

Diversity and inclusion programme update 2018/19



Contents

Overview	1
Foreword.....	2
Introduction	3
Ofcom as an employer	5
Ofcom as a regulator.....	15
In focus - work supporting our diversity and inclusion	20

Overview

Ofcom's [diversity and inclusion programme](#), published last year, explains how diversity and equality are essential to how we operate, both as an employer and as the UK's communications regulator. It sets our objectives for 2018-2022. They are to:

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

This report provides an update on our progress against these objectives over the past year, and what we're committing to focus on next year.

A Braille copy of this report is available on request and we welcome requests for formats other than print, for example an audio recording or a British Sign Language video.

Our diversity and inclusion programme addresses our duties to further the interests of consumers, as well as duties under equality legislation including as an employer.¹ We are also required to publish our equality objectives.²



¹ We have duties under the Equality Act 2010 to promote equal opportunities. This means we have a responsibility to a) eliminate unlawful discrimination, harassment and victimisation; b) advance equality of opportunity between people in protected groups and people who are not; and c) foster good relations between people in protected groups and people who are not. In addition, Section 75 of the Northern Ireland Act 1998 requires us to promote good relations between

people of different religious beliefs, political opinions or racial groups. The Equality Act 2010 covers a range of employment issues, such as providing training opportunities, ensuring fair access to our facilities, giving women and men a right to equal pay for equal work, maternity and paternity leave policies, and flexible working arrangements.

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



Foreword

This is our first update on the progress we've made against our four-year diversity and inclusion programme. We are committed to ensuring Ofcom is an organisation where our colleagues are treated with dignity and respect, building an inclusive culture that welcomes diversity.

We are making progress in many of the areas that we committed to. For example, we have improved how we recruit new colleagues through inclusive recruitment training to ensure a level playing field for everyone and to tackle the unconscious biases that we know can occur during recruitment.

We also now take greater care to advertise roles in ways that are open to everyone. These include advertising on a location-neutral basis to open up opportunities across the nations and regions and for homeworkers, and advertising roles as open to part-time or flexible working.

We are encouraged by the high-calibre colleagues we've attracted through our first returnship programme, which supports people at mid to senior levels back to work after a career break of two years or longer, and by recent appointments to our national Advisory Committees. Our colleague networks – for example our Affinity network and our RACE (Raising Awareness of Culture and Ethnicity) network – are flourishing, giving a voice to colleagues and challenging us to do better.

While we've made some progress, there's much more to do to draw the best and

brightest talents from across our society, irrespective of their background, and to retain and develop them in their careers. We must sustain the progress we have made and improve on it. That's why we've made diversity and inclusion a priority in our Annual Plan, right alongside our policy priorities. This is particularly important for Ofcom as we play our role in holding the TV and radio sectors to account for their diversity.

Our disabled colleagues and colleagues from a minority ethnic background tell us that for them, we haven't done enough. So, this year we'll concentrate in particular on improving experiences for those colleagues.

And it's not just our colleagues. Our Boards, committees and panels need to better reflect the society we serve too. We are working hard to make sure our recruitment principles extend to these bodies.

Ensuring Ofcom reflects the diverse make-up of the UK population makes us a more effective regulator – and the Executive and the Board are committed to achieving this.

***Terry Burns, Chairman and
Sharon White, Chief Executive***



Introduction

As co-chairs of Ofcom's Diversity and Inclusion Delivery Group, we believe strongly that diversity and inclusion should sit at the heart of everything we do – as an employer and as a regulator.

Last year we set an ambitious programme of work to deliver our objectives, drawing on the ideas and enthusiasm of colleagues across Ofcom. We have made some good progress, including improving our gender balance (particularly at a senior level) and gender pay gap, introducing initiatives to attract new and diverse talent, developing an agile workplace that helps colleagues to work flexibly, and we've completed the vast majority of the work that we committed to carry out as a regulator. It will take time to show whether our actions have had a positive impact on diversity at Ofcom and across the sectors we regulate. We will monitor how we're doing, and will learn lessons and change our plans if they're not working.

We know we still have a long way to go. We haven't achieved all the things that we wanted to in the timeframes we set. This is partly because we underestimated the amount of effort and collaboration required and the degree of change that even simple initiatives in this space take to deliver, particularly in the first year of the work.

This year, we'll prioritise the areas which will make the biggest overall difference and allow ourselves the time to do them well. We will focus more on the outcomes we want to achieve and be clear about what our priorities are.

- Building an inclusive culture is our top priority. This means ensuring everyone at Ofcom feels comfortable to be themselves, speak up on issues important to them and is actively supported to do their best work. This will make Ofcom a better place to work and make us a more effective regulator.
- It's clear from our colleague survey that colleagues with disabilities and colleagues from a minority ethnic background don't feel as positive and included as other colleagues. We're exploring these concerns to make improvements. We are adopting a social model philosophy (which says people are disabled by society, not by their disability or difference) to improve experiences for our disabled colleagues and visitors, and we'll review our policies, buildings and technology to support this.

Our approach to recruitment and progression for minority ethnic colleagues will be prioritised over the coming year.

- Not all diversity characteristics are visible (even where they are, assumptions can be wrong) and it's often difficult to know where some groups are underrepresented, or if some colleagues have poorer experiences than others. We are working hard to improve the data we collect on this, to help us make better decisions and help us know if we are improving things.

We will improve our policy making by making our policy teams and decision-making more diverse, making our publications more accessible, making sure anyone who wants to contact us can do so how they want – including those who want to communicate with us in Welsh. We will also learn from our stakeholders and other regulators and organisations we work with.

We are proud that so many colleagues are devoting their time, energy and enthusiasm to making ours a more diverse and inclusive organisation, through our vibrant colleague networks, our policy work in groups across Ofcom and our Diversity and Inclusion Delivery Group. We are excited to be working with them this year to build a better Ofcom for everyone.

Katie Pettifer – *Co-chair of Ofcom's Diversity and Inclusion Delivery Group and Director of Public Policy*

Tony Close - *Co-chair of Ofcom's Diversity and Inclusion Delivery Group and Director of Content Standards, Licensing and Enforcement*



Ofcom as an employer

Going into our second year of the programme, we remain fully committed to our objectives as an employer.

“In our first year we have learned that changing habits and behaviours, not just policies and processes, is key - and this takes time and effort across the entire workforce. Last year we set out a bold ambition for how we want to be as an employer and we put some better foundations in place - new people policies, training, programmes and partnerships. I am particularly pleased with our extensive gender and ethnicity equal pay audit and ethnicity pay gap analysis, which has resulted in action. However, it hasn't yet had the impact we would like on our culture and how people, particularly those who have a disability, are LGBT+ or from a minority ethnic background, experience working at Ofcom. Our work now is to build on what we have put in place so far and give greater focus to inclusive behaviours, wellbeing and mental health, and management accountability for inclusion and people's career development no matter what their needs are”.

Kerri-Ann O'Neill, People and Transformation Director

Last year we set ourselves over 100 diversity and inclusion actions in our role as an employer. Although these were set out until 2022, we committed to the majority of these in our first year. This meant that we were very much task focused, setting up systems, initiatives and processes and working through the actions to start, progress or complete them. There were seven actions that we committed to in 2018/19 that we didn't manage to start (below).

Summary of progress against our 2018/19 commitments

Completed	32
Started	42
Not started	7
Total	81

(Notes: completed actions include those that were achieved in 2018/19 but remain as ongoing initiatives, for example specific learning and development programmes.

The total commitment of 81 employer actions is higher than in our Diversity and Inclusion Programme publication in March 2018 because we treated as separate any commitments that included more than one action in a single line. For example, where we say we will launch and monitor a particular initiative we have treated these as two actions and not one).

After reviewing our work and listening to feedback from colleagues, we will revise our approach for the coming year and will be more outcomes focused, concentrating on a more realistic, smaller set of priority areas that we think will make the most difference and have the strongest impact. We will be clear on the measures we will use to track our progress against our aims.

This doesn't mean that we will forget about the actions that we started or didn't manage to get off the ground last year. Rather we will re-evaluate the actions, which might mean removing some, moving some to later years or introducing new ones that best fit the spirit and outcomes that we are focusing on.

The assessment of our progress below looks at our two overarching objectives as an employer. We recap what our commitments were and the actions we said would take for those commitments, how we got on, and what we will do this year.

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

What we said we would do

In 2015 we set ourselves ambitious targets for women to make up half of our organisation overall; for 40% of our senior roles (the top two roles of Principals and Senior Management and Specialists) to be held by women; and for 13% of our senior roles to be held by minority ethnic colleagues. We said we would continue to work towards our targets and to decide whether to set new targets on sexual orientation, disability, social mobility and religion in 2019/2020.

We committed to strengthen our approach to recruitment and take positive steps to attract people from under-represented groups to work for us.

We said we would continue to measure and report on our workforce and to improve the standard and quality of our data.

What we did

Our targets

We have **exceeded our 2020 target for senior women** ahead of time. Currently 43% of colleagues in senior roles are female, from 31% in 2015 – and we want to build on that. The gender balance across Ofcom (currently 47% female) is improving and requires a focus on female under-representation in areas such as technology, engineering and maths-based roles.

At 11%, progress on increasing the representation of senior colleagues from minority ethnic backgrounds has remained static from last year (and was 9% in 2015) and has proven challenging, particularly at director level.

In the past year we have worked to recruit new and diverse talent to Ofcom as part of our aims. We will keep the impact of these under review.

Recruitment

We developed and launched our **new inclusive recruitment policy, process and guidance** in June 2018, working with an external expert to reflect best practice in attracting talented people from diverse backgrounds. The programme aims to ensure we have a consistent, fair and inclusive approach to recruitment across the organisation and builds on the actions we committed to in our diversity and inclusion programme.

These include using a wider range of channels to attract a diverse range of applicants and encouraging diversity in interview panels and shortlisted candidates (gender and ethnicity) where possible. The inclusive recruitment learning programme is a blend of online and face-to-face training covering the full recruitment process. Over 350 colleagues (at the end of May 2019) have completed the training and received accreditation to be able to support, recruit or make hiring decisions³. They are supported by our People and Transformation Team throughout their recruitment activity. We made refresher unconscious bias training mandatory (annually) for all colleagues and they are also able to access materials related to unconscious bias at any time. All our advertised jobs now offer flexible working in the headline description of the job type, and where possible, are flexible on their location across the UK.

We took a **different approach to our annual graduate programme** in December 2018 to tap into a more diverse pool of graduates and universities. This resulted in a diverse range of candidates being offered jobs with us this year. Of our latest intake of graduates, 56% will be female, 33% will be from a minority ethnic background, 15% have a declared disability or long-term condition and 41% are the first in their family to attend university.

Working closely with our women's network, we launched a **returnships programme** in May 2018. This aims to create a pathway for professional people who have had time away from work for at least two years, into our organisation. The returners undertake a professionally-paid internship of six months which offers a strong possibility of a

permanent role at the end of the programme – but without commitment on either side. Mentoring, training (for both returners and their line managers) and coaching is provided.

We recruited a small number of colleagues (the programme was also open to men) into various roles across the organisation at Senior Associate level. The programme was very well received by the organisation and work is underway to recruit the next group of candidates. More about this initiative and the results of our refreshed approach to graduate recruitment is at the 'In Focus' section of this report.

Community outreach

We successfully hosted **work experience students through S4SNextGen** for the first time in April 2018. S4SNextGen, managed by Speakers for Schools, works with state schools, academies and college students aged between 14 and 18, to help them find work experience with major organisations. We continue to work with them and will be hosting students again this summer.

We again opened our doors to students from the educational business charity, **Career Ready**, in July 2018. Career Ready is a UK-wide charity that links employers with schools and colleges to open up the world of work to young people. They give students with little family background of higher education or professional careers the confidence, skills and networks to achieve their potential. We have worked with Career Ready for 10 years. We **offered paid internships** to seven A-level students on a four-week placement to allow them to apply what they've learned at school in a working environment and to learn about the different work that we do.

³ Topics covered include the business case for Ofcom to recruit inclusively; common barriers and dispelling established myths; building inclusive job descriptions;

hiring the right person not the same person; objective shortlisting and interviewing; inclusive competency-based interviewing.

Our interns took up positions in our Strategy and Research, Consumer and External Relations, Content and Media Policy and Competition groups.

We continue to work with the Institution of Engineering and Technology (IET) to **promote women in engineering**. This included holding our first panel event with them on closing the gender gap in engineering in the communications sector in April 2018. We opened our office in Baldock, Hertfordshire, to children and their parents as part of the IET Engineering Open House Day event in August 2018.

Socio-economic diversity

We believe diversity is more than the protected characteristics. We collected **information on the socio-economic background** of our employees for the first time through our annual colleague survey. This helped us to understand our current socio-economic diversity. We also entered the Social Mobility Index for the first time in May 2018 and ranked 81 out of 106 entrants. We would have liked to have been higher up the rankings, but it showed there is more we need to do in this important area. We have since launched a social mobility working group and appointed a social mobility champion and a sponsor⁴ to develop a strategy building on the feedback from the colleague survey.

Data reporting

We **developed an internal reporting tool** that allows our senior directors to monitor the diversity of their group and teams with the most up-to-date information. They can also easily access information on colleague performance and pay.

⁴ We have senior management champions for the diversity characteristics and senior sponsors who sit on

What we'll do next

Progress our workforce targets with a focus on gender and minority ethnic colleagues

We are doing better on some of our targets than on others. We will work **to reach our target for a 50% gender balance** by the end of 2020. We are equally **committed to our senior ethnicity target** and will focus on our approach to recruitment, how we work with external partners on senior hires, and a strategic approach to succession planning, as well as more dedicated support for the development and progression of our minority ethnic colleagues this year. We will provide targeted development support for high-performing women and those from a minority ethnic background or with a disability to prepare them to apply for senior roles as they become available. This is alongside other initiatives such as mentoring for minority ethnic colleagues and has partly come from reviewing our data and listening to feedback. Our *Diversity at Ofcom 2018/19* report shows some of the data that we looked at in our review.

Our inclusive recruitment approach will need some time to impact on our overall diversity. We also need to apply the **same rigour of approach to our internal opportunities**, such as secondments. At the moment, we are limited by our data which can't easily track colleagues as they move around the organisation. We expect to have a new People system in place in 2020 that will help us to do this.

our Diversity and Inclusion Delivery Group to drive the work for the organisation. Our sponsors also work closely with our colleague networks.

In the next year we will **consider a new set of workforce targets** to 2025 taking into account our evaluation of targets on disability, sexual orientation, religion and social mobility in 2019/20. Our new targets will consider our forward-looking organisational talent and people strategies that are being developed.

Reduce our 'no data' gaps

We have further improvements to make with the level and consistency of **our colleague data**. This includes making it easy for our colleagues to provide their information and ensuring they feel confident that the information is protected. This is particularly true of disability, sexual orientation and religion/belief which can be less visible. Having data gaps makes it difficult to identify under-representation or poorer outcomes for these colleagues and to take action to address this. We have run internal communications campaigns to encourage our colleagues to share their data with us, and while we have reduced our no data gaps, some gaps remain. We continue to focus on this, working closely with our senior management team and colleague diversity networks and learning from other organisations. We hope our focus on fostering a more inclusive culture (set out in the next section) will also encourage colleagues to share their diversity information.



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

What we said we would do

We said we would empower our colleagues to succeed, whatever their background, by

- supporting them with development;
- ensuring fair pay and transparent pay structures;
- supporting our leaders to be accountable for, and to champion, a diverse and inclusive culture.

We also said we would:

- improve the accessibility of our offices, our technology and our processes for disabled colleagues and to focus on wellbeing and mental health;
- continue to externally benchmark ourselves against leading employers;
- make sure that our procurement practices reflect our equality ambitions; and
- to nurture and support our vibrant colleague diversity networks including promoting LGBT inclusion.

We also listen to how colleagues feel about working at Ofcom through our annual colleague survey and to act on the feedback.

What we did

Building leadership capability

To empower our colleagues to succeed, whatever their background, we wanted to enhance our leadership capability with a focus on getting under-represented groups into management positions. Our **first Future Leaders programme**, launched in May 2018, is part of our long-term strategy to develop future leaders and managers. The programme is open to colleagues at all levels from administrator to principal through a competitive process and without needing line manager approval. We focused on strengths and leadership potential rather than established skills. Our first intake of 32 was made up of 42% male to 58% female and 18% minority ethnic colleagues. The programme lasts for 18 months and is supported by coaching and action learning sets. A new round of Future Leaders will be recruited next year, and we will listen to feedback from colleagues who completed the first programme to build on this.

Ongoing work on pay

Through our **ongoing equal pay** work, we monitor and take action on any pay differences that can't be reasonably explained⁵ between men and women who do the same job. For many years we have extended this to look at equal pay between minority ethnic and non-minority ethnic colleagues doing the same work. This gives us confidence that we pay equally across both gender and ethnicity.

We also **look at the overall pay gap for both gender and ethnicity** by comparing the average salaries of all men with all women whatever their role, and the average salaries

of all minority ethnic and non-minority ethnic colleagues. Any difference between the two is the gender and ethnicity pay gaps. In 2019 we published externally and internally the results of our work regarding fairness in pay.

We continued to close the mean gender pay gap to 10.4% in 2018 from 11.7% in 2017 but the ethnicity pay gap slightly increased from 13.6% to 14.6% (although it reduced to 12.3% from 15.4% when measured on the median). The mean is the average of the total pay of each group while the median is the mid-point of all the salaries for each group.

Improvements in gender pay are down to an increasing number of female colleagues in senior roles, a structured pay-setting review process and the equal pay audit. The ethnicity pay gap is because we have not reached our goals in minority ethnic representation in our more senior roles and higher paid professional groups. Closing the gaps requires more work to ensure we have a better balance at senior levels in both gender and ethnicity.

More widely, we launched a **pay and reward review** in September 2018. We wanted to ensure our approach is up-to-date, reflects and supports our values, and underlines our commitment to fairness and diversity. Formed of a cross-section of colleagues from across Ofcom, the first phase of the project was informed by an anonymous, all-colleague survey and worked to increase transparency of the pay decision-making process. In the coming year we will make more changes to our approach to pay and reward, considering the views and pay outcomes of diverse colleagues, and in the wider context of our People, Talent and Reward strategies.

⁵ We take into account internal differences and circumstances in levels of pay such as expertise as well as benchmarking against the external market.

Building management capability

Our leaders have a pivotal role to play in creating an environment where equality, diversity and inclusivity can thrive. We launched mandatory **training to equip our line managers** with the skills and tools to have good quality conversations with the colleagues they are responsible for. The three-day workshops covered how to have effective conversations on performance, career development, progression and wellbeing. All people managers - later extended to all colleagues - must now have **unconscious bias awareness training** annually, as set out earlier in this report. This is an online learning course and completion is monitored. Also, all people managers are required to have **diversity and inclusion training**. At the end of March 2019, 60% of line managers had taken all three of the skills for conversation training workshops (73% had attended at least one of the workshops so far), 100% had completed the diversity and inclusion training and 98% of all colleagues the unconscious bias training. We will build on this in future.

Leadership commitment and accountability

To increase accountability, our most senior managers, including our Chief Executive, built a diversity and inclusion objective into their yearly set of **performance and development objectives**. These were shared with all colleagues. The objectives have been assessed as part of our recent annual performance appraisals, which are linked to pay outcomes. We will update colleagues on how the diversity and inclusion objectives have been met. This year we will ask all our colleagues to include at least one diversity or inclusion objective for the coming year.

Disability inclusion

We had an ambitious set of commitments to help improve disability inclusiveness and to focus on wellbeing and mental health across 2018/19. We **commissioned an accessibility audit** of all our buildings across all our locations in October 2018 as we rolled out our agile working environment. Some of these have been implemented but others will take longer. We **improved the information given to colleagues** on disability and wellbeing. **Resilience training**, both face-to-face and online, became mandatory for all people managers and available to all colleagues, and our Listening Network, which offers a confidential, informal, peer-to-peer support for colleagues who need a chat and an empathetic ear, continued to be promoted and available to colleagues.

Our **new inclusive recruitment policy** and guidance and our performance appraisal guidance included information on how to make workplace adjustments for disabled colleagues or candidates or those with an impairment or long-term condition. Overall, however, making Ofcom more inclusive for disabled colleagues is an area in which we have not achieved as much as we would have liked this year, and it will be one of our priority areas next year including a complete refresh of our **approach to workplace adjustments**.

External benchmarking

We **achieved** (the highest) **gold banding** in July 2018 in Business in the Community's **gender and ethnicity benchmarking** and aim to maintain this for our 2020 entry. In January 2019 we were ranked 183 out of 445 organisations and scored a total of 82.5 points out of 200 in Stonewall's Workplace Equality Index.

Disappointingly, these figures were down from 2018 (when we were ranked 144 out of 434 organisations and scored 95 points) but we know the areas where we didn't perform as well and are taking action ready for the next Index.

Colleague networks

Our active and passionate **colleague diversity networks and groups** continue to thrive and support our equality, diversity and inclusion aims. They create and manage their own diversity work plans, lead on specific initiatives and drive forward the diversity and inclusion agenda, working with our people and transformation colleagues and our diversity sponsors. We have included information about each of our colleague networks and groups under the benefits section of our external jobs page and we tell all new joiners about them.

Our networks and groups have led on many initiatives this year to promote awareness of diversity and make Ofcom more inclusive. These include inviting external speakers such as:

- Dan Brooke, the Chief Marketing and Communications Officer and Board champion for inclusion and diversity from Channel 4, to talk about the success of their internal disability work;
- Asif Kapadia, the Academy Award winning director of Senna and Amy, to share his career journey and experiences as an Indian man in the film industry; and
- Heather Jones, General Manager and UK and Senior Vice President of Content and Creative from A+E Networks UK to discuss her career and the challenges of being a parent and juggling a demanding job.

These events and many others were open to all colleagues to attend.

Our transition sponsor and LGBT network worked with our people and transformation team, with advice and input from expert organisations, to **create a new policy and guidance** (for colleagues and line managers) **to support transgender colleagues** at work, including those who transition their gender while they are with us. And our parents and carers network launched a buddy support and informal advice scheme, open to any colleague with child care and other caring responsibilities.

Our colleague survey

Every year we **run a colleague survey** which helps us understand whether our actions are achieving some of the benefits of a diverse and inclusive workforce – such as increased motivation and engagement. While our overall engagement score increased for the fourth year in a row in April 2019 to its highest recorded level at 79%, our survey highlighted areas where we weren't doing as well as we would like. In particular, responses from colleagues from minority ethnic backgrounds and disabled colleagues were significantly less positive than other colleagues on many questions.

Agile working

A significant achievement in the past year has been the **introduction of our agile workplaces**. We transformed our offices to shape the way we work in three key areas:

- greater emphasis on colleagues working with other teams and groups, working in different locations and generally allowing colleagues to work more flexibly;
- making the best use of our space to provide stimulating and adaptable working zones; and

- investing in more flexible technology to enable us to work together more effectively.

It has transformed the way we work. Being free to move around means colleagues are able to work more closely with other teams and groups, it has further helped colleagues to work flexibly and enables many of our roles to be location-neutral. We did this by making the best use of our space to provide collaborative and adaptable working zones and by investing in new, more flexible technology, such as upgraded video conference facilities and cloud-based collaboration software such as business messaging, calling, video messaging and file sharing. Some 82% of colleagues feel comfortable asking their managers for flexible working, up 5pp from last year. It has been transformative for many colleagues and we will continue to promote agile and flexible working practices. But it hasn't worked as well for everyone. We need to do more to understand how this approach and the behaviours of agile working can work well for everyone in Ofcom.

What we'll do next

Focus on disability inclusion

The area that we made the least progress on last year is on our commitments around disability. Of the 14 actions we set ourselves last year we only started nine, as we took time to learn about the **social model to disability** and listen to colleague feedback. A social model says that people are disabled by society and not by their disability or difference (this is the medical model of disability). As a result, we did not achieve in the first year:

- the rollout of mandatory disability training to all colleagues;

- build on our disability Confident Leader status (level 2) to become a Disability Confident Leader (level 3);
- sign up to the Business Disability Forum's Accessible Technology Charter;
- promote knowledge and understanding of accessibility options within our ICT systems and devices; and
- introduce a system to separately record disability related absence.

Through the year, we realised that getting our workplace adjustments approach right is fundamental and the cornerstone from which inclusivity and equality flows into many other areas of the work environment and culture. A workplace adjustment simply means working closely with colleagues to make agreed changes to their physical environment or way of working, to remove barriers for them to work at their best. Changes might include working hours or patterns, or to physical equipment such as furniture and technology or perhaps giving access to a private space for colleagues to self-administer medicine or to pray.

At the same time, and underpinning our **refreshed workplace adjustments policy and process** (which is currently being finalised), we committed to be guided by the principle of the social model of disability. To improve experiences for our disabled colleagues, our plans this year will **focus on changes within the themes of people** (reviewing our policies and processes), **accessibility** of our offices (our physical spaces), and **technology**, based on an inclusive, social model. We are focused on the outcomes we want to achieve and have planned the actions that we think will help us to achieve them. But we know that there is a long way to go on our disability journey.

As well as focusing on workplace adjustments, we'll be reviewing our wellbeing strategy and provision for colleagues, particularly for mental health. We have committed to training 50 mental health first aiders by the end of 2019 and will supplement this with a range of support which means people can feel comfortable talking about mental health and disability.

We are concerned about the experiences of disabled colleagues and those with an impairment or long-term condition. Though overall engagement was high, disabled colleagues answered less positively on 90% of questions in our colleague survey; for example, 77% of colleagues with disabilities felt that they were treated with fairness and respect at Ofcom, compared to 88% of colleagues without a disability.

Create a culture shift

Building an inclusive culture so all colleagues feel comfortable and safe being themselves at work will be one of our top priorities in the coming year. We are developing ideas on how to build a more inclusive culture and this will be a key focus of our organisational change programme, Strength to Strength, led by a new cross-Ofcom steering group. Other plans include **a story-telling series** to raise awareness of the different experiences diverse colleagues have within Ofcom, seeking ideas and support and being clear about what an inclusive culture means.

We want to build on our colleague networks and have **more open, honest conversations**.

Our senior leadership group is working to address some other important areas highlighted in our colleague survey, including giving and receiving feedback, creating an environment in which colleagues feel safe to speak up and tackling incidences of bullying and harassment.

We're looking at our family-friendly policies and practices to ensure they promote a culture which is inclusive by design, and we will also be taking a more proactive approach to helping people look at how they want to develop their skills and careers.

Our colleague survey results are also used to develop action plans in local areas such as in groups and teams and by our colleague diversity networks and groups.

Reflect our equality objectives in our procurement practices

We are **reviewing our procurement practices** so they reflect our equality objectives. It's an area in which we have scored less well in external benchmarking surveys, such as those from Business in the Community's gender and ethnicity indices and Stonewall's Workplace Equality Index. We have taken advice on best practice and feedback from our benchmarking results, as well as carrying out our own research and. we are developing a plan to act on this.



Ofcom as a regulator

Diversity and equality are essential to how we operate as the UK's communications regulator. In our diversity and inclusion programme we reflect this in our objective to ensure the different needs and interests of all individuals are considered when carrying out our regulatory work.

This section sets out some of the external work we've completed to help meet the needs of a diverse society, and what we're committing to focus on over the next year.

What we did

Our diversity and inclusion programme set 51 individual actions, across 16 areas. We have completed or started all but two of these actions.

Summary of progress against our 2018/19 commitments

Completed	42
Started	7
Not started	2
Total	51

(Notes: Completed actions include those that were achieved in 2018/9 but remain as ongoing initiatives, for example our ongoing engagement with broadcasters to strengthen diversity and inclusion in the broadcast industry.)

The total commitment of 51 employer actions is higher than in our Diversity and inclusion Programme publication because we treated as separate any commitments that included more than one action in a single line. For example, where we say we will work with a number of stakeholders we treated each group of stakeholders as one action each, rather than one action for all stakeholders.)

We're pleased with the progress we've made against these actions – and the difference that our work has made to the lives of people who use the services we regulate. But we know there will always be more work to do. We have set out some of the work we've completed over the past year below.

Promoting the availability of easy-to-use technology and accessibility of audio-visual services

Over the last year, we have worked to make sure people with sight or hearing impairments have **access to the same television services** as everyone else. We started from a good place, with broadcast television more accessible than ever before – but for those who rely on subtitles, audio description and signing, there's much more to be done.

Varying levels of accessibility mean millions of people could be excluded from increasingly popular catch-up and on-demand television. That's why last December, following an extensive consultation, we made **recommendations to Government** that regulations should **require on-demand accessibility**. We're now working with Government to make this a reality, and in the meantime we've been publishing information to make sure [consumers know where they can find accessible programmes](#).

We also know that even when programmes are accessible, people with visual impairments can struggle to find them on their TVs. So in 2018 we amended our rules to **make sure on-screen listings can be used** without full vision. We've released [our first progress report](#) which shows encouraging steps to introduce features which allow text to be read out - a lifeline for those who can't see text on screen.

Much of our work this year has been about building a future of usable, accessible television for everyone – but we also knew there were some improvements we could make straight away. One of these was increasing the awareness of those services already out there. So, we worked with the RNIB and ten major broadcasters on a public awareness campaign which included promotions across radio and TV. Four months after the campaign, spontaneous awareness of audio description [increased by ten percentage points](#) (to 67%) when compared with awareness [before the campaign](#), and of these people, one in ten had since told someone else about audio description.

Protecting vulnerable consumers

We know that people in vulnerable circumstances may have different needs from the companies providing their phone, TV and internet services.

So in 2018 we [introduced new rules](#) to make sure companies have **policies in place to treat vulnerable consumers fairly and appropriately**. We've met with these companies to understand what difference the new rules are making for their customers – and what more we need to do.



We're pleased to hear of initiatives such as mystery shopping, dedicated teams and call handlers being assessed based on the quality, not quantity, of their calls – which will help improve how companies treat their customers who may be vulnerable. We want all companies to learn from each other, so we've taken examples like these and will be **sharing a good practice guide** in the autumn. And we welcome the [public commitments](#) the UK's biggest phone, TV and internet providers have made to put fairness at the heart of their businesses; including that their customers get the support they need when their circumstances make them vulnerable.

We recognise that vulnerable consumers may be particularly affected by companies charging different consumers different prices for the same, or very similar, service. In the past year we've started work to see whether vulnerable consumers who are less able to access the best deals are paying disproportionately higher prices. We'll publish our findings, including any action we think companies need to take, in the autumn.

We don't regulate in a bubble, so **hearing and learning from others** is an important part of what we do. Over the past year we've completed research, such as our [Access and inclusion report](#), to help us understand how well the communications sector is meeting the needs of vulnerable consumers. We've held workshops with other regulators to make sure we're learning from each other. And we've regularly met with consumer groups to seek their opinions and understand any concerns they have about the sectors we regulate.

We know that one concern is around the changing technology used for telephone calls. In future, all calls will be carried digitally using the internet rather than on the current telephone network. We recognise that changes in technology – while bringing many benefits – may also have negative consequences for some consumers. We've run our own **testing for text phones and amplified phones** so that we understand how deaf or hard-of-hearing customers may be affected by these changes, and are working with providers to address these concerns.

Enforcing our rules on harmful and/or offensive broadcast content

Ofcom is responsible for ensuring programmes broadcast on TV and radio meet the standards set out in the Broadcasting Code. These include rules on harm and offence, religion and hatred and abuse.

We recognise that some programmes might include material that has the potential to be harmful and/or offensive, particularly if the material relates to a protected characteristic. We also know that the use of language (including offensive language) is constantly developing.

So, we **seek a wide range of views to help us understand attitudes** towards material that's broadcast, to help inform our thinking when we deal with complaints.

In the past year we've met with charities including the Alzheimer's Society, Changing Faces and Samaritans. The Alzheimer's Society shared with us the impact that seeing outdated stereotypes and hearing negative language can have on people living with dementia. Changing Faces talked to us about how people with a visible difference feel excluded in the media – from a lack of representation to being portrayed in a prejudicial way. And Samaritans spoke to us about portrayal of suicide and self-harm within programmes.

Hearing first-hand accounts from charities like these of how material can be offensive helps us to better understand the expectations of different viewers, and plays an important part in helping to inform our thinking when we deal with complaints.



Ensuring our publications and external communications are accessible to all

We want to make sure that anything we publish or produce for others is open to everyone, so that anyone who wants to engage with Ofcom and our work can do so.

To help with this, over the last year we've worked with external consultants to **review our website and documents, and have made changes** to improve how easy it is to use and read them. And while we've always made our publications available in different formats if someone asks us for it (such as providing audio recordings or Braille copies), this year we've proactively published some of our work relating to accessing services in different ways. For example, with our work on [making video on-demand services more accessible](#) we posted a British Sign Language video alongside the publication on our website.

We've also started work on a **new way to apply for TV and radio licences**. At the moment we use application forms, which we know aren't the easiest to use, and could be stopping some people applying for licences. So, we're building a new way to apply for licences online, which will be simpler to use.

We hope this will make it easier for more people to apply for licences, which should in turn mean a wider range of services for a wider range of audiences. At the same time, we're also looking at how to improve our current application forms, so people who don't want to use the online application system won't be disadvantaged.

Strengthening diversity and inclusion in broadcasting

We believe broadcasting benefits consumers most when it reflects our rich and diverse society. We have a crucial role to play to create the conditions and shape the culture of the broadcasting industry so what we watch

on our screens and hear on our devices reflects the make-up of our society. So, since 2016, we've been **working with the broadcast industry to drive the changes needed** to achieve this.

We've collected data from the TV and radio broadcasters that we regulate about the diversity of their workforces. We've been able to share this information and shine a light on what's working – and what's not – in our [Diversity in television](#) and [Diversity in radio](#) reports.

Over the past year we've maintained our extensive engagement with broadcasters, unions, charities, freelancers, production companies and many other diversity and inclusion experts and media organisations – all of whom can help us develop a clearer picture of diversity in the industry and all of whom play a part in driving the change we want to see. We know that for diversity to be embedded in organisations, changes have to be led from the top. So, last year we arranged to meet the heads of all the major TV broadcasters – creating for the first time an opportunity for them to discuss together the steps they're taking to improve diversity.

And the [public pledges](#) made by the heads of the major TV broadcasters show their commitment to making the industry better.

We're pleased with the steps broadcasters are taking. Initiatives such as offering apprenticeship schemes across the UK to widen the background of their workforces; leadership pathways providing mentoring, training and coaching to those wanting to move to a leadership role, and reviewing how to recruit for roles, particularly at a senior level, to increase diversity in decision making, are all positive examples of how broadcasters are making sure they are being more representative of the whole of the UK.

What we'll do next

We've achieved a lot against the actions we set in the diversity and inclusion programme; with all of the 16 headline actions we identified either complete or in progress. While we are pleased with what we have achieved, we are conscious that many of the actions we have taken are part of work that we need to carry out to fulfil our statutory duties. We want to go further internally in **embedding diversity and inclusion within all our policy work**, and to ensure that innovative thinking about how to meet the diverse needs of consumers is a driving force as we set out work programme each year.

We've said that our action plan was intended to be flexible and that we'd continue to review, adapt and add to it. So, in this coming year, we think a more effective approach would be to focus on the outcomes that we want to achieve to ensure that the different needs and interests of all individuals are considered in our regulatory work.

There are three outcomes we would like to focus on:

- 1) Making policy in an inclusive way
- 2) Being accessible and inclusive in the way we communicate with others – and the way they communicate with us
- 3) Applying learnings from our role as a regulator to our role as an employer

Making policy in an inclusive way

We're the communications regulator for everyone in the UK. We work for all communities across a range of different issues. And for us to make communications work for everyone, we must make sure that the **voices that contribute to policies** we make are as **diverse of thought, background and experience** as the people and communities we serve.

Being accessible and inclusive in the way we communicate with others – and the way they communicate with us

We must ensure our own communications and our services are **accessible to anyone engaging with us**. We know that we can learn from others to make our publications as open as possible to everyone, and we can measure how we're doing against external benchmarks. And we also need to make sure that anyone who wants to contact us can easily do so in the way that they want to.

Applying learnings from our role as a regulator to our role as an employer

We recognise that that we can, and should, learn from others. The challenges that we face in our work as an employer are also faced by the companies we regulate. So to meet the objectives in our diversity and inclusion programme we must engage with others and **share and act on the best practices** that we find.

We'll report next year on the work we've done to achieve these outcomes, and how we're ensuring the different needs and interests of all individuals are considered when carrying out our work.



In focus - work supporting our diversity and inclusion

This section sets out in more detail the outcomes of two initiatives that were particularly successful towards our diversity and inclusion aims last year: our returnship programme and changes to our graduate recruitment.

We also include examples of other things we've done to promote inclusion and diversity, particularly among our colleague diversity networks.

Returnship programme – attracting talent back to work

Working with Ofcom's Women's Network, our returnship programme was designed to support women (and also men) at mid to senior levels back to work after a career break of two years or longer. We wanted to give individuals a chance to regain skills and confidence at work and for them to make a significant contribution to our organisation. We received over 160 applications and completed over 20 interviews, meaning a very competitive selection process for the new colleagues hired and confirming this is a valuable pool of talent.

A small group of colleagues started with us in September 2018 and the programme ran for six months, with flexibility from us and the

returners to continue or not after this time. The colleagues were supported with coaching by an external partner organisation, a mentor and buddy from Ofcom, as well as training and development throughout the programme. We also had an executive sponsor for the programme who actively championed the benefits of the initiative, for Ofcom and for the colleagues.

All our returner colleagues continue to work with us following their returnship, offering their diverse expertise across disciplines such as technology, economics and policy.

We are offering the programme again this year.

Comments from our returner colleagues:

“It has been a quick and smooth transition back into the work environment. I have been made to feel welcome, been given responsibility and feel like I am making a valuable contribution to the team”

“I love how Ofcom has embraced the agile culture. I am used to ‘hot desking’, but the flexibility that agile allows working parents and the way the everyone uses technology to work efficiently remotely is very impressive”.

“I have been struck by the genuine commitment and support from everyone - from the CEO and other senior leaders down to all the colleagues in my team. It has made the transition so much easier. I feel my contribution is really valued and [the organisation] is truly committed to bringing in people with different perspectives and backgrounds. It is very refreshing.”

Doing our graduate recruitment differently

We want to offer roles to graduates from a wider range of backgrounds and disciplines. To achieve this, we partnered with a specialist graduate organisation to attract and reach a more diverse group of graduates.

Our recruitment drive ran from December 2018 to February 2019. We received 988 applications and from these, 88 candidates were invited to eight assessment centres.

We are pleased to be able to welcome later this year a diverse range of colleagues into our organisation across our spectrum engineering, cyber security, statistics, economics, market research and policy development pathways. Investing in early careers expands the breadth of our talent and can help to improve the diversity of our leadership.

We want to continue with our approach next year and to learn from the areas we identified as needing adjustment to make the outcomes even better.

Our latest intake of graduates will be 56% female and 33% from a minority ethnic background. These are all above our overall organisational profile of 47% female and 20% minority ethnic. Our approach will also have a positive impact on socio-economic diversity: 41% of offers made are to first-generation university goers and 67% to candidates from state schools. The remaining 34% were offered to applicants from a private educational background and international educational background. 4% preferred not to say.



Our colleague networks

Earlier in the report we highlighted some of the initiatives that our colleague diversity networks have led on, and we want to showcase more of the work they have done.

Our Parents and Carers Network, working with our People and Transformation team, have been looking at career development and progression for colleagues that work part-time and will be putting the full findings and recommendations to our senior management team in the autumn. They also helped to develop the Carer Confident benchmarking scheme launched in January 2019 and plan to gain formal accreditation for Ofcom this year. The Carer Confident scheme supports employers to build a positive and inclusive workplace for staff who are, or will become, carers and to make the most of the talents that carers can bring to the workplace. The scheme has been designed to be progressive, starting at Level 1: Active, then moving to Level 2: Accomplished, and finally on to Level 3: Ambassador.

To help drive cultural change in how Ofcom views flexible working our Women's Network co-ordinated a series of articles, posted on our intranet, showcasing colleagues' experiences of flexible working across different teams.

They developed a role-modelling programme, to encourage open dialogue between more junior women and senior colleagues on the skills and behaviours that can help progress their careers. Two sessions have been held with four female directors so far, one on career progression and the other on how to have your voice heard.

Our RACE (Raising Awareness of Culture and Ethnicity) network held a world food event during Black History Month to raise money for the Stephen Lawrence Trust and published stories of their personal family experiences of arriving in the UK. They worked to ensure ethnic diversity in our internal coaching programme and started a schools outreach programme, together with our Women's Network, to compliment established external relationships that our People and Transformation team already have.

Each year we enter Stonewall's Workplace Equality Index and our Affinity Network led on this alongside our People and Transformation team. They celebrated LGBT History Month by showcasing interesting LGBT figures of all backgrounds across screens around our buildings, as well as more in-depth articles on our intranet on several of these figures.

