MeToo movement, sparked by allegations against Harvey Weinstein in 2017, was also cited many times. These social reckonings were unignorable and created powerful mandates for change. One CEO commented that it challenged the organisation to put its arms around its people and to 'feel their pain'. The quantitative analysis also shows decreases in the proportion of women in TV during the time that followed (2017-2019).

There was some concern, however, about the 'swinging door' of issues with D&I. Attention has turned from women to minority ethnic people to disabled people at various points, but meaningful, long-term change still seemed to be elusive.

- *Changes attributed to this factor by respondents included open discourse, female empowerment, better safeguarding and policy, reframed attitudes and embedded change, and visibility on representation.*

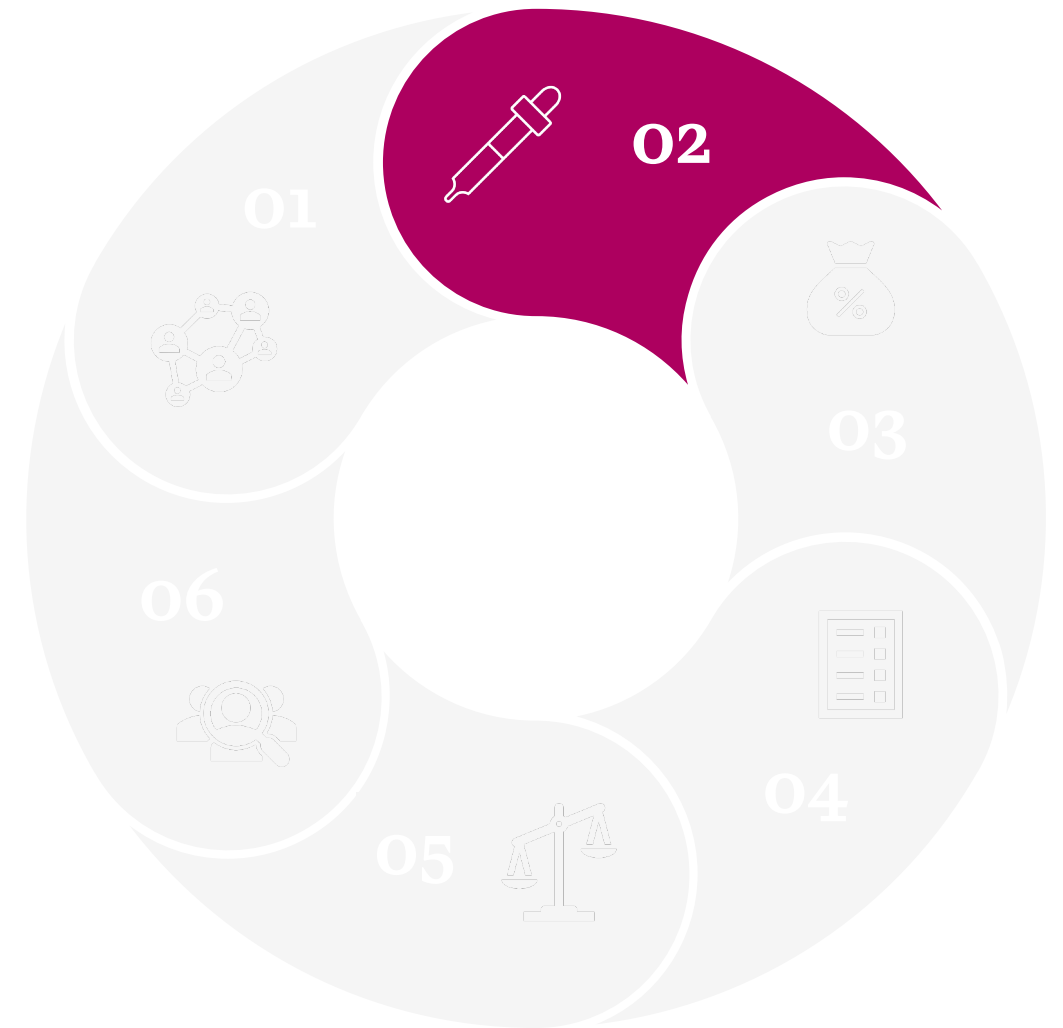


Impact drivers (3)

2. Pandemic

The pandemic was widely acknowledged by respondents to have had a devastating impact on the sector. Thousands of freelancers' income dropped to zero, with government interventions deemed insufficient or inaccessible. Many minority ethnic workers have reportedly left the industry, although we don't know the full scale of this impact yet. Some respondents considered that D&I would have fallen off the agenda were it not for George Floyd's murder and subsequent protest movements. Others noted the entrenchment of poor working practices and the benefits of being 'networked' to being hired.

However, many respondents also pulled out some unexpected benefits. One of these was an increase in intra-sector conversations and collaboration, accelerated by digital communication methods such as Zoom. Where historically it would have been very difficult to get industry leaders in a room to discuss D&I, the pandemic enabled this to happen and created an 'equalising' effect on interactions.



Impact drivers (4)

2. Pandemic

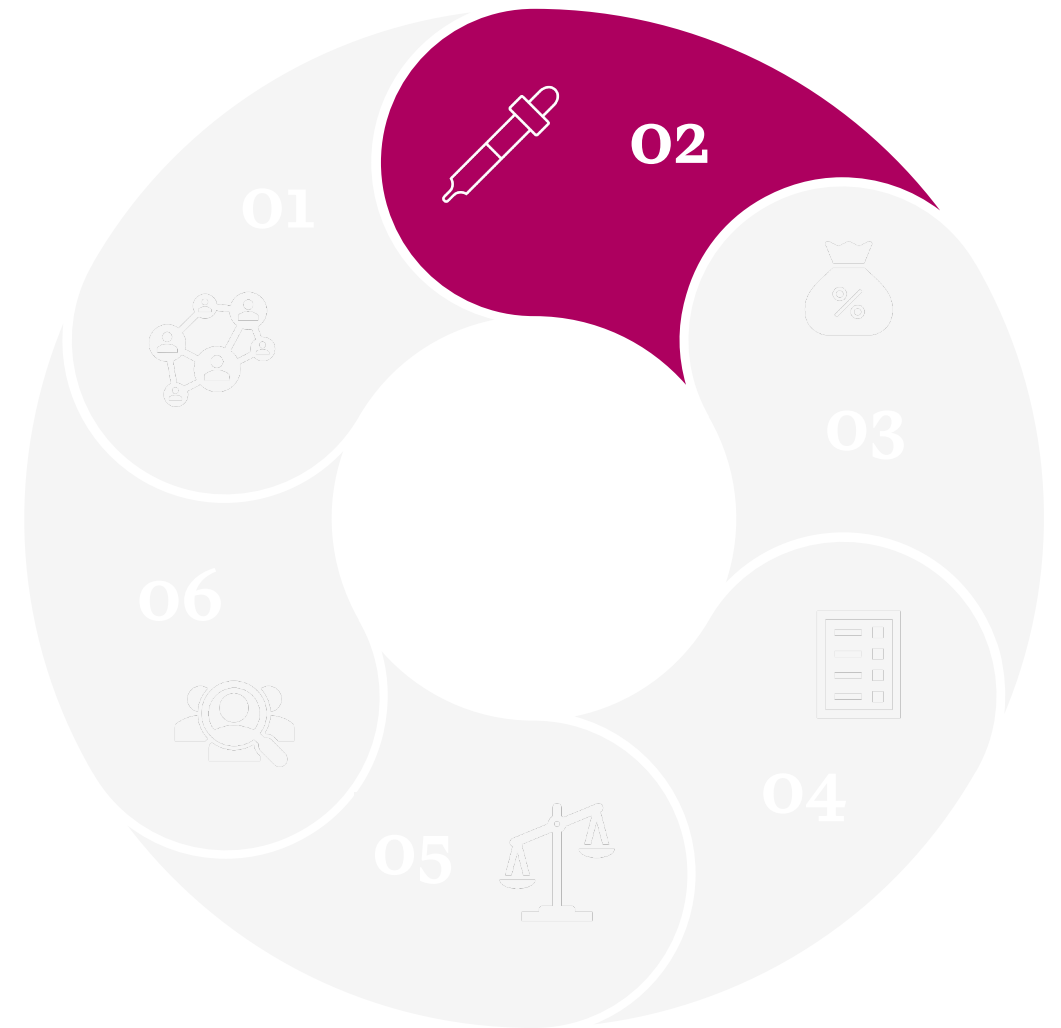
Flexible working was a highly referenced positive change. The expectation is that it will have positive impacts on accessibility, for those with children/caring responsibilities, some disabled people, and nations and regions diversity. The elevation of wellbeing issues was also welcomed, with enthusiasm for the retention and even expansion of wellbeing programmes. Positive work continued via Employee Resource Groups, with senior engagement.

Several respondents had observed much hard work in getting things running again, with smaller productions, creative innovation, user-generated content and investment in Covid-secure larger productions – a reported production spend of £2.1bn.

The pandemic also amplified the voices of grassroots campaigners. It urged people to ‘take stock’ of what mattered, including what they wanted from work and how workplaces might be configured. This increased thoughtfulness was generally considered to be a benefit for D&I.

[See pages 118-125](#) for a section dedicated to the Pandemic and its impact.

- *Changes attributed to this factor by respondents included open discourse, reframed attitudes and embedded change, and more diversity in content.*



included.

“ITV is a **stronger, better, more resilient** company because of the action we took in the pandemic.”

Carolyn McCall, CEO, ITV

“The pandemic has led us **15 years into the future**...we have a more flexible model for employment and are able to **attract people where there were barriers before**”

David Carrigan, Group Director of Diversity and Inclusion, Sky

Impact drivers (5)

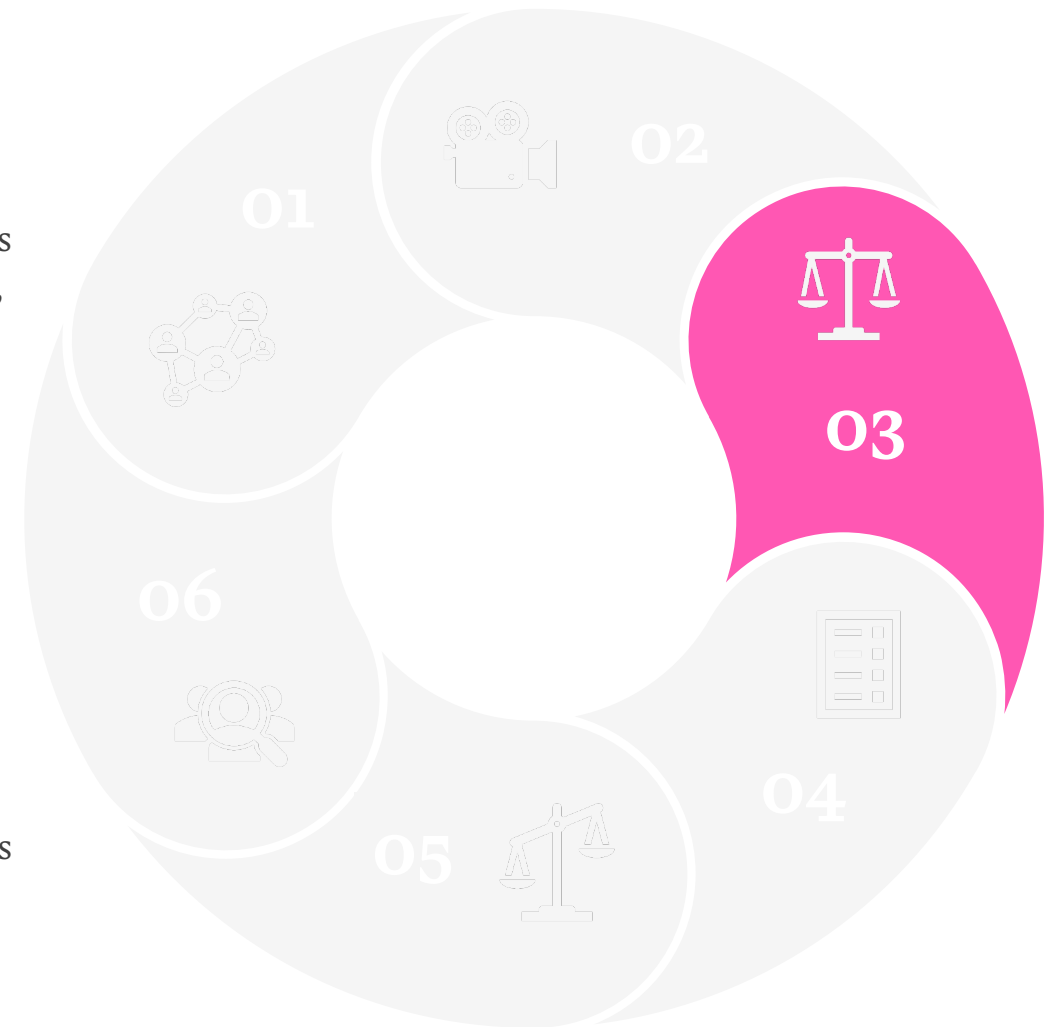
3. Data: measurement and reporting

The introduction of systematic reporting, data collection and measurement was cited as a highly influential contributor to progress. This had helped the sector, and organisations within it, to identify where progress was and was not happening. Examples cited here included the introduction of statutory gender pay gap reporting in the UK (2017-), the [‘Looking Glass’ report on mental health](#), the [Creative Diversity Network’s Diamond](#) reporting scheme which has ‘millions’ of datapoints, and Ofcom’s Diversity in Broadcasting data collection.

Many organisations have also introduced self-mandated reporting mechanisms, notably the major broadcasters. Whilst no data collection processes are considered to be perfect or exhaustive schemes, they have nonetheless been viewed positively on the whole.

To go further, many respondents felt that mandatory reporting on [ethnicity pay gaps](#) was a glaring gap and a required next step. Others noted that there has been too much of a focus on diversity to the neglect of inclusion, and that Ofcom’s mandate ought to change to ‘Diversity and Inclusion in Broadcasting’ (DIIB).

- *Changes attributed to this factor by respondents included open discourse, visibility on representation, reframed attitudes and embedded change, and better safeguarding and policy.*



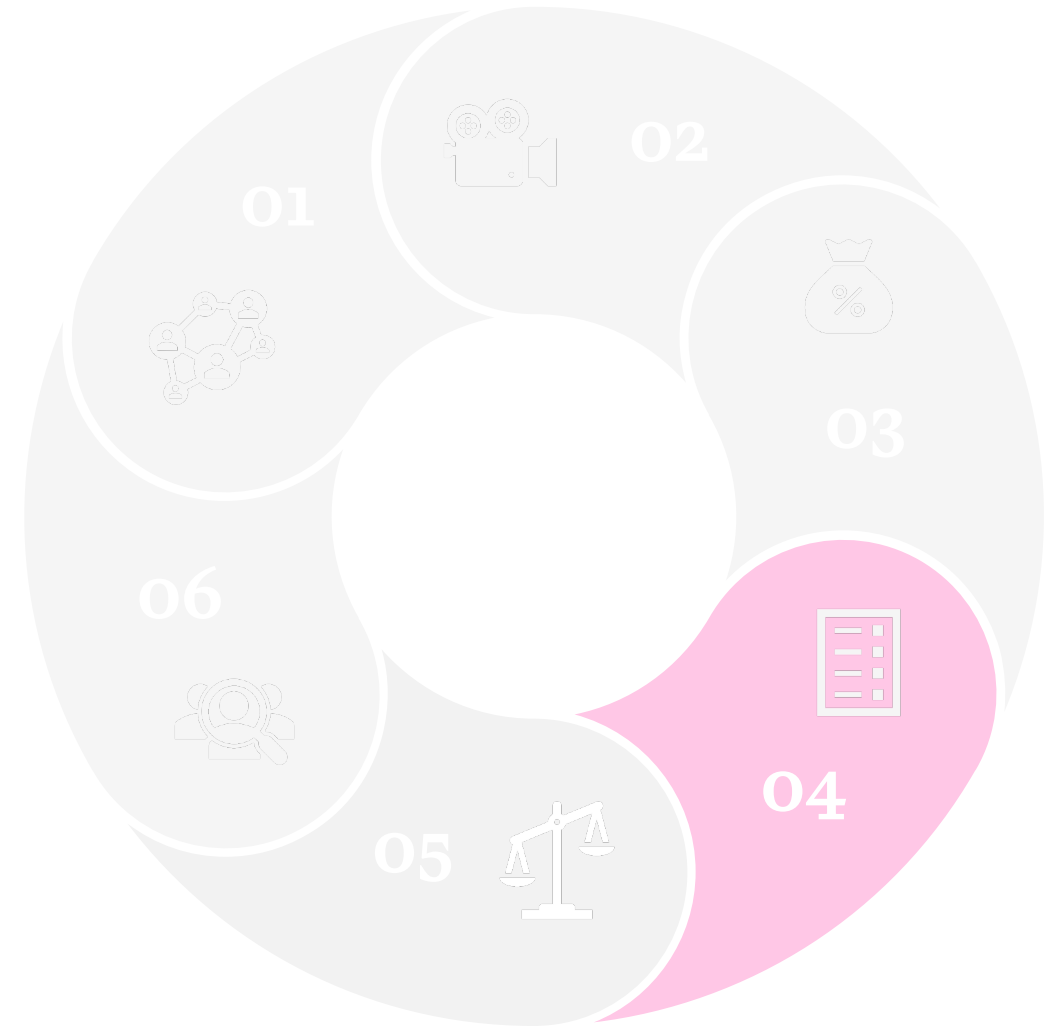
Impact drivers (6)

4. Effective regulation

Several respondents said that they took Ofcom's regulation very seriously, and that it had led to changes in priorities and actions. Ofcom's publication of comparative analysis was seen as helpful and encouraged organisations not to get 'left behind'. Sally Cairns, the CPO of Global, felt that '**external benchmarking, reporting, requirements and regulation**' were powerful tools. Ofcom's work in regulating and promoting the regions was considered to have had a positive impact. Ofcom's soft power in convening and encouraging collaboration was also viewed positively by several D&I professionals.

There were some contrasting viewpoints on Ofcom's approach to regulation. Several respondents welcomed its 'light touch' approach, which had benefits compared to more authoritarian methods. Others, however, as cited in the 'Barriers' section, felt that Ofcom could act in a tougher way. Many respondents agreed that Ofcom occupied a unique and important position in the sector and that accordingly, it could do more to work as a strategic partner to bring the sector together.

Changes attributed to this factor by respondents included visibility on representation, more diversity in content, collaborative working, and open discourse.



included.

“Bringing the sector together as one is the key. As one, to create real pace.”

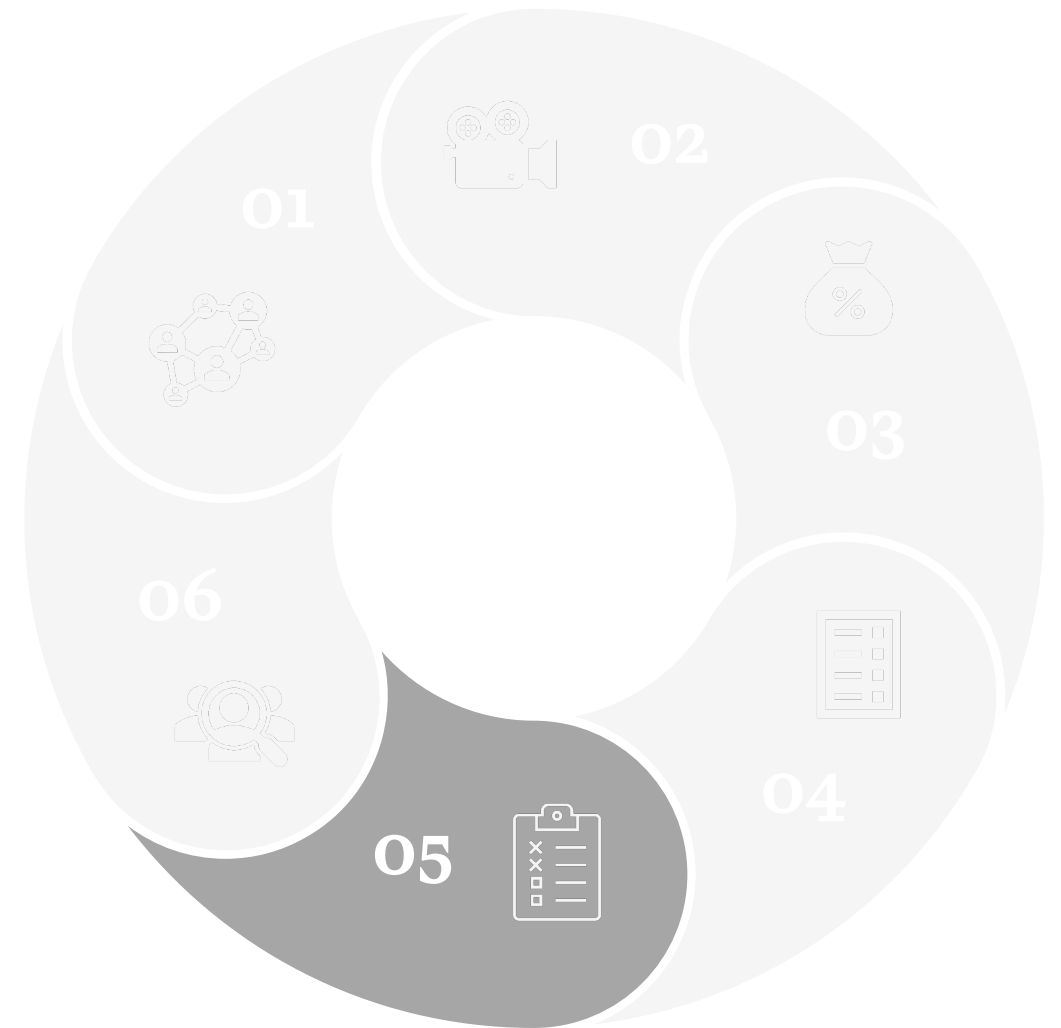
Dee Ford, Managing Director, Bauer Media Group

Impact drivers (7)

5. Broadcaster safeguarding failures

Many interviewees felt that one of the key drivers for change was when a 'harsh spotlight' had been trained upon the sector. This has occurred because of social movements such as those cited above, but also as a result of high-profile episodes where a lack of duty of care had allegedly resulted in neglect, and in some cases death of programme participants (see *Love Island* and *Jeremy Kyle*). This spotlight was something no broadcaster wanted to be known for, and was therefore cited as a powerful influencing factor on behaviours. It also helped to create sector-wide collaborative approaches to safeguarding.

- *Changes attributed to this factor by respondents included open discourse, better safeguarding and policy, and visibility on representation.*



Impact drivers (5)

6. Online, digital, and on-demand growth

It was widely acknowledged amongst respondents that the growth of subscription video on-demand (SVOD) services was having an enormous impact on the sector, and that it may have an even bigger impact in the future. It amounted to a 'production boom'. Amongst this expansion, some interviewees felt that there is a need for more talent and more diverse talent, not least because the data show that SVOD audiences are demanding more diverse stories. This has reinforced the position of D&I as a commercial imperative.

- *Changes attributed to this factor by respondents included more diversity in content.*



included.

Barriers

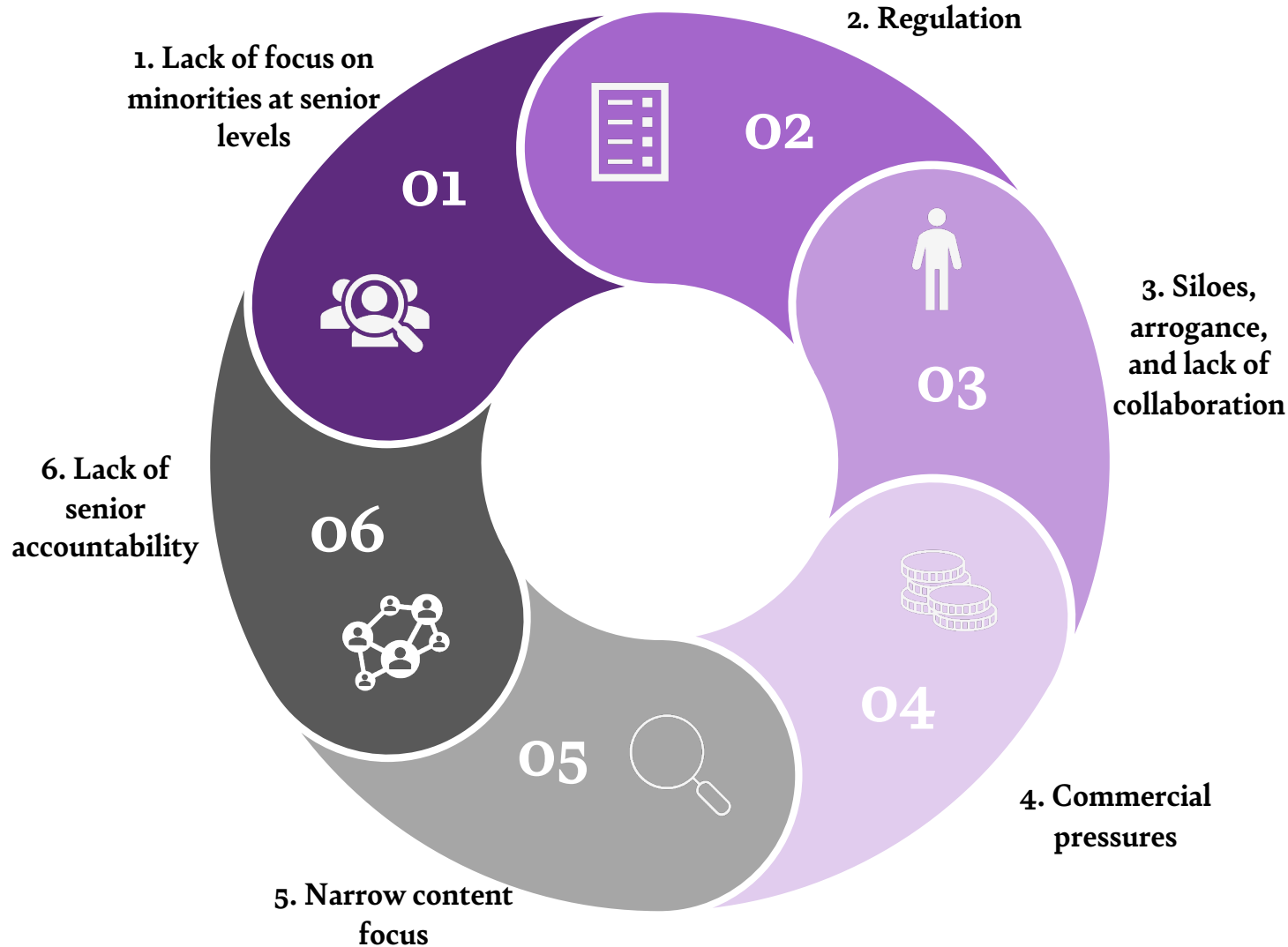
What hinders D&I progress

included.

“We do a lot of D and not enough I. We do a lot on representation, but not inclusion (authentic portrayal). **We’re so busy counting the numbers, that we’re not thinking about their experience, their voice.**”

Babita Bahal, Head of Creative Diversity, Channel 4

Barriers (1)



Introduction

As part of the qualitative research, we also asked each interviewee for their thoughts on what has – or will – hinder progress in D&I to better understand the most pressing barriers.

Interview respondents cited a range of different barriers to progress on D&I in the broadcast sector. One of particular importance is the perceived lack of focus on progress for minorities at senior levels, as opposed to in entry schemes/junior levels. Others included ineffective regulation or guidelines, a lack of collaboration (often going hand-in-hand with a perceived ‘self interest’ in the sector), commercial and financial pressures, and a lack of content diversity. These are presented in descending order of importance, determined as a combination of number of times cited as an issue and the depth of discussion.

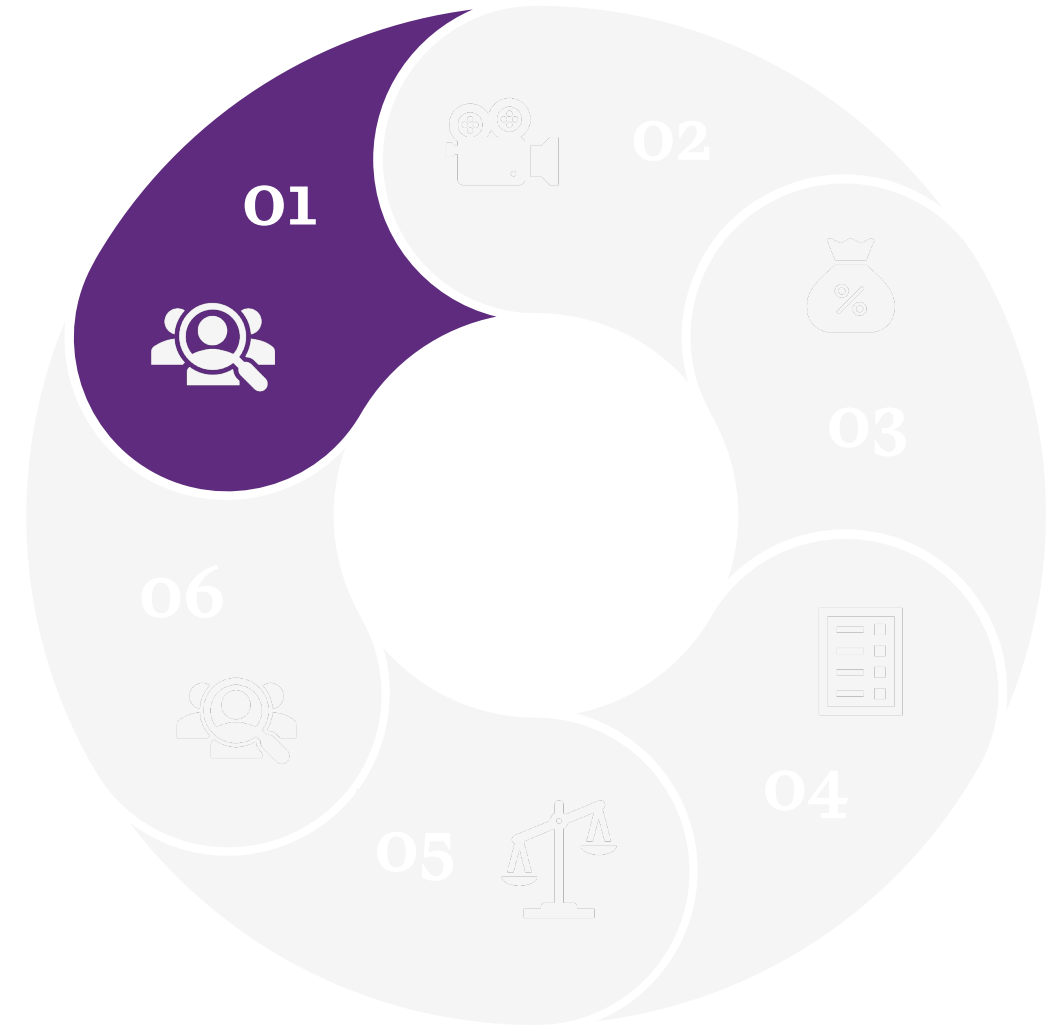
Other barriers less frequently cited included a lack of knowledge about diversity and inclusion in the sector; a lack of an intersectional approach which shows an understanding of how different issues compound each other; a disproportionate focus on diversity as opposed to inclusion; data failures; the invisibility of certain groups and characteristics; a lack of effective talent programming to help build a pipeline of minority talent; not enough attention on indies and freelancers.

Barriers (2)

1. Lack of focus on minorities at senior levels

Babita Bahal of Channel 4 argued that **‘we need to not kid ourselves that having a sprinkling of diversity at junior levels is enough. How much voice do they really have?’** This was echoed by many other respondents. For minority ethnic and disabled talent in particular, several respondents felt that senior opportunities simply weren’t there or weren’t as open as they were to other groups. This is important because senior leaders have the potential to have an outsized positive influence on their organisations and the sector - **‘it’s the people in decision-making roles who create radical change’** - as we were told by one industry leader. This sentiment is further highlighted through the quantitative analysis, which showed that whilst the proportion of minority ethnic employees in senior management positions has increased over the last 5 years, the gap between overall racial and disability diversity and that of senior management has not changed in TV. The gap for both of these groups has widened in radio.

Several respondents felt that the environment around senior roles was much less forgiving for marginalised groups, who were subject to a higher standard than majority groups. Many commented on a lack of support and sponsorship for underrepresented groups. Other comments on this topic focused on gender, where for example a main broadcaster Chief Executive expressed concern that progress for women at executive levels was slipping. The pandemic may have been a negative driver here.



included.

“In front of the camera, there is more diverse casting now. But in terms of the power, the gatekeepers, I think we’re probably further behind than ever.”

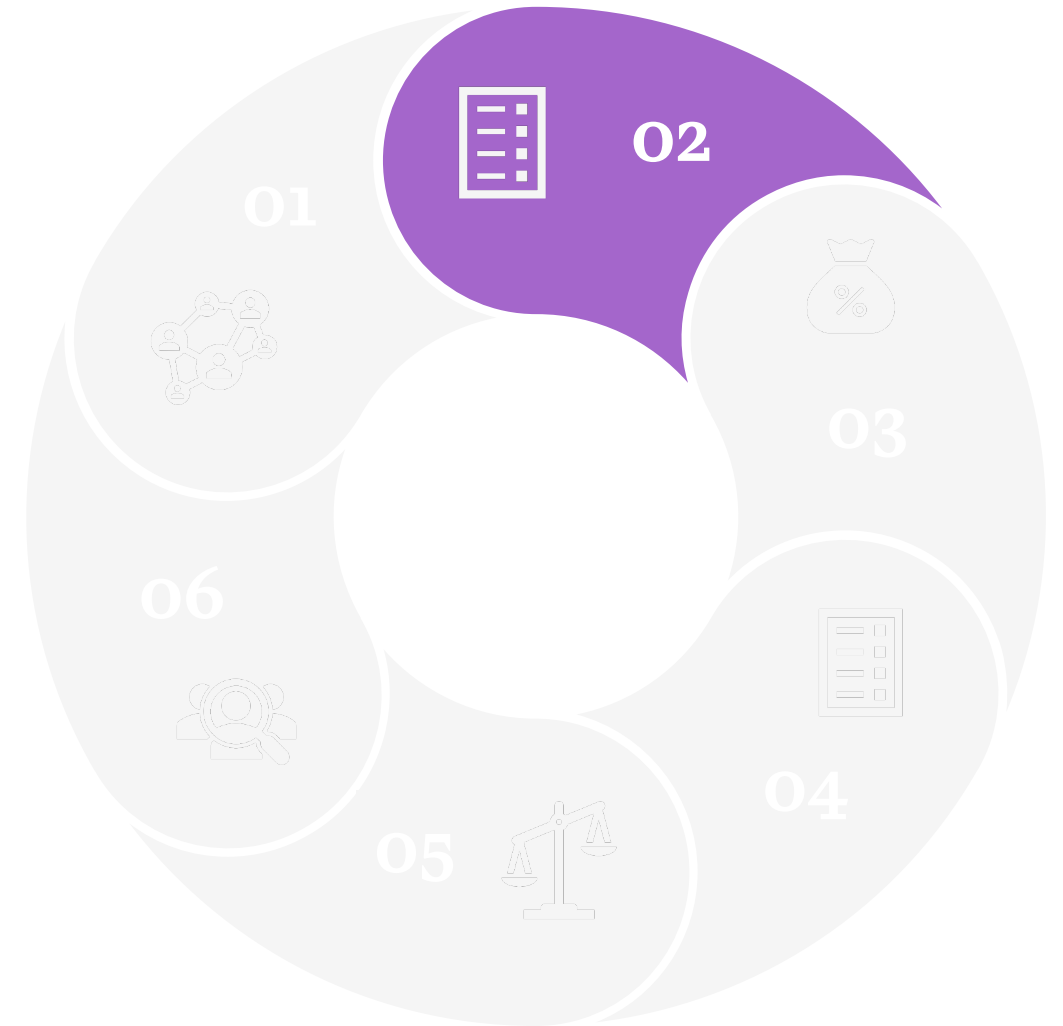
Krishnendu Majumdar, Chair of BAFTA

Barriers (3)

2. Regulation

Several respondents felt that Ofcom could be doing more to drive positive change. One respondent felt that a ‘big intervention’ was lacking from Ofcom on D&I, as opposed to other areas where they were more visible. Others didn’t wholly appreciate Ofcom’s ‘light-touch’ approach on this topic and felt that the regulator needed to show ‘more teeth’. One example given was the ‘laissez-faire’ approach to mainstream radio acquisitions of minority local stations, which was seen as harmful to minority content. However, it should also be pointed out that some other respondents felt that ‘light-touch’ regulation was a positive rather than a negative.

Some respondents who critiqued the regulatory environment felt that Ofcom needs to be given more powers, or needs to be more interventionist in its approach. One example given here was Ofcom getting more specific on inclusion (both definitions and how to measure progress). The same respondent pointed to the work Ofcom had done in the [nations and regions](#) as a good example of progress when done right. Another respondent felt that the danger is that organisations will not move things forward themselves, so interventionism is important. The continued lack of disabled workers in broadcasting was cited as evidence of this.



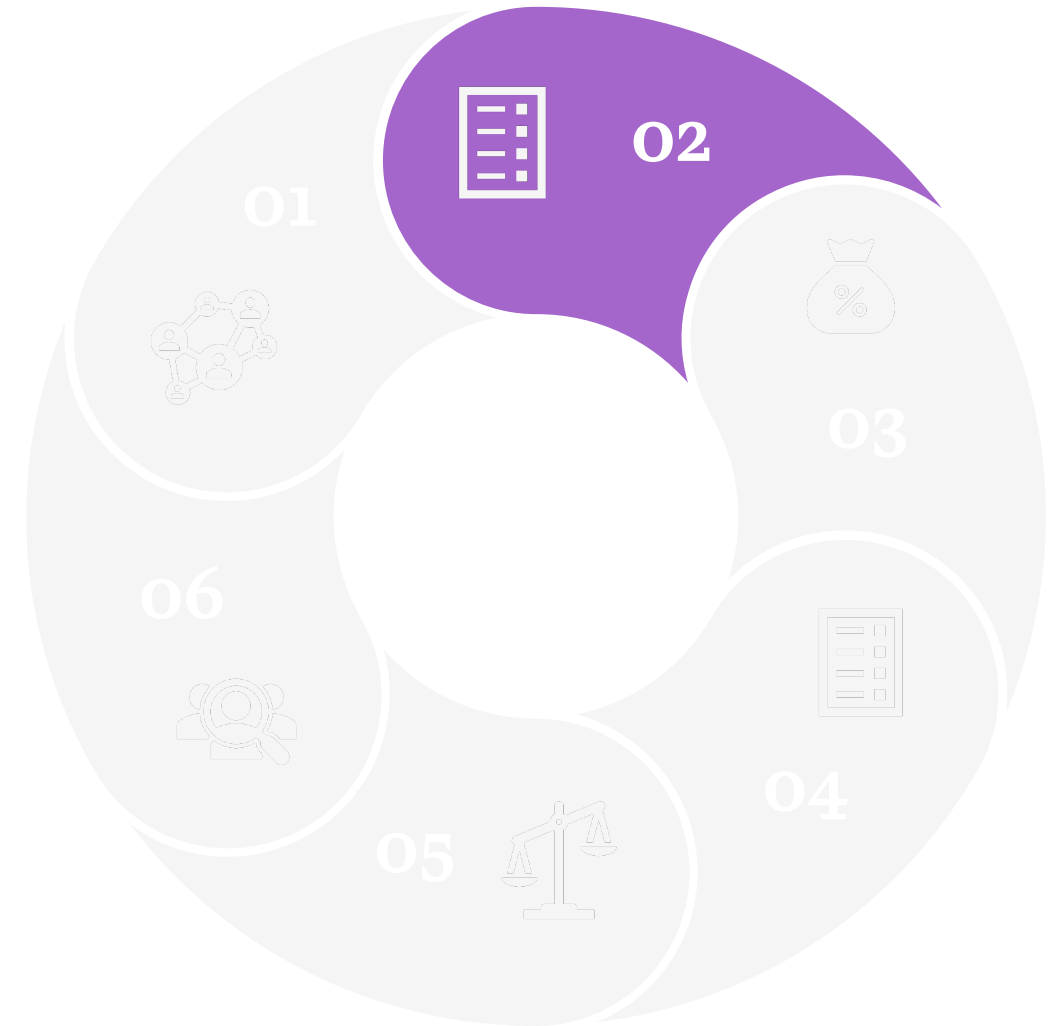
Barriers (4)

2. Regulation continued

Several interviewees said that they would like to see Ofcom do more to exercise its soft power to strategically convene and embrace the sector.

Given that commissioning was seen to be a positive driver of increased diversity, one respondent felt that Ofcom could for example require programmes to be made by diverse and inclusive teams as part of the licensing requirements. They suggested that at the moment the focus continues to be on on-air diversity, but things have not moved forward positively elsewhere.

As mitigation and further explanation, a couple of respondents pointed towards governmental attitudes towards public service broadcasting as a blocker to Ofcom's powers.



included.

“We are not short of good intent; we are short of levers to drive real change at speed.”

Tim Davie, Director-General, BBC

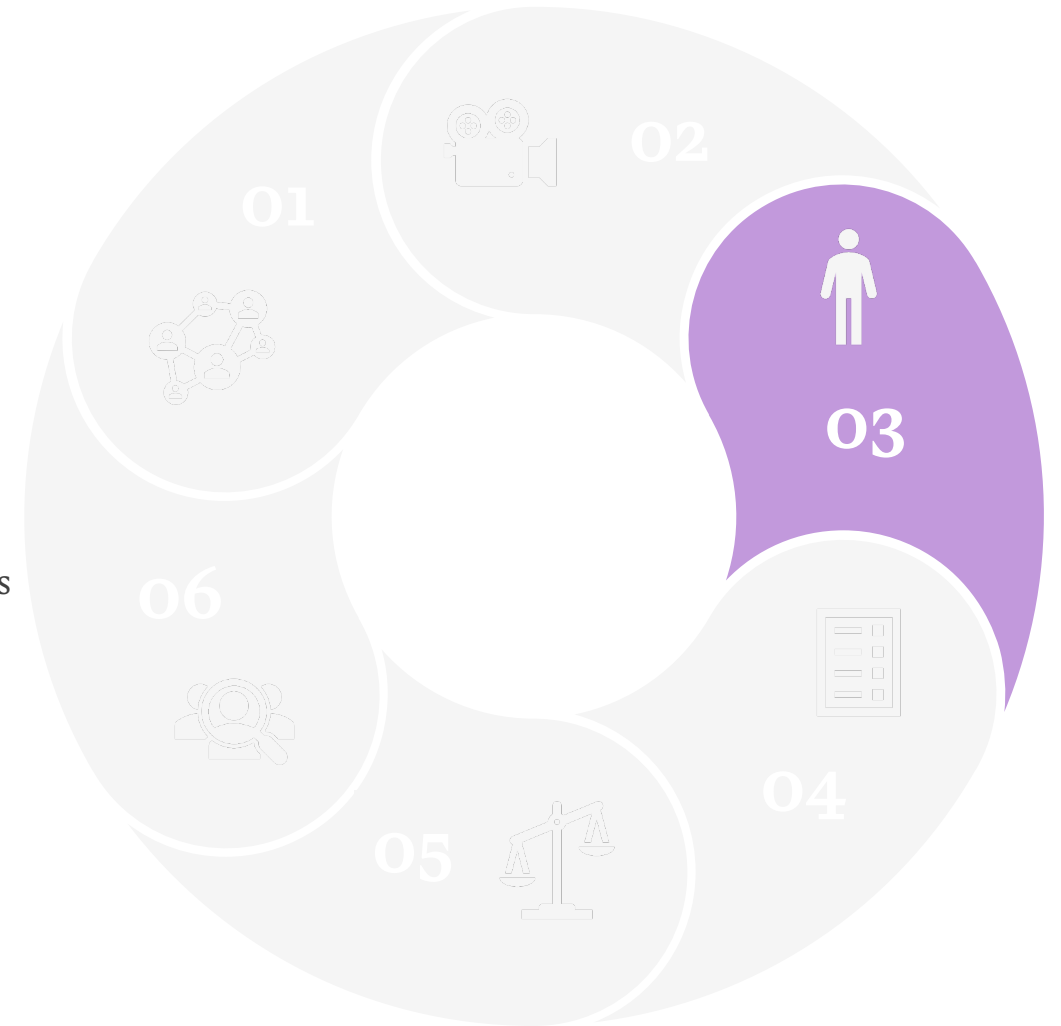
Barriers (5)

3. Siloes, arrogance, and lack of collaboration

Many interviewees noted that the broadcast sector continued to be held back by arrogance and egotistical behaviour, which led to a lack of collaboration. [David Olusoga's speech](#) on diversity in the sector at the Edinburgh television festival in 2020 was cited as a clear example of this, as it created energy and discussion for a short period before everyone fell back into their siloes and individual pursuits. The resulting feeling, in the words of Adeel Amini (Founder of TV Mindset, Coalition for Change) is that **'ego and a lack of collaboration is going to hinder this movement'**.

Others agreed that there were particular flurries of activity or highlighted issues where organisations were allowed to self-congratulate, but this was a 'swinging door' that didn't stay open. As one respondent put it, **'the reality is that things have not moved forward to a necessary extent and we could slip back at any moment'**. Many interviewees felt that Ofcom could take more of a leadership role in driving collaboration between groups.

Arrogance was cited by a few respondents as a blocker to progress on talent development. As television was historically seen as such a prestigious career, with many people keen to enter, entry conditions slipped and the opportunity for individuals to develop worsened. This, one respondent felt, has inevitably had a compounding effect on those from underprivileged groups, such as young people with low incomes who cannot afford gaps between employment and freelancing; they felt that the pandemic also exacerbated this.



included.

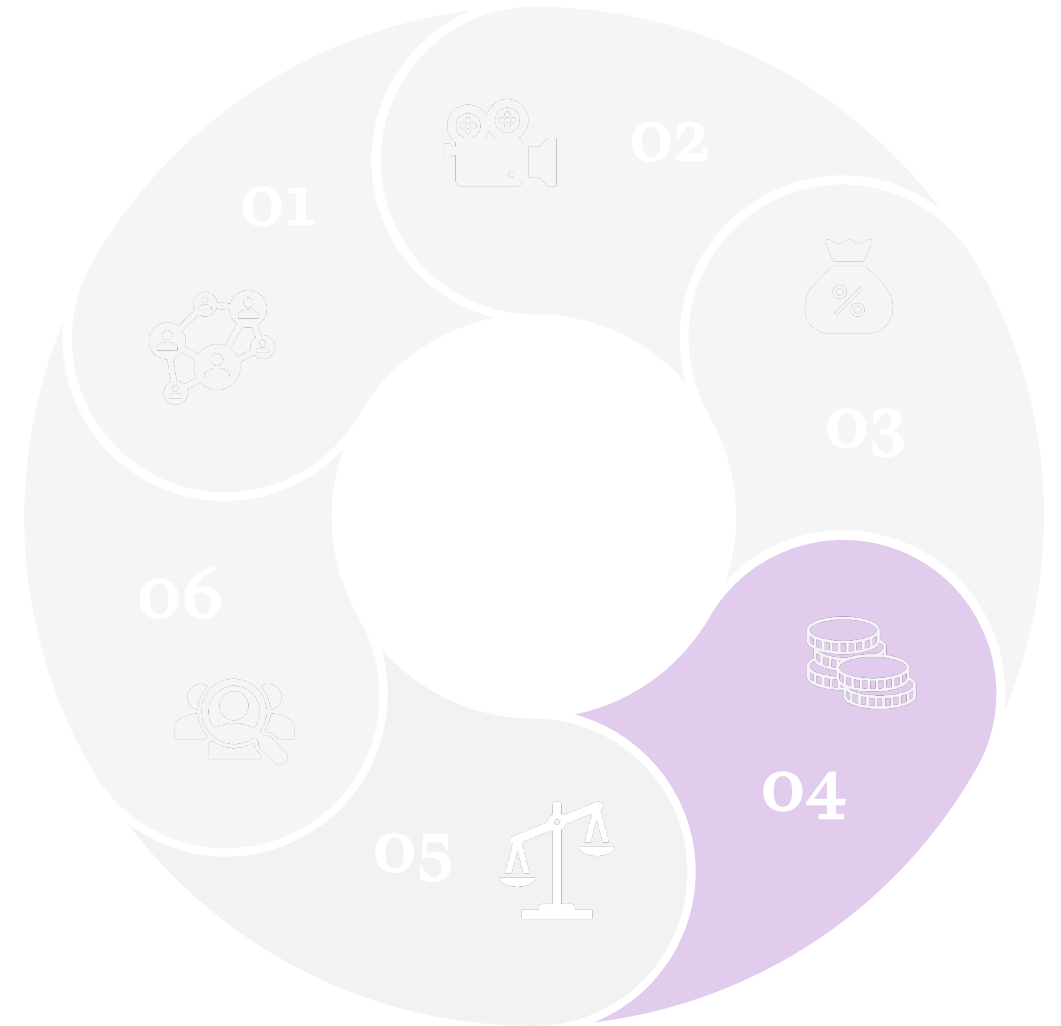
“I talk about D&I as a ‘swinging door’. When it happens, there’s loads of opportunity and people get involved and stuff happens. But slowly the door begins to swing shut. I’d love that door to be wedged open, but it keeps coming back and people get back into their own routine. There’s a worry that all the progress we’ve made starts to go away.”

Melanie Hoyes, Industry Inclusion Executive, BFI

Barriers (6)

4. Commercial pressures

Covid-19 had a devastating impact and, with production effectively shut down, led to increased commercial pressures, called out by several interviewees. One respondent told us that when financial pressures come to the fore, there is a danger that diversity and inclusion work gets pushed down the priority list. The same respondent had observed that **anything that is broadcast needs to be a commercial success, but we badly need to break away from the idea that diverging from 'tried and trusted' (often white) presenters or talent is a 'risk'.**

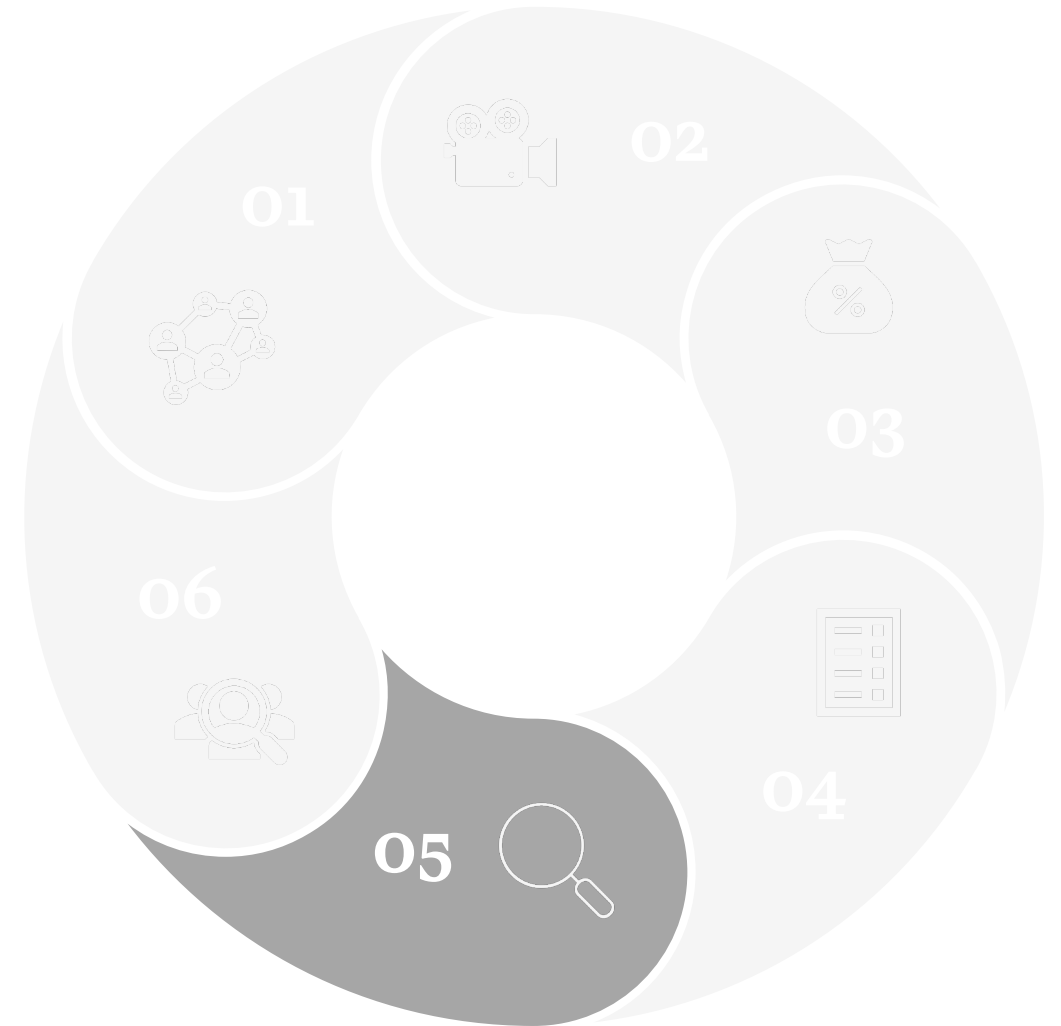


Barriers (7)

5. Narrow content focus

Janice Turner from BECTU told us that in radio there was a very narrow view of the types of music on offer in mainstream radio. This was dangerous because it could lead to a lack of inclusion in the sector, failure to represent audiences, and failure to attract diverse talent into the industry.

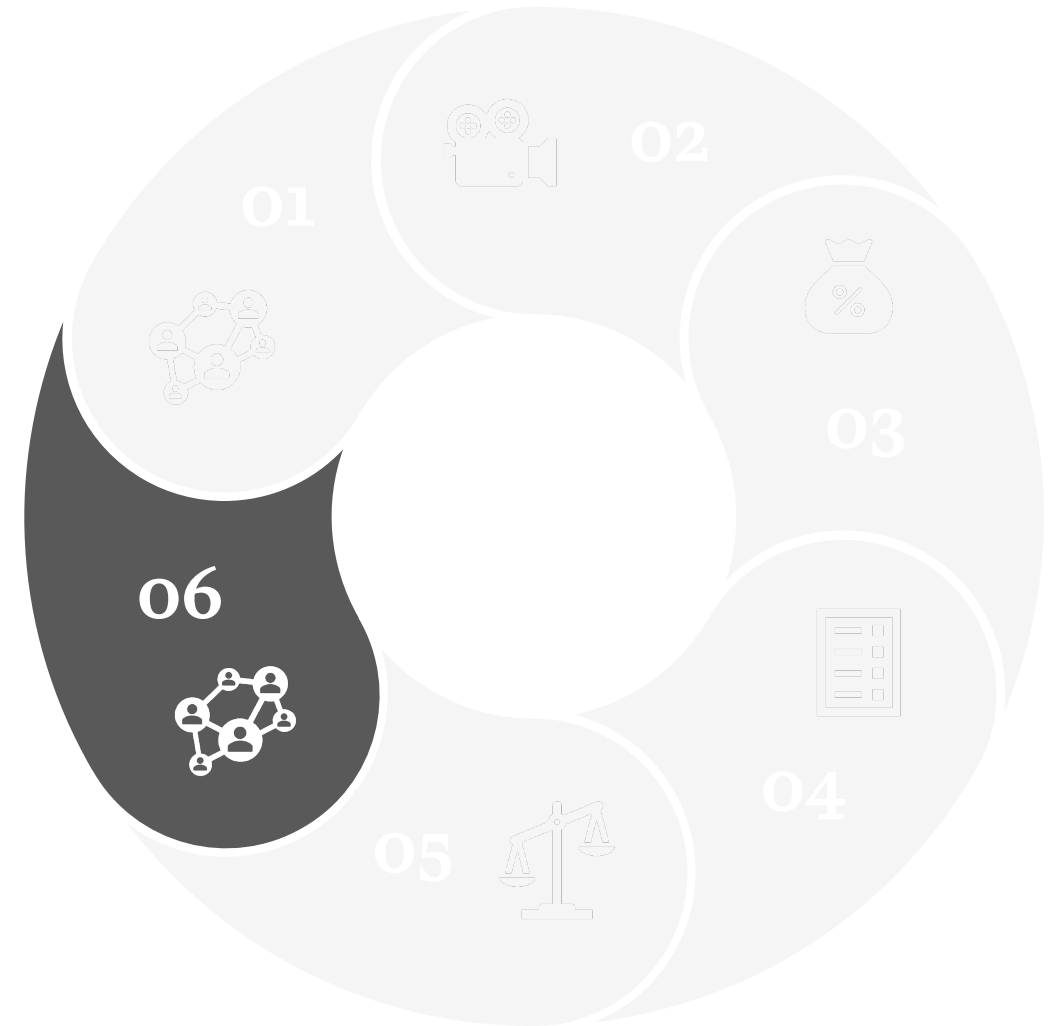
In television, whilst the growth of SVODs was generally seen by respondents as a driver of diverse content, the flip side was that ‘diverse’ content could become siloed and exist purely in digital content, amongst younger people, rather than in mainstream channels.



Barriers (8)

6. Lack of senior accountability

Some interviewees pointed towards the lack of engagement and accountability amongst senior leaders in the industry. This did not necessarily come from a place of bad intent, but rather a lack of knowledge and understanding about how best to effect change.



included.

Solutions Delivering enhanced D&I

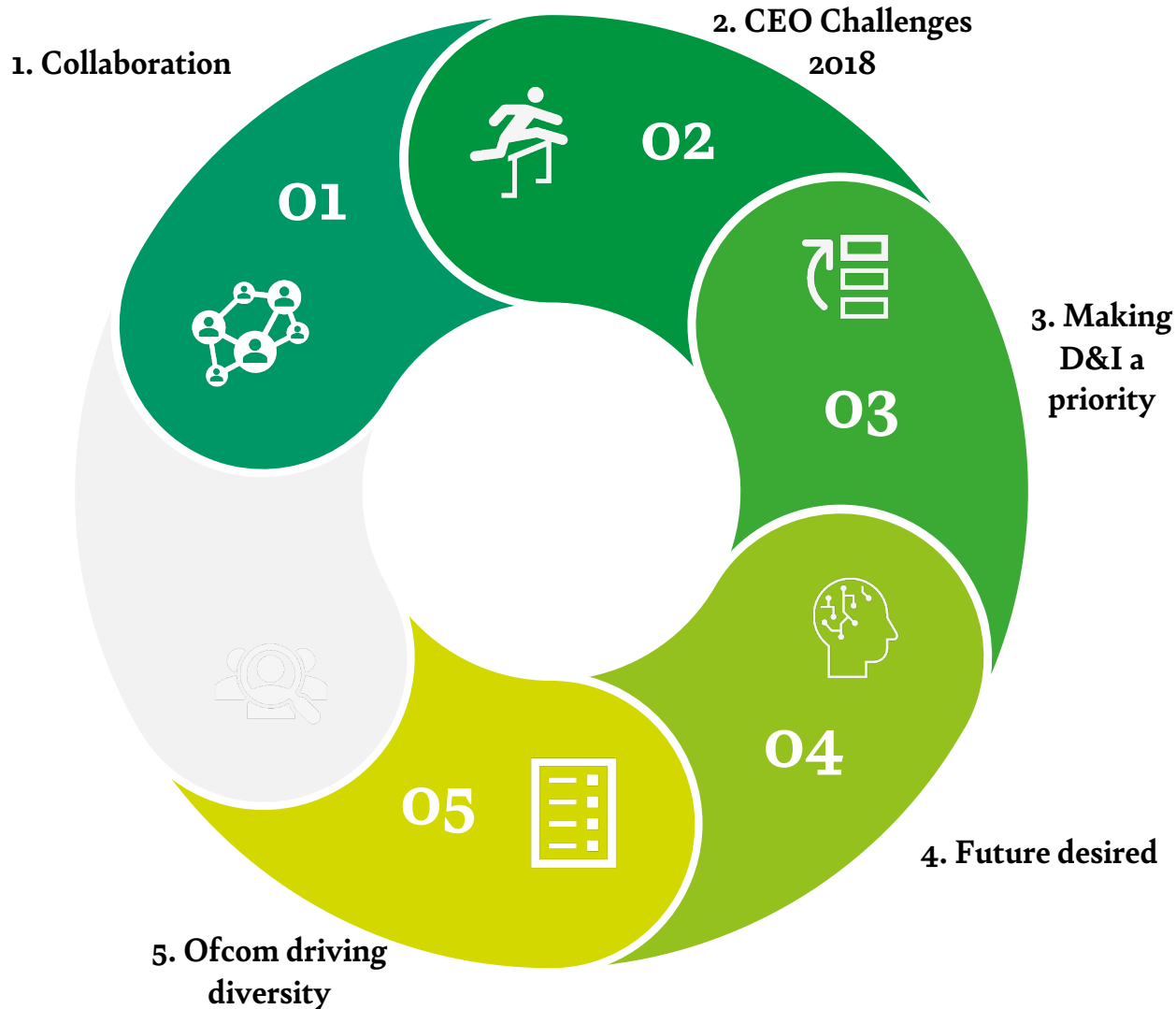


included.

“It should not have taken a freelancer from an intersectional (multiple minority) background with quite possibly everything to lose, to have started something like the Coalition for Change, and I will always resent this industry for that... always resent the unions, the training bodies, the charities. It should not have had to be me.”

Adeel Amini, founder of TV Mindset, Coalition for Change

Delivering enhanced D&I



Introduction

To focus on solutions and charting a way forward for D&I as a consistent thread in future developments, *Included* introduced the following elements to interviews for consideration: cross-industry collaboration, leadership that prioritised D&I, respondents' desires for future change, and how Ofcom would leverage its role as regulator in order to drive as well as support progress.

1. Collaboration – D&I delivery teams within broadcast, as well as respondents from other sector stakeholder organisations were asked to assess the extent to which collaboration was a feature of regular engagement.

2. [CEO Challenges 2018](#) – *Included* revisited the four challenges that chief executives of the broadcasters in 2018 identified as high priority for their organisations.

3 Making D&I a priority - All respondents were asked to provide evidence to demonstrate the level of priority that was given to D&I within their organisation.

4. Future desired - All participants were asked to articulate the changes they would wish to see in the future.

5. Ofcom driving diversity – The contributors were asked to assess the extent to which they believed the regulator was a driving force for D&I progress.

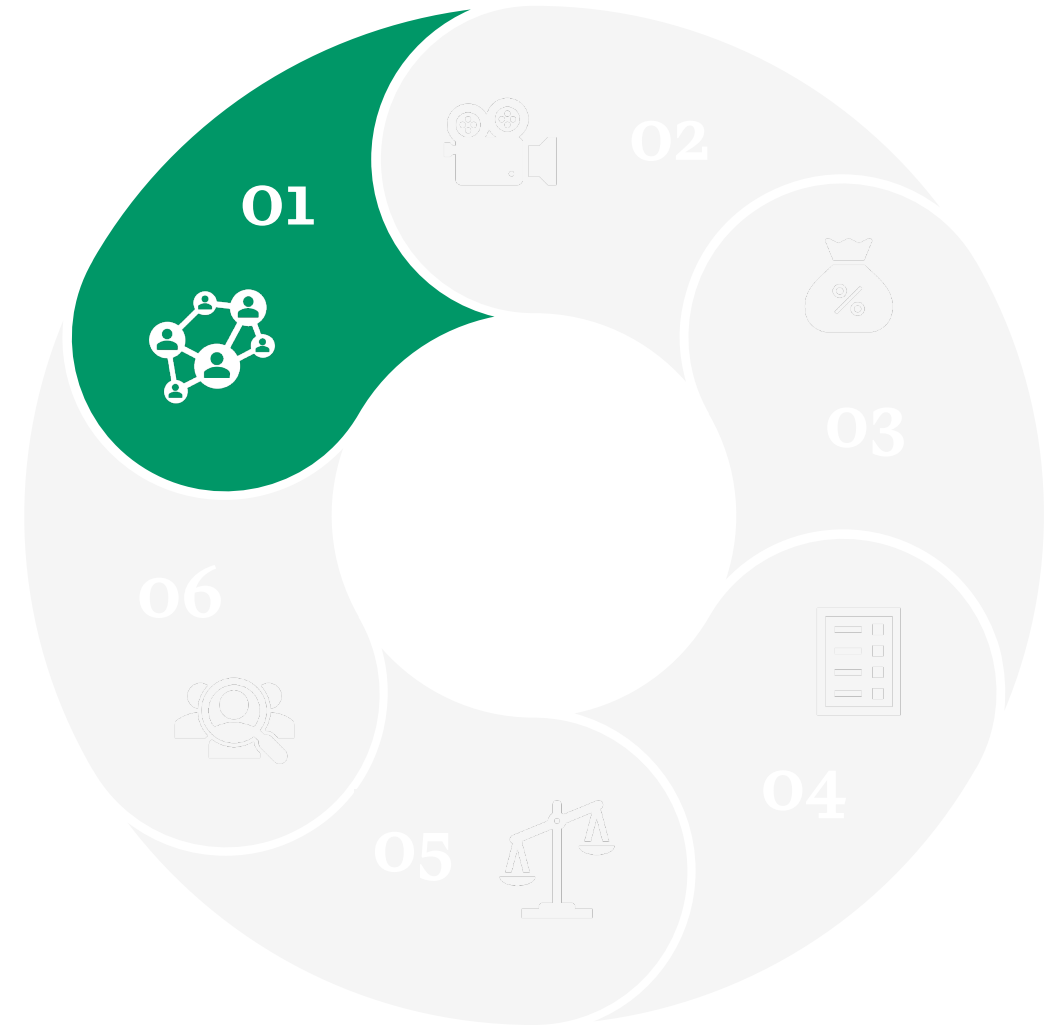
1. Collaboration (1)

Introduction

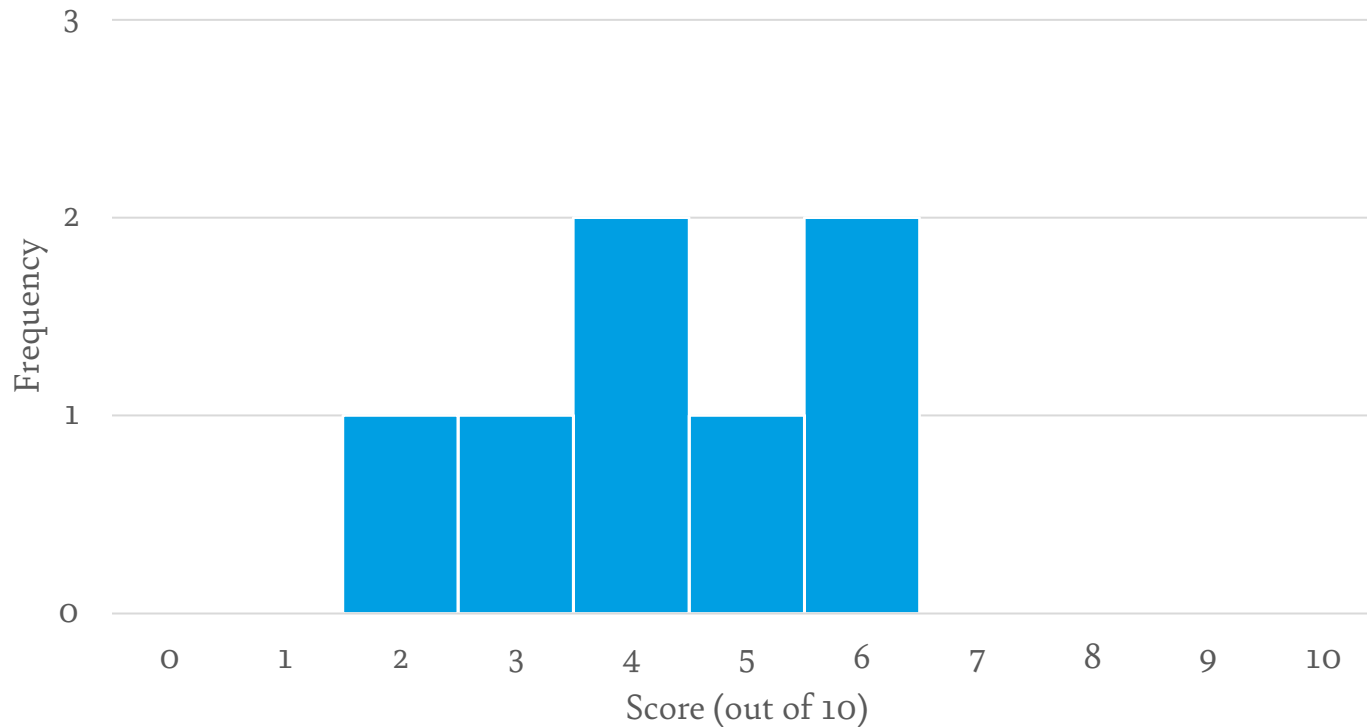
Throughout this project several participants referred to the importance of a cross-sector approach to issues such as D&I. The belief was that joint enterprise could more readily move the dial than a range of discreet actions by individual organisations. As one respondent put it:

'I always said that this is one area of work that is NOT competitive. We need to refer talent and cross-promote talent.' Babita Bahal (Head of Creative Diversity at C4).

D&I delivery teams within broadcast, as well as respondents from other sector stakeholder organisations, were asked to assess the extent to which collaboration was a feature of regular engagement. They were requested to give an empirical score on a 1-10 scale, 10 high, provide narrative evidence to support their scoring, and make suggestions for how to improve collaboration.



How is collaborative work progressing?



- This question had a total of 7 responses, all from D&I Delivery team members.
- Interviewees were asked to rate on a scale of 1-10 how collaborative work across the industry was progressing (1 = lowest, 10 = highest)
- Scores ranged between 2 and 6, with no particular differences to note. Overall, with an average score of 4, the sentiment was that there is still room for improvement in this area.

1. Collaboration (2)

Evidence that the ‘industry comes together in big moments’ was reported by some respondents. The ‘Move On Up’ event where 100 or more executives from all the major broadcasters make themselves available for one-to-one sessions with people who are aspiring to progress in the industry was cited as a great example of this. However, the [Film and TV Charity](#) reported doing a piece of work on anti-racism and reaching out to all of the principal D&I leads at the broadcasters, and none of them responded.

The danger of dissonance between the perception of ‘big event’ collaboration and the reality of the day-to-day was apparent in some responses. For example, one respondent said that during **‘an Edinburgh Festival panel session chaired by David Olusoga where leaders from the channels were talking about the good work they were doing, what was in the chat bar was principally people of colour just in rage, disappointed, displaying how disenfranchised those people quite clearly felt.’**

The Creative Diversity Network (CDN) was set up with a belief in cross-sector working as its foundation. Yet during the pandemic, when freelancers became the focus, campaigners felt impelled to create another forum. **‘Creative Diversity Network hasn’t made the impact we wanted it to, which is why we formed Coalition for Change’**, said Adeel Amini, one of the founders of CFC.

1. Collaboration (3)

The question, as posed by Paul Moore at ITV, is **‘how to ensure that high energy levels are transferred into a collaborative effort on D&I’**. Respondents felt that taking action to eliminate the following issues would greatly improve D&I outcomes across the industry.

1. Data

There was a wide desire for higher response rates and a greater granularity of data to Project Diamond by the broadcasters. Cross-sector data capture and sharing was referred to as poor, and under-reporting to Diamond as a 'missed opportunity'.

‘My dream is that we’re collecting data across characteristics and that we have targets for who we employ, cut by characteristics.’ Anon

2. Being prepared to share

Collaboration is believed often to be more 'performative than genuine'.

‘For some reason they’re always in competition about strategy.’ Anon

‘Sometimes we are more bothered by our own progression than that of the industry.’ Anon

3. Retaining talent

If the D&I benefits were truly understood, talent would be nurtured and shared.

‘We wouldn’t have so many people moving to America, women leaving after a certain age, or people dropping out because their mental attitude can’t take it.’ Anon

‘We need to do it for freelancers who would otherwise leave the industry.’ Anon

2. CEO Challenges 2018 (1)

In 2018, CEOs identified four major challenges to work on in the coming years:

- Diversity in senior management
- Improving reporting and tracking of D&I data
- Setting challenging targets and sticking with the plans to achieve them
- Taking risks and recruiting differently

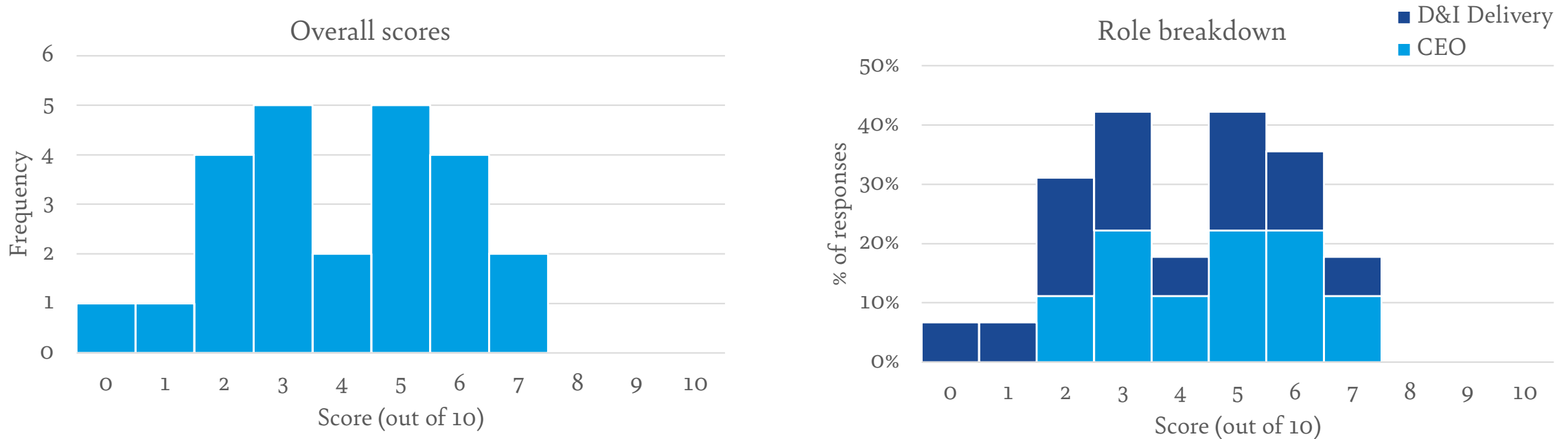
In 2021, *Included* asked interviewees how they thought each of these four challenge areas was progressing.

Across all the responses (83 scores in total), six specified two different scores for their organisation and the industry. For these, respondents scored on average 30% higher for their own organisation than for the industry.

There was a noticeable divergency between the perspectives of CEOs and the D&I Delivery Teams throughout, the former group believing the picture was a more positive reflection than the latter. The greatest disparity (perhaps not surprisingly) was in response to the question relating to reporting and tracking D&I data. However, it is not possible definitively to draw any conclusions as to causality from the information provided in the interviews.

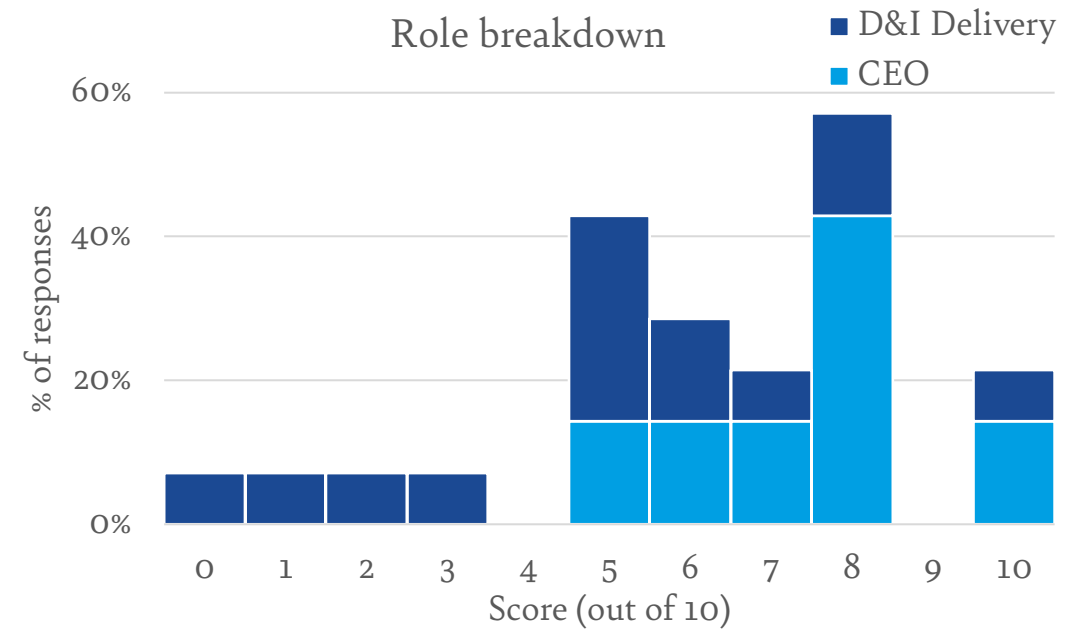
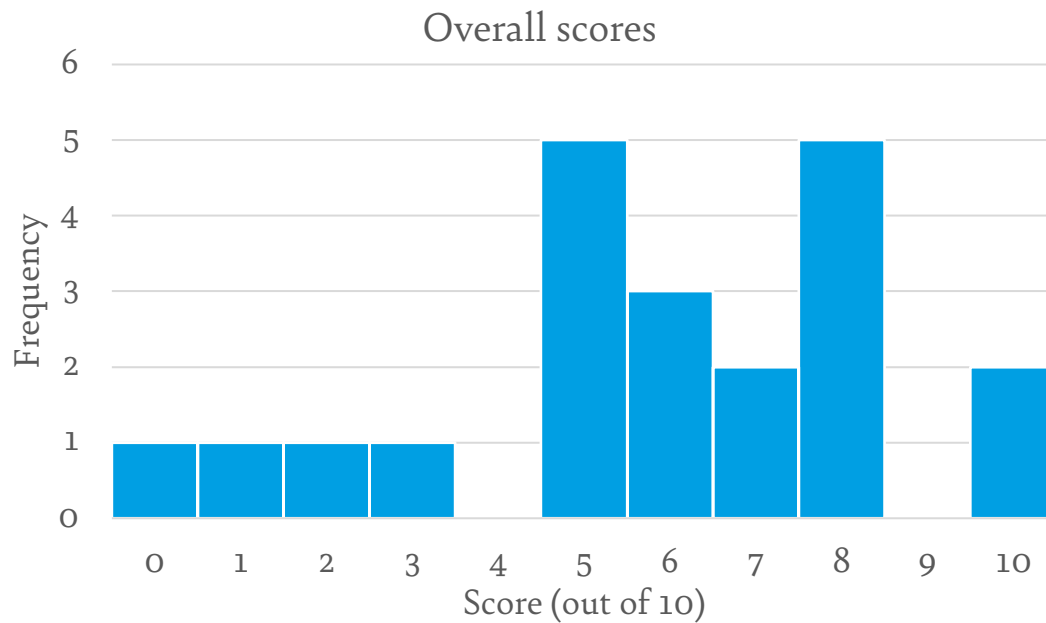


How would you assess progress in: diversity in senior leadership?



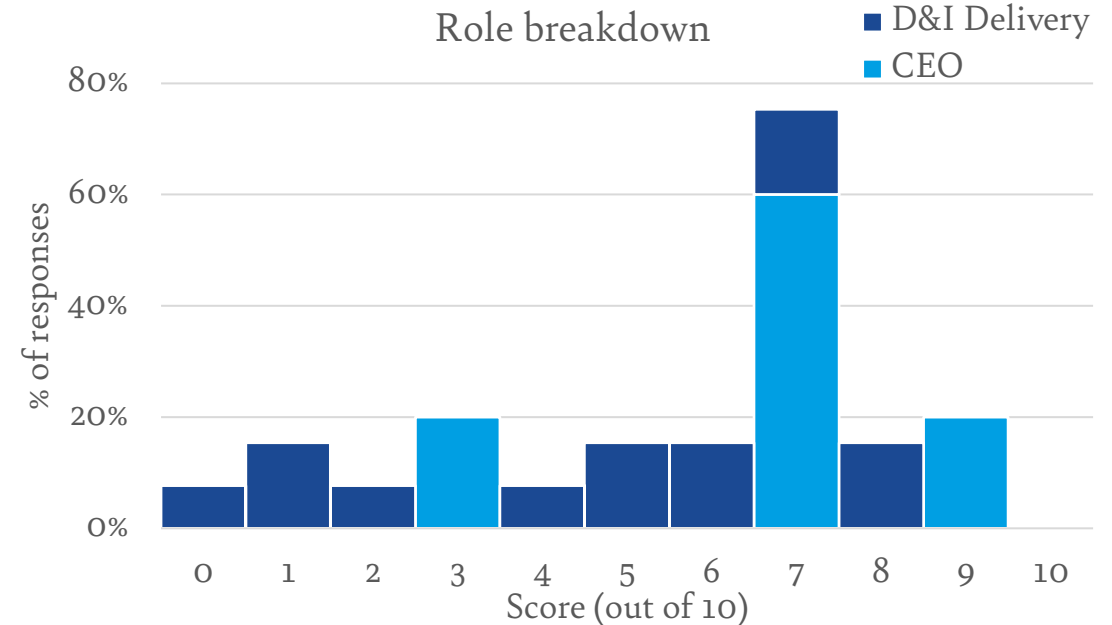
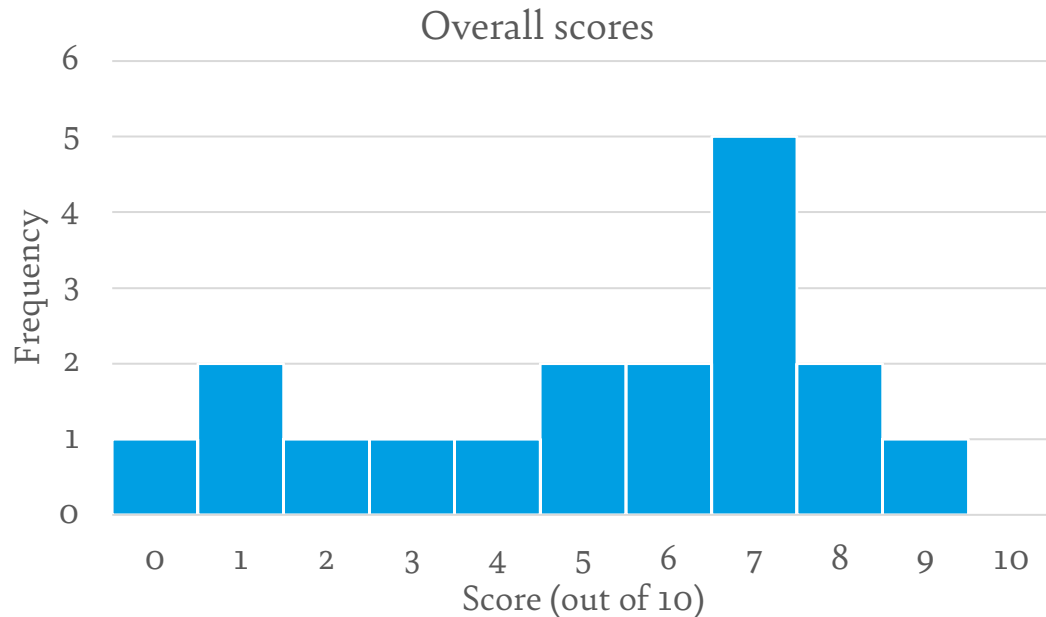
- This question had a total of 24 responses, of which 9 were CEOs (including CEOs of stakeholder organisations) and 15 D&I Delivery team members
- Interviewees were asked to rate on a scale of 1-10 how 'diversity in senior leadership' was progressing (1 = lowest, 10 = highest)
- Overall, scores ranged between 0 and 7, indicating that there is still room for improvement.
- As the second graph shows, there was a reasonably equal distribution between the two groups, with CEOs slightly more inclined towards the higher scores. A larger % of the D&I delivery teams group scored between 0 and 3, whilst a larger % of the CEO group scored between 3 and 7.
- This sentiment is in line with the 5-year progress in diversity in senior management; whilst the gender gap has decreased slightly, the gap for both overall ethnic minority and disability representation vs. that of senior management has either remained the same or increased since 2018.

How would you assess progress in: improving reporting and tracking of D&I data?



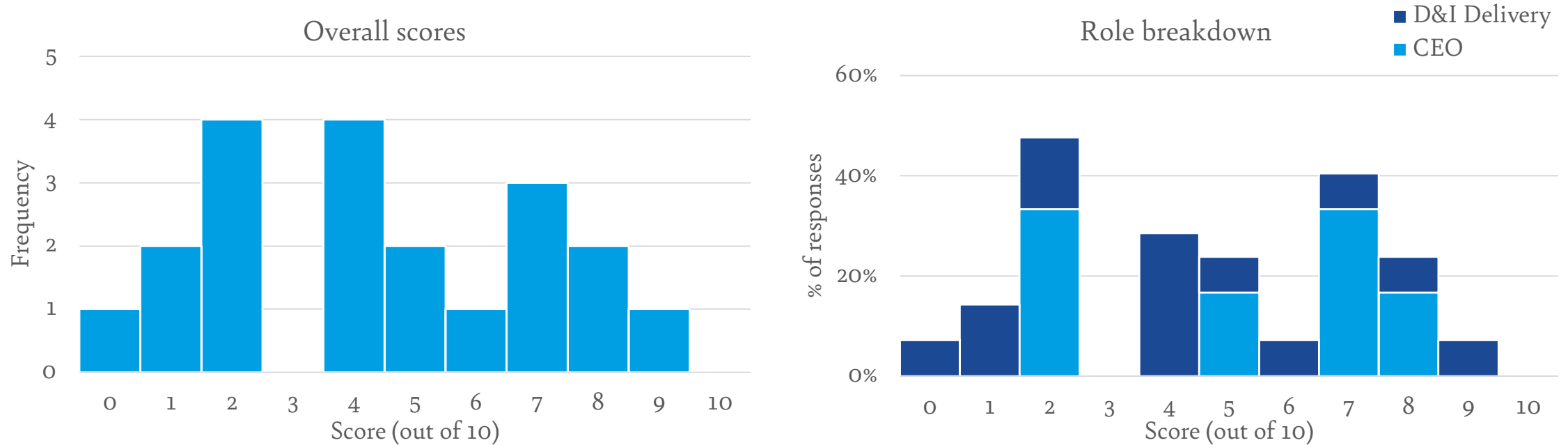
- This question had a total of 21 responses, of which 7 were CEOs and 14 D&I Delivery team members
- Interviewees were asked to rate on a scale of 1-10 how 'improving reporting and tracking of D&I data' was progressing (1 = lowest, 10 = highest)
- Of all 4 areas, overall, this question had the broadest range of responses between 0 and 10.
- As seen in the second graph, CEOs on average scored much higher for this question, with a range of 5-10. D&I delivery teams on the other hand, had a much wider range of 0-10.
- There were a few concerns about how data were being collected and reported on, as well as a lack of consistency across CDN's Diamond, and Ofcom. This confusion was more noticeable in the D&I delivery teams group.

How would you assess progress in: setting challenging targets and sticking with the plans to achieve them?



- This question had a total of 18 responses, of which 5 were CEOs and 13 D&I Delivery team members
- Interviewees were asked to rate on a scale of 1-10 how 'setting challenging targets and sticking with the plans to achieve them' was progressing (1 = lowest, 10 = highest)
- This question also had a very large range between 0 and 9, with 7 as the most common response. However, when looking at the role breakdown graph we can see that most of these responses were provided by CEOs (60%). On the other hand, D&I delivery teams gave a much broader range of responses. This could be a reflection of the more "top down" approach taken when setting targets, and the perception of this from the rest of the organisation.

How would you assess progress in: taking risks and recruiting differently?



- This question had a total of 20 responses, of which 6 were CEOs and 14 D&I Delivery team members
- Interviewees were asked to rate on a scale of 1-10 how 'taking risks and recruiting differently' was progressing (1 = lowest, 10 = highest)
- This question also had a very large range between 0 and 9, with 2 and 4 as the most common responses. On the role breakdown, responses were reasonably equally distributed across both groups, however, the average score for CEOs stood a little higher (5) than that of the D&I Delivery team group (4). Both groups indicated that there was still room for improvement in this area.
- Several interviewees pointed out the phrasing of this target, and that recruiting differently should not be seen through a "risk lens".

2. CEO Challenges 2018 (2)

1. Diversity in senior leadership

This challenge was seen by many interviewees as stubbornly intractable. Slight progress in terms of gender is offset by a worsening in the figures for minority ethnic and disabled people. There was a feeling among a significant number of respondents that this may be tied to the application of a 'risk' rather than an 'opportunity' lens to recruitment at this level. (*See 4 on next page*)

2. Improving reporting and tracking of D&I data

The wide range of responses reflected the extent to which data collection, reporting, monitoring and analysis remains complex. The approach is disjointed and there were repeated references to a lack of sharing and transparency. That Project Diamond had been introduced was generally considered a good thing. However, differences between the various parties (broadcasters, trade bodies/unions, CDN's Diamond and Ofcom) over what is counted and how was said to hinder meaningful progress. Given the widespread agreement that robust data are integral to identifying and targeting where to focus effort, the current position is cause for concern for several respondents.

3. Setting challenging targets and sticking with the plans to achieve them

Some respondents said they no longer set targets. Some considered them a hinderance, either masking unpalatable realities or distracting from inaction; others felt they were a useful tool for focusing attention. Further views included the assertions that top-down setting of targets had long proven ineffective; targets needed effective investment for them to be achieved; they were pointless if set so low anybody could achieve them and a query as to the value of having targets if there were no consequences to failing to achieve them.

2. CEO Challenges 2018 (3)

4. Taking risks and recruiting differently

Several respondents voiced the opinion that attaching the word 'risk' to recruitment was unhelpful, including some who had actively adopted different processes which they referred to as 'not taking risks, just prioritising diversity'.

Antipathy towards this perspective of recruiting as risk was most strongly represented by one respondent: **'Every appointment is a risk appointment. So do not apply that word when it comes to anything to do with diversity; that inflames me. It just makes me really angry'**.

included.

“Having ambitious targets and not reaching them is more important than setting non-ambitious targets and meeting them for PR purposes. We want to be pushing the organisation towards these ambitious targets.”

Carolyn McCall, CEO, ITV

3. Making D&I a priority (1)

Introduction

Each contributor to this research was asked to indicate where D&I featured on their organisation's list of priorities and to provide evidence to support their declaration.

‘High’ or ‘very high’ priority for D&I was the ubiquitous claim. D&I now featured at the highest levels, and there were mentions of it being **‘a lens through which everything is viewed’** and **‘increasingly integrated as part of broader strategy’**. A range of measures of accountability and responsibility for senior personnel were also offered as evidence of major changes that had been instituted. These included having D&I as a strand woven into all priorities; senior leaders having to create a strategic narrative around D&I and accountable to the chief executive; and key performance indicators (KPIs) linked to performance assessment.



included.

3. Making D&I a priority (2)

Public commitments

There have been several public commitments of targets for representation within content on-screen as well as in overall workforces. The BBC, as the largest employer and a publicly funded broadcaster, particularly attracted the focus of attention with its [50/20/12](#) plan (50% women. 20% Black and minority ethnic 12% disabled people).

There were also a variety of references to dedicated or ‘ring-fenced’ targeting of funding or financial awards, plus industry-wide crew diversity standards, with examples including:

- [BBC](#) – £112m of existing commissioning budget prioritised for diverse and inclusive content over three years
- [Sky](#) - £30m over three years to address minority representation as well as working within communities impacted by racism
- [Film and TV Charity](#) – 30% of financial aid ring-fenced for minority ethnic beneficiaries and 15% grants for disabled beneficiaries
- [BAFTA](#) - D&I standards, including crewing levels of diversity, have to be met in order to enter the show for awards or funding

included.

“The heart of the matter is driving it through all levels of the organisation. The target is important, but the accountability is equally important.”

Tim Davie, Director-General, BBC

3. Making D&I a priority (3)

Plans and procedures

Also brought to our attention was BECTU's commercials production [Diversity Action Plan](#), which as well as addressing recruitment of ethnic minority crews to make commercials also now includes a new retention section with provision 'to prevent people from being driven out of the industry through racist or other abuse, including bullying and harassment'.

It was acknowledged by most respondents that race had moved up the agenda in the last two years. Ofcom data requirements were cited as an initial driver, with a range of wider social events including #BAFTASoWhite, #Blacklivesmatter, #MeToo and the allegations regarding Noel Clarke credited with accelerating the pace and sharpening the focus. There was also consideration of the commercial imperative of appealing to wider audiences by being more representative.

There were a few cautionary voices concerned that this attention might overshadow the doubling disability commitment, foster a 'binary conversation over a small pot of money' and result in competing agenda.

4. Future Desired (1)

Introduction

Contributors to the research were asked to identify the changes they would most like to see in the next five years.



4. Future Desired (2)

Senior Leadership

More diversity in senior leadership was consistently near the top of the desires that it was felt would signal real change. This change, whilst often spoken about, has not happened at pace or equitably; while the gender gap between overall proportions of women and those in senior management has decreased, the gap for racial diversity and disability has remained unchanged in TV and actually increased in radio. Some suggested this was an indicator of the continued application of a ‘risk’ instead of an ‘opportunity’ lens to appointments, particularly at senior level. Whilst risks are often taken with content, the same appetite is not there for personnel.

Suggestions for how to fulfil the desire for ‘turnover at the top of businesses’ included set terms of office during which progress on D&I would be a significant component in assessing performance (*some such changes are already being instituted – see 3. Making it a priority’ above*). There was also a call for more innovative thinking and recruiting from other sectors and for cross-sector strategies for how to improve inclusion at senior levels in all organisations – broadcasters, production companies, trade bodies and Ofcom itself.

Across many interviewees, it became clear that a person of colour as Director General of the BBC or chief executive of colour at a major broadcaster would be a seminal indication of transformation, with value beyond just appearance.

4. Future Desired (3)

Data

Data collection, transparency, sharing and analysis were cited by respondents as key to progress. A commonly stated wish was for less secrecy about recruitment and retention, about innovative ways of looking outside the sector for talent, and about wages. In particular, trade bodies (BECTU, Directors UK and NUJ) strongly articulated the desire for a collaborative approach.

A range of measures advocated included cross-sector agreement on what data was collected and common methods of analysis, for example, organisations (i.e. CDN's Diamond and Ofcom) counting the same things in the same way. This was an issue which exercised several of the broadcaster respondents.

There was also a call by some respondents for equality monitoring data at the programme level and across grades and for this to be extended to include freelancers. This was stated by one interviewee as a 'sticking point' which had resulted in a lack of support for Diamond from the unions. Without the level of granularity requested, the figures mask the reality of continued lack of diversity in senior craft posts, therefore hampering attempts to chart progression and target intervention.

One participant offered this rationale:

'In relation to individual programmes we're talking about programmes that employ more than 50 in the workforce. And we're also saying that if it's a six-part drama, we're just looking for one set of data across the whole six-part drama. When you don't show the data by production, what happens is you just get this general picture that doesn't tell you the whole story. If you look at the BSC (British Society of Cinematographers) website, you'll see that they are 98 or 99% white and BSC members get the most prestigious work.'

4. Future Desired (4)

Data continued

It was suggested that a more collaborative approach would help shared learning - knowing which organisations, genres or programmes were doing well and how they were achieving progress/success could then inform those performing less well.

Whilst some broadcasters said they were relatively willing to be quite candid in one-to-ones with each other, there was also some hesitancy in being forthcoming publicly. Several interviewees noted a reluctance to admit a lack of progress or anything that might be considered a failure because of how this might be perceived or received. As one respondent put it:

'There's still fear of people being outed for doing it badly. Well, we are doing it badly!'

Financial

Many felt that wider acceptance and belief in the commercial imperative would result in more positive focus on how the organisations invest financially in D&I. Suggestions included 'ring-fenced' budgets for D&I teams and a minimum percentage of programming where 'no diversity no commission' is put in place.

Several respondents addressed the subject of public funding. One respondent suggested that where public funding is used to create broadcast content, hiring practices for programme makers should be aligned with equality practices used to hire PAYE employees, and be free from hiring bias. It was suggested that this needs to be backed up by regulation, with formal consequences for discriminatory practices in the supply chain.

5. Ofcom Driving Diversity (1)

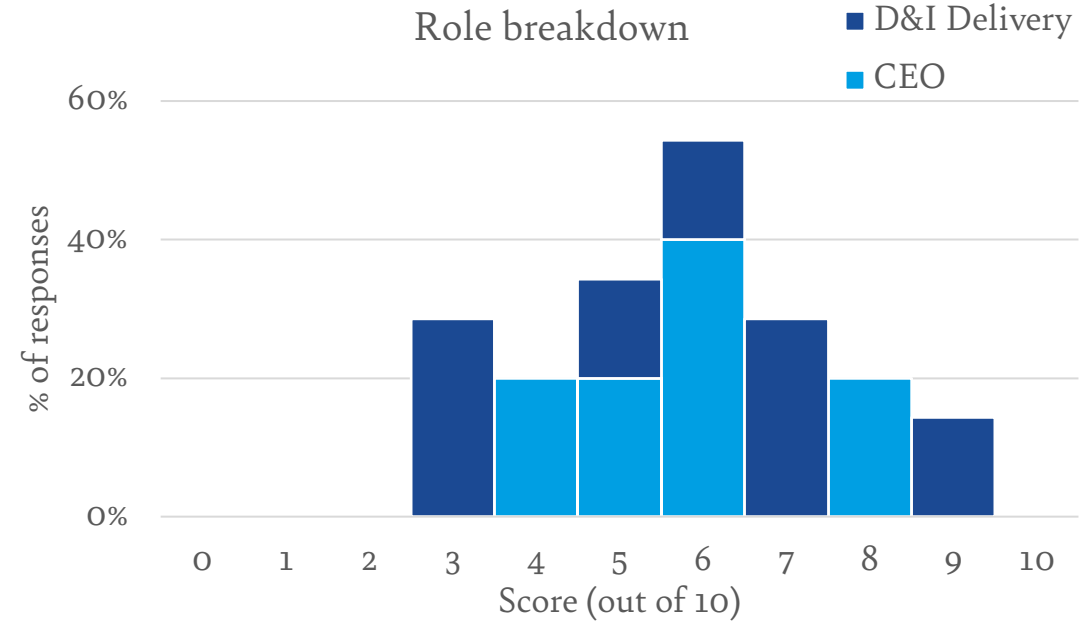
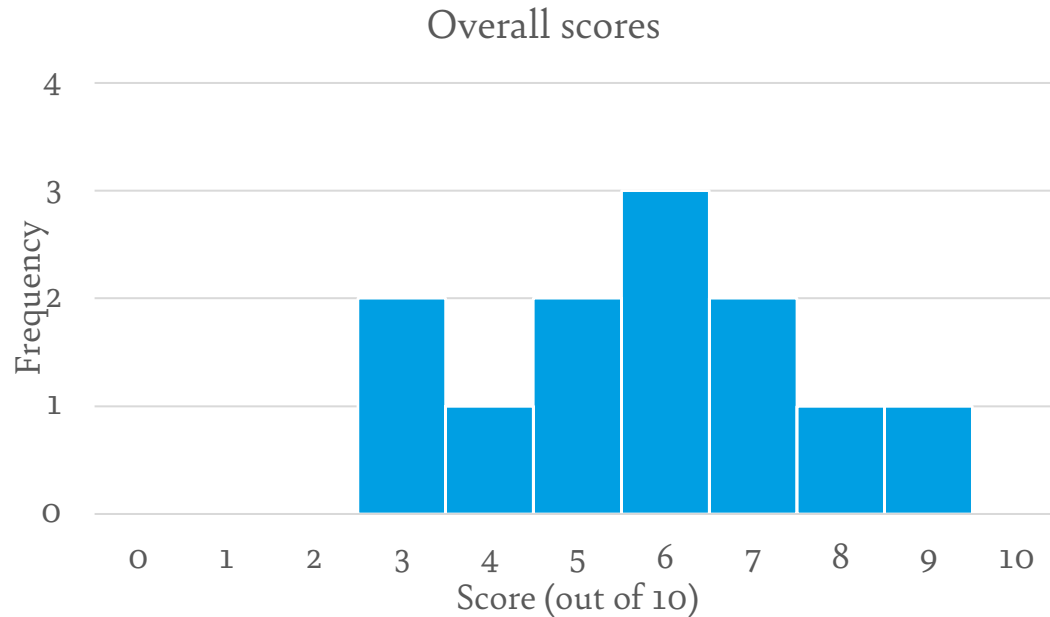
Introduction

One of the areas explored during this research related to impactful changes in the industry over the last five years. Ofcom wanted to find out what part regulatory engagement and guidance had played in those changes coming about. There was also a specific question asking respondents to gauge how effective regulation and guidance had been in driving positive D&I change using a 1-10, 10 high scale.

Throughout other elements of the project respondents were also encouraged to express views on where they thought Ofcom had or could in future help accelerate the pace of progress.



How effective has Ofcom's regulations/guidance been in driving positive diversity and inclusion change?



- This question had a total of 12 responses, of which 5 were CEOs and 7 D&I Delivery team members
- Interviewees were asked to rate on a scale of 1-10 how 'effective has Ofcom's regulations/guidance been in driving positive diversity and inclusion change' (1 = lowest, 10 = highest)
- Scores ranged between 3 and 9, with an overall average score of 6, indicating that whilst Ofcom is doing well in this space, there is still some room for improvement.
- Some respondents did not contribute to this question as they are not yet regulated by Ofcom.

5. Ofcom Driving Diversity (2)

What's working

Acknowledging the continually growing breadth of its remit and workload, some respondents (though not all) were welcoming of Ofcom's 'light-touch' style of regulation. The regulator was considered to play an important role in signalling intent and was recognised as a catalyst for some of this work initially. It was stated that having to report in a public way has impact and was a useful means for holding the industry to account. Now this intent was to create change and focus on D&I results.

Ofcom was believed to be generally right to make sure the responsibility remains upon industry; they should not do anything that relieves industry of its obligations. Some voices welcomed this 'critical friend' role; there was even a reference to the '**sense of trepidation before Ofcom report comes out**' being a useful indicator of the importance of pushing, challenging, and, where necessary, highlighting areas of failure.

Ofcom was reported to have '**done really well**' in the way they had driven the commercial radio broadcasters to raise their game in terms of capturing data and setting targets and doing something about them. Ofcom's publishing of comparative analysis, particularly the difference between TV and radio, was considered helpful. It was further suggested that some of the differential in quantitative results between radio and television is because Ofcom have focused its attention on TV for longer.

The regulator's Out of London review and new guidance was cited as successful in addressing the nations and regions issue and a particular example of effective work. It was also said to highlight that without a regulatory driver it is unlikely that improvement would happen at pace. Goodwill and 'best practice' were not sufficient in themselves to change longstanding culture and behaviour.

5. Ofcom Driving Diversity (3)

What are the gaps

Ofcom hasn't done **'a big intervention'** was one way of expressing the desire for more involvement from the regulator. Some of the suggestions below (see *'What might be done'*) were considered examples of what a 'big intervention' might entail. There was consensus that to be driving **'implies a much more active role than they tend to take'**.

It was stated that Ofcom still struggle to get data from the broadcasters themselves. It was mentioned as a **'missing part of the jigsaw with the Ofcom data'** that it doesn't look at the indies, which is such a massive part of the sector. And not looking at freelancers is problematic.

Some felt that Ofcom could help more on the 'how' of D&I by challenging the competitors within the industry to collaborate (for example in encouraging and achieving greater supplier diversity) and actively promoting best practice.

There was also comment on the need to address diversity within the regulator's own ranks, especially the D&I team.

What might be done

Ofcom was encouraged to take a formal leadership role, with strengthened application of its influence; **'no need to go gung-ho'** rather a desire that it be more authoritative, not authoritarian. In so doing it could bring broadcasters, producers and other relevant parties together to **'tackle some of these thorny industry-wide intractable problems'**. The aim would be to identify a relatively small number of things, agree them and then mandate the participants to go away and deliver them in the appropriate way. The pandemic/freelance issue was an example of where this would have applied (It was stressed that this would be different from the current roundtable sessions).

5. Ofcom Driving Diversity (4)

What might be done

It was requested by one respondent that the regulator take a similarly robust approach to D&I to that applied to nations and regions guidance. This would mean, for example, Ofcom calling for documentation from broadcasters detailing their specific requirements (not 'expectations') for production partners to hire inclusively as part of the licencing conditions.

It was proposed by another interviewee that current data requests have more on context and include the release of programme level data from Project Diamond (even if privately to Ofcom). This would mean actual levels of diversity can be understood and Ofcom can exercise more direct influence in creating positive change.

It was suggested by several respondents that reporting should be applied as a tool to move diversity to the top of Ofcom's agenda. Others wished for data analysis to be applied to oversee cross-industry agreement and setting of specific target(s) for particular focus areas over a determined period.

One respondent proposed that Ofcom should effectively state: **'Between now and when we report again, this is the change we expect to see as regulator ... and we want to see more interlinking in achieving it'**.

There was a call for the regulator to find ways to extend the gender pay gap regulations to apply to other protected characteristics by, for example, addressing this with the Department for Culture Media and Sport.

It was advocated by some that Ofcom sets the standard and diversifies itself in terms of its own personnel. It was also suggested by a handful of respondents that Ofcom looks at other regulators to see whether there are practices that could be adopted or adapted. One interviewee suggested that Ofcom should position itself as being a repository of best practice.

included.

Pandemic



Pandemic: highlights (1)

Support

Broadcasters, trade bodies, unions and The Film and TV Charity found ways of providing support during the pandemic. Particularly highlighted was ITV collaborating with Martin Lewis (moneysavingexpert.com) in successfully lobbying the Treasury for a change in the furlough rules so freelancers could be compensated. There was a concerted effort to 'get back up and running quickly' with smaller productions, creative innovation, user-generated content and investment in Covid-secure larger productions – a reported production spend of £2.1bn.

D&I work continuing

Reports are that, subsequently, positive D&I work continued via Employee Resources Groups (ERGs) - safe space forums for people to voice anxieties or concerns, ask questions (anonymously if necessary) and have them answered. Across the sector virtual meetings and forums have been cited as a positive for inclusion of more voices particularly from the nations and regions, increased accessibility including for disabled people. CEOs, executives and senior managers refer to having a better understanding of their teams and individual life circumstances.



Pandemic: highlights (2)



Change coalitions

Copious examples to evidence the elevation of D&I towards the top of the agenda include D&I being a regular and recurring topic at senior level conversations, charters and guidelines for representation in content and crews, and commissioning conversations.

The creation of the Coalition for Change (CFC) gave voice to the freelancers in a new way. The CFC was formed four months after George Floyd in response to Black Lives Matter, MeToo and events that had highlighted shameful, troublesome behaviour and practices.

‘Creative Diversity Network (CDN) hasn't made the impact that we wanted it to, which is why we formed the CFC’, said Adeel Amini, founder/organiser, listing PSBs, VODs, unions among those who attend quarterly meetings to produce a body of work to improve working culture within the industry. Ofcom also attends these sessions.

Pandemic: lowlights (1)

Freelancers and minority groups

The pandemic impact on freelancers was described as devastating, with reports that many thousands of freelancers went from expected incomes of £50-70,000+ to zero. In addition, a few respondents felt that government interventions, such as the Coronavirus Retention Scheme, and universal credit, proved either insufficient or inaccessible for many. The support was primarily designed for sole traders, whereas freelance encompasses a mix of limited companies and PAYE as well.

Many minority ethnic workers, who are disproportionately more likely to be freelance rather than on staff, have reportedly left the industry. They are less likely hold senior positions and are less well networked, therefore, they were **'least likely to be able to weather long periods without income'**. Other reasons cited include disaffection with personal work experiences, feeling undervalued, and that having found other jobs 'to make ends meet' they've found these more conducive.

Respondents, mainly those directly involved in D&I delivery, said that diversity and inclusion had slipped and might have fallen off the agenda but for George Floyd and Black Lives Matter turning the spotlight on race. Even so, there were those who felt the pandemic had set D&I back a few years.



Pandemic: lowlights (2)



Working practices

Long-standing poor working practices also came into focus, such as the 'long-hours culture'. This is epitomised by 'prep and wrap' where departments like hair and make-up, costume and wardrobe are expected to start a couple of hours (sometimes more on major dramas) before shooting starts and similarly stay on after 'wrap' is called.

Networks

There are concerns that being '**networked or in someone's contacts book**' is what determines your being hired remains entrenched.

included.

“To 'get things moving' in production, **hirers aren't exploring wide pools of applicants;** they are **talking to directors they already know.** These issues are felt to impact the chances of women, older people, people of colour, people from nations and regions and people with disabilities being hired if they are not already in established relationships with production companies and broadcasters - and this impedes the progress of emerging talent.”

Directors UK

Pandemic: what to build on (1)

Flexible working/Working from home

This has been the most positively referenced change, attracting the **‘game changer’** label. Many respondents urged that this should be true flexibility geared to meet the needs of different teams, departments, appropriately to benefit individuals as well as organisations. The expectation is that it will have positive impacts on accessibility, for those with children/caring responsibilities, some disabled people, and nations and regions diversity.

PSB trusted news source

Another positive impact of pandemic on which to build was the increased engagement with PSBs as preferred news service together with the delivery of educational (e.g. BBC Bitesize) health and wellbeing (i.e. Joe Wicks). A whole range of diverse new experts from all over the country were introduced to the public. No longer was it only established persons or ‘who was closest and could get into the studio’. It could just as easily be an epidemiologist in Scotland or an intensive care nurse in Leeds.



Pandemic: what to build on (2)



Wellbeing including mental health

The elevation of wellbeing issues was welcomed, with particular enthusiasm for the retention and even expansion of wellbeing programmes, particularly those relating to mental health e.g. 2-week winter wellness programme, mental health advocates.

Interviews: Conclusions



Conclusions (1)

Conclusions to be drawn from the responses of those interviewed can usefully be viewed through the lens of authority, breadth and collaboration – the ABC for the future, that is the next 5 to 10 years.

Authority

‘Ofcom is massively influential, and it’s about how that influence is discharged,’ said RTS CEO Theresa Wise.

Whilst there was general appreciation for the current light touch, influence-oriented approach, many of the respondents expressed a wish for Ofcom to take a more active leadership role in promoting D&I. This desire was founded on the evidence that in instances where the regulator has been more exacting (e.g. Made Outside London) this had a galvanising effect. The sense from many contributors is that Ofcom is best placed to perform this role, given the differing approaches throughout the sector to some of the fundamental issues. For example, data collection, analysis and evaluation as referenced repeatedly throughout this report (and below); target setting, where the BBC’s very specific targets for gender, race and disability contrast with Viacom’s avowedly anti-targets stance.

Diversity of senior leadership regularly featured as a cause for concern, with BBC Director General Tim Davie describing the lack of progress across the industry as **‘a profound failure of creative imagination’**. It was also suggested that for as long as there are no real consequences, there's likely to be no real change.

Conclusions (2)

Breadth

The importance of data in driving, or at least informing, diversity and inclusion progress was widely acknowledged. What was equally widely mentioned was the disparity and lack of clarity, transparency and robustness of data, including with regard to response rates - the call for agreed standardised processes has come from broadcasters in concert with trade bodies, unions and other stakeholders. Together with a mandated requirement for more nuanced data, it was suggested this would afford more meaningful analysis and evaluation - data could then be a more effective driver of diversity and inclusion across the sector.

Two impacts of the pandemic were cited as particularly significant. First, the importance of freelancers within the industry and the pivotal role they could play in D&I progress, or lack thereof. For example, some contributors were concerned that a residual effect of the pandemic would be that freelancers from diverse backgrounds were the most likely to have left the industry. Some also suggested it would be helpful if the desired nuanced data collection encompassed freelancers and independent companies (although it is important to note here that Ofcom cannot legally mandate data relating to freelances and indies). It was suggested that given the diversity of approach that exists in the sector (e.g. BBC specific targets, Viacom avowedly anti targets) the above approach is a role only Ofcom can play - to acknowledge the diversity of approach, but be relentlessly outcomes focused, and oversee which methods achieve change fastest.

'A missing part of the jigsaw with the Ofcom data is that it doesn't look at the indies, and that's such a massive part of the sector. And not looking at freelancers is problematic.' Babita Bahal, Head of Creative Diversity at C4

Conclusions (3)

‘I think Ofcom needs a bit more stick than carrot. Use the reporting as a tool to leverage diversity to the top of the pile not the bottom.’ Anon.

Also, the pandemic brought to the fore the desire for a healthier working environment, with a call for better provision of policy and procedure addressing long hours, bullying and harassment, unlawful discrimination and the mental health consequences that can result.

BECTU, CDN and some D&I delivery team members queried whether Ofcom might review and explore how these latter two might be addressed within its remit.

Collaboration

Part of the request for Ofcom to take a more pronounced leadership role was that this could be a foundation on which to build and foster spirit of collaboration. Sky's David Carrigan suggested Ofcom could be particularly effective in this regard with help on the 'how' of collaboration including promoting best practice, highlighting opportunities such as regarding supplier diversity and effectively challenging the competitors to collaborate. Meanwhile, ITV's Paul Moore felt that in assuming this kind of leadership the regulator, together with the broadcasters and other relevant stakeholders, could agree a small number of significant things that will really make a difference. Everyone would then go away and address these and then come back together and share best practice.

‘We don’t want to come back in a year's time or five years’ time and say well that didn't really change very much did it?’ Anon

Conclusions (4)

Included's reflections

Based on the interviews held, in the five years to date, it is clear that Ofcom has had an impact and played an important role. This is not least the case in terms of gathering diversity data and offering a simple and transparent way of benchmarking progress.

However, given that many of the [barriers to progress](#) are inclusion related (senior diversity, lack of collaboration, lack of accountability) it would seem timely and effective for the industry to focus on inclusion going forward. This would create a cumulative effect, building on the effective diversity work done to date, but focusing ever more on the key drivers for accelerated change in the industry that all purport to desire.

included.

Appendix



Interview question sets: CEOs

1. **What drives the engagement with D&I? (commercial/competition, creative excellence, regulatory imperative, CSR, external societal pressures (metoo/Black Lives Matter), other (what?))** diversity and inclusion change? (1-10, 10 high)
2. **Where is D&I on the organisation's priority list?**
 - 2a How is that evidenced? What supporting data?
3. **It is well documented that the industry is heavily dependent on freelance labour and that the pandemic has been especially detrimental to this group. What impact is/will the pandemic having/have on D&I aspirations?**
 - 3a How will this affect activities/engagement outside London (e.g. in nations and regions)?
4. **What impact do you foresee from changes in work practice as a result of the pandemic (e.g. remote working/fewer days in the office etc)**
 - 4a What has been learned and how will this be applied?
 - 4b How will this affect activities/engagement outside London (e.g. in nations and regions)?
5. **What have been the most impactful changes in last 5 years?**
 - 5a Detail 'change'
 - 5b What's the evidence of these changes? What supporting data?
 - 5c what causal factors?
 - 5d What's the effect of Ofcom's regulations/guidance?
 - 5e How effective has Ofcom's regulations/guidance been in driving positive
6. **In 2018, CEOs identified some major challenges: how would you assess progress in these areas? (1-10, 10 high)**
 - Diversity in senior management
 - Improving reporting and tracking of D&I data
 - Setting challenging targets and sticking with the plans to achieve them
 - Taking risks and recruiting differently
7. **How would you say you demonstrate your own commitment to D&I?**

Interview question sets: Indies

1. **What drives the engagement with D&I? (commercial/competition, creative excellence, regulatory imperative, CSR, external societal pressures (metoo/Black lives matter), other (what?))**
2. **Where is D&I on the organisation's priority list?**
 - 2a How is that evidenced? What supporting data?
3. **Broadcasters have individual organisational plans/priorities, what's being done collaboratively?**
 - 3a How is collaborative work progressing? (1-10 scale with 10 high)
 - 3b How is this evidenced? What supporting data?
 - 3c How might collaboration be improved?
4. **It is well documented that the industry is heavily dependent on freelance labour and that the pandemic has been especially detrimental to this group. What impact is/will the pandemic having/have on D&I aspirations?**
 - 4a How will this affect activities/engagement outside London (e.g. in nations and regions)?
5. **What impact do you foresee from changes in work practice as a result of the pandemic (e.g. remote working/fewer days in the office etc)**
 - 5a What has been learned and how will this be applied?
 - 5b How will this affect activities/engagement outside London (e.g. in nations and regions)?
6. **What have been the most impactful changes in last 5 years?**
 - 6a Detail 'change'
- 6b What's the evidence of these changes? What supporting data?
- 6c what causal factors?
- 6d What's the effect of Ofcom's regulations/guidance?
- 6e How effective has Ofcom's regulations/guidance been in driving positive diversity and inclusion change? (1-10, 10 high)
7. **What changes would you most like to see in the next 5 years?**
 - 7a How will these be achieved?
 - 7b What is/are in immediate future focus?
 - 7c How might Ofcom expedite/support?
8. **In 2018, CEOs identified some major challenges: how would you assess progress in these areas? (1-10)**
 - Diversity in senior management
 - Improving reporting and tracking of D&I data
 - Setting challenging targets and sticking with the plans to achieve them
 - Taking risks and recruiting differently
9. **What has or will hindered/hinder D&I progress?**
10. **What has or will enhanced/enhance the pace of change?**
11. **How would you say you demonstrate your own commitment to D&I?**

Interview question sets: D&I teams

1. **What drives the engagement with D&I? (commercial/competition, creative excellence, regulatory imperative, CSR, external societal pressures (metoo/Black Lives Matter), other (what?))**
2. **Where is D&I on the organisation's priority list?**
 - 2a How is that evidenced? What supporting data?
3. **Broadcasters have individual organisational plans/priorities, what's being done collaboratively?**
 - 3a How is collaborative work progressing? (1-10 scale with 10 high)
 - 3b How is this evidenced? What supporting data?
 - 3c How might collaboration be improved?
4. **It is well documented that the industry is heavily dependent on freelance labour and that the pandemic has been especially detrimental to this group. What impact is/will the pandemic having/have on D&I aspirations?**
5. **What have been the most impactful changes in last 5 years?**
 - 5a Detail 'change'
 - 5b what causal factors?
6. **What changes would you most like to see in the next 5 years?**
 - 6a How will these be achieved?
 - 6b What is/are in immediate future focus?
 - 6c How might Ofcom expedite/support?
7. **In 2018, CEOs identified some major challenges: how would you assess progress in these areas? (1-10)**
 - Diversity in senior management
 - Improving reporting and tracking of D&I data
 - Setting challenging targets and sticking with the plans to achieve them
 - Taking risks and recruiting differently
8. **What has or will hindered/hinder D&I progress?**
9. **What has or will enhanced/enhance the pace of change?**
10. **How would you say you demonstrate your own commitment to D&I?**

Interview Participants

1. Adeel Amini, Founder of TV Mindset, Coalition for Change
2. Ade Rawcliffe, Group Director of Diversity and Inclusion at ITV
3. Alex Mahon, Chief Executive at Channel 4
4. Alex Pumfrey, CEO at Film & TV Charity
5. Amy Turton, Creative Diversity Network
6. Anna Thomson, Chair Access and Inclusion at Directors UK
7. Babita Bahal, Head of Creative Diversity at Channel 4
8. Benjamin King, Director of Public Policy at Netflix
9. Carolyn McCall, Chief Executive at ITV
10. David Carrigan, Group Director of Diversity and Inclusion at Sky
11. Deborah Williams, Executive Director at Creative Diversity Network
12. Dee Ford, Managing Director at Bauer Media Group
13. Directors UK
14. Frances Rafferty, Campaign and Comms Officer at NUJ
15. Janice Turner, Diversity Officer at BECTU
16. June Sarpong, Director Creative Diversity at BBC
17. Krishnendu Majumdar, Chair of BAFTA
18. Maria Kyriacou, President at ViacomCBS Networks UK and Australia
19. Melanie Hoyes, Industry Inclusion Executive at BFI
20. Nahrein Kemp, Creative Diversity Partner at ITV
21. Nia Edwards, Diversity and Inclusion Officer at S4C
22. Paul Moore, CDN Chair (ITV)
23. Sally Cairns, Chief People Officer at Global
24. Sam Tatlow, Creative Diversity Partner at ITV
25. Seetha Kumar, Chief Executive at Screenskills
26. Theresa Wise, CEO at RTS
27. Tim Davie, Director-General at the BBC
28. Wincie Knight, Vice-President of Global Inclusion Strategy at Viacom



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