
Diversity and equal opportunities in broadcasting 2020

Methodology

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1. Legal background

- 1.1 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 employment by those providing television and radio services, and the training and retraining of people for such employment, between men and women, people of different racial groups¹ and disabled people².
- 1.2 Ofcom broadcasting licensees which employ more than 20 people in connection with the provision of their licensed service³ and are licensed to broadcast for more than 31 days a year are required⁴ to make arrangements for promoting, in relation to employment, equality of opportunity between men and women, people of different racial groups and for disabled people. They are also required to make arrangements for training people 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 observations on their operation and effectiveness at least annually.
- 1.3 The BBC is subject to similar requirements under paragraph 12 of Schedule 3 to the BBC Agreement.
- 1.4 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.
- 1.5 In addition, given the importance of equality of opportunity and diversity in the broadcasting industry in terms of the wider protected characteristics under the Equality Act 2010, we also asked broadcasters to provide, on a voluntary basis, information on their equal opportunities arrangements and employee make-up in terms of age, sexual orientation and religion or belief, as well as social mobility/social and economic background.

¹ 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 people defined by reference to race. Race includes colour; nationality; ethnic or national origins.

² 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.

³ Or where the licensee and any group companies together employ more than 20 people in connection with the provision of licensed broadcasting services.

⁴ Pursuant to section 337 of the Act.

2. Overview

2.1 This report describes the methodology used in carrying out the data collection for *Diversity and equal opportunities in broadcasting 2020*⁵. This year TV and radio broadcasters were sent the same questionnaire at the same time, in order to consider the regulated broadcasting industry as a whole. In recognition of the resourcing challenges faced by broadcasters due to the Covid-19 pandemic, we only required information from the larger broadcasters (those with 100 or more employees) and requested less detailed data.⁶ The following table summarises what has remained largely the same as the methodology used in the previous reports and what has changed.

What has stayed the same?	What has changed?
Two-staged approach to data collection, including a preliminary online screener questionnaire to establish qualification, followed by a PDF form method of data collection for the full questionnaire.	Reduced questionnaire, consistent across both TV and radio. The qualification threshold - only TV and radio broadcasters with 100 or more employees were asked to complete the main questionnaire this year.
Legal framework.	
Data reporting period of the previous April to March for TV broadcasters.	Data reporting period of the previous April to March for radio broadcasters (previously January to December).
Data security protections.	

2.2 More detail on each of the points above can be found in this report, which explains the data collection process, the level of responses we received from broadcasters, the changes made to the questionnaire in 2020⁷, and other important technicalities.

⁵ Previous year's reports can be found on Ofcom's [online diversity hub](#).

⁶ However, we have told broadcasters that we intend to ask for the rest of the 2019/20 data next year alongside the 2020/21 data.

⁷ Covering data for April 2019 to March 2020.

2.3 Alongside this year's *Diversity and equal opportunities in broadcasting* report, we have published, for the first time, three interactive dashboards. These dashboards use information, including data, presented in Power BI to allow comparison of this year's data submissions with those for the two previous reporting periods. The three dashboards cover:

- [employee diversity profiles for the UK radio and TV industries](#), 2018-2020;
- [employee diversity profiles for eight major UK broadcasters](#),⁸ 2018-2020; and
- [qualitative responses from broadcasters to questions on diversity and inclusion](#), 2020.

⁸ Bauer, BBC UK Public TV Services, BBC UK Radio Services, Channel 4, Global Media & Entertainment, ITV PLC, Sky and ViacomCBS.

3. How did we collect the data?

- 3.1 As has been the case since we implemented the diversity in broadcasting monitoring programme in 2017, all elements of the survey including questionnaire design, fieldwork and analysis were conducted in-house by Ofcom's market research/market intelligence team.
- 3.2 As a condition of their licences, Ofcom requires broadcasters to promote equality of opportunity in employment between men and women, people of different racial groups and for disabled people, and to make arrangements for training and retraining people for such employment.⁹

Stage 1: Screener questionnaire

- 3.3 At Stage 1 we sent a short online screener questionnaire to assess the qualifying questions only (i.e. how many employees a broadcaster has and how many days per year they are licensed to broadcast). This was used to gather initial information from licensees to help us to understand which licensees were required to complete a full questionnaire. All new licensees and broadcasters who had fewer than 50 employees (or who didn't provide a response) when we conducted the survey last year, were invited to complete it by 18 March 2020. All other broadcasters were automatically assumed to meet the threshold and sent a full questionnaire.
- 3.4 The screener questionnaire was sent to TV broadcasters on 26 February 2020 and to Radio broadcasters on 4 March (with deadlines of 11 and 18 March respectively). Due to the disruption caused by the Covid-19 pandemic Ofcom did not follow up in respect to the broadcasters who did not respond to the information request. Instead we realigned the nature and timeframe of our diversity requests as described below.
- 3.5 Ordinarily, all licensees that employed more than 20 people and were licensed to broadcast for more than 31 days per year in March 2020, would have been required to complete the full questionnaire (Stage 2). However, because of the Covid-19 pandemic, we decided to send a reduced questionnaire only to broadcasters with 100 or more employees (gauged from the 2019 questionnaire), and those with 50 or more employees from the screener questionnaire¹⁰.

⁹ This obligation only applies to broadcasters (or groups of companies) who employ more than 20 people in connection with the provision of licensed broadcasting services and are authorised to broadcast for more than 31 days a year.

¹⁰ Only those with 100 or more employees were required to fill in the full questionnaire. Those with between 50 and 100 employees were only required to fill in the first few questions regarding number of employees and days authorised to broadcast, and so are not included in the final reporting.

Stage 2: Full questionnaire

- 3.6 The full questionnaire was provided to broadcasters as a PDF form¹¹ (created in Adobe Acrobat DC), forming part of a formal information request. Each broadcaster was sent the questionnaire by email¹² and asked to use Ofcom’s secure managed file transfer (MFT) system to securely submit their response. Fieldwork took place July to September 2020.
- 3.7 All qualifying broadcasters identified from Stage 1 received a standardised version of the questionnaire, except for BBC and S4C who were sent their own bespoke versions¹³.
- 3.8 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 these. 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).
- 3.9 We have legal powers to require broadcasters to provide data on three protected characteristics: gender; racial group; and disability (these were mandatory). In addition, we requested information on other protected characteristics outlined in the Equality Act 2010: age; sexual orientation; and religion or belief. We also asked broadcasters to provide employee data relating to several questions around social mobility/social and economic background on a voluntary basis.
- 3.10 For broadcasters with multiple licences we accepted information on either a licence-by-licence or aggregated (combined across licences) basis, depending on how data had been collected internally by the broadcaster. Broadcasters were asked to specify at the top of the questionnaire to which licence(s) the data related.
- 3.11 For companies that provide services beyond broadcasting, we made clear that we only required information about those employed in connection with the provision of TV or radio broadcasting services. For example, Sky’s data only included information on the broadcasting side of its business, not telecoms and broadcast distribution.
- 3.12 Within the questionnaire, broadcasters were asked to provide the total number of employees the organisation employs either full or part time in connection with the provision of licensed broadcasting services. They were then asked to specify how many of these were based in and outside of the UK.
- 3.13 For UK-based employees¹⁴, a detailed breakdown was requested – specifically how many employees (for the period of 1 April 2019 to 31 March 2020) fell into five categories. These questions are what are referred to as the ‘profile grids’. We acknowledge that few organisations categorise employees in exactly the same way and so we asked broadcasters to input their

¹¹ The full questionnaire is available as a separate document on Ofcom’s [online diversity hub](#).

¹² We obtained consent from all relevant broadcasters to send this information request by email only.

¹³ Although the BBC and S4C had their own specific versions of the questionnaire the content was largely the same. The BBC was required to complete the questionnaire under provisions of the BBC Charter and Agreement, while S4C were asked to complete it on a voluntary basis.

¹⁴ Out of the 43 broadcasters included in the report, five of them did not have any UK-based employees so were not required to fill in these profile grids.

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 on the grids¹⁵:

- Total number of UK-based employees
- Were promoted
- Senior managers
- Middle/junior managers
- Non-management

The questionnaire contained six ‘profile grids’, each for a different protected characteristic. Broadcasters were required to type employee numbers into each profile field on the matrix (e.g. male and female, as shown in the gender example below¹⁶). 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 ‘data not collected’ field was provided for any employees whose data was not captured, as well as a field for ‘Employee preferred not to disclose’.¹⁷

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 if you have the explicit consent of the relevant individuals.

		1	5	6	7	8
		Total UK	Promoted	Senior	Junior	NonMgt
TOTAL SPECIFIED AT:		A5a	A6d	A7a	A7b	A7c
		100	20	10	20	30
a	Male	50	10	5	10	15
b	Female	50	10	5	10	15
c	Other (e.g. Intersex, non-binary)					
d	Employee preferred not to disclose					
e	Data not collected					
Total		100	20	10	20	30
Still to allocate		0	0	0	0	0

- 3.15 Where broadcasters supplied employee numbers that didn’t add up to the totals they had specified at Section A, they were contacted and asked to review them and (if possible) correct the data. This was also the case if any data fields for the mandatory questions were left blank.
- 3.16 For any unresolved queries where the figures didn’t add up correctly a rule was applied on processing the data. If the summed total of a column was less than the category total, the remaining number of employees was added to the ‘not collected’ variable.

¹⁵ Columns 2 to 4 and 9+ were blanked out from the questionnaire used in 2019 due to our reduced request this year.

¹⁶ Data relating to gender ‘Other (e.g. Intersex, non-binary)’ was requested on a voluntary basis.

¹⁷ For the voluntary characteristics we also included a field for ‘Data collected but no consent to disclose to Ofcom’.

4. Stage 2 responses

4.1 The main Stage 2 questionnaire was completed by 36 qualifying TV broadcasters (covering 44,770 employees). Of these, 17 were based solely in the UK, 14 had employees inside and outside the UK, and five only had employees based outside the UK (displayed in the table below).

Broadcasters with 100% of employees based outside of the UK	Employees
JSC Channel One Russia Worldwide	500+
Public Television Company of Armenia / AMPTV	500+
New Delhi Television Limited	101-499
Abu Dhabi Media Company PJSC	101-499
Channels Incorporated Limited	101-499

4.2 Across the TV industry, this amounted to 36,659 (82%) employees based in the UK and 8,111(18%) based outside of the UK. The former (which exclude the broadcasters in the table above) provides the basis for our reporting and is what we refer to as the 'UK-based TV industry.'

4.3 Seven radio broadcasters completed the Stage 2 questionnaire. Of these 8,441 employees were based in the UK and they provide the basis for our 'UK-based radio industry' figures.

4.4 Due to non-responses at Stage 1, the fact that the questionnaire was only sent to broadcasters with 100+ employees this year, and because some sections received only partial responses (i.e. data for <100% of the workforce), this research cannot provide a full picture of the industry. We estimate that it represents around 90-95% of the industry.

4.5 Response rates for each of the employee profile sections are shown in the following tables. The first column 'any data' shows the number of broadcasters who provided data for any of their employees. This is then expressed, in the second column, as a proportion of the broadcasters who have at least one UK-based employee (% broadcasters), and, in the third column, as a proportion of the UK-based employees with data¹⁸ (% employees).

¹⁸ Employees who were asked the questions but chose not to disclose their data, or didn't provide consent to provide the data to Ofcom (in the case of the voluntary characteristics), are included within these percentages.

Television

MANDATORY PROFILE SECTIONS	Any data	% broadcasters	% employees
SECTION C: GENDER	31	100%	100%
SECTION D: RACIAL GROUP	27	87%	90%
SECTION E: DISABILITY	23	74%	74%
VOLUNTARY PROFILE SECTIONS	Any data	% broadcasters	% employees
SECTION F: AGE	22	71%	95%
SECTION G: SEXUAL ORIENTATION	15	48%	72%
SECTION H: RELIGION OR BELIEF	16	52%	72%
SECTION I: SOCIAL MOBILITY Parent occupation when aged 14	8	26%	41%
SECTION I: SOCIAL MOBILITY School type attended between aged 11 and 16	8	26%	40%
SECTION I: SOCIAL MOBILITY Highest level of education achieved by parents	7	23%	36%

Radio

MANDATORY PROFILE SECTIONS	Any data	% broadcasters	% employees
SECTION C: GENDER	7	100%	100%
SECTION D: RACIAL GROUP	7	100%	96%
SECTION E: DISABILITY	7	100%	93%
VOLUNTARY PROFILE SECTIONS	Any data	% broadcasters	% employees
SECTION F: AGE	6	86%	98%
SECTION G: SEXUAL ORIENTATION	6	86%	78%
SECTION H: RELIGION OR BELIEF	6	86%	87%
SECTION I: SOCIAL MOBILITY Parent occupation when aged 14	2	29%	29%
SECTION I: SOCIAL MOBILITY School type attended between aged 11 and 16	4	57%	38%
SECTION I: SOCIAL MOBILITY Highest level of education achieved by parents	3	43%	31%

- 4.6 In addition to the above, the questionnaire contained several qualitative questions in the form of open-ended/write-in responses (Section J, as described in paragraph 5.2).

Data protection and personal data

- 4.7 When completing the questionnaire broadcasters were asked to ensure they identified any 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.
- 4.8 Regardless of whether a broadcaster marked such numbers with a 'P' we treated any fields pertaining to a specific characteristic (such as female, minority ethnic group, or disabled), with fewer than ten employees for an individual broadcaster, as potentially personally identifiable. Therefore, in reporting the findings, we have been careful not to include any percentages relating to a single broadcaster which equate to fewer than ten employees. This means that even when reporting on the larger (500+ employee) broadcasters, we are sometimes unable to report on specific subgroups where the base sizes are relatively low.
- 4.9 We asked that broadcasters use Ofcom's managed file transfer (MFT) to submit their data securely via individual password locked accounts on the secure system. Broadcasters were also 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.

5. Changes from 2019

Specific questionnaire amendments

- 5.1 The reduced questionnaire involved removing the following from the standard questionnaire (as asked in 2019):
- Section on non UK-based employees - gender, racial group and disability
 - Section on freelancers - gender, racial group and disability
 - Section on equal opportunities (primarily qualitative/write-in responses)
- 5.2 In our 2019 TV questionnaire we included a series of questions that were recommended to measure social mobility progress by the Bridge Group. These questions were not included in the equivalent 2019 Radio questionnaire. As a result of harmonising the two questionnaires, radio broadcasters were now asked to provide employee data on the following:
- a) Occupation of main household earner when employee was aged 14.
 - b) Type of school employee attended for the most time between the ages of 11 – 16.
 - c) Highest level of qualification achieved by either of parent(s) or guardian(s) by the time employee was 18.
- 5.3 In addition to the above we included a new bespoke section with specific qualitative questions relating to the following topic areas:
- a) Activity from April 19 to March 20 - diversity of your workforce
 - b) Activity from April 19 to March 20 - inclusion, freelancers & commissioning
 - c) Looking forward - coronavirus, and priorities & collaboration

Changes to broadcaster makeup

- 5.4 Compared to last year's report (covering data for April 2018-March 2019), there are 32 fewer TV broadcasters (36 vs. 68) and nine fewer radio broadcasters included in our data. This was primarily due to us only sending the questionnaire to broadcasters with 100 or employees, in response to the Covid-19 pandemic. Although this means there are also fewer employees covered in total, the fact that those broadcasters excluded this year were those with fewer than 100 employees meant that the overall figures saw a relatively smaller reduction rate in employee numbers reported on - 1,903 fewer UK-based employees for TV, and 470 fewer UK-based employees for radio.
- 5.5 To provide a more meaningful comparison to last year, it is worth considering the broadcaster make-up solely among those with 100+ employees. Compared to the 36 TV broadcasters in this category included this year, there were 41 last year. For radio there were ten broadcasters in this category last year compared to seven this year.
- 5.6 One TV broadcaster is included in our data this year that didn't submit a response last year:

- Jewellery Maker Limited

5.7 Six TV broadcasters were included in our 2019 report but not in this year's report as they indicated having fewer than 100 employees this year:

- Columbia Pictures Corporation Ltd
- Fox Networks Group UK Ltd (now included as part of The Walt Disney Company Ltd)
- Immediate Media TV Ltd (licences now transferred to Jewellery Maker Limited)
- Perform Investment Ltd
- SNI/SI Networks LLC
- Sports Information Service Ltd

5.8 For radio, Celador, Lincs FM and UKRD were included in 2019 but were purchased by Bauer prior to this year's data collection.

6. Terminology and reporting

- 6.1 **Mandatory characteristics:** We have required broadcasters to provide data on the three characteristics where we have legal powers to do so: gender (male or female);¹⁹ ethnicity; and disability. In this report we term these as mandatory characteristics.
- 6.2 **Voluntary characteristics:** We have requested data on other ‘protected characteristics’ in the Equality Act 2010: age; sexual orientation; and religion or belief. We have termed these voluntary characteristics.
- 6.3 **Workforce:** This term is used to refer to employees and contracted freelancers combined.
- 6.4 **Not disclosed:** Even when broadcasters captured data about their workforce, individuals may have preferred not to disclose their individual information to the broadcaster. In these cases the broadcaster was asked to include these individuals as ‘Employee preferred not to disclose’. These individuals are therefore included in the totals but are not identifiable by category and their data are referred to as ‘not disclosed’.
- 6.5 **Not collected:** This term is used throughout this report to refer a lack of data because the employer has not requested data or the employee has not responded at all to the request or the employer left a section of our questionnaire blank without explanation.
- 6.6 **No consent:** Even when employees disclosed their individual information to the broadcaster, they (or the employer) may not have consented to that information being shared with Ofcom. In these cases the broadcaster was asked to include these individuals as ‘Data collected but no consent to provide to Ofcom’. They are therefore included in the totals but are not identifiable by category and their data are referred to as ‘no consent’.
- 6.7 **Visible and invisible data:** The latter term is used throughout this report to refer to the combined ‘not disclosed’ and ‘no consent’ data. This signifies data that has been collected but we (and the broadcaster in the case of not disclosed) are unable to determine the effect it has on the profile for that characteristic. While this is also the case for data that are not collected/recorded in the first place, ‘visible data’ (the remainder) is what helps us to create an accurate picture of the industry. However, we acknowledge the visibility of data is not entirely within broadcasters’ control, as employees are entitled to not disclose their data to employers or to withhold consent for it to be shared with Ofcom.
- 6.8 **Race/ethnicity:** Although our 2020 questionnaire retained the terminology ‘Black, Asian and Minority Ethnic (BAME)’, when we report on this group we refer to it as ‘Minority Ethnic Groups’ (MEG). For those specified as ‘White,’ or within the sub-groups under this heading, we refer to them as ‘White Ethnic Groups’ (WEG).
- 6.9 **Age:** When reporting on age we primarily focus on two age groups – ‘under 50’ and ‘50+’. Despite collecting data for several age ranges, this provides a more focused means for benchmarking across age.

¹⁹ We asked for information relating to gender ‘other (e.g. intersex, non-binary)’ on a voluntary basis.

6.10 **Socio-economic background:** in our 2020 report, we use the term 'class' as an informal shorthand to refer to socio-economic background.

7. UK Benchmarking data

7.1 The following table outlines the UK wide benchmark figures we have used in reporting, when looking at the UK-based industry overall as well as individual broadcasters.

MANDATORY CHARACTERISTICS

GENDER	53% Male, 47% Female ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20). All employed males and females (employees and self- employed).
RACIAL GROUP	12% MEG, 88% WEG 5% South Asian, 3% Black ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20). All in employment. For London (35% Minority Ethnic, 65% White) we use ONS Annual Population Survey Apr 19 – Mar 20 – NomisWeb . Proportion in employment, aged 16-64 in London. For Manchester (31% Minority Ethnic, 69% White) we use ONS Annual Population Survey Apr 19 – Mar 20 – NomisWeb . Proportion in employment, aged 16-64 in Manchester For Glasgow (12% WEG, 88% MEG) we use Scotland's Census 2011 - National Records of Scotland Table KS201SC - Ethnic group . Proportion of all people in Glasgow. <i>Note: this differs to the UK or London benchmarks which are among the working population (as opposed to the general population).</i>
DISABILITY	19% disabled, 81% not disabled ONS Labour market statistics A08: Labour market status of disabled people (Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20). Proportion of all 16-64 who are 'Harmonised Standard Definition Disabled'

VOLUNTARY CHARACTERISTICS

AGE	68% under 50, 32% 50+ Note: these proportions are the same among both men and women. ONS Labour market statistics Table A05: Labour market by age group: People by economic activity and age (seasonally adjusted) (Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20). All employed people/women/men
SEXUAL ORIENTATION	2% LGB, 93% Heterosexual, 4% not disclosed ONS Sexual identity, UK: 2018 - Percentage of UK adult population who identify themselves as LGB Note: other sources differ: <ul style="list-style-type: none"> • When analysing the financial implications of the Civil Partnerships Act, the Treasury estimated 6% • Stonewall say 5-7% is a reasonable estimate • Public Health England concludes an LGB adult population in England of 2.5%, rising to 3.6% (Greater Manchester), 5.1% (Greater London), and 9% (Brighton and Hove) • Healthcare company euroClinix, found that 13% percent of respondents identified as LGB
RELIGION	67% religious, 26% non- religious, 4% not disclosed Census 2011
SOCIAL MOBILITY – MAIN EARNER OCCUPATION	33% Professions, 38% Intermediate, 29% Working class Social Mobility Commission and the Bridge Group (Jan2017)

**SOCIAL MOBILITY –
SCHOOL ATTENDED**

7% private school

[Sutton Trust report Leading People 2016, published 24 February 2016](#)

A1. 2020 questionnaire

A1.1 The [full questionnaire for 2020](#) has been published as a separate document.