
Ofcom Diversity and Inclusion Programme 2018-2022

CONSULTATION:

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About this document

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

It reviews the progress we have made since publishing our Single Equality Scheme (SES) in 2014 and sets out our proposed objectives and actions for 2018-2022.

These are to:

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

This document provides an opportunity for those with an interest in Ofcom's work on diversity and equality to comment on our objectives and suggest any activities that should be part of our Diversity and Inclusion Programme.

A Braille copy of this consultation is available on request and we welcome responses in formats other than print, for example an audio recording or a British Sign Language video. Details of how to get in touch with us is in Annex 2, Responding to this consultation. We will publish a transcript of any audio or video responses we receive (unless your response is confidential).

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1. Who we are and what we do

- 1.1 Ofcom is the UK's communications regulator. We regulate the TV and radio sectors, fixed line telecoms, mobile, postal services, plus the airwaves over which wireless devices operate.
- 1.2 We operate under several Acts of Parliament, in particular the Communications Act 2003. The Communications Act says Ofcom's principal duty is to further the interests of consumers. We make sure people in the UK get the best from their communications services and are protected from scams and sharp practices, while ensuring competition can thrive. Meeting this duty is at the heart of everything we do.
- 1.3 We also have duties under the Equality Act 2010 to promote equal opportunities. This means we have a responsibility to:
 - a) eliminate unlawful discrimination, harassment and victimisation;
 - b) advance equality of opportunity between people in protected groups¹ and people who are not; and
 - c) foster good relations between people in protected groups and people who are not.
- 1.4 In addition, Section 75 of the Northern Ireland Act 1998 requires us to promote good relations between people of different religious beliefs, political opinions or racial groups. Ofcom must provide an approved Equality Scheme, specific to Northern Ireland, stating how we aim to fulfil our duties.
- 1.5 The Equality Act 2010 affects a range of employment issues, such as providing training opportunities, ensuring fair access to our facilities, giving women and men a right to equal pay for equal work, maternity and paternity leave policies, and flexible working arrangements. As an employer of approximately 900 people, we must promote equality in the way we recruit new colleagues, and in how we treat our colleagues on a day-to-day basis. We are also required² to publish our equality objectives.
- 1.6 Ofcom's Diversity and Inclusion Programme addresses these duties and shapes the way we work, as an employer and as a regulator.
- 1.7 We are determined to promote diversity and inclusion within our organisation and in the sectors we regulate. In order for us to make communications work for everyone through promoting choice, securing standards and preventing harm, we need to make the best decisions for all UK consumers and citizens. To do this, it is essential that we represent the diversity of the society we serve. Valuing, encouraging and promoting diversity and inclusion creates a culture where everyone is valued on their merits and makes us a more effective employer, able to recruit, motivate, develop and keep the most talented people.

¹ Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

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

2. Progress since 2014

- 2.1 Our Single Equality Scheme (SES)³, published in 2014, set out how we intended to be a fair and equitable employer and regulator. It covered a three-year period until the end of March 2018 and was written as a working document which was regularly reviewed and updated to ensure it remained relevant and appropriate.

Our progress includes a number of highlights.

As an employer

- 2.2 **Diversity workforce targets:** In 2015, we set ourselves stretching diversity targets to ensure that, by 2020, we better represent the diverse UK population we serve:

50% gender balance across Ofcom;
women to make up at least 40% of colleagues at a senior level⁴; and
13% of colleagues at a senior level to be from a Black, Asian or Ethnic minority background.

- 2.3 Since 2015, we have made progress against these targets⁴. In 2015 females made up 41% of all colleagues at Ofcom, with 31% of them in Principal and Senior Management and Specialist (SMS) roles. 9% of minority ethnic colleagues were in Principal or SMS positions. In 2017 the proportions were 43%, 37% and 10% respectively. We know there is more work to do and will continue to monitor and report publicly on the diversity of our workforce each year.
- 2.4 **Leadership:** Our senior leaders and people managers play a vital role in delivering our diversity and inclusion objectives. To help support managers, we have provided mandatory unconscious bias⁵ training to all hiring managers, people managers, team leaders and the senior leadership team. Our senior leaders also have an overall people development objective and, as part of this, we measure their performance on diversity. To help build greater understanding across the organisation, we have made available online unconscious bias learning material to all colleagues.
- 2.5 **Performance and appraisals:** We introduced a new appraisal system in 2016 which introduced equal emphasis on what colleagues achieved and delivered against their objectives, as well as how they achieved and delivered them. The 'what' and the 'how' are assessed against expected competencies and behaviours across our organisational values

³ Our diversity and inclusion related reports, including the SES and our 2017 Diversity and Inclusion Report can be found at <https://www.ofcom.org.uk/about-ofcom/what-is-ofcom/corporate-responsibility/diversity-and-equality>

⁴ Colleagues at senior level refers to those who are Principals, Senior Managers and Specialists, which currently makes up 25% of all Ofcom colleagues.

⁵ Unconscious bias happens when our brains make quick judgements and assessments of people and situations without us realising it. Our biases are influenced by our background, cultural environment and personal experiences.

of Excellence, Collaboration, Agility and Empowerment. In 2015, colleagues from a minority ethnic background were less likely to receive high performance ratings than white colleagues⁶. While scores for colleagues from a minority ethnic background were largely in line with the overall Ofcom profile one year on in 2016, we will continue to keep the results of performance ratings for these colleagues under review.

2.6 **Working environment:** Ofcom has offices in the devolved nations and different regions of the UK. In 2016 we opened offices in Edinburgh and Warrington which has enabled Ofcom to become more geographically diverse. Further expanding our presence outside of London was an important step to help meet our vision of making communications work for everyone. We also launched our move to agile working, to deliver the environment and working practices we need to support our values and culture. The agile working changes are transformational, and we aim to meet the needs of all colleagues and shape the way we work together in three key areas:

- a) **People:** developing an agile working culture to support our greater emphasis on cross-team, cross-group or cross-location working, allowing colleagues to work in more flexible ways;
- b) **Place:** making the best use of our physical space to provide stimulating, collaborative and adaptable working zones and environment; and
- c) **Technology:** investing in new, more flexible technology to enable us to work together more effectively. For example, our upgraded video conference facilities allow us to better interact with each other, no matter where colleagues are located.

2.7 **Colleague support and wellbeing:** In 2008 we launched our first colleague network to support colleagues and diversity. Since then our diversity networks have grown and are thriving.

- a) Created in 2014, Ofcom Women's Network (OWN) furthers the interests of women in the workplace.
- b) Our Parents and Carers Network supports our parents, guardians and carers. It was launched in 2016;
- c) Our first colleague network, the Affinity Network supports lesbian, gay, bisexual and transgender colleagues and allies.
- d) Launched in 2016, the Raising Awareness of Culture and Ethnicity (RACE) group represents all colleagues at Ofcom, in particular, those from a black, Asian and minority ethnic background.
- e) Our Disability and Wellbeing Group's (DWG) purpose is to improve the working experience of disabled colleagues and promote the wellbeing of all colleagues. We also launched a Listening Network in 2017, with volunteers offering informal peer support

⁶ Full definitions and Ofcom's diversity profile are set out in the [Diversity and Inclusion at Ofcom 2017 report](#).

to colleagues who may need a confidential chat. We further strengthened our support for colleagues by introducing resilience workshops, mandatory for all people managers, and open to all colleagues.

- 2.8 **Benchmarking:** We continue to benchmark ourselves against other organisations. We have scored well in the annual Stonewall Workplace Equality Index, which looks at our attitude to lesbian, gay, bisexual and transgender colleagues. We undertake other benchmarking periodically and we achieved gold standard in Business in the Community's (BITC) gender and race indices in 2015. We will enter BITC's Opportunity Now and Race for Opportunity benchmarking this year along with the Social Mobility Foundation's Social Mobility Employer Index. Once again, we were also featured in The Times Top 50 Employers for Women in 2017.

As a regulator

- 2.9 **Diversity in broadcasting:** We are holding broadcasters to account through our Diversity in Broadcasting programme. Starting with our Diversity and equal opportunities in television⁷ annual report, first published in September 2017, we have:
- a) tracked employee diversity across the UK-based broadcasters that we regulate and the initiatives they are putting in place to improve diversity and inclusion;
 - b) provided a comprehensive, annual picture of how major broadcasters are performing on diversity, the steps they are taking to improve it, and the strength of commitment at different levels of each organisation;
 - c) encouraged broadcasters to promote equal opportunities among their employees across all the protected characteristics listed in the Equality Act, and other important aspects of diversity such as social mobility and geographic and educational backgrounds;
 - d) provided new guidance for broadcasters, published in December 2017, based on the report's findings; and
 - e) are seeking additional powers to require broadcasters to promote equal opportunities for a broader range of protected characteristics than currently listed in the Communications Act.

In 2018, we will publish our first report on diversity and equal opportunities in radio, and our second annual diversity report on the UK TV industry to monitor broadcasters' year on year progress.

2.10 **Protecting consumers:**

- a) We updated the rules⁸ which all communications providers must follow to operate in the UK. The improvements will strengthen protection for consumers and make sure

⁷ https://www.ofcom.org.uk/data/assets/pdf_file/0017/106343/diversity-television-report-2017.pdf

⁸ Called the General Conditions of Entitlement

https://www.ofcom.org.uk/data/assets/pdf_file/0026/106397/Statement-and-Consultation-Review-of-the-General-Conditions-of-Entitlement.pdf

they are treated fairly. These include strengthening the rules on handling consumer complaints to make sure they are dealt with promptly and effectively, and requiring providers to have policies to take account of the needs of all vulnerable consumers including the elderly, disabled and those on low incomes.

- b) We have worked to ensure disabled and vulnerable consumers receive the services to which they are entitled and that these services are widely publicised by providers. These services include priority fault repair, Next Generation Text Service (formerly text relay)⁹, allowing customers to nominate somebody to help manage their account, and bills in accessible formats. In March 2015 we fined BT £800,000 for failing to provide an improved text-to-voice service for customers with hearing or speech impairments between April and September 2014.¹⁰
- c) We published a new Access and Inclusion report, in 2016,¹¹ that sets out data to help us understand how well the communications sector is meeting vulnerable customers' needs.
- d) We conducted a review that will see line rental price cuts for BT landline-only customers, who are often elderly or more vulnerable.
- e) We worked with industry to implement the Radio Equipment Directive. This aims to improve the safety of radio equipment products¹² and make them less likely to interfere with other equipment such as hearing aids or cochlear implants.

2.11 **Accessible communication with consumers and stakeholders:** We have improved how we communicate with consumers and stakeholders. This includes:

- a) ensuring our website meets the current standards to make text, images and sound more accessible to disabled people; and
- b) publishing easy read guides for people with learning difficulties, on topics such as nuisance calls and use of communications technology.

2.12 There is, however, more work to be done and this consultation document sets out our action plan for 2018 to 2022. Some of these activities build on existing work. Other activities reflect changes in our regulatory duties or have been developed in response to feedback from colleague surveys and external benchmarking.

⁹ The Next Generation Text Service facilitates a phone conversation between a text user and a phone user. A 'text' user types their conversation to a helper, a person called a relay assistant, who speaks their words to the phone user. The service has enabled phone calls between a text user and family and friends, doctors, competition lines, takeaways, and emergency services. See <http://ngts.org.uk>

¹⁰ BT missed the deadline having encountered technical problems with the sound quality of emergency calls. It launched Next Generation Text on 24 September 2014. See <https://www.ofcom.org.uk/about-ofcom/latest/media/media-releases/2015/bt-fined-over-relay-text> for further details.

¹¹ This report is available here: <https://www.ofcom.org.uk/research-and-data/multi-sector-research/accessibility-research/access-and-inclusion>

¹² The Regulations define "radio equipment" as a product, or a component of a product, that communicates by using radio waves. This includes equipment like wireless CCTV, mobile phones and remote controls.

3. Summary of our Diversity and Inclusion Action Plan 2018-2022

- 3.1 We have engaged with colleagues across Ofcom to develop a new Diversity and Inclusion Action Plan 2018-2022. We propose the following objectives:
- a) Build a diverse and inclusive workforce to better reflect the UK population we serve;
 - b) Ensure diversity and inclusion are central to our work practices and culture so everyone understands, supports and is accountable for diversity; and
 - c) Ensure the different needs and interests of all individuals are considered when carrying out our regulatory work.
- 3.2 We are proposing an action plan to meet these objectives. A summary of some of these actions are set out below. The full draft version of all our proposals is included in the annex to this document.

As an employer

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

To make sure our workforce represents the diversity of the UK population we will focus our efforts on the following areas:

- 3.3 **Strengthening the diversity of our workforce**
- a) **Diversity workforce targets:** We will continue to work towards the gender and ethnicity workforce targets we set ourselves in 2015, which we aim to achieve by 2020. On sexual orientation and disability, our initial focus will be on capturing more data, and strengthening our working culture, practices and colleague engagement. We will make a decision whether to set new diversity workforce targets on sexual orientation, disability and social mobility during 2019/2020.
 - b) **Regular assessment and reporting:** We will continue to monitor and publish each year the diversity of our workforce and the impact of our processes and policies on colleagues who meet one or more of the diversity characteristics¹³. This will include annual progress towards our gender and ethnicity 2020 targets. We are reviewing our measures and developing a tool to enable us to monitor diversity across individual teams, so we can report consistently and transparently on progression, pay and performance across Ofcom.
 - c) **More comprehensive diversity data:** We will strive to collect more diversity data by encouraging colleagues to complete their diversity profile. We will launch an internal

¹³ Our annual reports around diversity and inclusion at Ofcom can be found here <https://www.ofcom.org.uk/about-ofcom/what-is-ofcom/corporate-responsibility/diversity-and-equality>

communications campaign in 2018 to increase understanding of the importance of collating diversity information.

- d) **Social mobility:** We want to reinforce our position as an inclusive employer that welcomes colleagues from all backgrounds. We plan to collect data and report on colleagues' socio-economic background, to better understand our organisation's profile. We will work with external partners to help us measure social mobility as well as making it consistent with the broadcast industry, as we tackle the same issues.
- e) **Ensuring we are disability confident in all we do:** We are already a Disability Confident Employer¹⁴. To strengthen this, during 2018, we will upgrade our workplace adjustments process; provide mandatory disability training for all colleagues, including line managers; introduce a system for recording disability-related absence; and ensure our recruitment, development and performance management processes incorporate appropriate adjustments.

3.4 **Recruitment and induction:** We will strengthen our approach by setting new recruitment and selection practices to attract high-potential individuals from a diverse talent pool. These include:

- a) Ensuring our interview panels and shortlisted candidates for all posts, including those for our graduate recruitment programme, senior positions, internal secondment opportunities and leadership development programmes, are diverse, for example by having a gender mix and ethnic minority representation.
- b) Promoting the Ofcom brand as an inclusive employer and targeting a wider range of advertising platforms such as specialist press or websites to reach under-represented groups. We will also work with our recruitment partners to attract a more diverse range of applicants. To identify whether our recruitment practices are operating effectively for all groups, we will review data on applicant diversity at each stage of the process to ensure our recruitment practices are effective.
- c) We will inform new recruits about our colleague networks and other support mechanisms as part of their induction. For disabled colleagues, we will ensure workplace adjustment agreements are made and put in place.

3.5 **Apprenticeships:** We are increasing our commitment to apprenticeships to promote early career opportunities and to create a more diverse talent pool for the future. We plan to expand our apprenticeship scheme to offer a broader range of opportunities across our organisation.

¹⁴ The Disability Confident scheme was developed by employers and disabled people's representatives. The three levels are: Disability Confident Committed (level 1); Disability Confident Employer (level 2) and Disability Confident Leader (level 3). The scheme is voluntary. <https://www.gov.uk/government/publications/disability-confident-guidance-for-levels-1-2-and-3>

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

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

- 3.6 **Colleague development:** We will be open and transparent about the routes to career progression and development. We will enhance leadership and management capability across the organisation with a focus on developing colleagues from under-represented groups into management and leadership positions.
- a) During 2018, we will roll out our Future Leaders Programme, monitoring its effectiveness in developing colleagues from diverse groups.
 - b) We will continue to promote our internal coaching and mentoring opportunities so more colleagues can be mentored or become a mentor.
 - c) We will introduce new initiatives, including a reciprocal mentoring programme where senior leaders are encouraged to pair with colleagues from diverse backgrounds in more junior roles. This exchange will help senior leaders to better understand the positive impact that diversity has on our organisation, while more junior colleagues will have the opportunity to exchange skills and learnings with senior colleagues.
 - d) We will roll out a role-modelling scheme to support women at Ofcom to maximise their potential. It will cover topics including career progression and line management. Ofcom will continue to work with the Institution of Engineering and Technology (IET) to promote women in engineering and to raise awareness about engineering roles at Ofcom.
- 3.7 **Pay:** We will continue to ensure we have a fair, equal and transparent pay structure. We will achieve this by monitoring and addressing any pay gaps between colleagues, especially those with protected characteristics, and analysing data on how diversity groups perform in remuneration. Our gender and ethnicity pay audits will help us to ensure a fair pay structure across the organisation. We will be transparent with our results, both publishing them externally and communicating them internally.
- 3.8 **Accessibility:** We are transforming the working environment across all our offices¹⁵ as we move to agile working. As part of this, we are working to make our physical premises as accessible as possible to all colleagues. We are undertaking accessibility audits of our buildings and will take action where appropriate. Separately, in early 2018, we will complete a disability and wellbeing review of our systems and processes, and will seek input on this from disabled colleagues. We will ensure our systems and processes are

¹⁵ Our offices are in London, Edinburgh, Cardiff, Belfast, Birmingham, Haydock, Warrington and Baldock.

Disability Confident¹⁶. These efforts will help us to become a more attractive employer for colleagues with disabilities.

- 3.9 **Nurturing our diversity networks:** Our thriving colleague networks take a leading role in our diversity work. We will continue to support these networks, all of which are open to all colleagues to join and support¹⁷. They provide support for colleagues, organise awareness-raising events and work together to engage with the organisational diversity and inclusion agenda and influence change at Ofcom.

Strengthening our leadership and accountability: It is vital that our diversity and inclusion plan is driven from the top. Our chief executive, Sharon White, is leading the diversity and inclusion agenda across our organisation.

- 3.10 **Leadership and accountability:** Each of our senior management team is a diversity champion for gender, ethnicity, sexual orientation, disability, age, religion and belief or parents and carers. Our Corporate Responsibility Steering Group, made up of senior leaders, meets every two months to share best practice and track progress. We will report every six months on progress to our Policy Management Board as well as providing regular updates to all colleagues. The Ofcom Board holds overall responsibility and accountability for our Diversity and Inclusion programme, and our progress.
- a) We will ensure our diversity and inclusion priorities are reflected in the annual measurable objectives of all people managers and senior leaders and that they are supported by mandatory diversity and inclusion training, including on disability and workplace adjustments. All new people manager joiners and colleagues promoted to people management or senior level roles must also undertake this training along with mandatory unconscious bias training and an assessment of their unconscious bias.
 - b) We will also make sure diversity checks are built into performance discussions and moderation.
 - c) To further embed unconscious bias awareness and training, unconscious bias training will be made compulsory for all colleagues and at regular intervals.
 - d) We will seek external benchmarking on diversity measures such as the Business Disability Forum's Disability Standard, Stonewall Workplace Equality Index, Business in the Community's Opportunity Now and Race for Opportunity.

¹⁶ Disability Confident is a scheme that is designed to help organisations recruit and retain disabled people and people with health conditions for their skills and talent. The Disability Confident scheme is voluntary and was developed by employers and disabled people's representatives. <https://www.gov.uk/guidance/disability-confident-how-to-sign-up-to-the-employer-scheme>

¹⁷ Ofcom Women's Network, Parents and Carers Network, Affinity Network for LGBT colleagues and allies, RACE network, Disability and Wellbeing Group and the Listening Network.

As a regulator

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

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

- 3.11 **Protecting vulnerable consumers:** We aim to ensure all consumers do not face sharp practices and that people affected by factors such as age, disability, income, geographical location and life events such as illness or bereavement which can make them vulnerable, are protected from specific harms. We will also ensure disabled and vulnerable consumers receive the additional support services to which they are entitled. We monitor, through complaints and liaison with industry, how these services are provided and publicised. In October 2018 an additional broader requirement for communications providers will come into force, to ensure the fair treatment of vulnerable consumers, along with new protections for mobile and broadband consumers in debt. We will work to ensure providers' policies and procedures are updated to fully comply with the new rules.
- 3.12 **Monitoring outcomes for vulnerable consumers:** First published in 2017¹⁸, we will publish an updated Access and Inclusion report in 2019, with data on the availability, take-up, use and affordability of communications services. This will assess how well the sector serves vulnerable consumers.
- 3.13 **Protecting consumers as voice services evolve:** The way in which consumers use voice services will change substantially over the next decade. Traditional corded telephones are being replaced by new types of telephone (wireless handsets, devices which enable telephone calls over broadband), copper exchange lines are being replaced by fibre and mobile is now established as consumers' medium of choice for voice services. Ofcom will ensure vulnerable consumers are assisted and protected by communications providers as they migrate to these new services.
- 3.14 **Promoting the availability of easy-to-use technology:** Our programme recognises the importance of promoting the availability of easy-to-use technology. This includes working with industry to improve the performance of Assisted Listening Devices to help those with hearing disabilities¹⁹, improving radio equipment specifications and making them less susceptible to interference, working to improve the accessibility features of the Electronic Programme Guide and working with stakeholders to support the continued improvement in the quality of live subtitles. We will continue to publish and maintain web resources about the usability of telecoms equipment and work with others to increase knowledge and good practice by, for example, taking part in research and events.

¹⁸ <https://www.ofcom.org.uk/research-and-data/multi-sector-research/accessibility-research/access-and-inclusion>

¹⁹ Assisted Listening devices amplify sound and bring them directly into the ear. Devices include headphones, wireless TV listeners and induction loops.

- 3.15 **Ensuring vulnerable consumers remain able to access a basic universal postal service:** Our current regulation, which provides price protection for second class universal postal services, is due to expire in March 2019. We plan to review what price protection vulnerable consumers may require after this date.
- 3.16 **Strengthening diversity and inclusion in broadcasting:** We recognise that audiences expect programmes that reflect modern life across the UK, its nations and regions. We will work with television and radio broadcasters to improve the diversity of people working on and off screen and air, to better represent and portray modern life across the UK. We will also continue to license a range of restricted services and invite applications for community radio to ensure services continue to serve diverse audiences. Furthermore, as part of the extension in our role, as an independent and external regulator of the BBC, we will monitor how the BBC fulfils its mission and purposes to reflect, represent and serve all the diverse communities across the whole of the UK.
- 3.17 **Ensuring our publications and external communications are accessible to all:** We will continue to produce and publish content and communications that are clear, easy to understand and accessible to people with special needs and disabilities.

A1. Diversity and Inclusion Programme: Full Action Plan 2018-2022

Our **overarching objectives** are to:

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

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

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

A1. Ofcom as an employer – action plan

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

	Aim	How we will do it	When we will do it
1	<i>Set diversity targets and take positive steps to attract colleagues from underrepresented groups</i>	<p>Continue to work towards our diversity targets:</p> <ul style="list-style-type: none"> a 50:50 gender balance across all colleagues; 40% female representation at a senior level²⁰; and 13% black, Asian and minority ethnic colleague representation at a senior level. <p>Develop workforce diversity targets to build a more diverse organisation generally, and make a decision whether to set new diversity targets on sexual orientation, disability and social mobility.</p> <p>Develop a returnship programme to attract people with professional skills and experience who have had time away from the workplace.</p> <p>Broaden pathways into the organisation and develop our early career proposition to bring fresh thinking to our organisation, by:</p> <ul style="list-style-type: none"> • taking steps to broaden the base from which we recruit to our graduate programme; and • developing and expanding opportunities for apprenticeships, internships and work placements 	<p>By 2020</p> <p>2019/2020</p> <p>2018/19</p> <p>2018/19</p>
2	<i>Continue to measure on the diversity of our workforce and improve the standard and quality of our diversity data</i>	Monitor and publish annually our progress against our diversity targets and the impact of our processes and policies on colleagues who meet one or more of the diversity characteristics.	Annually

²⁰ Colleagues at senior level refers to those who are Principals, Senior Managers and Specialists, which currently make up 25% of all Ofcom colleagues.

		<p>Review the measures and develop a tool to monitor diversity across individual teams so that we can report consistently and transparently on progression, pay and performance across the whole of Ofcom.</p> <p>Continue to encourage colleagues provide us with diversity information, including a new initiative to collect information on socio-economic background, to help us to understand our colleague diversity profile. We will launch an internal communications campaign to help us achieve this.</p> <p>Review and monitor the diversity profile of the executive and non-executive members of our boards, panels and committees.</p> <p>Work with recruitment consultants to improve the quality of our information on diversity.</p>	<p>2018/19 and ongoing</p> <p>2018 and Ongoing</p> <p>2018/19</p> <p>Ongoing</p>
3	<i>Strengthen our approach to recruitment and resourcing</i>	<p>Make sure recruitment agencies are aware of our approach to diversity and inclusion and partner with them to increase applicant diversity, including the base from which we appoint to our boards and committees.</p> <p>Promote the Ofcom brand as an inclusive employer brand and use a wider range of advertising channels, including specialist press and websites and disability recruitment sites, to attract a more diverse range of applicants.</p> <p>Increase our commitment to apprenticeships to promote early career opportunities and to create a more diverse talent pool for the future.</p> <p>Build in a diversity check at each stage of recruitment from shortlisting applicants for interview, initial interview, second interview and assessment panels through to final appointment. This will help us identify whether any groups are being unfairly excluded and develop further actions to address any issues we find.</p> <p>Ensure interview panels for all posts, including those for our graduate recruitment programme and senior positions, are diverse, for example by having a gender mix and</p>	<p>2018 onwards</p> <p>2018/19</p> <p>2018/19</p> <p>2018/19</p> <p>2018/19</p>

		<p>including more under-represented groups such as ethnic minority representation. We will also ensure shortlisted candidates are diverse.</p> <p>We will apply the same principles of diverse shortlists and interview panels for internal progression including secondment opportunities, promotions and leadership development programmes, such as our Future Leaders initiative.</p> <p>Take further steps to ensure that our internal and external recruitment and promotion processes are accessible to disabled applicants as part of our goal to become a Disability Confident Leader²¹.</p> <p>As part of our induction programme, make sure that colleagues are informed about our diversity networks and other colleague support mechanisms, such as our Listening Network, that are available to them.</p> <p>Ensure workplace adjustment agreements are in place for all existing and newly appointed disabled colleagues, and workplace adjustments are consistently made in a timely way.</p>	<p>2018/19</p> <p>2018/19</p> <p>2018/19</p> <p>2018/19</p>
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²¹ Disability Confident is a scheme that is designed to help organisations recruit and retain disabled people and people with health conditions for their skills and talent. The Disability Confident scheme was developed by employers and disabled people’s representatives. The three levels are: Disability Confident Committed (level 1); Disability Confident Employer (level 2) and Disability Confident Leader (level 3). The scheme is voluntary. <https://www.gov.uk/government/publications/disability-confident-guidance-for-levels-1-2-and-3>

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

	Aim	How we will do it	When we will do it
4	<i>Empower colleagues to succeed</i>	<p>Empower all colleagues to get the most out of development opportunities by being open about the routes to career development and progression such as internal and external secondment opportunities, specialist skills and continuing professional development.</p> <p>We will roll out our Future Leaders programme to enhance leadership and management capability across the organisation. The rolling annual programme, available for all colleagues from Administrator to Principal grade, is open to all colleagues in a competitive process. We will review the effectiveness of the initiative in attracting and developing colleagues from diverse groups that are currently underrepresented at senior and leadership level.</p> <p>Implement an initiative where colleagues are matched to projects based on personal career ambitions and development needs.</p> <p>Offer colleagues at all levels the opportunity to be mentored or to gain accreditation as an internal coach.</p> <p>Introduce a new initiative for reciprocal mentoring where senior colleagues are encouraged to seek out reciprocal mentoring opportunities with colleagues from diverse backgrounds in more junior roles. The emphasis is on an exchange of learning where senior managers and leaders can better understand the positive impact of diversity at Ofcom while more junior colleagues are able to benefit from the support, skills and learning offered by senior colleagues.</p>	<p>2018/19 and ongoing</p> <p>2018 and annual</p> <p>2018/19 and ongoing</p> <p>2019/20</p> <p>2019/20</p>

		<p>Our Women’s Network will launch a role-model programme, covering topics from career progression to line management, giving colleagues the opportunity to explore these with Ofcom’s role models.</p> <p>2018 being the year of engineering, we will continue to promote women in engineering, working with the Institution of Engineering and Technology; raise awareness of our engineering roles; and how engineering at Ofcom helps make communications work for everyone. As an employer with a significant engineering workforce we will define our strategy to promote diversity within this function, starting from understanding the diversity profile of our engineering workforce.</p> <p>Ensure our recruitment, performance, and development processes take full account of workplace adjustments for disabled colleagues.</p> <p>Further equip line managers with the skills and tools to have quality conversations with colleagues about career development.</p>	<p>2018</p> <p>2018</p> <p>2018/19</p> <p>Ongoing</p>
5	<p><i>Champion a diverse and inclusive culture by strengthening leadership accountability</i></p>	<p>Introduce, and measure performance against, diversity and inclusion priorities in the annual objectives of all people managers and senior leaders including new joiners and newly promoted colleagues. Ensure they are supported by mandatory Diversity and Inclusion training, including on disability and workplace adjustments.</p> <p>Ensure that all current, new and newly promoted people managers, recruiters and senior leaders are trained about unconscious bias and that they assess their own unconscious bias.</p> <p>Make sure that diversity checks are built into performance discussions and moderation.</p> <p>Make online unconscious bias training mandatory for all colleagues at all levels, and at regular intervals.</p> <p>Equip line managers to support staff going on and returning from maternity, paternity, shared parental and adoption leave.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>2018/19</p>

			Ongoing
6	<i>Ensure a fair and equitable pay structure</i>	<p>Carry out an annual equal and fair pay audit covering both gender and ethnicity across the organisation.</p> <p>Monitor and address any pay gaps between colleagues, particularly those with protected characteristics and review and monitor remuneration among diversity groups.</p> <p>Use the findings to develop an action plan aimed at closing any unjustifiable pay gaps.</p> <p>Be transparent with our findings by publishing a summary of our findings and any proposed action externally, and sharing results internally.</p>	<p>Annually</p> <p>Annually</p> <p>Annually</p> <p>Annually</p>
7	<i>Continue to benchmark ourselves against leading edge employers</i>	<p>We will continue to participate in external benchmarking to continuously improve and develop our working practices:</p> <p>Business Disability Forum’s Disability Standard</p> <p>Stonewall Workplace Equality Index</p> <p>Business in the Community (BITC) Opportunity Now (gender)</p> <p>BITC Race for Opportunity (race)</p> <p>Social Mobility Foundation’s Social Mobility Employer Index</p> <p>Disability Confident scheme</p> <p>The findings and recommendations will inform our individual gender, ethnicity, sexual orientation and disability and wellbeing action plans.</p>	<p>2018</p> <p>Annually</p> <p>2018</p> <p>2018</p> <p>2018</p> <p>Ongoing</p>

8	<i>Support and nurture our colleague diversity networks</i>	<p>Continue to encourage colleagues to take an active part in our diversity and wellbeing networks²². The networks will be given the time and resources to enable them to own diversity work plans and lead on specific initiatives. They will be encouraged to drive forward the diversity and inclusion agenda.</p> <p>Promote the existence and activities of our diversity networks and groups on our website.</p>	<p>Ongoing</p> <p>2018</p>
9	<i>Improve accessibility of our physical premises as part of our move to agile working</i>	<p>Audit our working environment plans for accessibility before rolling out agile working changes to our premises, including undertaking accessibility audits of our buildings.</p> <p>Determine what accessibility recommendations we will implement, with a view to exceeding our legal obligations in providing accessibility for all. We will also track the implementation of agreed recommendations.</p> <p>Update our workplace adjustments policy to reflect the move to agile working, training colleagues on it and encouraging effective use of the process.</p> <p>Ensure our facilities are accessible to all colleagues.</p>	<p>Ongoing</p> <p>2018</p> <p>2018</p> <p>Ongoing</p>
10	<i>Strengthen our approach to colleague wellbeing with a focus on disability and mental health</i>	<p>Consider and act on feedback from internal focus groups and a Business Disability Forum engagement review of our policies and processes and the experiences of colleagues around disability and wellbeing.</p> <p>Build on our Disability Confident Employer status (level 2) to become a Disability Confident Leader employer (level 3)²³;</p>	<p>Ongoing</p>

²² Our colleague networks are: the Ofcom Women’s Network, Parents and Carers Network, Affinity Network (supporting LGBT colleagues and allies), Raising Awareness of Culture and Ethnicity (RACE) network, the Disability and Wellbeing online network, supported by the Disability and Wellbeing Group and our Listening Network (offering informal peer support to all colleagues).

²³ The Disability Confident scheme was developed by employers and disabled people’s representatives. The three levels are: Disability Confident Committed (level 1); Disability Confident Employer (level 2) and Disability Confident Leader (level 3). The scheme is voluntary. <https://www.gov.uk/government/publications/disability-confident-guidance-for-levels-1-2-and-3>

		<p>Sign up to the Business Disability Forum’s Accessible Technology Charter.</p> <p>Roll out mandatory disability training to all colleagues.</p> <p>Promote knowledge and understanding of accessibility options available within our information communications (ICT) systems and devices to all colleagues.</p> <p>Ensure that requests for adjustments are formally recorded and centrally logged to facilitate monitoring and to better understand trends and speed of response.</p> <p>Upgrade and build our intranet based toolkits on disability and wellbeing and promote their use and knowledge.</p> <p>Introduce a system to separately record disability-related absence.</p> <p>Ensure our recruitment, development and performance appraisal processes make appropriate allowance for workplace adjustments.</p> <p>Ensure line managers feel confident having disability-friendly and wellbeing conversations.</p> <p>Continue to make resilience training available to all colleagues and mandatory for all people managers.</p>	
11	<i>Publish a revised Northern Ireland Equality Scheme</i>	Our current Equality Scheme for Northern Ireland runs until January 2019. We will work with the Equality Commission for Northern Ireland to publish a draft revised Equality Scheme for consultation during 2018, and publish an approved scheme by the end of 2018.	2018
12	<i>Set targets to improve our colleague engagement scores and inclusivity measures across all groups of colleagues</i>	Use colleague survey results to help us develop action plans and internal targets for increasing colleague satisfaction across the organisation, including those with diverse characteristics.	Ongoing

13	<i>Consider and reflect our equality objectives in our procurement practices</i>	We will include supplier diversity assessments as part of our procurement procedures, engage with our suppliers on diversity issues and be clear on our expectations in this area.	Ongoing
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A2. Ofcom as a regulator - action plan

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

	Action	What we will do	When we will do it
1	<i>Protecting vulnerable consumers</i>	<p>Monitor how well the communications sector is meeting the needs of vulnerable consumers and ensure they have access to the additional services they are entitled to²⁴. We will do this through research, monitoring complaints and liaison with industry and stakeholder groups, including monitoring how the provision of the additional services is publicised.</p> <p>We will publish an updated Access and Inclusion report with new data on the availability, take-up, use and affordability of communications services. We will also make sure that providers' policies and procedures to protect disabled and vulnerable consumers are updated to comply with new Ofcom rules in October 2018.</p> <p>Work with industry to improve the performance of equipment that uses radio waves, such as devices that amplify sound for people who are hard of hearing (known as Assisted Listening Devices), to make them less susceptible to interference²⁵.</p>	<p>2019</p> <p>2019</p> <p>2019</p>

²⁴ Factors and circumstances that can make consumers vulnerable include age, disability, income, geographical location, and life events such as illness or bereavement. Additional services to which vulnerable consumers are entitled to include priority fault repair, Next Generation Text Service (was text relay), free directory enquiries, allowing customers to nominate a friend or relative to help manage their account, and bills in accessible formats.

²⁵ Under the Radio Directive.

		<p>Our current rules, which provide price protection for second-class universal post, will expire in March 2019. We plan to review what price protection measures vulnerable consumers might need after March 2019.</p> <p>We aim to make sure that vulnerable consumers are assisted and protected by communications providers as traditional telephone handsets are replaced by new technology such as wireless handsets, mobile phones and devices which enable telephone calls over broadband, and as copper exchange lines are being replaced by fibre.</p>	<p>2018/19</p> <p>Ongoing</p>
2	<p><i>Promote the availability of easy-to-use technology and accessibility of audio-visual services</i></p>	<p>Work with a number of stakeholders including:</p> <p>Electronic Programme Guide (EPG) providers on improving accessibility features of EPGs for blind and visually impaired people, including text-to-speech functionality;</p> <p>Broadcasters, access services providers and groups representing the interests of access service users, to support the continued improvement of the quality of live subtitles, and to support a drive to increase consumer awareness of audio description; and</p> <p>Take measures to improve the audibility of dialogue on TV programmes by continuing to engage with industry and other groups, such as the Digital Production Partnership. We will seek to understand and address the causes of poor audibility, improve specifications and check on the conformance of products.</p> <p>Government and stakeholders to ensure that regulations in the area of accessibility of on-demand services are effective and result in measurable progress. When regulations have been finalised by Government, we will then draft, consult on and enforce a new code for the provision of accessible on-demand services.</p> <p>Work with industry on technical standards to promote assistive technologies in mobile handsets and other portable/mobile devices and publish information on developments in this area because of our actions.</p>	<p>Ongoing</p>

		Publish and maintain web resources about the usability of telecoms equipment and work with others to increase knowledge and good practice.	
3	<i>Ensure our publications and external communications are accessible to all</i>	<p>We will produce clear, user-friendly communications and that are accessible to all people particularly those with disabilities or special needs:</p> <ul style="list-style-type: none"> • Write our publications in plain English; • Publish 'easy-read' versions of guides and market research that are particularly relevant to people with learning disabilities to make this information accessible to them; • Make publications available in alternative formats on request; • Ensure our consumer guides are kept up to date and are easy to understand; • Use social media to connect with a wider and more diverse audience; and • We welcome communication with us in formats other than standard print, for example an audio recording or a British Sign Language video. 	Ongoing
4	<i>Consider the impact of our proposed policies on diverse groups as part of our policy development</i>	<p>Set up governance mechanisms to challenge policy proposals on equality issues, including seeking input from advisory bodies such as Age UK.</p> <p>Conduct and monitor equality impact assessments for all policy projects.</p>	Ongoing
5	<i>Engage effectively with consumer groups to understand consumer concerns and interests and explain the likely impact of our work</i>	Engage with consumer groups including the Communications Consumer Panel/Advisory Committee on Older and Disabled People and the Consumer Forum for Communications. We will ensure that diversity groups are aware of our work and know how to engage with us, and when a project or policy may impact them.	Ongoing
6	<i>Promote diversity in our external engagements</i>	<p>Invite and consider requests for disability adjustments when we deal with external stakeholders.</p> <p>Consider diversity, accessibility and equality when contributing to international policy debates.</p>	Ongoing

		Continue to integrate the Welsh language into our work on a daily basis, ensuring that it isn't treated less favourably than the English language and that those that wish to communicate with Ofcom in Welsh can do so easily.	
7	<i>Support individual consumer, citizens and stakeholders appropriately when they contact Ofcom.</i>	Continue to train our Consumer Contact Team ²⁶ (CCT) and Spectrum Licensing Department colleagues to support the needs of all citizens and consumers, including that they: <ul style="list-style-type: none"> • Complete disability training within the first two weeks of joining, and before they engage with consumers; • Are given flexibility in how they respond to individual queries and complaints, to enable them to provide more tailored and helpful responses; and • Know when to raise vulnerable consumers' complaints directly with the relevant provider (CCT team only). 	Ongoing
8	<i>Conduct and share the results of our consumer research</i>	We will conduct robust research among consumer groups where feasible, to increase awareness of the experiences, needs and media literacy among different groups of consumers, including minority groups such as ethnic groups and disabled people. We will publish the data and reports.	Ongoing
9	<i>Strengthen diversity and inclusion in broadcasting</i>	Audiences expect to see and hear programmes that reflect modern life across the UK and we will continue to build on our Diversity in Broadcasting programme of work. <ul style="list-style-type: none"> • Run the monitoring programme across the television broadcasters we regulate and publish our findings on an annual basis. We will look to develop the monitoring programme further to identify how data provision can be made easier and explore what new data can be provided, such as the social, geographical or educational background of employees; • Launch the monitoring programme across the radio industry and publish the first annual report in 2018; 	2018 and Ongoing

²⁶ Our Consumer Contact Team who handle around 70,000 calls a year offer bespoke advice to consumers who need assistance with a wide variety of matters including complaints about TV programmes or advice on mobile phone and broadband services. Our Spectrum Licensing Department process around 100,000 applications and requests every year for permission to use our finite 'radio spectrum'. This is the invisible airwaves that underpin radio communications, and includes things like TV, radio and mobile.

		<ul style="list-style-type: none"> Engage with those broadcasters who we consider have inadequate arrangements, to develop these; Take enforcement action against broadcasters who fail to provide information about the make-up of their workforce; Encourage a strong industry-wide diversity and inclusion standard by encouraging broadcasters to work together, sharing initiatives and best practice. 	
10	<i>License radio stations serving diverse audiences</i>	<p>To encourage the radio sector to serve a diverse range of audiences we will continue to:</p> <ul style="list-style-type: none"> Invite applications for community radio and ensure the licence decision process takes account of diversity issues where relevant and appropriate; License restricted services, providing access to the broadcast platform to cover events, including a variety of religious festivals; and Ensure the licence decision process takes account of diversity issues. 	2018 and Ongoing
11	<i>Enforce our rules on harmful and/or offensive broadcast content, including potentially offensive material on the grounds of a protected characteristic</i>	<p>Seek a wide range of views when assessing broadcast complaints to ensure we consider the different needs and interests of audiences.</p> <p>Anonymise complaints before they are discussed in assessment meetings to remove the risk of any potential unconscious bias.</p> <p>Ensure all enforcement staff receive unconscious bias training.</p> <p>Protect audiences from harm from flashing images by requiring broadcasters to take precautions to maintain a low level of risk to viewers with photosensitive epilepsy.</p> <p>Continue to investigate complaints of flashing images on TV programmes that could cause photosensitive epilepsy and take appropriate action; and</p> <p>Take account of our published research on offensive language.</p>	Ongoing
12	<i>Monitor appropriate conditions for requiring the BBC to</i>	<p>Under the BBC's licence conditions we require the BBC to:</p>	The Operating Licence will come

	<i>promote the fourth public purpose, which is to reflect, represent and serve the diverse communities of all of the UK's nations and regions</i>	<ul style="list-style-type: none"> Report annually on how the UK public services have reflected, represented and served the diverse communities of the whole of the UK; Report annually on audience satisfaction in this respect; Report annually on the diversity profile of the UK public services workforce; and Have an Ofcom-approved diversity commissioning code of practice to cover on-screen portrayal and casting and workforce diversity. <p>We will do the following:</p> <ul style="list-style-type: none"> Report annually against performance measures on the BBC's promotion of its public purpose on the diversity of its output, including specific requirements in consideration to the UK nations and regions. Conduct a thematic review of the BBC, centered on how the BBC represents and portrays the diverse communities of the whole of the UK. 	<p>into force from 1 January 2018, with some requirements applying from 1 April 2018.</p> <p>We will report annually on the BBC's compliance from autumn 2018.</p>
13	<i>Consider how the Public Service Broadcasting (PSB) system reflects the diversity of the UK, its cultural identity, and represents alternative points of view</i>	<p>We will look at the available evidence to assess the extent to which the Public Service Broadcasting (PSB) system represents and portrays people, places, cultures and communities across the UK</p> <p>Carry out an analysis of the way PSB services are distributed, the devices the PSB services are distributed on and consider whether certain groups of people are disenfranchised by the PSB system by not having access to appropriate technology.</p>	<p>During Ofcom's fourth PSB Review (date to be confirmed)</p>
14	<i>Review Channel 4 Corporation's (C4C) delivery of its media content duties across its services, including assessing its appeal to a wide variety of audiences and how it informs and motivates UK viewers</i>	<p>Continue to carry out annual reviews in this area, as part of our response to Channel 4 Corporation's (C4C) annual Statement of Media Content Policy. This will feed into a periodic review of C4C's performance in this area.</p>	<p>Annual reviews, while the periodic review will be carried out alongside Ofcom's fourth PSB Review (date to be confirmed)</p>

Ofcom Diversity and Inclusion Programme

15	<i>Review our Made Outside London Programme Making Guidance</i>	<p>The guidance is intended to help ensure that programme-making which qualifies towards the relevant nations or 'outside the M25' quotas supports and strengthens production in the UK's nations and regions.</p> <p>We will review the current guidance, determine whether it needs amending to take account of recent and upcoming market developments, and review the current compliance and reporting regimes we have in place.</p>	Commence review in 2017/18
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A2. Responding to this consultation

How to respond

- A2.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on Friday 23 February 2018.
- A2.2 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/category-3/diversity-inclusion-programme-2018-2022>. You can return this by email or post to the address provided in the response form.
- A2.3 If your response is a large file, or has supporting charts, tables or other data, please email it to diversityinclusion@ofcom.org.uk, as an attachment in Microsoft Word format, together with the cover sheet (<https://www.ofcom.org.uk/consultations-and-statements/consultation-response-coversheet>). This email address is for this consultation only, and will not be valid after 23 February 2018.
- A2.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Alpha Abraham
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- A2.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- Send us a recording of you signing your response. This should be no longer than five minutes. Suitable file formats are DVDs, wmv or QuickTime files. Or
 - Upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A2.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A2.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt if your response is submitted via the online web form, but not otherwise.
- A2.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A2.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex A5. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.

- A2.10 If you want to discuss the issues and questions raised in this consultation, please contact Alpha Abraham on 020 7981 3000, or by email to alpha.abraham@ofcom.org.uk.

Confidentiality

- A2.11 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish all responses on our website, www.ofcom.org.uk, as soon as we receive them.
- A2.12 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A2.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A2.14 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further at <https://www.ofcom.org.uk/about-ofcom/website/terms-of-use>.

Next steps

- A2.15 Following this consultation period, Ofcom plans to publish a statement in 29 March 2018.
- A2.16 If you wish, you can register to receive mail updates alerting you to new Ofcom publications; for more details, please see <https://www.ofcom.org.uk/about-ofcom/latest/email-updates>

Ofcom's consultation processes

- A2.17 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 3.
- A2.18 If you have any comments or suggestions on how we manage our consultations, please email us at consult@ofcom.org.uk. We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A2.19 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact Steve Gettings, Ofcom's consultation champion:

Steve Gettings
Ofcom
Riverside House
2a Southwark Bridge Road
London SE1 9HA
Email: corporationsecretary@ofcom.org.uk

A3. Ofcom's consultation principles

Ofcom has seven principles that it follows for every public written consultation:

Before the consultation

- A3.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

During the consultation

- A3.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A3.3 We will make the consultation document as short and simple as possible, with a summary of no more than two pages. We will try to make it as easy as possible for people to give us a written response. If the consultation is complicated, we may provide a short Plain English / Cymraeg Clir guide, to help smaller organisations or individuals who would not otherwise be able to spare the time to share their views.
- A3.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A3.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A3.6 If we are not able to follow any of these seven principles, we will explain why.

After the consultation

- A3.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish all the responses on our website as soon as we receive them. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

A4. Consultation coversheet

BASIC DETAILS

Consultation title: Ofcom Diversity and Inclusion Programme 2018-2022

To (Ofcom contact): Alpha Abraham

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts? _____

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

A5. Consultation questions

Question 1: What are your views on Ofcom's Diversity and Inclusion Programme?

Question 2: To what extent do you believe that our approach will promote diversity and inclusion within Ofcom and in the sectors we regulate?

Question 3: Are there any additional objectives that you feel Ofcom should include in its Diversity and Inclusion Programme?