
Diversity and equal opportunities in television

Methodology

Publication Date: 14 September 2017

Methodology

Introduction

A1.1 This section outlines the methodology used in carrying out the data collection.

Survey administration

- A1.2 All elements of the survey including questionnaire design, fieldwork and analysis were conducted in-house by Ofcom's market research team. The questionnaire was provided to broadcasters via a PDF form (created in Adobe Acrobat Professional). For additional security, the forms were hosted through individual accounts on Ofcom's managed file transfer (MFT) system. Each broadcaster was notified by email and asked to download and fill in the questionnaire, save locally, and upload it back on to the same system by a specified date. Fieldwork took place April-May 2017.
- A1.3 Where a broadcaster has multiple licenses we accepted information on either a licence-by-licence or aggregated (combined across licenses) basis, depending on how data had been collected internally. Broadcasters were asked to specify at the top of the questionnaire to which licence(s) the data related.
- A1.4 For companies that provide services beyond broadcasting (such as telecoms), we made clear that we only required information about those employed in connection with the provision of broadcasting services.

The qualification threshold

- A1.5 All licensees were required to complete the cover sheet and part of Section A to confirm their total number of employees and whether they are licensed to broadcast more than 31 days a year. Those with fewer than 21 employees and/or licensed to broadcast fewer than 31 days a year were not required to complete the remainder of questionnaire.

Response

- A1.6 We sent out information requests to 345 licensees, as well as the BBC and S4C¹, which totaled 347. We received 250 submissions, which accounted for 287 licensees and 758 individual licences.² This effectively means that we had a response rate of 83%. Of these:
- a) 172 (69%) didn't meet the qualification threshold (specified above) so were not required to complete the questionnaire. This accounted for 1,311 employees in total, or less than 3% of employees across the industry.
 - b) 78 (31%) met the threshold and completed at least the mandatory sections of the questionnaire; these are the licensees whose data is aggregated to make up the total UK industry figures assessed in this report, and accounts for 49,314 employees in total.

¹ S4C is not an Ofcom licensee and was asked to complete the questionnaire on a voluntary basis. The BBC was required to complete the questionnaire under provisions of the BBC Charter and Agreement.

² Submissions were allowed to cover multiple licences. The new total figure was 310 as opposed to the original 347, as 37 of the licensees who received an information request responded jointly with another licensee.

- c) There were three broadcasters sent an information request whose licences ceased for other reasons during the period for responses. We Commenced enforcement action against the remaining 57 from which we did not receive any response or we received a response which was incomplete and will publish our findings shortly.³

A1.7 Due to non-responses, the qualification threshold, and the fact that some sections received only partial responses (i.e. less than 100% of the workforce provided information) the research cannot provide a full picture of the industry. While we know that the 172 licensees who didn't meet the threshold account for just 3% of employees across the submissions, we do not know this information for the 57 licensees that did not respond at all.

Mandatory and voluntary sections

A1.8 The questionnaire was designed so it was clear which questions were mandatory to fill in, and which were voluntary. Purple and blue colour-coding was used to distinguish the former from the latter. All licensees were required to respond to the mandatory questions, and it was clarified that failure to do so would result in a possible breach of their licence condition(s).

A1.9 Licensees operating both TV and radio services were asked to complete the questionnaire if the majority of their business is the provision of TV services. Licensees who operate both, but predominantly radio services, will be asked to complete the radio data questionnaire which will be circulated later this year.

A1.10 Where it was not possible for broadcasters to provide the required information, we asked licensees to provide reasons for this and state whether alternative information could be provided.

A1.11 Response rates to each section are shown below:

MANDATORY SECTIONS	COMPLETED	RESPONSE
SECTION A: ABOUT YOU AND YOUR ORGANISATION	78	100%
SECTION B: EQUAL OPPORTUNITIES ARRANGEMENTS	78	100%
SECTION C: GENDER	78	100%
SECTION D: RACIAL GROUP	78	100%
SECTION E: DISABILITY	78	100%
VOLUNTARY SECTIONS	COMPLETED	RESPONSE
SECTION F: AGE	25	32%
SECTION G: SEXUAL ORIENTATION	21	27%
SECTION H: RELIGION	21	27%
SECTION I: OTHER ⁴	19	24%

³ These licensees are listed on the online Diversity Hub

⁴ Pregnancy and maternity, and gender reassignment

The profile grids

Within Section A, broadcasters were asked to provide the number of employees who fall into 14 categories using a grid system. We acknowledge that few organisations categorise employees in exactly these ways (particularly job level and job role), and so we asked broadcasters to input their information in the categories they considered most closely matched those used by their organisation. This allows us to present like-for-like comparisons across the industry. The categories were displayed as columns:

1. Total number of employees
2. Joined the organisation in 2016
3. Left in 2016
4. Attended training in 2016⁵
5. Were promoted in 2016

Job level

6. Board and non-executives
7. Senior managers
8. Middle/junior managers
9. Non-managers

Job role

10. Programming
11. Commissioning (within Programming)
12. Technical and engineering
13. Sales and marketing
14. Support/admin

- In sections C to H data in relation to six protected characteristics was collected:

- C. Gender (mandatory)
- D. Racial group (mandatory)
- E. Disability (mandatory)
- F. Age (voluntary)
- G. Sexual orientation (voluntary)
- H. Religion (voluntary)

A1.12 For each characteristic, broadcasters were asked to provide breakdowns among each of the 14 categories above. This required numbers of employees to be put into each profile field (e.g. male and female, as shown in the gender example below). To help with this, at the header of each grid, the form automatically fed through the relevant total figure from Section A. At the bottom of each grid there was also a running total which would automatically recalculate each time a number was entered. The licensees were instructed to ensure that these two figures matched. A 'no data' field was provided for any employees whose data was not captured.

⁵ We noted that several broadcasters indicated that they collected training data on a session-by-session basis, so the data we collected may have included multiple instances of the same employee in some cases.

SECTION C: GENDER

For each column please ensure that the sum of boxes a to e equals the total specified in the top row (as already specified in Section A). Completion of row c is voluntary. Only provide information in row c which is personal data if you have the explicit consent of the relevant individuals.

TOTAL SPECIFIED AT:		1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Total A2	Joiners A4a	Leavers A4b	Trained A4c	Promoted A4d	Board A5a	Senior A5b	Junior A5c	Non-mgt A5d	Prog A6a	Comm A6b	Tech A6c	Sales A6d	Support A6e
		100	10	10	20	5	2	6	30	62	40	5	30	20	10
a	Male	50	4	1											
b	Female	50	6												
c	Other (e.g. Intersex, non-binary)														
d	Employee preferred not to disclose														
e	Didn't request this information/no data														
Current total		100	10	0	0	0	0	0	0	0	0	0	0	0	0

- A1.13 A rule was also applied on processing the data to ensure that the breakdowns added up to each category total. If the summed total of a column was less than the category total, the remaining number of employees was added to the 'no data' variable. If the summed total was higher, the licensees were contacted and asked to review the questionnaire.
- A1.14 Additional categories and profiles were also requested in a similar manner for the following:
- a) Freelancers
 - i) Total, gender, racial group and disability profiles⁶
 - b) Number of employees based in the UK⁷
 - c) Whether employees consider themselves to be English, Scottish, Welsh, Northern Irish, British, None of these⁸
 - d) Maternity leavers and returners (2016)⁹
- A1.15 The copy of the full questionnaire is provided at the end of this document.

Personal data

- A1.16 Broadcasters were asked to ensure they correctly identified any information which is personal data by adding the letter 'P' before such information. We explained that personal data was data which, due to the small numbers and the make-up of the organisation, could lead to an individual being identified. This type of data cannot be published in our report unless it is aggregated with other data so that individuals are not identifiable. In accordance with the Data Protection Act 1998, broadcasters were asked to provide certain information to any individuals whose personal data they would provide in the mandatory sections of the questionnaire, and to obtain consent from any individuals whose personal data they proposed to provide on a voluntary basis.

Legal background

- A1.17 Ofcom has a duty under section 27 of the Communications Act 2003 (the 'Act') to take all such steps as we consider appropriate for promoting equality of opportunity in relation to

⁶ Broadcasters were required to provide the total number of freelancers but provision of data on the gender, racial group and disability of freelancers was requested on a voluntary basis.

⁷ Mandatory section

⁸ Mandatory section

⁹ Voluntary section

employment by those providing television and radio services, and the training and retraining of persons for such employment, between men and women, persons of different racial groups¹⁰ and disabled persons.¹¹

- A1.18 Ofcom broadcast licensees which employ more than 20 people in connection with the provision of their licensed service¹² and are licensed to broadcast for more than 31 days a year are required¹³ to make arrangements for promoting, in relation to employment, equality of opportunity between men and women, persons of different racial groups and for disabled persons. They are also required to make arrangements for training persons employed in, or in connection with, the provision of the licensed service or the making of programmes to be included in the service. They are required to take appropriate steps to make those affected by the arrangements aware of them, to review them, and to publish observation on their operation and effectiveness at least annually.
- A1.19 The BBC is subject to similar requirements under paragraph 12 of Schedule 3 to the BBC Agreement and the S4C under Part 2, paragraph 23 of Schedule 12 to the Act.
- A1.20 In order to review broadcasters' arrangements, and to take appropriate steps to promote equal employment and training opportunities in relation to gender, racial group and disability, Ofcom required licensees and the BBC to provide information about their arrangements and employees in terms of these three protected characteristics.
- A1.21 Given the importance of equality of opportunity and diversity in the broadcasting industry also in terms of protected characteristics in the Equality Act 2010 other than gender, racial group and disability, we asked broadcasters to provide, on a voluntary basis, information on their equal opportunities arrangements and employee make-up in terms of age, sexual orientation, religion or belief, gender reassignment, and pregnancy and maternity. S4C, which is not an Ofcom licensee, provided all information on a voluntary basis.
- A1.22 We have written to the Secretary of State for Digital, Culture, Media and Sport to request an extension to the list of protected characteristics in sections 27 and 337 of the Act. This would allow us to require broadcasters to provide data on a broader range of characteristics, rather than sections being voluntary, and require¹⁴ their equal opportunities arrangements to cover these characteristics.

¹⁰ Under the Equality Act 2010, and therefore for the purposes of section 27 and 337 of the Act, a racial group is a group of persons defined by reference to race. Race includes colour; nationality; ethnic or national origins.

¹¹ Under the Equality Act 2010, and therefore for the purposes of section 27 and 337 of the Act, a person has a disability if he or she has a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.

¹² Or where the licensee and any group companies together employ more than 20 people in connection with the provision of licensed broadcasting services.

¹³ Pursuant to section 337 of the Act.

¹⁴ In the case of the BBC, the Secretary of State would give a direction.

DIVERSITY IN BROADCASTING SURVEY

ABOUT THE SURVEY

Ofcom is launching a new annual *Diversity in Broadcasting* monitoring programme. This will enable Ofcom to develop a more comprehensive picture of what broadcasters are doing to promote equality and diversity in their organisations.

THE INFORMATION REQUEST

The covering letter and Annexes 3 and 4 set out why Ofcom is seeking this data, what it will be used for, the elements you are required to provide under your licence/s and what we are asking you to provide voluntarily. Annex 1 sets out data protection obligations you must comply with before providing any information which is personal data. Please read these before completing this questionnaire and follow the steps described in Annex 1.

As you complete this questionnaire please ensure you correctly identify any information which is personal data. This is data that, due to the small numbers and the make-up of your organisation, could lead to an individual being identified. It cannot be published in our report unless it is aggregated with other data so that individuals are not identifiable. To do this please add the letter 'P' before any information you enter that is personal data.

PLEASE TICK THE FOLLOWING BEFORE CONTINUING:

I have provided information to and, where necessary, obtained consent from individuals whose personal data I am providing, in accordance with Annex 1

☐

REQUIREMENTS

All television broadcast licensees are required to complete questions A1 to A3 of **Section A**.

If you (or you and any group companies together) employ more than 20 people in connection with the provision of licensed broadcast service/s and you are authorised to broadcast for more than 31 days a year, you are also required to respond to the questions coloured purple in the remainder of Section A and in **Sections B to E**. It is important to note that Ofcom could find you in breach of your broadcast licence/s if you do not complete and submit these mandatory sections by 5 May 2017.

Broadcasters are also asked to respond, to the questions coloured blue which are mostly found in **Sections F to I**. This information will enable Ofcom to develop a more comprehensive picture of the make-up of the broadcasting industry in terms of other protected characteristics in the Equality Act 2010 and, as appropriate, to promote equality of opportunity in relation to employment and training for other potentially under-represented groups. It is not a licence requirement to provide the information requested in the questions coloured blue and failure to do so will not result in a licence breach being recorded.

To provide context and transparency, Ofcom's *Diversity in Broadcasting* report will note which licensees responded to which sections of the questionnaire.

Before completing the questionnaire please familiarise yourself with each section. Unless otherwise specified, data is requested for the calendar year 2016.

PLEASE TICK THE SECTIONS YOU ARE ABLE AND WILLING TO COMPLETE:

SECTION A: ABOUT YOU AND YOUR ORGANISATION	Page 2-3	A1-A3 Mandatory. Others mandatory if A2>20 and A3=Yes	
SECTION B: EQUAL OPPORTUNITIES ARRANGEMENTS	Pages 4-5	Majority Mandatory if A2>20 and A3=Yes	
SECTION C: GENDER	Page 6	Majority Mandatory if A2>20 and A3=Yes	
SECTION D: RACIAL GROUP	Pages 7-8	Mandatory if A2>20 and A3=Yes	
SECTION E: DISABILITY	Page 8	Mandatory if A2>20 and A3=Yes	
SECTION F: AGE	Page 9	Voluntary	
SECTION G: SEXUAL ORIENTATION	Page 9	Voluntary	
SECTION H: RELIGION	Page 10	Voluntary	
SECTION I: OTHER	Pages 11-12	Voluntary	

SECTION A: ABOUT YOU AND YOUR ORGANISATION

A1 Please complete the following details:

Name:	
Job title:	
Licence(s) relevant to this submission:	

- This questionnaire can be completed on a licence by licence or aggregated basis (i.e. for your licensed television services taken together), depending on how your organisation collects information.
- If the licensee does not employ more than 20 individuals in connection with the provision of licensed broadcasting services you should include individuals employed by any group companies in connection with the provision of such services in the data you provide.

A2 Including yourself, how many people does your organisation (including, if relevant as explained above, any group companies) currently employ either full or part time in connection with the provision of licensed broadcasting service/s?

Total number of employees

A3 Is your organisation authorised to broadcast for more than 31 days a year?

1	Yes	<input type="radio"/>
2	No	<input type="radio"/>

- If you answered A2 with a number lower than 21 or A3 with 'No' you do not have to continue with this questionnaire. Please send your responses for A1 to A3 to Ofcom.
- If you answered A2 with a number of 21 or higher and A3 with 'Yes' you are required to continue to complete the questionnaire as explained above.

A4 How many employees fell into the following categories in 2016...?

If you don't hold this information for any of the categories, please leave the relevant box blank

a	Joined your organisation	
b	Left your organisation	
c	Received training (related to developing in their role)	
d	Were promoted within your organisation	

A5 How many of the {A2} employees referred to in your response to A2 fall into the following broad classifications of job level?

Please ensure that the sum of boxes a to e equals the number from A2 shown above:

a	Board and non-execs	
b	Senior managers	
c	Middle / junior managers	
d	Non-management	
e	No data	

A6 How many of the {A2} employees fall into the following roles?

Please ensure that the sum of boxes a+c+d+e+f equals the number from A2 shown above:

a	Programmes/programming	
b	Within programming how many fall under Commissioning?	
c	Technical/Engineering	
d	Sales/Marketing	
e	Support functions/admin	
f	Other / No data	

A7	Are your licensed service/s received in the UK?	
1	Yes	<input type="radio"/>
2	No	<input type="radio"/>

A8	How many of those employed in connection with the provision of your licensed television service/s are based in the UK?	
a	Employees based in the UK	

Freelancers

A9	In 2016, how many freelancers worked in connection with the provision of your licensed service/s?	
a	Freelancers	

- Completion of questions A10 and A11 is voluntary. Only provide information in response to A10 which is personal data if you have the consent of the relevant individuals.

A10	Of the {A9} freelancers, how many are...? Please ensure the total for each category equals the number from A9 shown above
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Gender

a	Male	
b	Female	
c	Other / No data	

Racial Group

d	White	
e	Black, Asian and Minority Ethnic (BAME)	
f	Other / No data	

Disability

g	Disabled	
h	Not Disabled	
i	Other / No data	

A11	Does your organisation collect information on any of the following protected characteristics for freelancers? Please tick all that apply	
1	Age	
2	Sexual orientation	
3	Religion or Belief	
4	Pregnancy and maternity	
5	Gender reassignment	
6	Marriage or civil partnership	
7	None of these	

SECTION B: EQUAL OPPORTUNITIES ARRANGEMENTS

B1	Which of the following statements apply to your organisation? Please tick all that apply.
1	There are arrangements in place to promote equal employment opportunities and training in relation to gender, racial group and disability
2	There are arrangements in place for monitoring the composition of the workforce
3	The organisation has a written equal opportunities policy statement
4	The organisation offers training, special schemes or facilities to promote equal opportunities
5	The organisation offers work experience, internships or other schemes designed to attract new talent to the industry
B2	Please outline briefly the arrangements your organisation has in place to promote equal employment opportunities and training in relation to gender, racial group and disability. If you have an equal opportunities policy statement please send a copy of this to Ofcom when you return this questionnaire.

B3	How often are these arrangements discussed at senior management / board level?		
B4	How often are these arrangements reviewed?		
		B3	B4
1	Weekly or more often	<input type="radio"/>	<input type="radio"/>
2	Monthly	<input type="radio"/>	<input type="radio"/>
3	Quarterly	<input type="radio"/>	<input type="radio"/>
4	Bi-annually	<input type="radio"/>	<input type="radio"/>
5	Annually or less often	<input type="radio"/>	<input type="radio"/>
6	Never	<input type="radio"/>	<input type="radio"/>
7	Don't know	<input type="radio"/>	<input type="radio"/>

B5	How are those affected by the arrangements made aware of them?
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B6	Do these arrangements also cover any of the following protected characteristics, or socio-economic background? Please tick as many as apply	
1	Age	<input type="checkbox"/>
2	Sexual orientation	<input type="checkbox"/>
3	Religion or Belief	<input type="checkbox"/>
4	Pregnancy and maternity	<input type="checkbox"/>
5	Gender reassignment	<input type="checkbox"/>
6	Marriage or civil partnership	<input type="checkbox"/>
7	Socio Economic Background/Social Mobility	<input type="checkbox"/>
8	None of these	<input type="checkbox"/>

B7	Please explain briefly any system your organisation has in place for monitoring the diversity make-up of your employees.
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B8	Which of the following protected characteristics are monitored within your organisation? Please select all that apply from the list below
1	Gender (MANDATORY)
2	Racial group (MANDATORY)
3	Disability (MANDATORY)
4	Age (DISCRETIONARY)
5	Sexual orientation (DISCRETIONARY)
6	Religion or Belief (DISCRETIONARY)
7	Pregnancy and maternity (DISCRETIONARY)
8	Gender reassignment (DISCRETIONARY)
9	Marriage or civil partnership (DISCRETIONARY)
10	None of these

B9	If you <u>do not</u> monitor gender, racial group or disability, please explain why.
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B10	Please outline any training offered by your organisation to encourage in-role development or to encourage a diverse and inclusive environment (e.g. unconscious bias training) or any special schemes or facilities offered by your organisation to promote equal opportunities.
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B11	Please outline any work experience, internships or other schemes offered by your organisation which aim to attract new talent to the industry. Please mention if these are targeted at any particular protected groups and whether they are paid or unpaid.
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B12	What priorities does your organisation have in terms of promoting equal opportunities in 2017?
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B13	If it is not possible for you to provide required information please provide reasons and state whether alternative information could be provided.
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For Sections C to H please use the grids provided to input the number of employees in your organisation with specific characteristics who fall into each of the above categories. If you don't hold information by a category please leave the column blank.

Column	Category	Heading
1	At a total level i.e. among the {A2} employees in your organisation	Total
2	Among the {A4a} employees who joined your organisation in 2016	Joiners
3	Among the {A4b} employees who left your organisation in 2016	Leavers
4	Among the {A4c} employees who completed development training in 2016	Trained
5	Among the {A4d} employees who were promoted in 2016	Promoted
6	Among the {A5a} employees at board / non-exec level	Board
7	Among the {A5b} employees at senior management level	Senior
8	Among the {A5c} employees at junior / middle management level	Junior
9	Among the {A5e} employees at non-management level	Non-mgt
10	Among the {A6a} employees in a programmes/programming role	Prog
11	Among the {A6b} employees in a commissioning role	Comm
12	Among the {A6c} employees in a technical/engineering role	Tech
13	Among the {A6d} employees in a sales/marketing role	Sales
14	Among the {A6e} employees in a support functions/admin role	Support
FOR SECTION F (AGE) ONLY		
15	Among the {C1a} men in your organisation	Males
16	Among the {C1b} women in your organisation	Females

SECTION C: GENDER

For each column please ensure that the sum of boxes a to e equals the total specified in the top row (as already specified in Section A). Completion of row c is voluntary. Only provide information in row c which is personal data if you have the explicit consent of the relevant individuals.

[illegible]

SECTION D: RACIAL GROUP

For each column please ensure that the sum of all boxes equal the total specified in the top row (as already specified in Section A).

For **Column 1** only use rows 1-6 if you don't have more detailed figures (e.g. a-e). Only use row u if you don't have numbers for rows 2-6 or f-t

For **Columns 2 to 14** we only require details for rows 1-6. Only use row u if you don't have more detailed figures for rows 2-6.

[illegible]

D15	Of the {A2} employees specified at A2, how many consider themselves...? Please ensure that the sum of boxes a to h equals the number from A2 shown above:	
a	English	
b	Scottish	
c	Welsh	
d	Northern Irish	
e	British	
f	None of these	
g	Employee preferred not to disclose	
h	Didn't request this information/ no data	

SECTION E: DISABILITY

For each column please ensure that the sum of boxes a to i equals the total specified in the top row (as already specified in Section A).

For **Column 1** only use row g if you don't have numbers for rows b to f.

For **Columns 2 to 14** we require a less detailed breakdown so please fill in details for rows a, g, h and i only.

TOTAL SPECIFIED AT		1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Total	Joiners	Leavers	Trained	Promoted	Board	Senior	Junior	Non-mgt	Prog	Comm	Tech	Sales	Support
		A2	A4a	A4b	A4c	A4d	A5a	A5b	A5c	A5d	A6a	A6b	A6c	A6d	A6e
a	No disability														
b	Sensory Disability (e.g. hearing/visually impaired)														
c	Physical Disability/Muscular-skeletal (including co-ordination, dexterity, mobility, wheelchair user)														
d	Mental Health (including serious depression, bipolarity)														
e	Cognitive/Learning disabilities (including dyslexia, Down's syndrome, autism)														
f	Multiple, Long term or other disability/condition*														
g	Has a disability														
h	Employee preferred not to disclose														
i	Didn't request this information/ no data														

*This includes conditions such as diabetes, epilepsy, arthritis, asthma, speech impairments, facial disfigurements

Completion of Sections F to I is voluntary. Only provide information in response to these questions which is personal data if you have the consent of the relevant individuals.

SECTION F: AGE

For each column please ensure that the sum of boxes a to h equals the total specified in the top row (as already specified in Sections A and C).

[illegible]

SECTION G: SEXUAL ORIENTATION

For each column please ensure that the sum of boxes a to h equals the total specified in the top row (as already specified in Section A).

For **Column 1** only use row f if you don't have numbers for rows b to e.

For **Columns 2 to 14** we require a less detailed breakdown so please fill in details for rows a, f, g and h only

[illegible]

SECTION H: RELIGION

For each column please ensure that the sum of boxes a to k equals the total specified in the top row (as already specified in Section A).

For **Column 1** only use row i if you don't have numbers for rows b to h.

For **Columns 2 to 14** we require a less detailed breakdown so please fill in details for rows a, i, j and k only

[illegible]

SECTION I: OTHER

Pregnancy and Maternity

11 Please specify how many people in your organisation went on, and returned from maternity leave in 2016.

a	Went on maternity leave in 2016	
b	Returned from maternity leave in 2016	

Gender Reassignment

12 One of the protected characteristics under the Equality Act 2010 is gender reassignment, defined as applicable if a person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing the physiological or other attributes of sex. To be protected a person does not need to have undergone any specific treatment; the process is personal rather than medical.

Do you have any arrangements in place to promote equality of opportunity for those with this protected characteristic? If so please describe briefly below. Please note that we are not requesting that you provide the number of employees with this protected characteristic.

13 Is there any additional information you would like to add or comment on regarding this questionnaire or your equal opportunities activities? In addition, if it is not possible for you to provide requested information please state whether alternative information could be provided.

Please ensure that you have correctly identified any information which is personal data by adding the letter 'P' before the data. Personal data is data that, due to the small numbers and the make-up of your organisation, could lead to an individual being identified. It cannot be published in our report unless it is aggregated with other data so that individuals are not identifiable.

How will Ofcom use the information?

The information will be used to produce Ofcom's first annual Diversity in Broadcasting report which will set out how broadcasters are doing on equality and diversity overall and steps being taken by individual broadcasters, highlighting areas where the industry is doing well and which groups lack representation. To provide context, the report will note which licensees responded to which sections of the questionnaire.

Ofcom will publish all the information each broadcaster provides unless the information constitutes personal data under the Data Protection Act 1998 or is confidential. Where possible the data will be published on a broadcaster by broadcaster basis, but we anticipate that in some cases the information will have to be aggregated at an industry level to prevent data being attributable to individuals. No individuals will be identifiable in the final report.

Please see the covering letter for further information on Ofcom's publication plans and how to return the questionnaire.