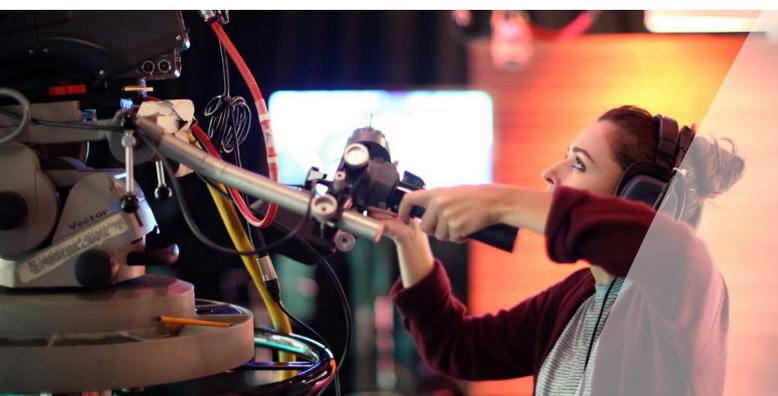


Diversity and equal opportunities in television 2018

Monitoring report on the UK-based broadcasting industry



Foreword

Welcome to Ofcom's second report on the diversity of the UK's television industry. Since our first a year ago, I have been really encouraged by the work being undertaken by broadcasters of all sizes to extend opportunities to people across society.

Just as diversity is about representing the broadest possible range of people, achieving it requires the widest possible collaboration.

So in July 2018, I chaired a meeting of the heads of major UK broadcasters, to share ideas and experiences on improving the diversity of our industry. We heard about the vital work that companies are taking to tackle the issue.

Industry leaders made clear they want to adopt a far more vocal direct, approach to increasing diversity. All agreed that greater collaboration must be the driving force of change in the UK TV industry.

Our broadcasters understand the need to attract talented people, from every background, especially those who don't feel they can make a career in an industry, where many groups remain poorly represented.

Opportunity is important in its own right. But a more diverse workforce can also benefit broadcasters – helping them to create innovative, imaginative and authentic television that reflects the lives and experiences of their whole audience.

This report shows the progress that has been made over the last year - but there remains a long way to go.

Monitoring has improved, as companies provide better, more complete data. For example, the industry now reports the age of 86% of its employees, up from 71% a year ago. Broadcasters are aware of the religion or belief of 56% of TV workers, up from 41%.

But information on disability remains poor, with 31% of employees unaccounted for – the same as last year.

Representation has improved in some areas. The proportion of employees who define themselves as disabled has doubled from 3% to 6%; but this remains far below the UK population average of 18%.

The proportion of women in senior television jobs has increased from 38% to 41%. But all of the five main broadcasters employ more men aged 50 or over than women.

So we want broadcasters to build on the momentum of the last year, and to keep improving their monitoring and staff diversity. That means collecting better data. Broadcasters need to set clear targets to improve opportunities for groups of people across the sector – such as disabled people, and people from minority ethnic backgrounds at senior levels.

Social mobility matters too. At our summit in July, we talked about how, as industry leaders, we could work together to agree a common measure of people's social and economic background. And we intend to ask broadcasters to report on the industry's social and economic diversity next year.

As the industry regulator, Ofcom must play its part. Alongside our work with broadcasters to help them promote opportunity, we are working to increase the diversity of our own workforce through clear targets and monitoring.

Changing our TV industry to reflect the whole of British society is a long-term, collaborative endeavor. It cannot be achieved overnight. Some of the excellent work now underway will take time to be reflected in workforce data, as job opportunities arise, and companies embed new recruitment and training processes.

But with the continued support of industry leaders, I am convinced we can achieve further, tangible progress over the year ahead.



Sharon White,
Chief executive

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Executive Summary

Why diversity in television matters

Ofcom research shows that TV viewers want to see programmes that authentically portray their lives, reflecting the UK's diverse communities, nations and regions.

A crucial means of meeting those expectations, is for broadcasters to ensure their workforces reflect the UK's society. That means recruiting from a broad pool of diverse talent, and ensuring that the door to a career in TV is open to everyone.

As a condition of their licences, Ofcom requires television 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.¹

To help us assess how broadcasters are meeting these requirements, Ofcom can ask them to provide information about their equal opportunities policies and the make-up of their workforces, which we report on in this document.²

What does this report cover?

This is our second report on diversity in television broadcasting. It presents our key findings across the main five television broadcasters that Ofcom regulates and across the UK-based industry. It does not include radio, as we published a separate report on that sector in [June 2018](#).³ Like last year, we required broadcasters to provide data on the three protected characteristics⁴ where we have powers to do so: gender; racial group; and disability.⁵ In addition, we requested information on other protected characteristics outlined in the Equality Act 2010: age; sexual orientation; religion or belief; pregnancy and maternity; and gender reassignment. This year we also asked broadcasters to tell us about the work they have been doing around social mobility/social and economic diversity.

We expected broadcasters to improve significantly on progress on collecting diversity data within their organisations, as this requires better communication with existing employees. However, given that it has been only a year

since our last monitoring report, we wouldn't anticipate all areas of broadcasters' diversity profiles to have changed significantly during that time, as employee turnover is not likely to be high year on year and no broadcaster shared plans to recruit a substantial number of employees over the year. With that in mind, we asked broadcasters to provide as much contextual information as possible to demonstrate how they are addressing the challenges highlighted in last year's report. This includes initiatives to increase progression and recruitment of employees with specific protected characteristics, new employee networks, fair recruitment practices such as gender balanced recruitment panels, target setting, work experience and training schemes and senior level staff involvement in diversity and inclusion activity.

While understanding the make-up of workforces through comprehensive data monitoring is key, fostering the creation and growth of an inclusive culture, where diversity can thrive, is equally

1. 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.
2. Parliament has given Ofcom a legal duty to promote equality of opportunity in relation to employment in the broadcasting sector under the Communications Act 2003.
3. <https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/guidance/diversity/diversity-equal-opportunities-radio>
4. Protected characteristics are also referred to as characteristics in this report.
5. The data were collected via a questionnaire sent to all television broadcasters and are based on broadcasters' own reporting systems. As such, there may be some variation in how categories of data are defined.

important. This summary report focuses on the diversity of the main five⁶ UK broadcasters: the BBC⁷, Channel 4, ITV, Sky and Viacom.⁸ We compare them, by characteristic, to UK labour workforce averages⁹ and the wider UK-based TV broadcasting industry, and highlight some of their key initiatives. Our [In-focus report](#) provides further detailed analysis across each of the main five broadcasters and includes a more comprehensive write up of the initiatives and strategies they have implemented to tackle

under-representation. We also set out findings from the [total industry in a third report](#), which looks at UK and international based employees working for UK licensed broadcasters.¹⁰

We examine diversity across job roles, job levels, completion of training and development, promotions, joiners and leavers. A detailed methodology explaining the data request and process is also available alongside the three reports on [Ofcom's online diversity hub](#).¹¹

What have we changed since last year?

Following a review of last year's survey, we have improved the methodology for the data collection for this report to get better quality and more detailed information. A full summary of these changes can be found in the [methodology document](#).¹² Most notably, the job roles have been updated with more detailed job titles and breakdowns, for example the broad term 'programming' has been replaced with more specific roles such as journalism and creative and content production.¹³ This means that as the job roles are different, these cannot be compared year on year. Also, we have separated collection of data on UK-based and international employees, to more accurately reflect the UK-based industry. The time period of the data collected has also changed, from calendar year 2016 in the first report to April 2017 to March 2018 in this report.

Due to these new job types and further detailed guidance on who should be included, Sky has included a larger number of its employees than last year and has provided an update on last year's figures to reflect this larger sample and provide a year on year comparison. As was the case last year, Sky only provides information on TV focused employees, not its wider organisation. Similarly, following discussions with the BBC about its data being as comparable as possible to that of other television broadcasters, in this report, its employee numbers are smaller to account for the removal of BBC World Service and radio employees.¹⁴ As a result, the 2016 data for these two broadcasters will look different to that published in last year's report but importantly, this allows us to assess year on year progress.¹⁵ These changes improve the quality of the data collected and should make year on year comparisons more straightforward in the future.

6. These are the main five broadcasters with 750+ UK-based employees who provided information on three or more of the protected characteristics including disability, racial group and gender.
7. Throughout this report the BBC refers to the BBC Public Television Service only. The BBC commercial services licensed by Ofcom (BBC Worldwide and BBC Global News) are included in the UK industry total figure and total industry report.
8. Both Sky and the BBC report only on TV focused employees, not their entire organisations. Both broadcasters have also provided an updated data cut for 2016 to allow accurate year on year comparison to this year's improved, more accurately representative employee group for those working in television.
9. Last year we compared broadcaster data to the total UK population. This year we have compared the data to the UK working population for all characteristics where we make comparisons, except for disability where we continue to use the 16 to 64 population figures – further explanation can be found in the [methodology document](#).
10. The BBC and broadcasters licensed by Ofcom, authorised to broadcast for more than 31 days per year and with more than 20 employees were required to respond with data on their employees. Broadcasters who did not meet this threshold were not required to respond with data. S4C provided data on a voluntary basis.
11. www.ofcom.org.uk/diversity
12. The [methodology document](#) for 2018 can be found on Ofcom's diversity hub (www.ofcom.org.uk/diversity)
13. A full list of the job role guidance note shared with broadcasters can be found in the [methodology document](#) on Ofcom's diversity hub (www.ofcom.org.uk/diversity)
14. The BBC has confirmed that BBC Studios was included in the BBC diversity data in Ofcom's 2017 report as it was then part of in-house production, but as it is now a commercial subsidiary it has been removed from the BBC 2016 and 2017/18 data covered in this report.
15. This is explained in more detail in the [methodology document](#) available on the Ofcom diversity hub (www.ofcom.org.uk/diversity).

What have we found out?

- **The data gap has reduced.** Last year we were clear that the UK broadcasting industry needed to vastly improve its data monitoring and we highlighted the data gap across each characteristic. This year that data gap has reduced significantly at the total industry level across all of the protected characteristics, apart from disability.
- **However, data quality still needs to improve.** While some areas of data quality have improved, such as monitoring across different job levels, job roles and those promoted or trained, many broadcasters continue to collect data within broad categories which offer limited insight. People from minority ethnic backgrounds, those who self-define as religious, who identify as lesbian, gay or bi-sexual, or who are disabled are not uniform groups and should not be treated as such.
- **Disabled people are still significantly under-represented.** Though there has been some improvement in the proportion of employees who self-define as disabled, from 3% in 2016 to 6% in 2017/18, this is still very low in comparison to the UK population average of 18%.¹⁶
- **Minority ethnic representation at senior levels shows no improvement.** Representation of employees from minority ethnic backgrounds has improved slightly across the industry from 11% to 13%, but at senior management level there has been no improvement year on year.
- **Small increase in women at senior management level.** Across the UK-based industry, women are represented broadly in line with the workforce population. Representation of women at senior management level has increased slightly from 38% to 41%. However, this is still below the UK average.
- **Broadcasters are collaborating to better understand social mobility/social and economic diversity.** All of the main five broadcasters have worked with the [Bridge Group](https://thebridgegroup.org.uk/),¹⁷ a charitable policy association researching and promoting social and economic diversity and equality and have acknowledged that this is a key area on which industry needs to continue to engage on. Following a meeting with broadcasters hosted by Ofcom in March 2018, we reached a consensus on the key measurement question¹⁸ to determine employees' social and economic background. Further collaboration is required to discuss next steps and how to improve access to the industry.
- **Freelancers remain largely unmonitored.** We called on industry to improve monitoring in this area by requesting data from freelancers, but little improvement appears to have been made. Ofcom has already discussed facilitating further discussions on this area across the creative industries, with the main five broadcasters.

What has changed?

The data gap has reduced significantly across the TV industry in the past year

There has been a slight increase in women at senior management level

Broadcasters are working together to better understand social and economic diversity



MIND THE DATA GAP

What has stayed the same?

The quality of data still needs to improve

Disabled people are still significantly under-represented across the industry

Minority ethnic representation at senior levels shows no improvement

Freelancers remain largely unmonitored



16. Disability = ONS Labour market statistics [A08: Labour market status of disabled people](#) (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). Proportion of all 16-64 who are 'Harmonised Standard Definition Disabled'.

17. <https://thebridgegroup.org.uk/>

18. Question which asks the individual what their parental occupation was when they were aged 14 - more information on this and related research can be found in the [In-focus](#) and [total industry](#) reports.

How diverse are the broadcasters?¹⁹

Figure 1: Summary table for the six characteristics^{20 21}

	UK labour market / population*	2017/18 UK-based TV industry	2016 UK-based TV industry	Data gap (not collected) change since 2016	2017/18 BBC	2017/18 Channel 4	2017/18 ITV	2017/18 Sky	2017/18 Viacom
Disability									
Those with a disability	18%	6%	3%	+1pp	10%	11%	2%	3%	8%
No disability	82%	62%	66%		81%	73%	84%	51%	75%
Not disclosed		2%	1%		3%	2%	0%	1%	0%
Not collected (DATA GAP)		31%	30%		5%	13%	14%	45%	17%
Racial group									
Minority Ethnic Groups (MEG)	12%	13%	11%	-5pp	13%	18%	9%	15%	19%
White Ethnic Groups (WEG)	88%	71%	70%		83%	80%	70%	77%	75%
Not disclosed		4%	2%		3%	0%	1%	2%	1%
Not collected (DATA GAP)		12%	17%		2%	2%	20%	6%	5%
Gender									
Men	53%	54%	52%	No change	55%	44%	47%	62%	47%
Women	47%	46%	47%		45%	56%	53%	38%	53%
Women in senior management		41%	38%		42%	42%	45%	38%	45%
Not collected (DATA GAP)		1%	1%		0%	0%	0%	0%	0%
Religion or belief									
Religious	67%	22%	19%	-15pp	37%	48%	0%	24%	37%
Non-religious	26%	28%	18%		54%	37%	0%	23%	45%
Not disclosed	7%	5%	4%		8%	9%	0%	8%	1%
No consent (to provide to Ofcom)		1%	0%		0%	0%	0%	0%	0%
Not collected/No response (DATA GAP)		44%	59%		1%	6%	100%	45%	17%
Sexual Orientation									
Lesbian/Gay/Bisexual (LGB)	2%	4%	3%	-10pp	7%	7%	4%	2%	8%
Heterosexual	93%	49%	41%		71%	83%	66%	47%	71%
Not disclosed	4%	5%	5%		7%	4%	4%	6%	5%
No consent (to provide to Ofcom)		1%	0%		0%	0%	0%	0%	0%
Not collected/No response (DATA GAP)		41%	51%		15%	6%	26%	45%	16%
Age									
Under 50 years old	69%	69%	55%	-15pp	73%	89%	81%	87%	92%
50+	31%	16%	17%		27%	11%	19%	13%	8%
Women under 50 years old	69%	71%	58%		77%	91%	85%	91%	95%
Women 50+	31%	13%	14%		23%	9%	15%	9%	5%
Men under 50 years old	69%	66%	50%		70%	88%	76%	84%	89%
Men 50+	31%	19%	19%		30%	12%	23%	16%	11%
Not disclosed		0%	0%		0%	0%	0%	0%	0%
No consent (to provide to Ofcom)		1%	0%		0%	0%	0%	0%	0%
Not collected/No response (DATA GAP)		14%	29%		0%	0%	0%	0%	0%

19. The 'UK-based TV industry' figure for 2017/18 (April 17-Mar 18) includes any UK-based employees of broadcasters licensed by Ofcom. This definition is different to the 2016 (Jan-Dec) figure, which included all employees (UK and non-UK-based) among broadcasters who had at least 98% of employees based in the UK. Because of this an exact comparison is not possible, so should be treated with some caution. See separate [methodology document](#) for a full explanation.

20. Sources used for UK labour market / population figures:

Disability = ONS Labour market statistics A08: Labour market status of disabled people (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). Proportion of all 16-64 who are 'Harmonised Standard Definition Disabled'

Racial group = ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). All in employment.

Gender = ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). All in employment.

Sexual Orientation = ONS Sexual identity, UK: 2016 - % of UK population who identify themselves as LGB / Heterosexual.

Age = ONS Labour market statistics Table A05: Labour market by age group: People by economic activity and age (seasonally adjusted) (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). All employed people/women/men

21. pp = percentage point

Disability

The data gap for disability has failed to improve. The disability data gap across the UK-based industry remains at close to a third (31%), almost the same figure as in 2016 (30%). Some broadcasters have good collection rates but overall this continued lack of accurate monitoring means that we cannot form a robust picture of the industry in terms of representation of disabled people. This must improve. We are encouraging all broadcasters to have targeted initiatives and to develop long term plans which consider a range of different conditions or types of disability.

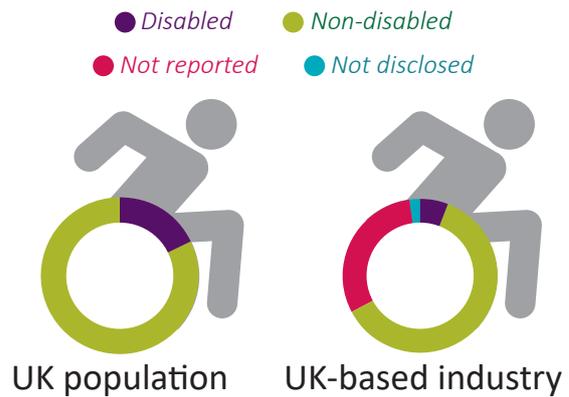
Disabled people continue to be significantly under-represented. The proportion of employees self-defining as disabled has doubled across the UK-based industry from 3% to 6% in 2017/18 but this is still extremely low compared to the UK average figure of 18%.

Racial group

Minority ethnic representation at senior levels shows no improvement. Overall representation of employees from minority ethnic backgrounds has improved slightly across the industry, from 11% to 13%, but at senior management level there has been no improvement year on year (7% this year vs. 8% in 2016).

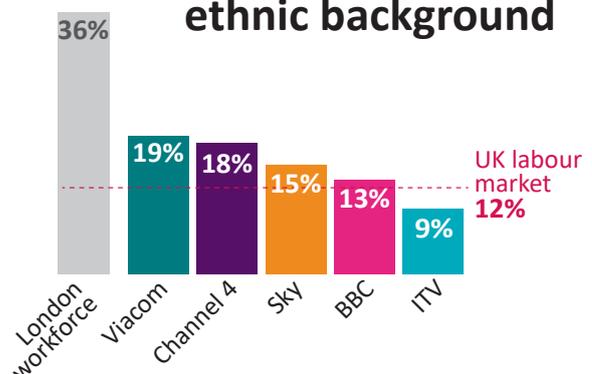
Viacom has the highest proportion of employees from minority ethnic backgrounds, at almost a fifth of their workforce, and ITV the lowest at 9%, compared to the UK national workforce average of 12%. At senior management level the proportion of employees from minority ethnic backgrounds is highest at Viacom, and lowest at ITV (as was the case last year). For the BBC, 8% of senior management roles are held by people from minority ethnic backgrounds, a similar proportion to Sky (7%).²³ This is the only monitored characteristic that has shown no improvement despite various initiatives mentioned by some broadcasters last year. This year broadcasters have provided clearer, more focused initiatives to target this specific area

Proportion with a disability



Channel 4 and the BBC have the highest representation of disabled people, while Sky and ITV have the lowest. All five of the broadcasters have targeted initiatives, such as the [disability confident scheme](#),²² so we hope to see significant progress in this area over the coming year.

Proportion from a minority ethnic background



and we will continue to monitor and report on progress.²⁴

Minority ethnic employees are under-represented across content and creative roles.²⁵ This trend is identified across all the main broadcasters except for Viacom, where over a quarter (26%) of their content and creative roles are held by employees from minority ethnic backgrounds.

22. <https://www.gov.uk/government/collections/disability-confident-campaign>

23. Due to small sample sizes Channel 4 cannot be reported on in this list.

24. Channel 4 and the BBC have conducted focused employee interviews and developed targeted progression strategies. ITV has committed to a similar review next year. Sky plans to review whether employees from minority ethnic backgrounds progress in the organisation at the same rate as employees from white ethnic groups.

25. Due to re-classification of job roles from last year we cannot compare year on year change.

Gender

Increase in women at senior management level. Across the UK-based industry women are represented broadly in line with the workforce population. Representation of women at senior management level has increased from 38% to 41%, however, this is still below the UK average.

Women continue to be under-represented in technology and engineering roles.

Men continue to dominate technology and engineering roles, with only 25% of all roles held by women. Women also appear to be under-represented to a lesser extent across creative and content production roles at 43%.²⁶

Viacom and ITV identify as having the highest proportion of women in senior management



Gender in senior roles

Senior management



positions, both at 45%. Sky has the lowest at 38%. Broadcasters have started to cement current initiatives and re-develop existing ones to address under-representation. This appears to have had a positive impact and we expect to see greater improvements over the coming year through similar well-focused initiatives.

Religion or belief

Religion or belief has the highest data gap.

While the data gap has reduced, more than two fifths of employees across the industry remain unmonitored²⁷ for religion, amounting to over 16,000 people.

The BBC has the most complete data set, while ITV doesn't monitor at all, though it has

committed to doing so in the next year. The four broadcasters who collect information on religion or belief monitor the specific religions of their employees. This is not an area of particular focus for any of the main five broadcasters, but they do have arrangements in place to promote equal opportunities in this regard.

Sexual orientation

Data gap is still high - Despite the data gap reducing by 10 percentage points (pp), having fallen from 51% to 41%, it is still high. The proportion of employees self-defining as LGB²⁸ has remained relatively similar at 4% (3% in 2016), there are still almost 15,000 employees across the UK-based industry unmonitored in terms of their sexual orientation.

Viacom has the highest proportion of employees self-defining as LGB at 8%, while Sky has the lowest at 2%. All of the main five broadcasters focus their work on supporting the LGB community through their respective networks and are part of the [Stonewall Diversity champions](#)²⁹ programme.

Gender reassignment

The main five broadcasters have relevant policies in place to promote inclusion for people from the trans community or employees considering or undergoing gender reassignment.

We recommend that all broadcasters consider adopting similar policies or guidance and speak to Stonewall for further advice on these.

26. See [In-focus report](#) for more detail on job roles by gender on Ofcom's online diversity hub (www.ofcom.org.uk/diversity)

27. We requested broadcasters provide us with information, including if they hadn't collected or didn't have consent to provide information to Ofcom, so believe the data gap to be unmonitored.

28. Lesbian, Gay and Bi-sexual. Also included are employees who self-defined as Other as a response under the question on sexual orientation.

29. <https://www.stonewall.org.uk/diversity-champions-programme>

Age

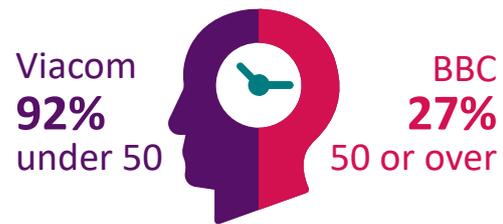
Data monitoring on age has improved across the UK-based industry. The data gap on age has reduced from 29% to 14% across the UK-based industry. This year all five of the main broadcasters provided complete data on the age of their employees, compared to three last year.

The UK-based industry has a much younger workforce profile than the UK average workforce. Across the UK-based industry, 16% of employees are aged 50 or over, compared to 31% across the UK workforce population. Three of the main five broadcasters have workforces that are significantly younger. Viacom has the youngest workforce with 8% of their employees aged 50 or over and the BBC has the oldest workforce, with 27% of employees aged 50 or over.

Social mobility

Whilst not protected characteristics under the Equality Act 2010, understanding the social and economic background and social mobility of the workforce is considered key in helping to form a picture of how open and accessible the TV industry is. It also helps reveal whether it is one where every person is able to enter into and fulfil their potential, irrespective of where they were born, their educational background, or what their parents did for a living.

Age diversity



The UK-based industry employs a greater proportion of older men compared to older women. All of the main five broadcasters employ a greater percentage of males aged 50 or over than females, and a greater percentage of females aged under 50 than males to varying degrees. This difference is highest within ITV at 8pp and lowest within Channel 4 at 2pp difference.

Broadcasters are working together to better understand social mobility/economic diversity. All of the main five broadcasters have acknowledged that this is a key area that needs continued focus. They have worked with the [Bridge Group](#)³⁰ in developing their understanding of social mobility/economic diversity. Our In-focus report³¹ includes recommendations from the Bridge Group and a summary of the main five broadcasters' initiatives. We've also included the key monitoring question which we discussed and agreed with the main five broadcasters and encourage all broadcasters to adopt, to enable consistent monitoring across the industry. Further work is required to discuss next steps.

30. <https://thebridgegroup.org.uk/> - The Bridge Group is a charitable policy association researching and promoting social and economic diversity and equality.

31. Please see the [In-focus report](#) on the main five broadcasters on Ofcom's diversity hub at www.ofcom.org.uk/diversity

Conclusions and next steps

The industry has made positive progress with more detailed and improved diversity and inclusion plans and some data improvement. But there is still much more to do, and today's report shows that the initiatives and actions to tackle under-representation do not always have an instant positive effect on the data, due to

the time it takes to embed new processes and bring about cultural change. Transparency is key and while data gaps still exist,³² broadcasters will lack an accurate picture of the make-up of their employees, or any under-representation. The conclusion includes detailed actions for broadcasters which are outlined below.

Further action required by broadcasters

- **Continue to improve quality of data collected**
- **Increase focus on improving representation of disabled employees**
- **Hold focused discussions with employees from minority ethnic backgrounds about progression and inclusion**
- **Workforce targets must be measurable and time specific**
- **Work together to monitor Freelancers not captured by [Diamond](#)³³**
- **Continued collaboration on social mobility**

Further action by Ofcom

Ofcom will continue to work closely with the industry to help improve the diversity of its employees and encourage collaboration. In the conclusion, we have set out our next steps in more detail which cover the following areas:

- **Assessing broadcaster's arrangements for promoting equal opportunities, diversity and inclusion**
- **Updating our guidance to reflect findings in the TV and Radio reports including new areas such as progression**
- **Diversity roadshows for broadcasters**
- **Enforcement action**
- **Reporting on social and economic background**
- **Radio monitoring and other related diversity work**

32. Religion or belief, sexual orientation and disability have the largest data gaps.

33. <https://creativitydiversitynetwork.com/diamond/>

The UK-based television industry and the main five television broadcasters

How do the main five broadcasters compare?

In this section we focus on the main five broadcasters with 750+ UK-based employees who provided information on three or more of the protected characteristics including disability, racial group and gender.

We have compared the main five broadcasters against each other and the UK-based industry across eight³⁴ protected characteristics along with, for the first time, additional contextual information on social and economic background. This information is provided for the period of April 2017 to March 2018 and is compared to last year's report figures where appropriate.

These five broadcasters represent 74% of the UK-based industry and vary in size. The BBC is still the largest with 13,959 UK-based employees followed by Sky at 7,229 employees.³⁵ ITV has 4,245 UK-based employees but Channel 4 and Viacom each have fewer than 1,000 employees.

Across the main five broadcasters data gaps have reduced, with a reduction in 'not collected' across every characteristic, except disability. Despite this there are still some substantial gaps in the data provided, most notably on sexual orientation, and religion or belief. Sky did not provide information on the voluntary characteristics³⁶ last year but was able to do so this year.³⁷ The main five now collect information on all characteristics aside from ITV, which is not yet collecting employee information on religion or belief, but it plans to do so in 2018/19.

We know many of the broadcasters have undertaken employee monitoring campaigns over the last few years, some of which have been more successful than others. We will continue to engage with industry, collaborate and share best practice on creating an inclusive culture, which in turn can improve disclosure rates.

34. Gender, Racial Group, Disability, Sexual Orientation, Religion or Belief, Age, Gender Reassignment, Pregnancy and Maternity (broad question also covering flexible working).

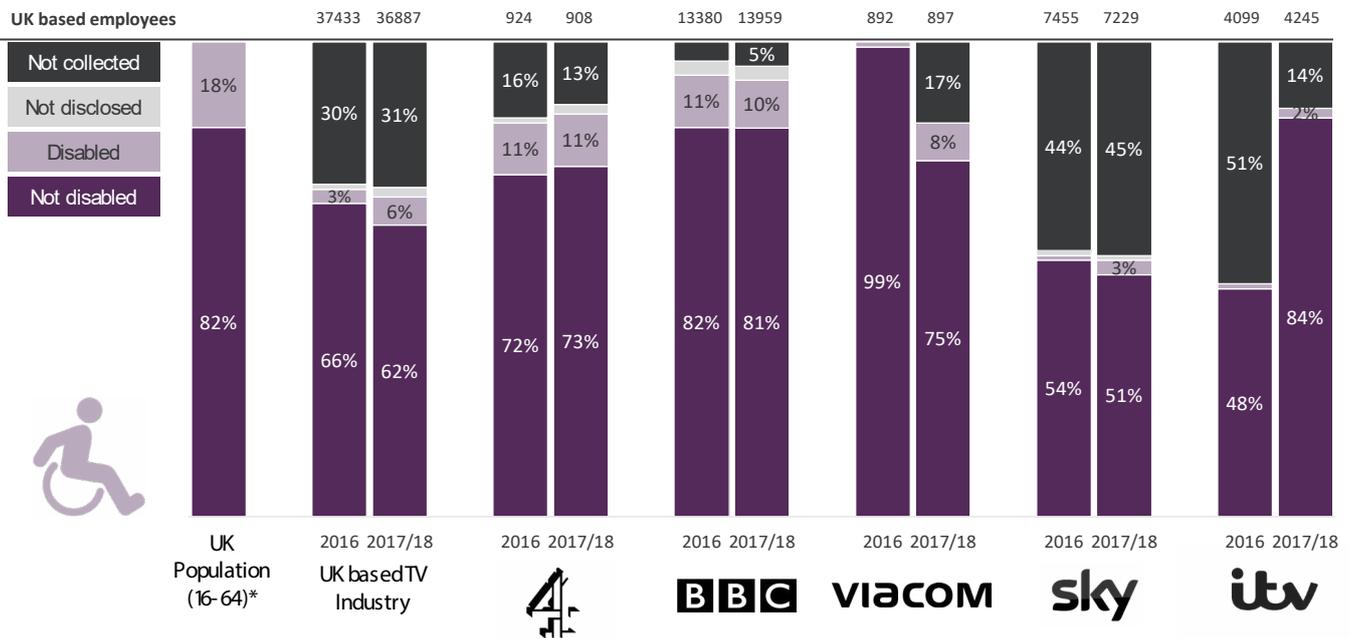
35. Both Sky and the BBC report only on TV focused employees, not their entire organisations. Both broadcasters have also provided an updated data cut for 2016 to allow accurate year on year comparison to this year's improved, more accurately representative employee group for those working in television.

36. We required broadcasters to provide quantitative data on the three characteristics where we have powers to do so: gender; racial group; and disability. In addition, we have requested data on other 'protected characteristics' in the Equality Act 2010 on a voluntary basis: age; sexual orientation and religion or belief.

37. Sky's rebased 2016 data was used for all the mandatory characteristics it provided data on last year. We have included a comparable data cut for 2016 where this information was provided last year but have left as 'not collected' where that was the case in 2016.

Disability

Figure 2: Disability across the main five UK broadcasters – 2017/18 vs. 2016



*ONS Labour market statistics [A08: Labour market status of disabled people](#) (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). Proportion of all aged 16-64 who are/are not 'Harmonised Standard Definition Disabled'. Note: BBC and Sky provided us with comparable figures for 2016, so they differ from what we reported on in 2017.

In our report last year, we were clear that broadcasters needed to improve monitoring across all characteristics, and this was particularly the case for disability status. While across the UK-based industry there is still 31% of employees for which there are no data available, Channel 4 and ITV³⁸ have improved in this respect. Nevertheless, more still needs to be done in terms of improved monitoring. Sky provided no disability status information for almost half of its workforce and Viacom provided no information for almost a fifth of its employees.

Across the UK-based industry, while the proportion of employees who self-define as disabled has doubled year on year to 6%, this proportion is still well below the average UK

population (16-64s) figure of 18%. Channel 4 has the highest proportion of employees who self-define as disabled 11%, followed by the BBC 10%, Viacom 8% and Sky 3%, with ITV reporting the lowest proportion at 2%. More broadcasters are collecting detailed information on types of employee disability than last year, but a quarter of broadcasters collecting disability data still fail to do so.

Aside from Channel 4, which was already leading the way last year through its 'Year of Disability' initiative, the main five broadcasters appear to have stepped up their work on promoting equal employment opportunities for disabled people over the last year. Viacom notes this was one of their areas of focus for 2018.

38. The data submitted by Viacom for 2016 incorrectly combined the number of employees who declared as not having a disability and those who chose not to make a declaration. The data for 2016 is therefore not being used for the purposes of making annual comparisons.

What are the main five broadcasters doing on disability?

Channel 4 continues to lead the way having achieved its Disability Confident Leader (Level 3) status as part of the [government scheme](#)³⁹ in August 2017. It has also encouraged others to sign up to the scheme in conjunction with the Department for Work and Pensions' Disability Confident Business Leaders Group, which Channel 4's Dan Brooke sits on as the media sector champion. The BBC, Sky and Viacom have all met the Level 1 Disability Confident (Committed) Employer status and are all working towards the Level 2 Disability Confident Status, which ITV has already achieved. We are supportive of the broadcasters' voluntary commitment to the good practice required by this scheme and recommend that other broadcasters consider the guidance provided on the [scheme's website](#).⁴⁰

Channel 4 produced a [sector guide to employing disabled talent](#)⁴¹ and all of the main five broadcasters have run or developed internal disability events or training over the past year. More information on these initiatives can be found in the [In-focus report](#) on [Ofcom's online diversity hub](#).⁴²

Sky set up an Ability Taskforce to improve its reasonable adjustment process and Channel 4 has also overhauled its workplace adjustments internally, creating a workplace adjustments policy. Viacom and the BBC also have reasonable adjustment policies in place. In addition to its reasonable adjustment policy, ITV has a partnership with 'Microlink' who are available to carry out more specialised desk assessments as required.

Mental Health is another area the broadcasters are giving greater attention to. ITV has worked with MIND to deliver mental health awareness training sessions and organised a campaign around mental health awareness week.

Viacom has launched an 'approach team', an employee led mental health first aid team, which is trained to be the first port of call and provide information for employees struggling with mental health issues. Sky has a range of employee support arrangements including mental health support offered by Cognitive Behavioural Therapy clinics through Sky's healthcare plan. Channel 4 produced a new, revised action plan on mental health having re-signed the [Time to Change employer pledge](#).⁴³ Channel 4 also trained over 80 Mental Health First Aiders (MHFAs) who make up around 10% of its staff, and wants to reach 100 trained MHFAs by the end of 2018. The MHFAs are part of the employee network 4Mind which is sponsored by the board champion for mental health.

The BBC has also set out its future plans, noting that it will be running a Disabled Staff Career Progressions and Culture Project which aims to better understand the experiences of disabled staff at the BBC. The project aims to find out how well they are supported, how the culture of the BBC affects disabled staff and how any barriers can be removed. The BBC is the only broadcaster that publishes a disability pay gap, reporting a median pay gap of 4% and a mean pay gap of 4.9% in [2018](#).⁴⁴ ITV has partnered with organisations such as [Sharpfutures](#)⁴⁵, [Mencap](#)⁴⁶ and [Lighthouse Futures](#)⁴⁷ to offer work experience and internships on ITV programmes for people with autism or learning difficulties.

Ofcom is supportive of the recently announced 'Doubling Diversity' initiative led by the Creative Diversity Network, via which the main five broadcasters aim to double the percentage of disabled people working in British television by 2020.⁴⁸

39. <https://www.gov.uk/guidance/disability-confident-how-to-sign-up-to-the-employer-scheme>

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

41. https://s3-eu-west-1.amazonaws.com/c4-cp-assets/corporate-assets/documents/2018-02/TV%20Sector%20Guide%20to%20Employing%20Disabled%20Talent_Version2.1.pdf

42. www.ofcom.org.uk/diversity

43. <https://www.time-to-change.org.uk> - this has also been signed by Sky and committed to by ITV.

44. http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/reports/gender_pay_report_2018.pdf

45. <http://sharpfutures.org.uk/>

46. https://www.mencap.org.uk/?gclid=EAlalQobChMlrPP2rLmP3QIVQbTtCh2ZPge8EAAYASAAEgJrRPD_BwE

47. <https://lighthousefuturestrust.org.uk/>

48. <http://creativitydiversitynetwork.com/creative-diversity-network-and-uk-broadcasters-commit-to-doubling-disability/>

Recommendations

▪ Improve disability status disclosure rates

Last year the disability data gap across the UK-based industry was 30% of employees. This year, disappointingly, that figure remains largely unchanged at 31%. This continued lack of accurate monitoring means that we cannot form a robust picture of the industry in terms of representation of disability status and this must improve.

▪ Make disability an area of focus to improve representation

Though there has been some improvement in the proportion of employees who self-define as disabled from 3% in 2016 to 6% in 2017/18, this is still very low in comparison to the UK average of 18%.⁴⁹ If not already a defined area, broadcasters need to have focused initiatives and to develop long term strategies and plans

rather than individual schemes, and to consider different conditions or types of disability.⁵⁰ Targeted recruitment and progression schemes are needed to support disabled employees and we encourage more broadcasters to work with disability charities and organisations.

▪ Set clear disability targets

It is only the BBC and Channel 4 who have set clear, specific and measurable targets on disability. We recommend that if broadcasters are not nationally representative they should set defined targets with clear delivery dates to assess progress. Disability is the only characteristic that can be supported by positive discrimination under the Equality Act 2010⁵¹ and broadcasters should be alert to this when considering how to improve representation of disabled people in their employment.



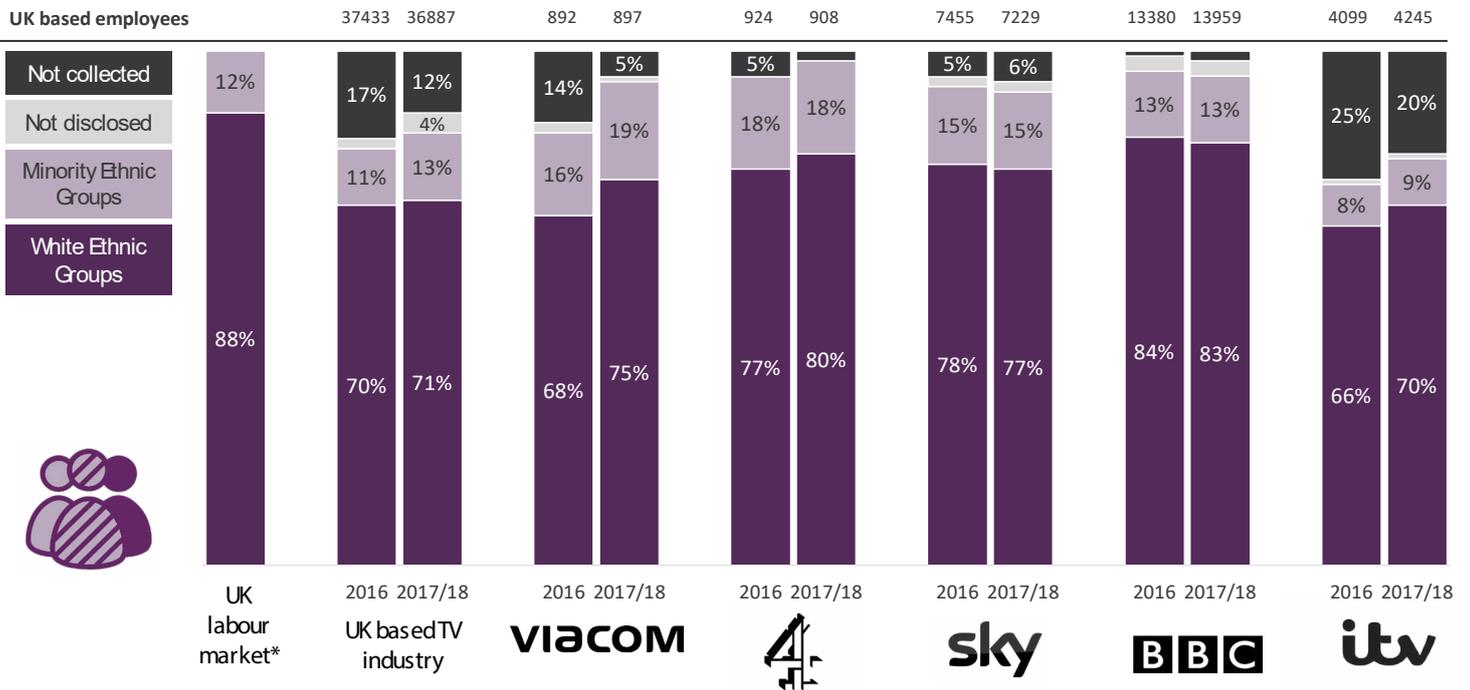
49. Disability = ONS Labour market statistics A08: Labour market status of disabled people: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/labourmarketstatusofdisabledpeoplea08> (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). Proportion of all 16-64 who are 'Harmonised Standard Definition Disabled'.

50. Such as sensory impairments for example those affecting hearing or sight, visual difference/disfigurement, learning difficulties, including people with specific learning difficulties such as dyslexia and dyspraxia.

51. Certain positive action measures are allowed in relation to other protected characteristics. See Thinking outside the box https://www.ofcom.org.uk/_data/assets/pdf_file/0030/47496/increasing-diversity.pdf for further information.

Racial Group

Figure 3: Racial group across the main five UK broadcasters – 2017/18 vs. 2016



*ONS Labour market statistics [A09: Labour market status by ethnic group](#) (Average of Apr-Jun 17, Jul-Sep 17, Oct-Dec 17, Jan-Mar 18). All employed people. Note: BBC and Sky provided us with comparable figures for 2016, so they differ from what we reported on in 2017.

Overall monitoring of ethnicity across the UK-based industry has increased year on year, with the proportion of employees with data not collected falling 5pp to 12% in 2017/18. Of the main five broadcasters Viacom, Channel 4 and ITV all saw improvements in this respect. This increase in monitoring allows for a more accurate picture of the industry to emerge.

Employees from minority ethnic backgrounds make up 13% of employees across the UK-based TV industry in 2017/18, up 2pp from 2016, but this is likely to be driven more by increased reporting. While this proportion is slightly higher than the UK labour market figure of 12%,⁵² the majority of the main five broadcasters are predominantly London based where 36%⁵³ of the London workforce is made up of employees from minority ethnic backgrounds. The UK labour force figures are the lowest comparator that the broadcasters should be reaching and, in most cases, they should be aiming for London offices to represent groups in line with the London

population.

Viacom has the highest proportion of employees from minority ethnic backgrounds at 19% while ITV has the lowest proportion (9% versus the national average of 12%). This was also the case in 2016, but the proportion of ITV's employees who didn't provide racial group information has improved from a quarter to a fifth. ITV needs to continue to improve monitoring and at a faster rate, as a fifth of its workforce are still unknown in terms of ethnic breakdown.

There is continued under-representation of employees from minority ethnic backgrounds in senior management roles across the UK-based industry, with no improvement year on year (7% this year vs. 8% in 2016). Across the five broadcasters the proportion is highest at Viacom, and lowest at ITV (as was the case last year). For the BBC, 8% of senior management roles are held by people from minority ethnic backgrounds, a similar proportion to Sky (7%).⁵⁴

52. ONS Labour market statistics A09: Labour market status by ethnic group:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/datasets/labourmarketstatusbyethnicgroupa09> (Average of Apr-Jun 17, Jul-Sep 17, Oct-Dec 17, Jan-Mar 18). All in employment.

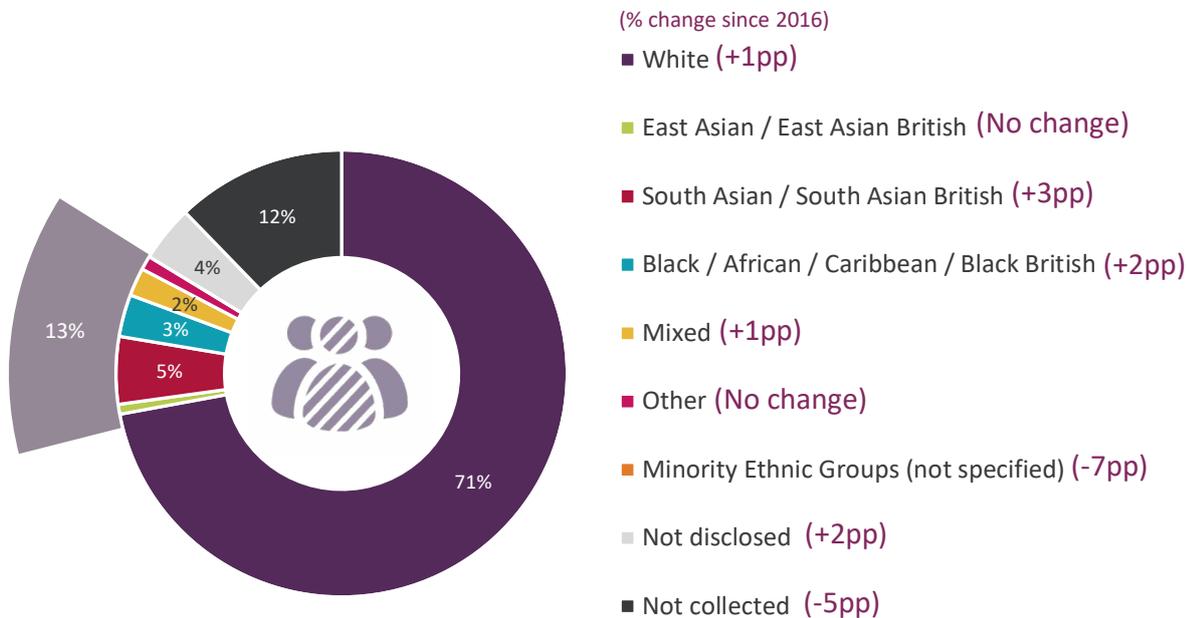
53. ONS Annual Population Survey (Apr 2017 to March 2018) – NomisWeb (<http://www.nomisweb.co.uk/>). London, aged 16-64 in employment

54. Due to small sample sizes Channel 4 cannot be reported on in this list.

Across the UK-based TV industry employees from minority ethnic backgrounds are under-represented across creative and content production roles.⁵⁵ This trend is identified across

all the main broadcasters except for Viacom, where over a quarter (26%) of creative and content production roles are held by employees from minority ethnic backgrounds.⁵⁶

Figure 4: Racial group profile of UK-based employees – 2017/18 v 2016



*Census 2011 – Figures from England & Wales, Scotland and Northern Ireland Census combined to produce a UK figure for those aged 16-64. Note: East Asian/East Asian British (Green) and Other (Pink) are both 1% so figures not shown on the chart.

On the face of it the proportion of employees from minority ethnic backgrounds across the UK-based TV industry appear to be broadly in line with the UK workforce average population, and this also looks to be the case at the combined ethnic group categories level. However, employees from minority ethnic backgrounds are not one single uniform group, and it is important to conduct more detailed monitoring and reporting of the different ethnic groups to understand whether there is true representation. There is under-representation of particular ethnic groups which is being masked by the lack of detailed reporting, as many broadcasters only collect data within broad ethnic categories (see figure above) which offer limited insight.

Across all 60 broadcasters with at least one UK-based employee, 48 provided ethnicity data of their employees beyond the categories of white vs total other ethnic groups combined, albeit with varying levels of detail. Across the main five broadcasters, only the BBC didn't provide ethnicity data broken down by individual ethnic groups,⁵⁷ and they make up 38% of all employees across the UK-based TV industry. The lack of detailed ethnicity data from the BBC together with the inconsistent and varying levels of detailed information monitored by the other broadcasters (no ethnicity data was provided by seven broadcasters) means that we are unable to look at this analysis across the industry as a whole.

55. Due to re-classification of job roles from last year we cannot compare year on year change.

56. See the [In-focus report](http://www.ofcom.org.uk/diversity) for more detail on Ofcom's online diversity hub (www.ofcom.org.uk/diversity)

57. The BBC provided ethnicity data broken down by the categories below 'BAME' but not to the most detailed level.

We have been able to look at the detailed information provided by the four main broadcasters Channel 4, ITV, Sky and Viacom but are unable to publish the data due to small sample sizes.⁵⁸ It is clear from the data that while the total proportion of employees from minority ethnic backgrounds appears to be in line with the UK working population across the industry, this is being skewed by particular ethnic groups, while others are significantly under-represented. This is particularly the case

for Pakistani and Bangladeshi employees who are significantly under-represented across all the main four broadcasters. It is important for industry to monitor this detail so that such insights can be gleaned, which are vital to developing effective equal opportunities policies to target and tackle under-representation of specific ethnic groups in order to achieve a workforce which truly reflects the UK population and audiences.

What are the main five broadcasters doing on racial group?

All five of the main broadcasters have an employee network group that brings together employees from a range of backgrounds, with a focus on improving representation of employees from minority ethnic backgrounds. The BBC, Channel 4 and Sky have targets in place for both their organisations as a whole and at senior management, while Sky also has departmental targets across a number of divisions. ITV and Viacom benchmark their figures against national labour force data⁵⁹ but haven't committed to a particular date that they aim to achieve that level of representation by. The BBC acknowledges in its annual report that the highest proportion of its employees from minority ethnic backgrounds are in its World Service (not included in the data above) and professional service groups, so it needs to do more to ensure this representation is spread across the whole of the BBC.⁶⁰ The BBC is also the only broadcaster that publishes ethnicity pay gap information, reporting a Black, Asian and minority ethnic median pay gap of -1.1% and a mean pay gap of 4% in 2018.⁶¹

The BBC and Channel 4 both conducted internal reviews on the experiences of employees from minority ethnic backgrounds in 2017/18. The [BBC review sponsored by Tim Davie](#)⁶² culminated in a report published on career progression and culture based on what employees told the BBC about their experiences. Channel 4 conducted a similar exercise and was the first broadcaster to share its findings from

internal research. Despite some challenging findings Ofcom are very supportive of the transparency and commitment demonstrated by publishing this information.⁶³ Both sets of research have informed new action plans for the year ahead and more detail on these can be found in the In-focus report. We support these comprehensive plans and look forward to an update on progress made next year.

ITV has commissioned a similar review to those carried out by the BBC and Channel 4 which we hope will provide some vital insight and help ITV to develop a more comprehensive strategy to support people from minority ethnic backgrounds. One of ITV's key initiatives is the Plus 1 initiative which is focused on overarching inclusion and diversity and is sponsored by CEO Carolyn McCall. The scheme encourages leaders and managers to look at ways to improve the diversity of their teams, with a focus on recruitment, development and succession planning, and is supported by key objectives for senior managers to embed the initiative. Over the last year ITV has continued to work with its Embrace network and with Creative Access, a community interest company that provides opportunities for paid internships targeted at young people from under-represented backgrounds.

Viacom's Fusion Employee Resource Group informs and celebrates cultural diversity while its listening groups offer a platform for

58. More detail on this can be found in the [methodology document](#).

59. Viacom statistics are tracked against the numbers held by the Employers Network for Equality and Inclusion (ENEI)

60. BBC Annual Report 2017/18, page 80.

http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/reports/pdf/bbc_annualreport_201718.pdf

61. http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/reports/gender_pay_report_2018.pdf

62. <http://downloads.bbc.co.uk/mediacentre/bame-career-progression-and-culture-report.pdf>

63. <http://www.channel4.com/info/press/news/alex-mahon-speech-to-isba-annual-conference-6th-march-2018> - mentioned in Alex Mahon speech and reported by Broadcast 5 Dec 2017 'C4 study uncovers BAME discontent' <https://www.broadcastnow.co.uk/channel-4/c4-study-uncovers-bame-discontent-/5124737.article>

employees to share their experiences of what it is like being from a minority ethnic group within Viacom UK, providing insight to HR and the senior management team on an ongoing basis. Viacom also partners with the Insider Group which aims to encourage employees from minority ethnic backgrounds to network and debate issues facing them in the TV industry.

Sky has several initiatives in place to help its departments meet the targets set. This includes supporting leaders, managers and employees

Recommendations

▪ Set targets at senior level

Minority ethnic representation at senior levels has shown no improvement year on year. If not already in place senior level targets, aimed for a particular delivery date, can aid focus and demonstrate a clear public commitment to improving representation that can help to inspire a more inclusive culture.

▪ Run focus groups and develop action plans

Ofcom supports the comprehensive internal reviews and action plans underway at the BBC and Channel 4. To improve the representation of employees from minority ethnic backgrounds

Nations and regions

We also asked the main five broadcasters what arrangements they had in place that specifically targeted the nations and regions of the UK. Channel 4 has several such arrangements including its 4Talent Hubs, a production training scheme based in Glasgow and the Alpha Fund which provides financial support for diverse and emerging production companies based in the nations and regions. The BBC's Hilda Matheson Women into leadership scheme is targeted at women in the nations and regions, and the BBC's Writersroom has expanded to have bases in the nations. ITV has set up a northern diversity hub and Sky employs people from 80 different nationalities and has employees across the UK in its wider business.

Viacom is the only broadcaster to monitor the regional origins of its employees, asking which

to become more comfortable talking about race by providing access to toolkits and facilitators, to get the conversation going about what more needs to happen to improve engagement and belonging. Sky conducted an end to end review of its attraction and recruitment processes⁶⁴ to ensure bias is engineered out of them, and a similar review is underway to ensure people from minority ethnic backgrounds progress through the organisation at the same rate as employees from white ethnic groups.

and promote an inclusive culture in which they can thrive and succeed, an overall strategy is required that sets out a range of commitments alongside a clear target for a specific delivery date.

▪ Collect detailed data and consider individual ethnic groups

As broadcasters achieve an employee diversity make-up representative of the national population, they should also consider how individuals and smaller demographic groups are supported to provide a truly inclusive culture alongside opportunities for progression within the organisation.

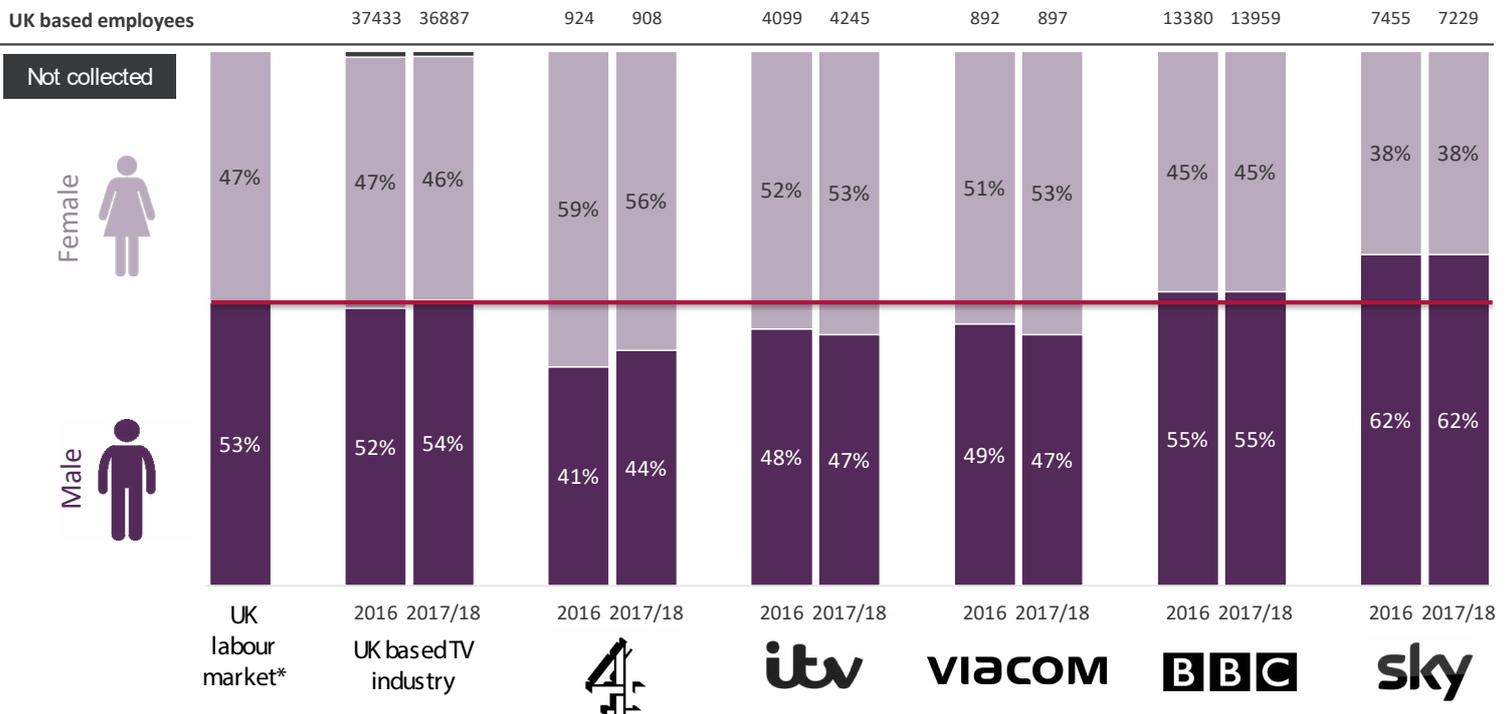
Local Authority its employees grew up in. More than 80% of Viacom employees provided data and of the employees who provided data, 78% grew up in the UK, with 13% from Europe and 9% international. The three local authorities most commonly cited were Essex (8%), Surrey (6%) and Kent (5%). Viacom aims to make its intern intake as regionally diverse as possible.

More information on broadcaster initiatives targeted at the nations and regions and S4C's information on employees' Welsh language ability can be found in the total industry report available on Ofcom's online diversity hub.

64. particularly in its customer facing team

Gender

Figure 5: Gender across the main five UK broadcasters – 2017/18 vs. 2016



*ONS Labour market statistics [A09: Labour market status by ethnic group](#) (Average of Apr-Jun 17, Jul-Sep 17, Oct-Dec 17, Jan-Mar 18). All employed males and females (employees and self-employed). Note: BBC and Sky provided us with comparable figures for 2016, so they differ from what we reported on in 2017.

Gender profiles were complete for all of the main five broadcasters, as was the case last year. Across the UK-based TV industry, the proportion of female employees is in line with the UK workforce population and this has remained stable year on year. Of the main five apart from at Sky and to a lesser extent the BBC, female employees are either represented in line with the UK average workforce figure or above. Sky's workforce profile hasn't changed year on year and is more male skewed (62%) than the UK workforce average (53%).

Women continue to be under-represented in technology and engineering roles where men dominate, with only 25% of roles held by women. Women also appear to be under-represented

to a lesser extent across creative and content production roles, at 43%.⁶⁵

Though not something we collected information on, it is worth noting for context that while Sky has the lowest percentage of women in its organisation it has also reported the lowest gender pay gap⁶⁶ of the main five.⁶⁷ Conversely Channel 4 has the highest percentage of women but also reported the highest gender pay gap in 2017. Several broadcasters, Channel 4 included, have acknowledged the need to ensure women are represented at all levels of their organisations, including the most senior, and have plans in place to improve the representation of women in senior levels and reduce the gender pay gap.^{68 69}

65. See the [In-focus report](#) for more detail on job roles by gender on Ofcom's online diversity hub at www.ofcom.org.uk/diversity

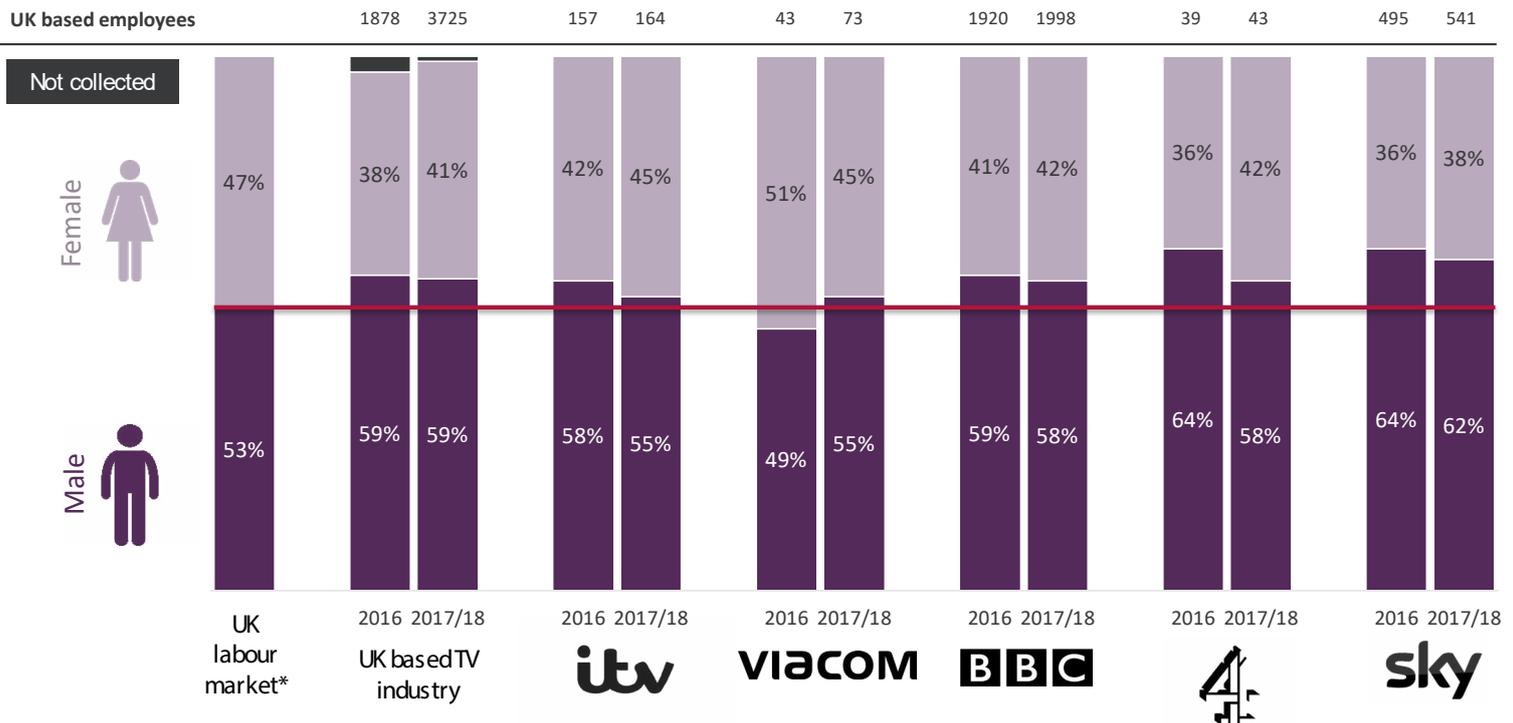
66. For further information on which companies are required to publish this information and in what format please see <https://www.gov.uk/guidance/gender-pay-gap-reporting-overview>

67. <https://gender-pay-gap.service.gov.uk/>

68. https://s3-eu-west-1.amazonaws.com/c4-cp-assets/corporate-assets/2018-03/190318%20-%20Channel%20%20-%20Gender%20Pay%20Report%202017_FINAL.pdf - since this report Channel 4 has announced that its gender pay gap figure for 2018 has reduced.

69. Gender pay gap information reported on by the main five can be found in the [In-focus report](#).

Figure 6: Gender among senior management – 2017/18 vs. 2016



*ONS Labour market statistics [A09: Labour market status by ethnic group](#) (Average of Apr-Jun 17, Jul-Sep 17, Oct-Dec 17, Jan-Mar 18). All employed males and females (employees and self-employed). Note: BBC and Sky provided us with comparable figures for 2016, so they differ from what we reported on in 2017.

The proportion of women at senior management level has increased year on year across the UK-based industry, at 41% up 3pp. Although this proportion has decreased for Viacom (down 6pp to 45%), it still (along with ITV) has the highest proportion of women in senior management at 45%. Despite this, its figures are still lower than the proportion of women in the

workforce. At the BBC and Channel 4, 42% of senior management roles are held by women. The latter has seen the greatest increase among all the main five broadcasters (+6pp). While Sky has the lowest percentage of women in senior management roles at 38% (as was the case last year), the figure has increased by 2pp.

What are the main five broadcasters doing on gender?

The data findings are supported by broadcasters' work to promote equal opportunities in employment for women. Both Channel 4 and the BBC have conducted internal research in 2017/18, working on developing new plans for improving female career progression. The BBC's review "Making the BBC a great workplace for women" and Channel 4's Women's Development Programme reviewed key factors, such as what the perceived barriers to progression are and

how women feel about their career development opportunities. Sky's Women in Leadership programme has several different elements including clear departmental targets, executive champions, considering the language used in job descriptions, insisting on gender balanced shortlists, formal sponsorship and development support for women and networking events. Sky was also featured in the Times Top 50 employers for Women for the third year running.

Viacom notes its succession plans are gender balanced and supported with development plans where required. Its recruitment panels are also gender balanced and the women's network 'HERE' supports female career development. ITV was highlighted in the [2017 Hampton Alexander Report](#)⁷⁰ as being one of the ten top performing companies, in terms of percentage of women on the board and in direct report roles. ITV also runs the Plus 1 initiative and has held career development workshops by Shine for Women, focusing on confidence and influencing.

All of the main five broadcasters have women focused employee networks and most of the groups engage regularly with senior management to keep track of progress and explain challenges that still exist. Most of the broadcasters mentioned promotional events that were arranged around supporting women in the workplace, such as Viacom's events around International Women's Day. The broadcasters also pointed to schemes and arrangements for areas such as flexible working or mentoring that further support women and men in the work place.

Recommendations

▪ Senior management targets

Sky, Channel 4 and the BBC all have in place targets to improve representation of women at senior levels. We recommend that all broadcasters set specific targets with a planned delivery date to focus work and demonstrate commitment. This can be more effective than just committing to being representative of the national workforce/population which can change over time, and work can become less focused without a target date. Having a more attainable target at senior level that can then be increased when reached, can help to monitor progress rather than having targets too far from the existing workforce which may seem unrealistic.

▪ Continued focus on progression schemes and strategies

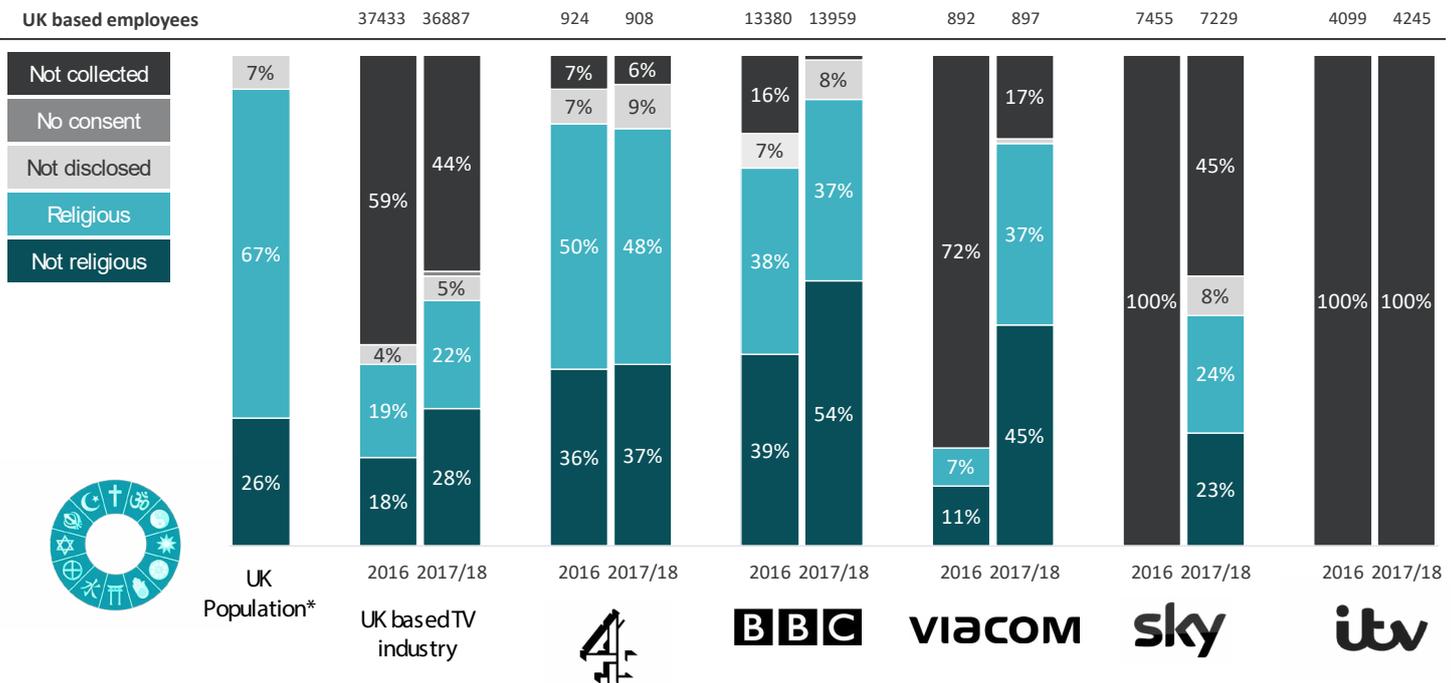
Some of the broadcasters have begun to conduct colleague discussions and reviews and put progression plans and schemes in place as a result. This kind of focused work can be very valuable if broadcasters are under-representing women at senior level or want to maintain current representation. We hope to see continued improvements in senior representation next year as broadcasters' plans are fully implemented.



70. This independent review by Sir Philip Hampton and the late Dame Helen Alexander, commissioned by the government, looks at ways to ensure that talented women at the top of business are recognised, promoted and rewarded. The focus of the review is on senior women below the company board. The initial report was published on 8 November 2016. The 2017 report was published on 9 November 2017: https://ftsewomenleaders.com/wp-content/uploads/2017/11/Hampton_Alexander_Review_Report_FINAL_8.11.17.pdf

Religion or Belief

Figure 7: Religion across the main five UK broadcasters – 2017/18 vs. 2016



*Census 2011. Note: BBC provided us with comparable figures for 2016, so differs from what we reported on in 2017.

There has been an increase in overall monitoring of this characteristic across the UK-based industry, with a reduction in the proportion of employees with no data collected from 59% to 44%. Last year two of the main five broadcasters provided data for more than half of their employees on religion, and this has now increased to four out of the five. Only ITV didn't supply any data (it has told Ofcom that it plans to introduce this later in 2018/2019). Religion or belief remains the characteristic with the highest proportion of employees for which no data are available. For many people religion is a defining part of their life and is often closely tied to differences in ethnicity and cultural expectation. This is an important area of understanding for promoting diversity and inclusion across an organisation and ensuring accurate on-screen portrayal that reflects audiences' own experiences and fosters cultural understanding.

Across the UK-based industry 22% of employees self-define as religious, compared to 28% not religious. Both the BBC (54% vs. 37%) and Viacom (45% vs. 37%) have more employees who self-define as not religious than religious, with over

half of BBC's employees stating so. In contrast, Channel 4 has a higher proportion of employees who self-define as religious compared to not religious (48% and 37% respectively), while Sky is evenly split (24% religious and 23% not religious). Compared to the UK population average, all of the main five broadcasters except for Sky appear to have a greater proportion of employees who self-define as religious, and a significantly lower proportion of employees who self-define as religious.⁷¹

Detailed monitoring is important to understand the profile of different religions across the industry and this has also improved. Last year 16% of UK broadcasters monitored and provided Ofcom with this detailed information, and this year the figure has increased to 27%, but the industry needs to do more with close to three quarters of UK-based broadcasters not providing this detail.⁷² Analysis of the breakdown of the different religious groups shows Christianity to be the dominant religion across the UK-based industry and across each of the four main broadcasters, which is the case across the UK population.

71. Although we have chosen to use the Census figures for religion, we are aware that other studies such as the NatCen British Social Attitudes survey 2017 suggest that 'non-religious' has now surpassed 'religious' in the UK.

72. The four broadcasters who provided information on religion also provided detailed breakdowns.

Across the UK population Islam is the second largest religion held by 4% of the population, but Muslim employees appear to be under-represented across the UK-based industry, making up only 1% of employees. This increases to 2% across the four main broadcasters for which we have data⁷³, but is still less than half the UK population average of 4%. Across the UK

population 1% of adults self-define as practising Hinduism; the proportion of employees across the main four broadcasters with data is 2%. Less than half a percent of the UK population self-define as practising Judaism; the proportion of employees across the four main broadcasters who self-define as belonging to the Jewish faith is 1%.

What are the main five broadcasters doing on religion or belief?

Religion and belief is not an area of particular focus for any of the main five broadcasters, but they do have arrangements in place to promote equal opportunities in this regard. Channel 4 has a religion and belief policy which line managers are asked to familiarise themselves with. ITV has worked with its Embrace Network to consult on new Ramadan guidance for managers and colleagues. Viacom's Fusion network celebrates cultural difference by marking religious festivals

and important cultural dates to help foster inclusivity, as well as securing speakers from different religious backgrounds for internal talks. Sky publishes a notable dates calendar, provides faith rooms and run a series of events and restaurant takeovers throughout the year to raise awareness of a range of different religious festivals and the BBC also notes that multi faith prayer rooms are available at its main sites.

Recommendations

▪ Improved monitoring/encourage reporting

Religion or belief remains one of the areas with the lowest employee declaration rates across the main five broadcasters, suggesting it is given less focus in internal communications. For many people religion is a defining part of their life and should therefore be given greater focus. Better monitoring is essential to ensure that people from a range of religions and beliefs are represented in the broadcast industry and can help to support accurate on-screen portrayal that reflects audiences' own experiences and fosters cultural understanding.

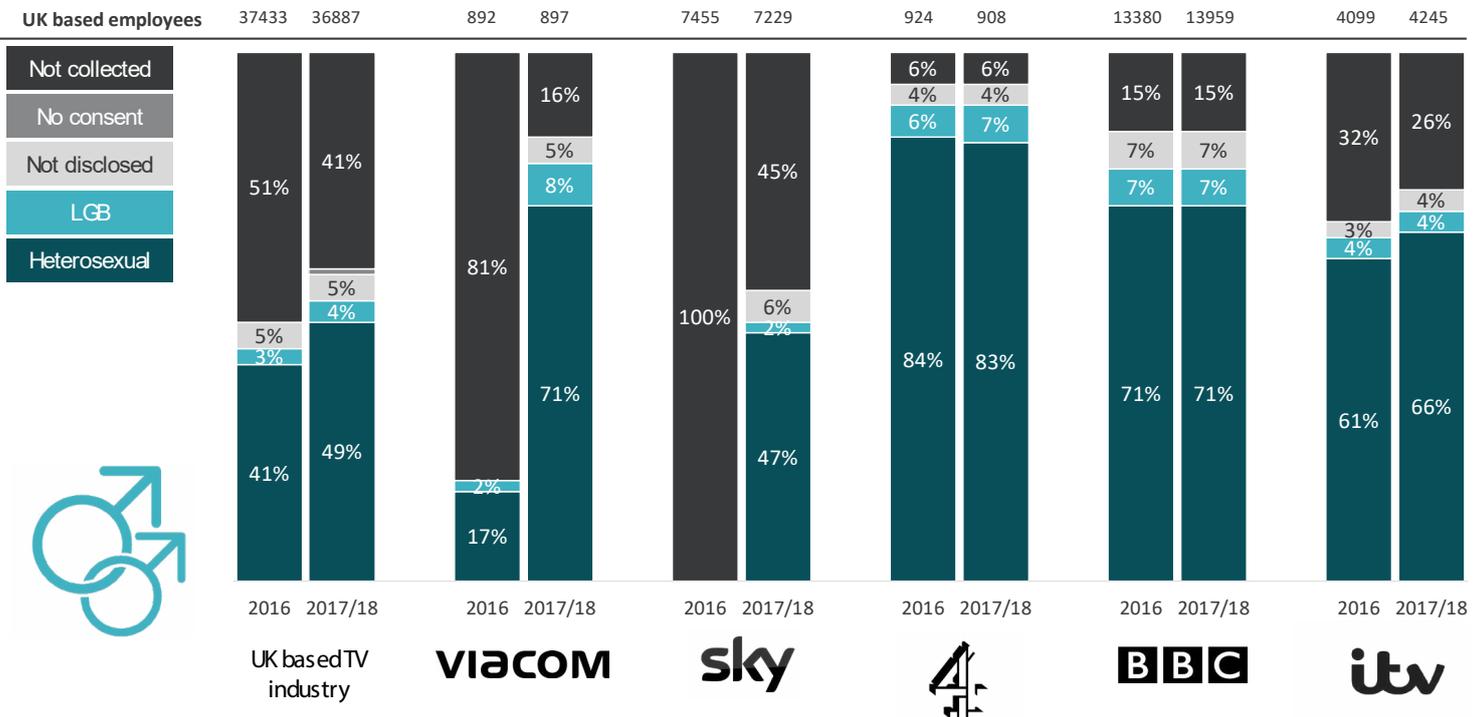
▪ More consideration of different religions and culture to promote inclusion

The work broadcasters have done to promote inclusion in this area is positive and celebrating and sharing information on different religious events is an excellent way to promote a sense of community and understanding. Broadcasters should ensure these are more consistent and that religion and belief is something all line managers are trained to be mindful of when supporting employees.

73. Detailed information on religion was provided by BBC, Channel 4, Sky and Viacom.

Sexual Orientation

Figure 8: Sexual orientation across the main five UK broadcasters – 2017/18 vs. 2016



Note: BBC provided us with comparable figures for 2016, so differs from what we reported on in 2017. A UK population bar hasn't been included for benchmarking as we don't believe there to be a reliable/robust figure to use. According to ONS Sexual identity (2016) LGB stood at 2%, which we believe to be too low. Research from Dalia has UK as 6.5%:

<https://daliaresearch.com/counting-the-lgbt-population-6-of-europeans-identify-as-lgbt/>

This year there has been an increase in data collection across this characteristic and the proportion of employees for which data aren't collected has reduced across the total UK-based industry by 10pp year on year. This year all the main five broadcasters provided data on sexual orientation and the reduction in data not collected continued across Viacom, Sky and ITV. (The data gap across the BBC remains at 15% of employees year on year and Channel 4's 'not collected' proportion has also remained the same at 6%, but they already had a high collection rate at 94%.)

While there has been a positive increase in monitoring, it's important to stress that more can be done. Data is unavailable for over 15,000 employees, which equates to two-fifths of the UK-based industry. Close to half of Sky's employees are not monitored, and neither are just over a quarter of ITV's.

Across the UK-based industry 4% of employees identified as lesbian, gay or bisexual (LGB), which is an increase on the figure reported last year. Across the main five broadcasters, only Viacom and Sky showed increases from 2016 but this was primarily driven by the increase in data provided. The proportion of the employees who self-define as LGB was lowest for Sky (2%), followed by ITV at 4% (the same proportion as last year). The figure was similar for Viacom (8%), and Channel 4 and the BBC (7%).

Not only has there been an increase in monitoring across this characteristic, but the detail of the monitoring has also improved across the main five broadcasters. Last year only BBC and Viacom monitored this level of detail, but this year all except ITV conducted detailed monitoring. In terms of the UK industry as a whole, detailed monitoring is still lacking, as last year only 20% of UK industry broadcasters provided detailed sexual orientation information. This year the proportion has remained the same.

What are the main five broadcasters doing on sexual orientation?

All of the main five broadcasters focus their work on supporting the LGB community through their respective networks. Through its Pride Network and individually, the BBC has been hearing from its LGBT colleagues, who explained that they don't always feel the data shares the whole picture and they don't always feel represented. Specifically, it was found that when they drill down the BBC hasn't always fully captured discrepancies within these diverse groups, particularly in terms of progression and opportunities for transgender and lesbian employees. These findings tie with Ofcom's data across the industry which shows lesbians to be the least represented group within the 'LGB' grouping.

ITV Pride is ITV's longest running employee network at six years old and recently appointed a board sponsor. Channel 4's network 4Pride has an area on the Channel 4 intranet where they share experiences in 'This is Me' videos as well as details of regular meetings, events

and resources. Viacom also sponsors the LGBT awards, with the executive champion of its Emerge employee network participating on the judging panel.

Sky's LGBT network was credited as a key part of Sky being recognised at number 29 in the [Stonewall Workplace Equality Index in 2018](#),⁷⁴ an impressive increase from 162 in 2017. This puts it as the highest ranked media organisation in the UK. ITV will be entering the index next year to measure its performance and receive recommendations. All five broadcasters are part of the [Stonewall Diversity champions](#)⁷⁵ programme.

All of the main five take part in Pride events with ITV attending several across the country including Belfast for the first time in 2017. Sky attended ten Pride events throughout the UK and Ireland, and over 60 Viacom employees took part in the Pride London festival with the InterMedia Pride float.

Recommendations

▪ Improved monitoring/encourage reporting

In addition to the positive work the main five broadcasters are doing with Stonewall and the employee network groups, broadcasters need to do more to continue to encourage more comprehensive and detailed reporting and to ensure that people of all sexual orientations feel supported.

▪ Cross broadcaster networks collaboration

Given the focus on employee networks, it may be of benefit to encourage more cross broadcaster collaboration in this area and to have cross industry events that help to promote even greater industry-wide awareness of the challenges that may be faced by LGB people in the workplace and how these can be tackled.

74. <https://www.stonewall.org.uk/full-list-top-100-employers-2018>

75. <https://www.stonewall.org.uk/diversity-champions-programme>

Gender Reassignment⁷⁶

All five of the main broadcasters have a transitioning at work policy or guidance. ITV, Sky, the BBC and Viacom also referenced work with Stonewall, whether providing internal training, adding monitoring questions to surveys or consulting on the arrangements set out in transitioning policies. Channel 4 is rolling out a trans allies programme and has done research into transphobia and its impact.

All of the main five broadcasters are doing positive work to promote understanding of gender reassignment and the trans community. This work includes sharing information on the importance of using the correct pronouns, not having formal dress codes, working with employee networks to promote events such as transgender day of visibility and setting up information sharing events such as ITV's 'All about Trans' session.

Recommendations

- **Continued engagement and support**

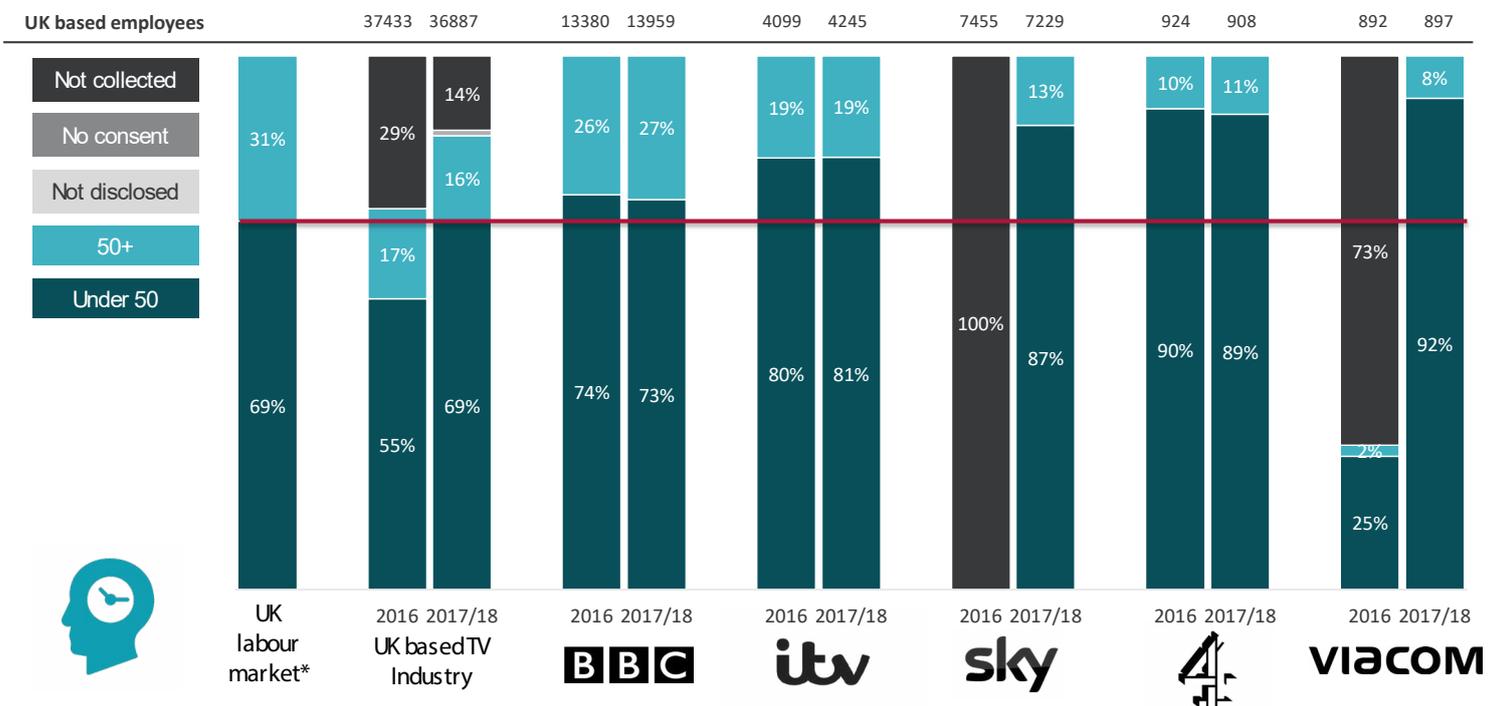
The main five broadcasters are doing good work to promote inclusion for people from the trans community or employees considering or undergoing gender reassignment. We recommend that all broadcasters consider putting in place similar policies or guidance and speak to Stonewall for further advice on these.



76. Our questionnaire asks for information on any arrangements broadcasters have in place related to gender reassignment. We ask for information on this separately to that on sexual orientation but as the LGBT community works closely together, we have reported on this information here.

Age

Figure 9: Age across the main five UK broadcasters – 2017/18 vs. 2016



*ONS Labour market statistics

[Table A05: Labour market by age group: People by economic activity and age \(seasonally adjusted\).](#)

(Average of Apr-Jun 17, Jul-Sep 17, Oct-Dec 17, Jan-Mar 18). All employed people. Note: BBC provided us with comparable figures for 2016, so differs from what we reported on in 2017.

Data monitoring on age has improved across the UK-based industry with over a 50% reduction in the number of employees for which no data were collected – it now stands at 14%. This year complete data on age were provided by all five of the main broadcasters, compared to only three last year.

Across the UK-based industry 16% of employees are aged 50 or over, compared to 31% across the

UK workforce population. Three of the main five broadcasters are significantly younger - Viacom has the youngest workforce with 8% of their employees aged 50 or over, followed by Channel 4 at 11% and Sky at 13%. Nineteen percent of ITV's employees are aged 50 or over, slightly above the industry average; along with the BBC they have the oldest workforce with 27% of employees aged 50 or over.

What are the main five broadcasters doing on age?

While all the main five emphasise that they are committed to equal opportunities, and are committed to equality across age groups, only Viacom mentioned a specific scheme. In 2018 Viacom began offering work experience to candidates from [Community Time Camden](https://communitytimecamden.wordpress.com/),⁷⁷ a local organisation aimed at creating time and skills 'exchange' which offers employment support to people over 50. ITV has several initiatives in place to attract new young talent

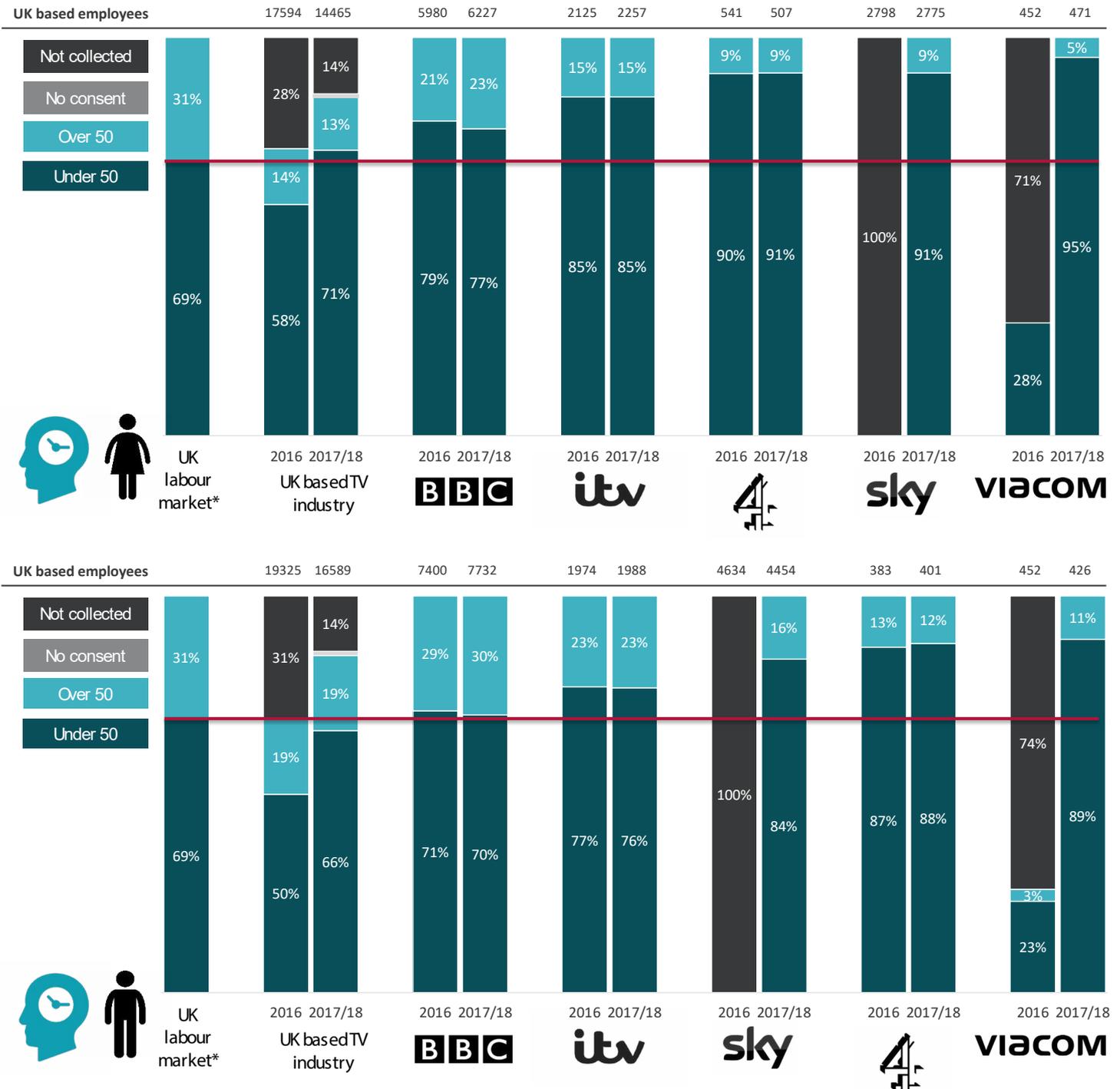
and while its apprenticeships have no age limit, they tend to attract school leavers.

More information on broadcasters' flexible working arrangements can be found on page 30 of this report and in the In-focus report. Sky referred to these in its response to age, acknowledging that caring responsibilities are life changing and multi-generational.

77. <https://communitytimecamden.wordpress.com/>

Age by Gender

Figure 10: Age by gender across the main five UK broadcasters – 2017/18 vs. 2016



*ONS Labour market statistics:

[Table A05: Labour market by age group: People by economic activity and age \(seasonally adjusted\)](#)

(Average of Apr-Jun 17, Jul-Sep 17, Oct-Dec 17, Jan-Mar 18). All employed males/females. Note: BBC and Sky 2017/18 figures are not comparable to 2016 (faded bars) due to changes in how their overall UK-based employee figures have been defined

Across the UK-based industry 13% of all female employees are aged 50 or over, compared to 19%⁷⁸ of all male employees. The proportion of women aged 50 or over in the UK workforce population is 31% and this is the same proportion for men. Except for the BBC and ITV, the other main broadcasters all employ a lower proportion of females aged 50 or over, with Channel 4 and Sky both at 9% and Viacom with the lowest proportion at 5%.

All of the broadcasters employ a greater percentage of males aged 50 or over than females, and a greater percentage of females

aged under 50 than males. Across the UK-based industry there is a 6pp difference in terms of the proportion of males aged 50 or over and females employed (19% vs 13%).

Across all the main five broadcasters except for Channel 4 (where the difference is below the UK-based industry average), the difference in the proportion of older men compared to older women is higher. ITV has the highest difference and employs 8pp more males aged 50 or over than females. BBC and Sky both show a 7pp difference, and Viacom a 6pp difference.

Recommendations

- **Consider barriers and additional support that might be needed for older people**

As the data shows a younger workforce across the main five broadcasters than in the national labour force population, broadcasters should ensure that they are confident older people are offered equal opportunities.

- **Hold focus groups for older women and review practices where there is under-representation**

Given the proportion of women over 50 is also particularly low, broadcasters should consider holding focus groups such as those used in relation to other characteristics to understand why this might be the case and whether this group of employees needs additional support to take advantage of employment opportunities.

Parents, carers and flexible working

Promoting diversity successfully can involve the need for employees to work flexibly or to be supported in their caring responsibilities. This is something recognised by the main five broadcasters and all of them have some form of flexible working or family friendly policy. Channel 4's covers a range of areas including shared parental leave, emergency leave to care for dependants and check ins during maternity leave.

ITV also has some specific support schemes for parents (such as maternity returner workshops and paternity and enhanced maternity, paternity and shared parental pay) and set up a new network ITV Balance which had its formal launch in June 2018. Similarly, Viacom has a parenthood employee group which offers coaching for

returners who have taken any enhanced period leave. The broadcaster offers matching pay for parents taking shared parental leave and provides paid leave for those needing to care for dependants. Sky also has a colleague network for parents and offers a range of support arrangements such as free emergency family care sessions, emergency childcare and back up adult or elder care for when regular family care arrangements fall down.

Initiatives and supportive policies in these areas can be very valuable to promote inclusion for all employees and to support employees from all backgrounds, particularly those who may be under-represented in the industry.

78. For both male and female age by gender data information, there is no data collected for 14% of employees so these figures could be higher.

Social Mobility

In our report last year, we made clear that while not a protected characteristic under the Equality Act 2010, understanding the make-up of the TV industry in terms of social and economic background of the workforce is important.

We made a commitment to work with broadcasters to understand how they are moving forward on collecting information in this area and what challenges they've identified.

Meeting with the main five broadcasters

Ofcom hosted a social mobility roundtable event for the main five broadcasters on 21 March 2018 to facilitate collaboration on social mobility. The session encouraged the broadcasters to share information and learnings on what their organisation is doing about social mobility and what work, if any, is underway or planned around attempting to capture and measure the social mobility of their employees.

It was clear that some broadcasters have only recently begun to look at this area, while others are further advanced in their social and economic diversity work and were able to provide valuable insight to those with less developed plans. Most had already engaged directly with the Bridge Group, a charitable policy association researching and promoting social and economic diversity and equality, in order to develop their understanding in this area.

Social mobility vs. social and economic background?

Some of the key areas raised at the roundtable session centred around terminology, social mobility vs social and economic background, how they differ and what exactly industry should be trying to monitor. It was felt that social and

economic background was the measure which industry could focus on initially as this could be collected anonymously, whereas to track social mobility broadcasters need to make data identifiable to track progression of individuals.

How to measure social and economic background?

Agreeing the best indicator in terms of the question(s) to ask employees was discussed in detail and some of the broadcasters had already begun to collect information. Only the BBC has collected and published data relating to the social and economic background of its employees, but research and monitoring has also been undertaken in varying forms by Channel 4, ITV and Viacom. Sky is also keen to begin monitoring but is waiting on an agreed question to take forward. There was consensus that the best single indicator was found to be the question which asks the individual what their parental occupation was when they were aged 14.⁷⁹ Ofcom recommends that all broadcasters begin with this question as a key indicator to begin collecting data on social and economic background. There was also agreement at the session that more discussions were needed on the job roles to be used in the 'drop down'

options for completing this question so we will continue these discussions soon.⁸⁰ We are also aware that social and economic background can be harder to consider for broadcasters with a larger proportion of employees based or having grown up in countries outside the UK, we will therefore consider this and the views of broadcasters with a diverse range of nationalities in our discussions.

We are supportive of the broadcasters' continued collaboration amongst themselves and with the Bridge Group. Some key guidance from the Bridge Group on why it's important to collect information on social and economic background, what questions can provide useful evidence of social and economic backgrounds, and how the information can be used effectively to develop inclusive strategies, is covered in the In-focus report.⁸¹

79. Please tell us about the occupation of your main household earner when you were aged 14. (drop down options e.g. Modern professional occupation, routine manual and service occupations etc.)

80. This can be found in the section on social mobility in the [In-focus report](#) at www.ofcom.org.uk/diversity

81. Please see the ['In-focus' report](#) on Ofcom's diversity hub at www.ofcom.org.uk/diversity

Broadcaster initiatives

The broadcasters shared a range of initiatives to support entry from people of different backgrounds and have since provided further information in response to our questionnaire.⁸² Both the BBC and Channel 4 have begun to analyse the data collected and are developing recommendations or a strategy for how to increase the social diversity of their organisation, and highlighting the importance of having an inclusive culture to facilitate this. The BBC conducted one to one interviews with employees from low-income backgrounds to understand career progression rates and experiences, while Channel 4 worked with LSE academic Sam Friedman to research social and economic diversity with people working both within the organisation and in the wider production industry.

Both broadcasters also have a number of initiatives in place, such as the BBC's training courses in London and Salford for school students from socially diverse backgrounds (developed with the Sutton Trust) and Channel 4's grass roots outreach programme set up with 4Talent, which involves six pop up events around the country in deprived areas to encourage people to consider working at Channel 4 and in the creative industries. In-depth research commissioned by Channel 4 found that Channel 4 and the television production industry are highly socially exclusive, with similar levels of social exclusivity to professions such as doctors, journalists and lawyers. The high-level take-outs from this research were shared at the Edinburgh

TV Festival and can be found in the In-focus report.

ITV has signed the Social Mobility pledge⁸³ and is a founding member of the Social Mobility Business Partnership (SMBP), an award-winning scheme that promotes social mobility in business, especially in the legal and accountancy professions.⁸⁴ Several broadcasters have funded apprenticeships or intern schemes such as the Viacom Breaks Internship which targets social mobility 'cold spots' and is based on 'education blind' applications which assess skills, competencies and creativity but not level of qualification. Sky invited over 20,000 young people from across the UK's social and economic spectrum to attend a Sky Skills Studio learning experience last year⁸⁵ as part of [Sky Academy Studios](#).⁸⁶ There are also several new plans underway such as Channel 4's plan to introduce a mentoring programme that pairs people from the same social and economic background and Viacom's plan to launch a rental deposit loan scheme for all interns next year to further encourage take up and remove all barriers to entry.

In relation to promoting equal opportunities in the nations and regions, Viacom is the only broadcaster to monitor the regional origins of employees as noted above. This gives an interesting insight into the makeup of a UK broadcaster and highlights the importance of work to promote opportunities to people outside London and the South East.

82. See the [In-focus report](#) on the main five broadcasters on Ofcom's diversity hub at www.ofcom.org.uk/diversity

83. Spearheaded by the Rt Hon Justine Greening MP, to enable people of all backgrounds reach their full potential in the workplace. The pledge asks businesses and employers to commit to three steps. Firstly, partnering with schools, secondly, giving access to apprenticeships or work experience opportunities to disadvantaged young people and thirdly, having open recruitment practices that promote a level playing field for candidates.

84. The scheme offers week-long work insight and skills programmes for Year 12 students. Over the week the students spend a day at four different high-profile businesses, including ITV, and a day run by a professional sports club to learn about the psychology of resilience.

85. Teachers bring classes of students to Studios in Livingston or Osterley for a half day "where the power of TV and innovation is used to open young minds, develop their creativity, collaboration and communication, as well as to inspire them to consider a career in broadcasting".

86. <https://teachers.sky.com/skills-studios>

Industry Collaboration

Social mobility is just one of the areas where broadcasters have begun to demonstrate how effective collaboration can be in driving change. Ofcom is committed to continuing to facilitate broadcasters working together in all areas of diversity. Since the first report was published Ofcom has engaged regularly with a range of interested groups including each of the main five broadcasters, some other large international broadcasters such as Discovery and Turner, the Commercial Broadcasters Association (COBA), the Federation of Entertainment Unions, the Campaign for Broadcast Equality, the British Film Institute (BFI) and the Creative Diversity Network (CDN).

Following discussions with some of the main broadcasters where we encouraged greater collaboration across employee networks, a number of broadcaster employee groups focused on improving cultural understanding and supporting employees from minority ethnic backgrounds have begun to meet regularly and share ideas, including Ofcom's [RACE network](#).⁸⁷ We are supportive of this type of cross network engagement and hope to see it increase across different network groups and broadcasters.

Ofcom's CEO Sharon White also hosted a discussion for the chief executives⁸⁸ of the main broadcasters to discuss their commitment to improve the diversity of their organisations and the challenges they have faced so far in doing so. This open and frank conversation was a valuable session that the group hopes to repeat in future to continue to facilitate effective leadership from the top of these organisations. The chief executives also took part in our video about their diversity work, demonstrating further commitment.

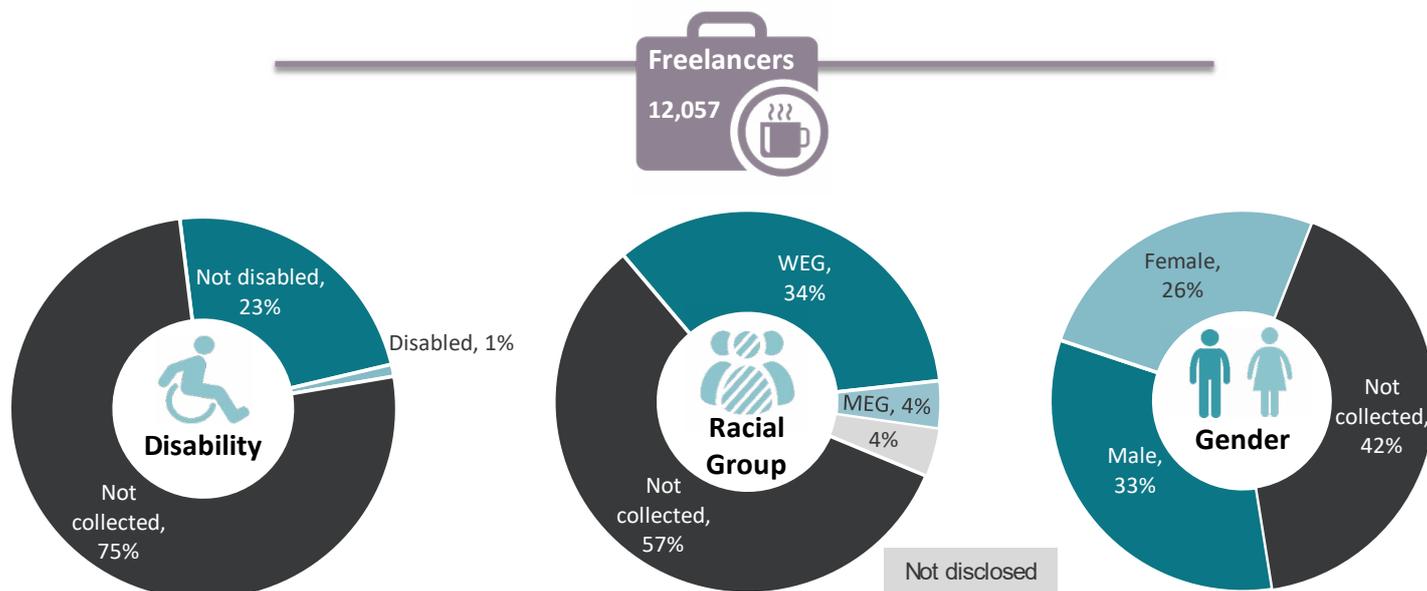


87. <https://www.ofcom.org.uk/about-ofcom/jobs/benefits/staff-networks-groups>

88. Director General for the BBC

Freelancers

Figure 11: Freelancer profiles among the main five UK broadcasters



The main five broadcasters employ 12,057 freelancers in total across the industry. We asked broadcasters (on a voluntary basis) to provide basic breakdowns for the three characteristics gender, racial group and disability, but only the BBC⁸⁹ was able to provide data on all three. Sky was able to provide data on gender and ten percent of racial group.⁹⁰ Therefore, the data are clearly limited due to low response rates, which is also the case across the UK industry. The BBC employs 5,115 freelancers, ITV employs 4,461, Channel 4 employs 545, Sky employs 120 and Viacom employs 1,816.

As shown in figure 11, the data provided represents fewer than half of employees for racial group and disability status, and just over three-fifths for gender. The proportion of data not collected being 42% for gender, 57% for racial group, and 75% for disability.

The proportion of females (26%) amongst freelancers is lower than that for males (33%). Four percent of freelancers self-defined as being from minority ethnic backgrounds (compared to 34% who self-defined as being from white ethnic groups), and just one percent as disabled (compared to 23% not disabled).

Both Viacom and Channel 4 flagged that there are considerable technical challenges in recording freelancer information as they do not have access to central HR systems due to licensing and related constraints, but both have been reviewing the feasibility of this. Channel 4 is considering how it might understand more about its freelancer population through a separate anonymous survey that asks the same questions as that of employees.

We are aware that our data captures very low numbers of on-screen talent, as the majority are not employed directly by the broadcasters. Some on-screen talent will have been monitored by [Project Diamond](#)⁹¹ if involved in content produced for one of the main five broadcasters. However, we expect that there are still a large number of freelancers working both on and off-screen that are not being captured or involved in equal opportunities strategies across the creative industries.

Though the broadcasters' regulatory obligations under their licence conditions only extend to promoting equal opportunities in relation to employment, Ofcom is keen to facilitate further discussions, across broadcasting and the wider

89. The BBC told us it collects diversity information on freelancers across all the protected characteristics we ask broadcasters to provide employee data on.

90. Sky told us it currently tracks diversity information for anyone employed on a fixed term contract and therefore on Sky's payroll. Data was collected for all freelancers on gender but only a small proportion on racial group.

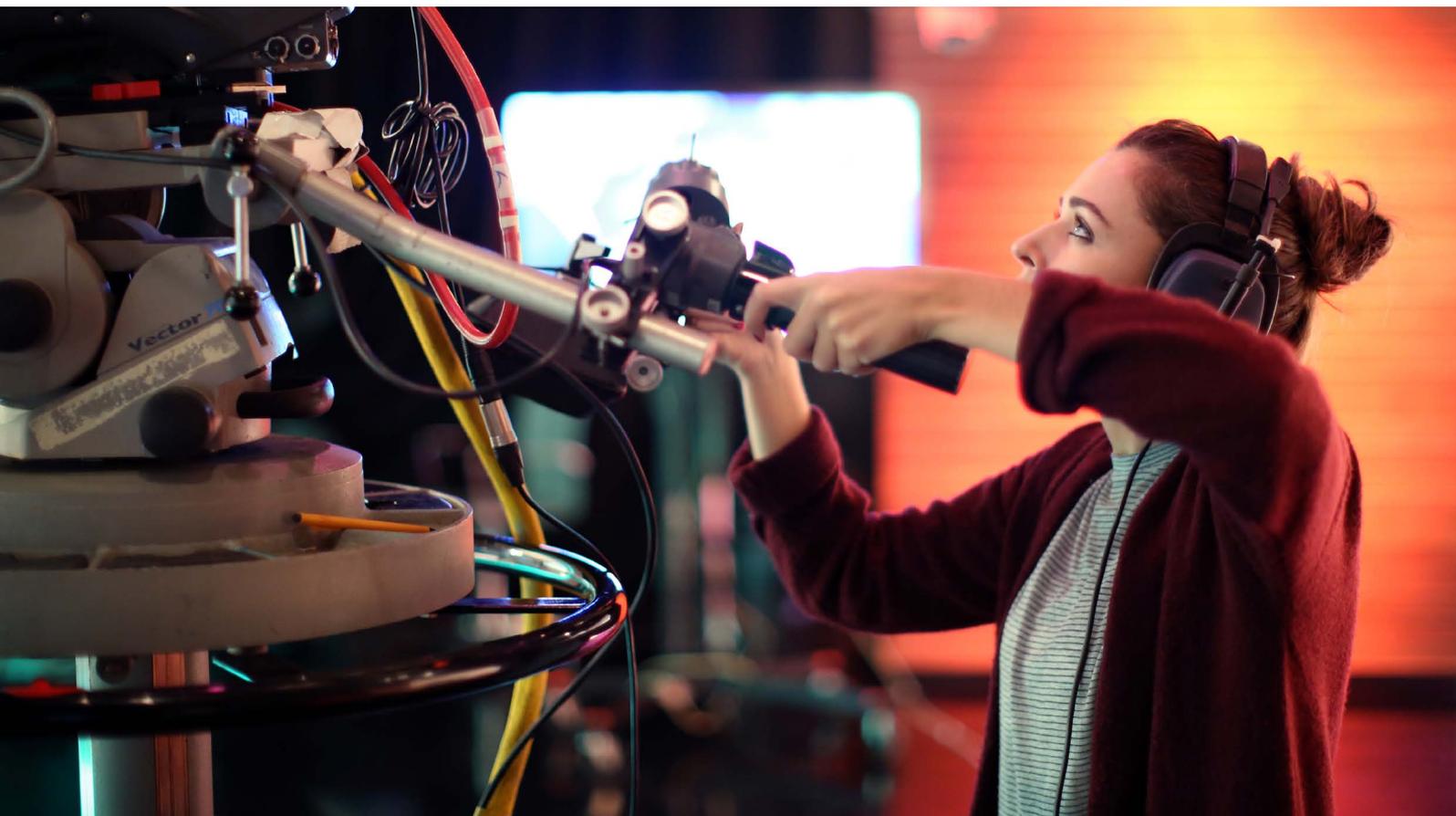
91. <https://creativitydiversitynetwork.com/diamond/>

creative industries, to do more to support freelancers.

We are supportive of schemes broadcasters have targeted at freelancers such as those working on-screen or writers and directors. However, research such as that conducted by [Directors UK](#)⁹² identifies clear gaps in monitoring of the freelance community, suggesting that a greater focus is needed to support people working in all parts of the television industry.

We are also aware that some job roles in all broadcasters are not caught in our data because of the way in which individuals are typically employed. For example, many journalists across the industry are employed by specialist

organisations that provide news to different broadcasters and are not therefore employees of the broadcasters, despite contributing a key part of their output. We therefore intend to engage in the future with such companies to learn more about their diversity work and how this complements the work of broadcasters.



92. <https://d29dqxe14uxvcr.cloudfront.net/uploads%2F1534498780256-1us01ik1t7s-53673fec300aa64609cd02b8619dca90%2FDirectors+UK+Who%27s+Calling+the+Shots+August+2018+FINAL.pdf>

Conclusions and Recommendations

Data gap has reduced

Last year we were clear that the UK industry needed to vastly improve its data monitoring and we highlighted the data gap across each characteristic. This year that data gap has reduced significantly across each protected characteristic, except for disability where it has remained broadly the same. We also highlighted the need for the industry to ensure that data monitoring happened across all levels of the organisation, particularly senior management, different job roles, those who were promoted and those who received training. Understanding the make-up and progression of employees at all levels is equally important. Furthermore, this year has also seen a significant improvement in the number of broadcasters who have started to

separately record those employees who chose not to disclose their information from whose data hasn't been collected. Again, this is an important distinction for broadcasters to identify which employees have not been offered the opportunity to provide information.

These are all positive steps forward which the industry has made and it is important to recognise, support and acknowledge these improvements. However, there is still more to do. The data gaps do still exist⁹³ and until they disappear broadcasters will lack an accurate picture of the make-up of their employees and any under-representation. Such a picture is vital to develop effective equal opportunities policies, and to increase employee diversity.

Further action by broadcasters

Data quality still needs to improve - People from minority ethnic backgrounds, those who self-define as religious, who identify as lesbian, gay or bi-sexual, or who are disabled are not uniform groups and should not be treated as such. Broadcasters need to collect more detailed information instead of broad categories which offer limited insight and make it harder to create a truly representative workforce. Only five⁹⁴ of 60 UK-based broadcasters monitored employees to the most granular level of detail requested. More detailed monitoring is needed for broadcasters to better understand their employee profile and to ensure that all areas of under-representation are identified. Only then can strategies be put in place to tackle them.

Increased focus on improving representation of disabled employees - Great improvement is needed in this area as disabled people continue to be vastly under-represented across the whole UK-based TV industry. If not already a defined area, broadcasters need to have focused initiatives and develop long term strategies and plans rather than individual

schemes and to consider different conditions or types of disability. Targeted recruitment and progression schemes are needed to support disabled employees and we encourage more broadcasters to work with disability charities and organisations. There is positive work being led by the main five broadcasters, but continued commitment is needed to ensure strategies deliver. Disability is the only characteristic that can be supported by positive discrimination under the Equality Act 2010 and broadcasters should use this to be bolder.

Hold focused discussions with employees from minority ethnic backgrounds about progression and inclusion

- Several broadcasters have run or intend to run employee focus groups to better understand the views of employees in minority groups, and to inform action plans for a more diverse workforce. We hope more effective change will result from these action plans and recommend that all broadcasters engage more with employees and involve them in developing strategies and schemes to improve representation and progression.

93. Religion, sexual orientation and disability have the largest data gaps.

94. Three of the main five (Channel 4, Sky, Viacom) and two other broadcasters (MUTV, UKTV)

Targets must be measurable and time specific

- Last year we called on all broadcasters to set clear diversity targets, so their employees more accurately reflect the society we live in. While some broadcasters have implemented time specific and measurable targets in some areas, for the most under-represented characteristic, disability, it is only the BBC and Channel 4 who have set clear, specific and measurable targets. We recommend that if broadcasters are not nationally representative they should set defined targets with clear delivery dates to assess progress and focus corporate strategy.⁹⁵

Leading from the top - As we recommended in last year's report, all of the main five broadcasters have senior management involvement in their diversity and inclusion strategies. The five broadcasters' chief executives are involved in their organisations' diversity work and receive regular updates on progress through various committees and steering groups. Ofcom supports this level of involvement and considers commitment from the top of the organisation across all broadcasters to be the best way to promote a truly inclusive culture that supports all employees.⁹⁶

Earlier this year Ofcom's chief executive Sharon White hosted a discussion for the chief executives/director general of the main broadcasters to discuss their commitment to improve the diversity of their organisations and the challenges they had faced in doing so. This open and frank conversation was a valuable session that the group hope to repeat in future to continue to facilitate effective leadership from the top of the largest organisations in the industry.

Each of the chief executives of the main five broadcasters was interviewed about diversity and inclusion at their organisation, a video of which can be found on [Ofcom's diversity hub](#).⁹⁷

Continued collaboration on social mobility/economic diversity - All of the main five broadcasters have acknowledged that this is a key area which industry needs to continue to engage on, and have all worked with The Bridge Group⁹⁸ in developing their understanding of social mobility/economic diversity. We have included in our [In-focus report](#) recommendations from the Bridge Group for industry with regard to understanding what social mobility/economic diversity is and how to measure this characteristic amongst their employees. We've also included the key monitoring question which we recommend broadcasters adopt to enable consistent monitoring of this characteristic across the industry. Further collaboration is required to discuss next steps and how to improve access to the industry.

Freelancers remain largely unmonitored - As highlighted in our first report, freelancers are a significant part of the industry. Of the 12,057 freelancers employed by the main five broadcasters, just over two-fifths have no information recorded regarding their gender, for racial group the data gap is 57% and for disability it's three-quarters. Not all these freelancers will be caught by the production monitoring system Diamond and therefore there is a significant monitoring gap. Ofcom has already discussed facilitating further discussions on this area across the creative industries, with the main five broadcasters.

95. As covered in Ofcom's Diversity Guidance which broadcasters must have regard to - [Ofcom's diversity guidance](#) sets out further detail

96. More information on the senior level diversity involvement and activities can be found in the [In-focus report](#).

97. www.ofcom.org.uk/diversity

98. <https://thebridgegroup.org.uk/>

Further action by Ofcom

Encourage more industry collaboration

– Ofcom is keen to continue facilitating broadcaster collaboration through meetings, events and information sharing. We will arrange further broadcaster discussions on areas such as social mobility and monitoring freelancers.

Assessing broadcasters' arrangements – As we did last year we will continue to call for improved diversity measures. We will examine in detail the arrangements each licensee has in place for promoting equal employment opportunities.⁹⁹ Broadcasters will be asked to explain how they have had regard to the recommendations we set out in [our guidance](#).¹⁰⁰ Ofcom will investigate any broadcaster who is unable to demonstrate that they have in place arrangements for promoting equal employment opportunities as required by their licence condition.

Updating our guidance – We continue to learn of new and positive work being carried out across the industry on diversity and inclusion which we will incorporate into our formal diversity guidance. Our guidance was updated last year following the first TV report, and we have committed to updating this to reflect learnings from our first radio report and this second TV report. It is likely to include updated recommendations on areas such as progression.

Diversity roadshows for broadcasters – We intend to run a diversity roadshow of stakeholder workshops that will encourage broadcasters to discuss the benefits of diversity, the purpose of the monitoring programme and to respond to any queries about Ofcom's guidance. These workshops will be aimed at all broadcasters across TV and radio.

Enforcement action – Last year we found 57 licensees in breach of their licence for failing to respond to our information request. We made it clear to those broadcasters who failed to respond, that should they fail to respond again this year and subsequently be found in breach of

their licences again, Ofcom would consider the imposition of a statutory sanction. This year 23 licensees failed to respond to our information request of which 12 were found in breach of their licences.^{101 102} Of the 12 licensees found in breach this year, five broadcasters had also failed to respond to our information request last year. We wrote to all five licensees inviting them in for a meeting to discuss the matter and requiring them to respond to our information request for a third time. As they did not respond by the deadline provided, we have launched investigations into their compliance with the licence condition to provide information on request. If the licensees are found in breach again we will likely consider the imposition of a statutory sanction.

Reporting on social mobility – Before our report next year, we plan to collaborate further with industry to agree the drop-down options for the main question discussed and a core set of questions for broadcasters to consider including, as part of their current monitoring programmes, to start measuring the social and economic diversity of their employees. We then hope to start to report on social and economic diversity across the industry.

Radio monitoring – We will continue to monitor the radio industry, with our second report to be published in 2019. For the first time, radio broadcasters' activities will be considered against Ofcom's updated diversity guidance. We have examined in detail the arrangements each broadcaster featured in our first report had in place for promoting equal employment opportunities. We are writing to each of them with an analysis of their arrangements and are engaging with the radio industry about diversity, inclusion and the sharing of best practice. Ofcom made three clear recommendations for the radio industry in our [first report](#),¹⁰³ and we expect to see significant improvement in these key areas.

99. Between men and women, between people of different racial groups and for disabled people, as required by the licence condition.

100. https://www.ofcom.org.uk/data/assets/pdf_file/0010/108100/guidance-diversity-broadcasting.pdf

101. We launched investigations into these licensees and nine subsequently provided the information for which we recorded a "resolved decision" with the other 12 failing to respond at all and were therefore found in breach of their licences.

102. https://www.ofcom.org.uk/data/assets/pdf_file/0017/115046/issue-356-broadcast-on-demand-bulletin.pdf - A list of the broadcasters found in breach is included in the [total industry report](#).

103. https://www.ofcom.org.uk/data/assets/pdf_file/0025/114829/Diversity-in-radio-2018.pdf

Seeking additional powers - Last year we wrote to the then Secretary of State for Digital, Culture, Media and Sport (Rt Hon Karen Bradley MP) to request an extension to the list of protected characteristics set out in the Communication Act 2003.¹⁰⁴ This would allow us to require broadcasters to provide data on a broader range of characteristics, rather than relying on them to provide this data voluntarily. It would also allow us to require their equal opportunities arrangements to cover these characteristics. In response, the Secretary of State agreed that the gaps in broadcasters' data needed to improve and the gap has reduced

this year. We are aware that the Department for Digital, Culture, Media and Sport continues to hold the view that broadcasters should also be providing Ofcom with data on the broader range of characteristics. We will therefore continue to work constructively with industry to drive change but will keep the situation under review. Since some of the largest data gaps still relate to characteristics not included in the Communications Act, we will continue to consider whether improvement would happen faster if they were added and advise the Secretary of State of developments.



104. Disability, gender and racial group are mentioned in the Communications Act, these are a sub set of the full list of protected characteristics detailed in the Equality Act 2010.