

Diversity and equal opportunities in television

UK broadcasting industry report

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1. Industry Overview

- 1.1 Ofcom has a duty to promote equality of opportunity in relation to employment in the broadcast sector. We can ask broadcasters to provide information about their equal opportunities policies and the make-up of their workforce. This document looks at the profile of broadcasters across the UK television industry over the period of 1 April 2017 to 31 March 2018. We required broadcasters to complete an information request by questionnaire. The methodology for this, which was updated to improve our data set from the first report, is described in detail in the relevant document on Ofcom's online diversity hub.¹
- 1.2 This document looks at data from all 72 broadcasters (covering 740 licences) who met the qualification threshold of having 21 or more employees and being authorised to broadcast for more than 31 days a year. They account for 49,901 employees in total across the industry, which we calculate to be around 97% of all employees. Though some broadcasters did not provide data in respect of all the characteristics we asked about, we consider that the data provides a comprehensive representation of the industry.
- 1.3 We required all television broadcasters with an Ofcom licence, the BBC and S4C³ to complete a questionnaire providing us with data on the make-up of their workforce across the three protected characteristics where we have powers to do so: gender, racial group, and disability. In addition, we requested data on other protected characteristics in the Equality Act 2010: age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment. For the first time we also asked for information on social mobility.
- 1.4 We found that of the 72 broadcasters (covering 49,901 employees), 33 were based solely in the UK, 27 had employees inside and outside the UK and 12 only had employees based outside the UK. This amounted to 36,887 (74%) employees based in the UK and 13,014 (26%) based outside of the UK.
- 1.5 In addition to the 72 broadcasters, we are aware that some smaller broadcasters with less than 21 employees⁴ are also working hard to promote equal opportunities. These include broadcasters that provided submissions to Ofcom despite not being required to do so, and others such as local television broadcasters that work to promote equal opportunities in their local areas.
- 1.6 This report summarises broadcaster arrangements as they have been described in the broadcasters' submissions to Ofcom.

¹ The methodology document can be found on Ofcom's online diversity hub - www.ofcom.org.uk/diversity

² See methodology document for a more detailed description of the project stages. There were three qualifying broadcasters who submitted the full questionnaire but didn't meet the deadline (431 employees), and there were 210 broadcasters who didn't meet the qualification threshold (1,342 employees). They account for approximately 3% of the industry (when considering the 49,801 employees from those broadcasters who completed the survey). Note that there were also 13 broadcasters who we didn't receive a response from and so are in breach of their licence conditions - we cannot gauge how many employees these correspond to.

³ S4C is not an Ofcom licensee and therefore took part on a voluntary basis.

 $^{^{\}rm 4}$ And therefore not required to provide information to Ofcom under the licence condition.

Employees based outside the UK

1.7 The 12 broadcasters who provided us with employee data who are <u>solely</u> based outside of the UK amount to 7,859 employees, which constitutes over three fifths of all the data provided on non UK-based employees. They are as follows:

Broadcaster	Employees
JSC Channel One Russia Worldwide	500+
New Delhi Television Limited	500+
Pakistan Television Corporation Ltd	500+
Public Television Company of Armenia / AMPTV	101-499
SNI/SI Networks LLC	101-499
Viacom International Media Networks France	101-499
Abu Dhabi Media Company PJSC	101-499
Channels Incorporated Limited	21-100
Eleven Sports Network SP. ZO.O.	21-100
Fashion One Television Limited	21-100
Lancaster LLC	21-100

- 1.8 In addition to the above, there are a further 5,155 non UK-based employees split across 27 different organisations. The four most significant of these are Nordic Entertainment Group (1,384), Discovery Corporate Services (1,096), ITV (735) and Bloomberg LP (691).
- 1.9 Within this report we only report on non UK-based employees at a total level, and for just the three mandatory characteristics (disability, racial group and gender).

UK-based employees

1.10 Of the 72 broadcasters who provided data, 60 of them have at least one UK-based employee, and the data for these has been aggregated to form the UK-based industry total of 36,887. Seven of these broadcasters have fewer than 21 UK-based employees, whereas there are 22 broadcasters with 21-100 employees, and the same number with 101-499 employees. The remaining nine broadcasters, who have 500 employees or more, and account for 85% of all UK-based employees, are as follows:

Broadcaster	Employees
BBC UK Public Television Services	13959
Sky UK Limited	7229
ITV Broadcasting Limited	4245
QVC UK	1847
Discovery Corporate Services Limited	923
Channel 4 Television Corporation	908
Viacom International Media Networks UK	897
Turner Broadcasting System Europe Limited	784
STV Group PLC	585

- 1.11 In this document we provide in-depth analysis across the employees based in the UK. The questionnaire asked broadcasters how many employees they had, and for those employees that were based in the UK, we asked for detailed breakdowns by the following categories.
 - **Job level:** Senior managers, middle/junior managers and non-managers
 - **Job role:** Broadcast management, Business management and administration, Technical, engineering and data analytics, Sales and marketing, Creative and content production, Journalism, and On-screen talent
 - Joiners: Those who joined the organisation in 2017/18
 - Leavers: Those who left the organisation in 2017/18
 - Trained: Those who received training (re. developing in their role) in 2017/18
 - Promoted: Those who were promoted in 2017/18

Further detail on what job titles are covered under each of the job roles can be found in the methodology document, and a summary of the overall totals are set out in Figure 1 below.

Figure 1: Total UK-based employees by category

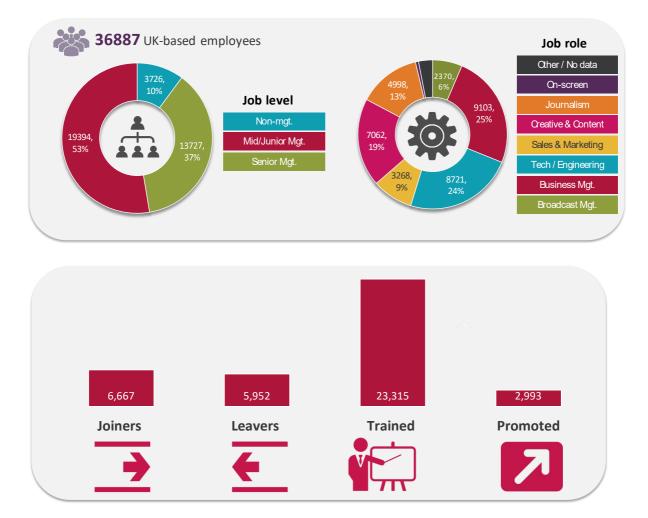


Figure 2 shows the key findings for UK-based employees for April 2017 to March 2018, compared to those reported last time (Jan-Dec 16),⁵ benchmarked with the UK labour market/population. For the three mandatory characteristics it also shows the 2017/18 figures for non UK-based employees and all employees (UK-based, and non UK-based combined).

Figure 2: Summary of UK-based employees on the six key characteristics 6 - 2017/18 vs. 2016

		2017/18	2016	Data gap	2017/18	2017/18
	UK labour market / population*	UK-based TV industry	UK-based TV industry	(not collected) change since 2016	Non-UK based employees	All employees
Disability						
Those with a disability	18%	6%	3%		1%	4%
No disability	82%	62%	66%	+1pp	59%	61%
Not disclosed		2%	1%	pp	1%	2%
Not collected (DATA GAP)		31%	30%		39%	33%
Racial group						
Minority Ethnic Groups (MEG)	12%	13%	11%		7%	11%
White Ethnic Groups (WEG)	88%	71%	70%	-5pp	10%	55%
Not disclosed		4%	2%	-3pp	2%	3%
Not collected (DATA GAP)		12%	17%		81%	30%
Gender						
Men	53%	54%	52%		71%	58%
Women	47%	46%	47%	No	28%	41%
Women in senior management		41%	38%	change	Not co	llected
Not collected (DATA GAP)		1%	1%		1%	1%
Religion or belief		,				
Religious	67%	22%	19%			
Non-religious	26%	28%	18%			
Not disclosed	7%	5%	4%	-15pp	Not co	llected
No consent (to provide to Ofcom)		1%	0%			
Not collected/No response (DATA GAP)		44%	59%			
Sexual Orientation		,				
Lesbian/Gay/Bisexual (LGB)	2%	4%	3%			
Heterosexual	93%	49%	41%			
Not disclosed	4%	5%	5%	-10pp	Not co	llected
No consent (to provide to Ofcom)		1%	0%			
Not collected/No response (DATA GAP)		41%	51%			
Age		,				
Under 50 years old	69%	69%	55%			
50+	31%	16%	17%			
Women under 50 years old	69%	71%	58%			
Women 50+	31%	13%	14%			
Men under 50 years old	69%	66%	50%	-15pp	Not co	llected
Men 50+	31%	19%	19%			
Not disclosed		0%	0%			
No consent (to provide to Ofcom)		1%	0%			
Not collected/No response (DATA GAP)		14%	29%			

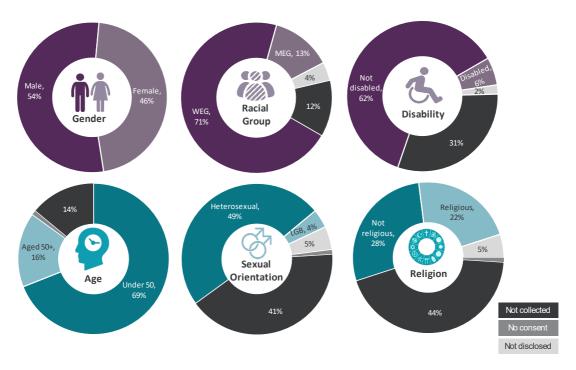
⁵ The 'UK-based TV industry' figure for 2017/18 (Apr 17-Mar 18) includes any UK-based employees of broadcasters licensed by Ofcom. This definition is different to 2016 (Jan-Dec), which included all employees (UK and non UK-based) among broadcasters who had at least 98% of employees based in the UK. Because of this an exact comparison is not possible, so should be treated with some caution. See separate methodology document for a full explanation.

⁶ Sources used for UK labour market / population figures (See methodology document for more detail): Disability = ONS Labour market statistics, Racial group = ONS Labour market statistics, Gender = ONS Labour market statistics, Religion or belief = Census 2011, Sexual orientation = ONS Sexual identity, UK: 2016, Age = ONS Labour market statistics. Note: Those who self-defined as 'other' for sexual orientation, as selected as a response in our questionnaire, are included in our LGB figures.

2. Television industry by characteristic

2.1 Within this section, we look at each individual characteristic in turn. For the three mandatory characteristics of gender, racial group and disability we break this down into the three total employee groups previously shown in Figure 1 (all employees, UK-based employees and non UK-based employees), and the additional categories shown in Figure 2. For the three voluntary characteristics these only include totals for UK-based employees, as well as the additional categories. In the case of age, there are two additional breakdowns included for males and females.





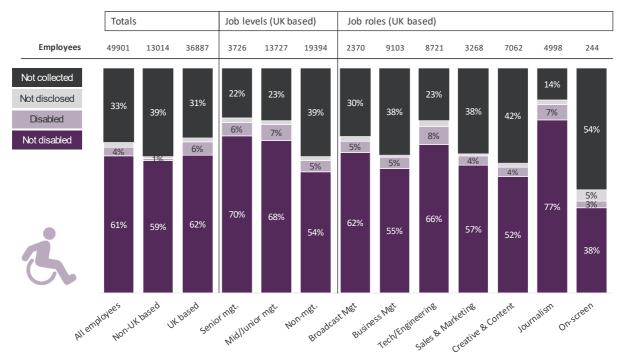
- 2.2 The summaries of 'what broadcasters are doing' on each characteristic refer to the arrangements put in place by all broadcasters except the main five broadcasters⁸ (which are covered in detail in the main and In-focus reports).
- 2.3 Following the publication of this report we will be reviewing the arrangements of each individual broadcaster and investigating any broadcaster who has not provided us with sufficient information to demonstrate they are promoting equal opportunities as required by their licence condition. We will also provide tailored advice to each broadcaster on what they could improve or focus on to better promote equal opportunities.

⁷ MEG = Minority Ethnic Groups, WEG = White Ethnic Groups

⁸ the BBC (Public Television Service only), Channel 4, ITV, Sky and Viacom (which owns Channel 5 Broadcasting Ltd, holder of the Channel 5 licence).

Disability





- There is an 8 percentage points (pp) difference in the proportion of employee disability data provided for UK-based (69%) and non UK-based (61%) employees, both contributing to the fact a third of total employees have no disability data (not collected). For those based in the UK 6% self-define as having a disability, compared to just 1% for non UK-based employees. The former has doubled from 2017 when it stood at 3%.
- 2.5 Due to the high level of data missing (not collected), it is difficult to benchmark with the UK population. However, at 6% the number of UK-based employees who self-define as disabled is still significantly below the 18% UK average (aged 16-64).⁹
- 2.6 By job level, the percentage of employees who self-define as disabled is relatively even (5-7%), but there is significantly more data missing for non-management staff (39%) than the two more senior levels.
- 2.7 By job role, the proportion of disabled employees is lowest within on-screen talent (3%) and creative and content production (4%), but the fact that these two categories have the highest proportions of data not collected means that the true percentages could vary. The figure is highest among those in technical, engineering and data analytics (8%) and this is also the second most complete category (behind journalism) with nearly eight in ten employees having information on disability. All categories are significantly below the UK average.

⁹ 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'

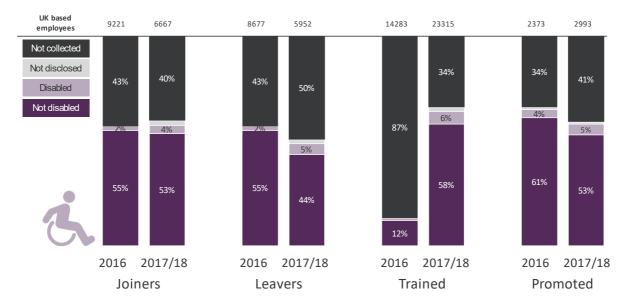


Figure 5: Disability by joiners, leavers, trained and promoted (2017/18 vs. 2016)

- 2.8 Regarding disability, the monitoring of joiners and those who completed training has improved slightly since 2016 with the data not collected figures now at 40% and 34% respectively (the latter being a large decrease from 87%). This contrasts with leavers (from 43% to 50%) and promoted (from 34% to 41%) where data not collected has actually increased from the year before.
- 2.9 The proportion of those who self-define as disabled is relatively similar across each group, ranging from 4% among joiners to 6% among those who completed training. In each case this represents a small increase from 2016.

Figure 6: Disability breakdown for UK-based employees - 2017/18 vs. 2016

	2016	2017/18
No disability	66%	62%
Sensory Disability	0%	<1%
Physical Disability/Muscular-skeletal	<1%	<1%
Mental Health	<1%	<1%
Cognitive/Learning disabilities	<1%	<1%
Multiple, Long term or other disability/condition	<1%	<1%
Has a disability (NOT SPECIFIED)	2%	5%
Employee preferred not to disclose	1%	2%
Didn't request this information/ no data	30%	31%

2.10 As shown in Figure 6, the granularity of disability data provided by broadcasters has by and large stayed the same since 2016, although the proportion of broadcasters who provided this detail has slightly improved (33% from 29% in 2016). While the proportion of employees who self-define as having no disability has decreased by 4pp, the increase in the proportion of disabled employees is largely within the generic disabled (not specified) category (from 2% to 5%).

What are broadcasters doing on disability?

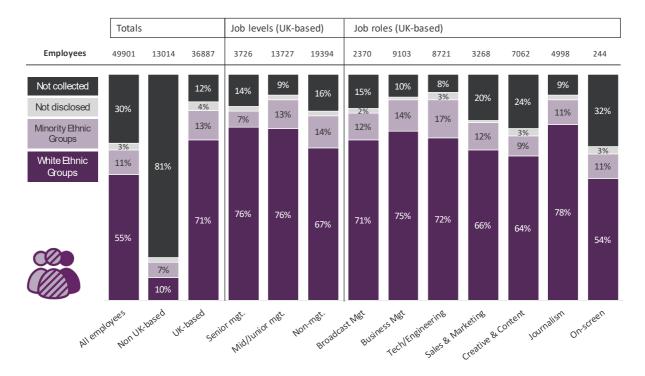
- 2.11 Seven broadcasters told us they have in place some additional arrangements or initiatives to support disability. Six of these spoke about how they ensure their physical workplace is accessible and comfortable for disabled colleagues. BT has an accessibility team which provides support to people who require adjustments at work, while colleagues at Discovery are working with individuals to explore how their workplace could be more accessible, for example installing audio in the lifts, and having automatic door openers for wheelchair users.
- 2.12 BT, CNBC/NBC, Discovery and Turner have all partnered with or supported external organisations with a focus on disability. BT partners with PurpleSpace (a professional disability network) and the Business Disability Forum, where they take part in crossorganisational mentoring programmes, while Turner works with Leonard Cheshire Disability's Change100 scheme, where they offer three-month paid internships to disabled people who have just left college. Discovery also work with organisations such as EmployAbility and JOLT Academy (a diversity internship scheme) to develop targeted advertising for new roles.
- 2.13 Both BT and Discovery have disability network groups to support employees. Discovery's 'ableD' resource group provides a forum for disabled employees and carers to receive advice and support from those who understand their position. BT's Disability Employee Network provides disability data to the business to help inform internal policy, as well as curating events and organising social outreach opportunities. BT also has two Executive Champions for disability who speak at events, provide internal and external mentoring, and inform the business' disability strategy.
- 2.14 Five of the broadcasters have an additional focus on mental health. CNBC/NBC, Columbia and UKTV all offer mental health training for employees, with UKTV aiming to have at least one person in each team who is a trained Mental Health First Aider. STV offers mental health awareness training to staff and managers in partnership with the Scottish Association of Mental Health and are in the process of establishing a network of trained mental health champions who colleagues can approach confidentially for help.
- 2.15 As part of their recent increased focus on mental health, UKTV employees also have access to a free and confidential assistance programme offering online, phone or face-to-face support. Finally, BT's Wellbeing team provides information and resources to employees about keeping healthy and recovering from illness, and they have a mental health support network run by employees.
- 2.16 Another four broadcasters said they will increase focus on disability, with Viacom France aiming to increase the number of disabled employees, and Vice introducing paperwork which will collect more information from employees relating to disability. Three broadcasters spoke of introducing initiatives around mental health and well-being, with

¹⁰ BT, CNBC/NBC, Discovery, STV, Turner, UKTV, Youview.

UKTV Media aiming for at least 10% of the company to be trained in Mental Health First Aid in the next year.

Racial Group

Figure 7: Racial group by job level and role



- 2.17 The majority of non UK-based employees have no racial group information, consisting of 81% data not collected and 2% data not disclosed. This contrasts with UK-based employees where these figures are 13% and 4% respectively. Therefore, sensible comparisons cannot be made between the two. Among UK-based employees, 13% self-define as being from minority ethnic groups versus 71% who self-define as being from white ethnic groups. For non UK-based employees these figures are 7% and 10% respectively.
- 2.18 Although the aforementioned not collected figure for UK-based employees (12%) is relatively low compared to all other characteristics except for gender, it still means that benchmarking with the UK labour force is somewhat problematic. However, at 13% the number of employees who self-define as being from minority ethnic backgrounds is in line with the 12% UK wide figure.¹¹
- 2.19 Job levels and roles were only requested for UK-based employees, and like gender there is a clear trend that the proportion of employees from minority ethnic groups decrease the more senior the role. Minority ethnic group representation is highest in non-management

¹¹ ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). All in employment. Note: due to the high proportion of not collected the actual figure could be higher or lower in reality.

loiners

- positions (14%, which is higher than the industry average of 13%), down to 7% of senior managers.
- 2.20 The racial group make-up differs by job role technical, engineering and data analytics (17%) and business management and administration (14%) are over-represented by employees from minority ethnic backgrounds compared to the UK workforce average, whereas they account for just 9% of creative and content production roles.¹²

9221 6667 8677 5952 14283 2373 2993 employees Not collected 11% 11% 19% 20% Not disclosed 26% 29% 28% 13% 14% Minority Ethnic 54% Groups 16% 16% 12% 10% 13% White Ethnic Groups 8% 75% 74% 63% 60% 61% 57% 38% 2016 2017/18 2016 2017/18 2016 2017/18 2016 2017/18

Figure 8: Racial group by joiners, leavers, trained and promoted (2017/18 vs. 2016)

2.21 In each of the four categories shown in Figure 8, data monitoring has improved. This is particularly the case for those who completed training - in 2016 data for more than half (54%) of employees were classified as not collected, but this figure is now 11% (the same as it is for promoted).

Leavers

Trained

Promoted

2.22 In terms of the proportion of employees who state they are from minority ethnic backgrounds, joiners and leavers are both at 16%. Despite the caveats placed on the data because of those grouped into data not collected, this suggests that it is above the UK-based industry average of 11%. The proportion of people trained and promoted are also above this average at 13% and 14% respectively.

¹² Again, given that 10% and 24% of employees respectively had no data, the actual figures could be higher or lower.

Figure 9: Racial group breakdown for UK-based employees - 2017/18 vs. 2016

	2016	2017/18
White Ethnic Groups	70%	71%
East Asian / East Asian British	<1%	1%
South Asian / South Asian British	2%	5%
Black / African / Caribbean / Black British	1%	3%
Mixed	1%	2%
Other	1%	1%
Minority Ethnic Groups (NOT SPECIFIED)	7%	<1%
Not disclosed	2%	4%
Not collected	17%	12%

2.23 The provision of detailed racial group information has improved since 2016, with less than 1% of all employees being placed in the generic (not specified) category for minority ethnic groups, down from 7%. This, coupled with the decrease in not collected (from 17% to 12%) means that the proportions have slightly increased in all categories, most notably South Asian / South Asian British (2% to 5%). The proportion of employees who self-define as being from white ethnic groups has remained stable at 71%.

What are broadcasters doing on racial group?

- 2.24 Out of the broadcasters analysed here, five broadcasters have additional arrangements or specific initiatives to support employees related to racial group.¹³ Some examples were given of general diversity initiatives, such as mentoring schemes or event programmes, though these are not specifically aimed at colleagues of a specific racial group.
- 2.25 Four broadcasters made reference to employee networks. ¹⁴ For example, CNBC/NBC's iCAN (International Cultural Awareness Network) employee group hosts networking, development and awareness events, as well as workshops looking at intersectionality and unconscious bias. ¹⁵ Discovery have both an Asian Cultural Alliance (ACA) and a Black Cultural Alliance (BCA), which promote cultural education, networking, and leadership, as well as giving members the opportunity to develop initiatives that will influence the business.
- 2.26 BT has an Ethnic Diversity Network, and also mentioned its two faith-based networks for Muslim and Christian employees, which connect employees and provide data and anecdotes to the business. Though the latter groups are more closely tied to religion or belief, we think BT highlighting them in relation to racial group is as important to

¹³ BT, CNBC/NBC, Columbia, Discovery, STV. AMC said that it was looking to set up groups supporting colleagues from minority ethnic backgrounds in leadership roles.

¹⁴ BT, CNBC/NBC, Discovery, The Walt Disney Company. Disney said that its 'Disney Cultures' group for employees from minority ethnic backgrounds is in development.

¹⁵ Columbia did not make reference to an employee network yet mentioned that they were creating a programme for Black History Month.

- demonstrate the interconnection between racial group, culture and religion. BT also has an Executive Champion for ethnic diversity, who speaks at events, provides internal and external mentoring, and informs the business' ethnic diversity strategy.
- 2.27 Four broadcasters made reference to their work or partnerships with external organisations and projects, which all differed in their focus. ¹⁶ BT works with the Rio Ferdinand Foundation and Business in the Community Race Campaign to participate in mentoring programmes, while Discovery works with consultancy company Aperian Global to develop cultural training for employees. STV works with Creative Access, a recruitment agency aimed specifically at young people from Black, Asian and minority ethnic backgrounds, to increase the diversity of their talent pipeline. Finally, Columbia has contributed to the Inclusive Employers 'BAME Challenge' toolkit, which it said it is now using to improve its processes and further foster an inclusive culture.
- 2.28 Finally, two broadcasters (Ginx TV and Shorts International) mentioned a focus on promoting talent from different ethnicities, with Shorts International working with organisations such as the NAACP¹⁷ and Hispanic American Foundation to advance opportunities in film for black and latino talent.

Nations and regions

- 2.29 In our first report, published in 2017, we asked broadcasters to provide information on whether their employees considered themselves to be English, Scottish, Welsh, Northern Irish, British or none of these. We found that due to the overlaps between British and the other options, and because only some broadcasters collected this information, the questions provided us with little insight. This year we replaced that question with one that asked broadcasters about any specific initiatives in place to promote equal opportunities in the UK nations and regions and/or amongst employees of different national origins.
- 2.30 Of the broadcasters analysed here, three broadcasters¹⁸ outlined specific arrangements or initiatives designed to support employees in the UK nations and regions, and/or amongst employees of different national origins. Of the remaining 65 broadcasters, many spoke about promoting a general culture of inclusivity, though without a specific example.
- 2.31 BT and STV both referred to their work with external organisations. BT's 'Work Ready' programme in partnership with the Rio Ferdinand Foundation supports young people to gain technical work experience in Doncaster, Manchester and London, and has been expanded to run in Northern Ireland. STV spoke about its work with Equate Scotland, which offers a 'Careerwise' programme providing placements for women within STV, as well as its partnership with Women in Journalism Scotland, to host networking events and training for women in the media in Scotland.
- 2.32 Discovery spoke about its focus on the inclusion of colleagues of different nationalities across all its regional offices. To promote this, Discovery celebrates a range of cultural

¹⁶ BT, Columbia, Discovery, STV.

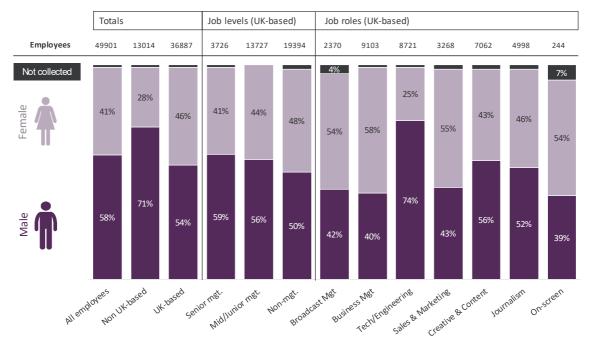
¹⁷ https://www.naacp.org/

¹⁸ BT, Discovery, STV. One broadcaster (Hochanda) said that this was something they were likely to look at in the next 12 months

- celebrations such as Lunar New Year, Eid and Diwali, with the aim of educating employees on their history and importance. It also streams training and events on its online platform to ensure colleagues from regional offices can be involved.
- 2.33 Given their focus on particular nations, S4C and STV target some of their work and initiatives in their local areas. For example, S4C supports 'It's My Shout', an initiative specialising in finding and developing new talent for the film industry, particularly amongst young people. It links communities with industry professionals, community associations, drama groups, schools and further education and higher education establishments to find the best new talent in Wales.
- 2.34 For the second year S4C volunteered to provide information on the proportion of Welsh speakers within its organisation. Forty two percent of S4C employees were categorised as fluent Welsh speakers, compared to 52% last year. Due to small group sizes we are unable to publish information on those employees learning the language or not fluent.

Gender





- 2.35 As shown in Figure 10 there is a noticeable difference in the gender make-up of employees who are UK-based (54% male) versus those who are not (71% male), resulting in a 58% male skew overall. For UK-based employees this is generally in line with the UK labour market population which is 53% male.¹⁹
- 2.36 Job levels and roles were only requested for UK-based employees, and for the former there is a clear increase in the male proportion as seniority increases, rising from 50% in non-management positions to 59% for senior managers.
- 2.37 The gender make-up differs by job role technical, engineering and data analytics (74%) and creative and content production (56%) are both male skewed, while business management and administration (58%), sales and marketing (55%), broadcast management (54%) and on-screen (54%) all have higher proportions of females than males.

¹⁹ ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). All in employment.

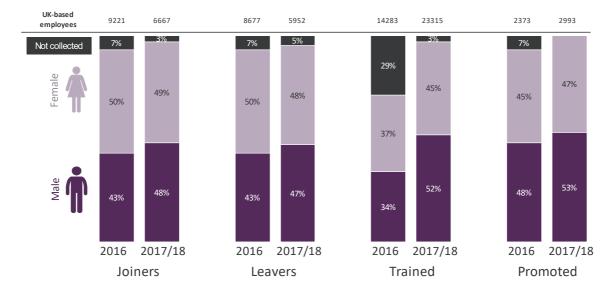


Figure 11: Gender by joiners, leavers, trained and promoted (2017/18 vs. 2016)

- 2.38 In each of the four categories shown in Figure 11, data monitoring has improved. This is particularly the case for those who completed training in 2016 there were 29% of employees whose gender data were not collected, but this figure is now just 3%. However, this category has become more male skewed (52% vs. 45% female) compared to 2016 (34% vs 37%).
- 2.39 In contrast, leavers has become less skewed in terms of gender in 2016 half of leavers were female compared to 43% male, but the figures have now become more evenly split at 48% male vs. 47% female.
- 2.40 In terms of those promoted, this is the only one of the four categories where the data is now complete it shows a slight male skew of 53% which is in line with the UK labour market average.²⁰
- 2.41 With regards to the proportion of employees who received training, across the UK industry the gender profile is generally in line with the overall workforce.

What are broadcasters doing on gender?

- 2.42 Nine broadcasters have in place initiatives or arrangements aimed at supporting women in their organisation and increasing female representation at senior levels.²¹
- 2.43 Four broadcasters made reference to gender or women's networks for employees, which host networking events, speaker series and workshops with the aim of developing and empowering women in the organisation.²² For example, both Discovery and BT mentioned hosting a range of events around International Women's Day. In addition, Columbia

²⁰ ONS Labour market statistics <u>A09: Labour market status by ethnic group</u> (Average of Apr-Jun17, Jul-Sep17, Oct-Dec17, Jan-Mar18). All employed males and females (employees and self-employed)

²¹ A+E, BT, CNBC/NBC, Columbia, Discovery, Immediate, STV, Turner, UKTV. AMC said that it was looking to set up groups supporting female colleagues in leadership roles.

²² BT, CNBC/NBC, Columbia, Discovery.

- AGENDA group works with the Diversity and Inclusion team to support the corporate principles, while BT's Gender Equality Network provides data and anecdotal evidence to the business.
- 2.44 BT also has an Executive Champion for gender equality, as well as one specifically for Women in Tech, who speak at events, provide internal and external mentoring, and inform the business' gender strategy.²³ Three broadcasters also mentioned the use of mentoring, with UKTV looking to set up a mentoring scheme for senior women across different media organisations.
- 2.45 Four broadcasters referenced the existence of 'family friendly' policies and programmes, though emphasised that these were not specifically aimed at women. ²⁴ STV is developing a 'Back to Business' programme, which aims to support colleagues who have had a voluntary career break to care for children and dependants to return to the workplace. This programme will provide skills training through rotational placements in the industry. ²⁵ BT, Immediate and UKTV all mentioned offering flexible working, with UKTV stating that 20% of the company already have formal flexible working arrangements in place.
- 2.46 Three broadcasters have initiatives or arrangements focused on female progression and leadership. ²⁶ CNBC/NBC have recently formed a Women in Leadership group which offers mentoring, role models and 'return to work' initiatives which aim to support women at every level. BT runs a personal development programme for women in management roles who have leadership potential in STEM (Science, Technology, Engineering, Maths) careers, which they are planning to extend to junior colleagues. ²⁷ Turner has identified female progression as its priority for 2018, and as such has hired a 'female progression expert' to hold staff focus groups and interviews to identify barriers to progression and clarify which measures staff believe would be most effective. Turner also offer 'Breakthrough Leadership' training, which aims to help high-potential women enhance skills such as negotiation and networking.
- 2.47 While Immediate and STV did not mention focused initiatives of this kind, both broadcasters stated a formal target for women in leadership. Immediate has a target of 50:50 gender parity in senior and tech roles by 2023, while STV is aiming to achieve gender balance in the top 25% of roles by earnings by 2021.
- 2.48 Finally, three broadcasters work or partner with external organisations which have a focus on gender. 28 STV offers paid placements for women within its technology team as part of its partnership with Equate Scotland's Careerwise programme, and also works with Women in Journalism Scotland to host networking and training events about women in the media. BT partners with organisations such as 30% Club, Business in the Community Gender Campaign, and Women of the Future to reinforce its commitment to gender

²³ CNBC/NBC's Women's Network also has male and female executive sponsors and co-chairs.

²⁴ BT, Immediate, STV, UKTV.

 $^{^{25}}$ Similarly, UKTV's 'Working Families Group' aims to support parents and carers within the business.

²⁶ BT, CNBC/NBC, Turner.

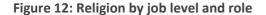
²⁷ This programme won the 2017 BQF Innovation in Diversity Award.

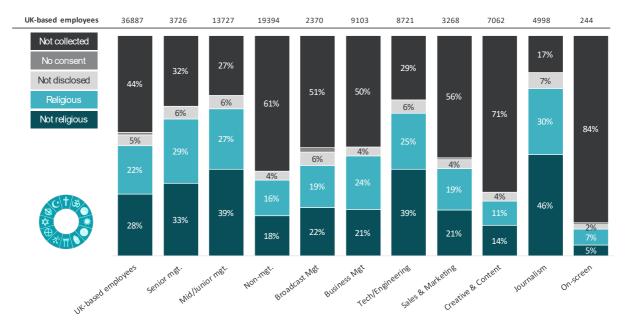
²⁸ A+E, BT, STV.

- equality and build networks across the industry. Youview told us it engages in events with the aim of attracting women to the company, including Women of Silicon Roundabout, Code First and Makers Academy.
- 2.49 Three broadcasters mentioned the importance of equality in pay and benefits in their response to our questionnaire, with Vice informing us it had taken the decision to report on its gender pay gap on a voluntary basis.
- 2.50 All companies with 250 employees are separately required to publish a median and mean gender pay gap²⁹ which several broadcasters included in this report have done. Information on individual broadcasters can be found on the Gender Pay Gap website.³⁰

²⁹ Additional data is required relating to bonuses and the proportion of male and female employees, these are listed in the gender pay gap guidance note https://gender-pay-gap.service.gov.uk/
https://gender-pay-gap.service.gov.uk/

Religion or Belief





- 2.51 Data on religion or belief were requested on a voluntary basis, and so it is unsurprising but disappointing, that the amount of data provided were lower than that for any of the three mandatory characteristics. Data were provided by a third (20 of the 60) of broadcasters, but this does account for over half (56%) of UK employees. The proportion not collected varies across job levels and is particularly high for non-management at three fifths. It also varies across job roles, from 17% of journalists (driven by the BBC) to 84% of on-screen talent.
- 2.52 According to the Census 2011, two thirds (67%) of the UK population are religious compared to 26% who are not. Although the high proportion of missing data means that it isn't possible to benchmark the figures for the industry directly, the fact that religious (22%) is lower than not religious (28%) shows a contrast.³¹
- 2.53 The low representation and fluctuations across job roles/levels also make it difficult to gauge any real conclusions or compare proportions across categories. The proportion of employees who self-define as not religious is higher than religious across all three job levels, but there are variations within job levels. For example, broadcast management currently shows a higher representation of religious (22%) than not religious employees (19%).

³¹ We are aware of other studies which also contradict the Census figures we use. For example, NatCen British Social Attitudes survey 2017 suggest that 'non-religious' is 53% (thus surpassing 'religious'). We have chosen to continue to use ONS for consistency with other characteristics as well as 2017 reporting.

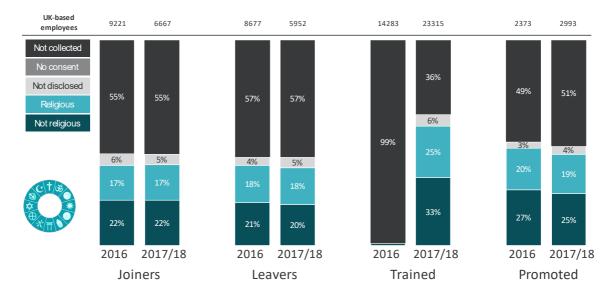


Figure 13: Religion by joiners, leavers, trained and promoted (2017/18 vs. 2016)

- 2.54 Across the four categories shown in Figure 13, all except for trained have remained relatively consistent in the proportion of employees represented since 2016 not collected is particularly high among joiners and leavers at over half for each.
- 2.55 All four categories show higher percentages for those who self-define as not religious, with the biggest difference being among those who completed training, at 8pp.

Figure 14: Religion breakdown for UK-based employees – 2017/18 vs. 2016

	2016	2017/18
Not religious	18%	28%
Christian	14%	16%
Hindu	1%	1%
Sikh	<1%	1%
Muslim	1%	1%
Buddhist	<1%	<1%
Jewish	<1%	1%
Other religion or belief	1%	2%
Religious (NOT SPECIFIED)	1%	<1%
Employee preferred not to disclose	4%	5%
Data collected but no consent to disclose to Ofcom	Not asked	<1%
Not collected	59%	44%

2.56 Overall there has been an improvement in the percentage of employees monitored, with not collected now applying to less than half of employees (44%) overall compared to more than half (59%) in 2016. This increase also translates to the number of broadcasters who provided detailed data on religion (27% from 16% in 2016). The proportion who self-define as not religious has seen a large increase from 18% to 28%, while those employees who self-define as Christian has also increased slightly from 14% to 16%.

What are broadcasters doing on religion or belief?

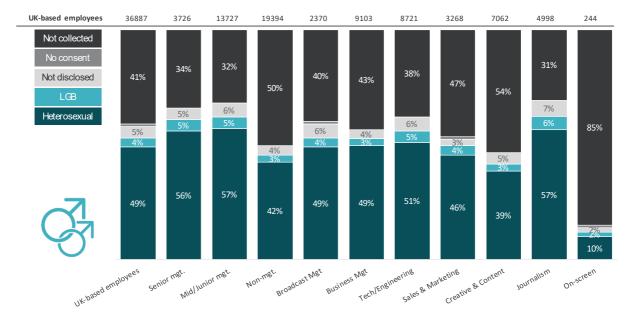
- 2.57 Five broadcasters³² provided information on additional arrangements or initiatives in place to support employees related to religion or belief.
- 2.58 Four of these³³ spoke about the use of private meeting rooms or dedicated rooms for colleagues to use for contemplation or prayer. CNBC/NBC mentioned its International Cultural Awareness Network (iCAN), which aims at an inclusive working environment through hosting workshops exploring religion as well as sharing information on religious events such as Diwali. As mentioned above in relation to racial group, BT has two faith-based networks for Muslim and Christian employees and celebrates multicultural events throughout the year. Similarly, Discovery celebrates events such as Lunar New Year and Eid to educate employees on different religions and beliefs.

³² AMC, CNBC/NBC, Discovery, Columbia, UKTV. One broadcaster (A+E) said that data on religion or belief will start to be included as part of a new collection process for new joiners and existing staff.

³³ AMC, Columbia, Discovery, UKTV.

Sexual Orientation





- 2.59 Although just over a third (22) of the 60 broadcasters with any UK-based employees provided data on sexual orientation, it equates to over half (59%) of employees. There are noticeable differences across job levels and roles in this respect, with the proportion of not collected ranging from 31% of journalists to 85% of on-screen talent.
- 2.60 Among all UK-based employees 4% self-define as LGB³⁴ compared to 49% heterosexual. This figure is highest among those in journalism (6%) but this is also the category with the most complete picture, so is difficult to compare with the other lower response job levels. For example, creative and content is 3% LGB, but is missing data for over half of employees.

³⁴ Those who self-defined as other sexual orientation, as selected as a response in our questionnaire are included in our LGB figures.

Note: we have not commented on these figures in relation to the UK population as we believe them to be under-stated (in addition to the issues of comparability due to the high proportion of missing data). See Section A5 of the separate methodology document for further details on this.

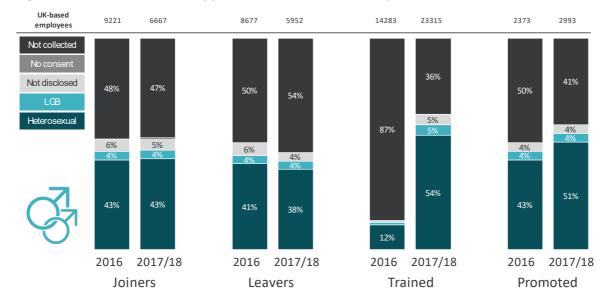


Figure 16: Sexual orientation by joiners, leavers, trained and promoted (2017/18 vs. 2016)

- 2.61 For the four categories shown in Figure 16, monitoring of leavers has worsened since 2016, with 54% of employees missing data. In contrast monitoring has improved for the other three categories; this is particularly the case among those who have completed training (from 87% to 36% not collected) but there is still data missing for much of the UK-based workforce.
- 2.62 The proportion of employees who self-define as LGB is similar across all four categories (4-5%).

Figure 17: Sexual orientation breakdown for UK-based employees – 2017/18 vs. 2016

	2016	2017/18
Heterosexual/straight	41%	49%
Gay men	<1%	2%
Gay women/lesbian	Zero	<1%
Bisexual	Zero	1%
Other	Zero	1%
LGB (NOT SPECIFIED)	3%	1%
Employee preferred not to disclose	5%	5%
Data collected but no consent to disclose to Ofcom	Not asked	1%
Not collected	51%	40%

2.63 The overall response rate has improved since 2016 with regards to sexual orientation – not collected has fallen from 51% to 40% of UK-based employees at a total level. The quality of the data, in terms of granularity, has also improved very slightly. While the generic LGB (not specified) category has fallen from 3% to 1%, the proportion who self-define as gay men (2%), has risen slightly from less than 1% in 2016.

What are broadcasters doing on sexual orientation?

- Out of the broadcasters analysed here, five broadcasters have additional arrangements or initiatives in place targeted to sexual orientation.³⁵ Each of these broadcasters spoke about publicly participating in celebrations such as Pride, as well as promoting or hosting LGBTQ events as a way to support and educate colleagues. For example, CNBC/NBC sponsor Pride in London and host an annual Pride party event open to all colleagues, as well as running panel events and workshops on LGBT representation, being an ally, and personal development.
- 2.65 CNBC/NBC, Discovery and Turner all have dedicated employee groups or networks, broadly aimed at fostering an inclusive working environment through events such as those outlined above. The OUT@NBC group also has an aim to attract, retain and develop LGBTQ and straight ally employees.
- 2.66 Four broadcasters spoke about their work with or memberships of external organisations such as Stonewall.³⁶ As part of Turner's partnership with GLAAD, an organisation aimed at countering discrimination against LGBT people in the media, it sponsors a programme which funds filmmakers from the LGBTQ community.
- 2.67 Four broadcasters referenced an upcoming focus on LGBT colleagues, broadly working on providing an inclusive environment and raising awareness of LGBT events.

Gender Reassignment

- 2.68 Some of the responses from the broadcasters about supporting transgender colleagues related more broadly to LGBTQ colleagues as a whole, as opposed to having a specific focus on gender reassignment. However, five broadcasters have some additional arrangements or initiatives in place to support transgender colleagues.³⁷
- 2.69 Discovery and Immediate Media both have gender neutral bathrooms for colleagues, with Discovery launching these during Pride Month to raise awareness of transgender issues.³⁸
- 2.70 CNBC/NBC, Turner and UKTV all mentioned the use of awareness-raising events. UKTV hosted a session for colleagues on the portrayal of transgender people on screen, and CNBC/NBC's LGBTQ employee group arranged a 'Trans in Media' panel hosted by a prominent trans activist, as well as a Trans 101 event. Turner said that it donated half of its float at Pride to the Mermaids charity, who work to raise awareness about gender non-conformity.
- 2.71 Channel I, Turner, The Walt Disney Company and UKTV either have or are currently designing guidance on supporting gender reassignment and are considering how this should relate to existing equal opportunities or diversity and inclusion policies.³⁹

³⁵ CNBC/NBC, Discovery, Turner, UKTV. One broadcaster (A+E) said that data on sexual orientation will start to be included as part of a new collection process for new joiners and existing staff. AMC said that it was looking to set up groups supporting LGBT colleagues in leadership roles.

³⁶ Columbia, Discovery, Turner, UKTV.

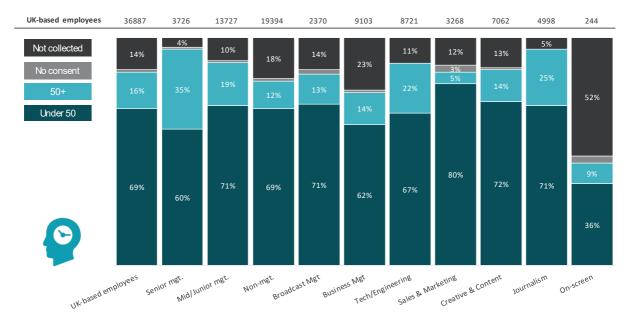
³⁷ Channel I, CNBC, Immediate, Turner, The Walt Disney Company.

³⁸ Turner plan to include gender neutral toilets in their new offices.

³⁹ The Walt Disney Company are working with Stonewall on its gender reassignment policies.

Age





- 2.72 Compared to the other two characteristics that were requested on a voluntary basis (sexual orientation and religion or belief), the picture for age is much more complete. In total 86% of employees have data for age, though it is important to note that this still only covers 30 broadcasters (so half of the 60 with any UK-based employees).
- 2.73 Across the UK-based industry the proportion of those aged 50+ is 16%, compared to 69% under 50. As we are missing data (not collected) for 14% of employees, it is difficult to do a direct comparison with the UK workforce. However, even taking this into account the proportion of those aged 50+ (16%) appears to be considerably below the UK average of 31%.
- 2.74 The proportion of those aged 50+ increases by level of seniority, rising from 12% of non-managers to 35% of senior managers. There are also differences by job role journalism has the highest proportion at 25% (driven by the BBC), compared to 5% in sales and marketing roles.
- 2.75 Across job level the proportion for not collected decreases by seniority from 18% among non-management to 4% for senior managers. In terms of job roles, this figure was lowest among journalists at 5% (driven by the BBC who accounted for four fifths of employees in this category) and highest among on-screen talent at 52%.

⁴⁰ 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.

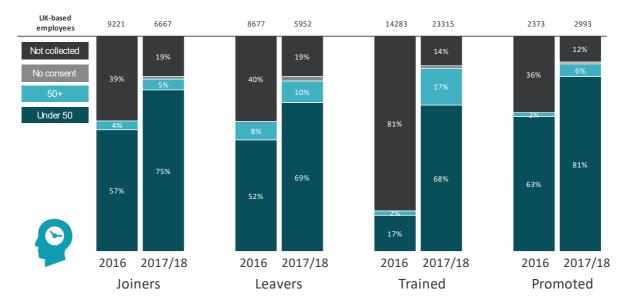


Figure 19: Age by joiners, leavers, trained and promoted (2017/18 vs. 2016)

- 2.76 Monitoring has improved considerably across all four of the categories shown in Figure 19, meaning they now cover at least 8 in 10 employees. The improvement is particularly noted for those who completed training, where data not collected has decreased from 81% in 2016 to 14%.
- 2.77 The proportion of employees who are aged 50 or more is higher for those who completed training at 17%, compared to 5% among joiners, 10% among leavers, and 6% of those who were promoted.

Figure 20: Age breakdown - 2017/18 vs. 2016

	2016	2017/18
Under 30	12%	18%
30-39	23%	29%
40-49	20%	22%
50-59	14%	13%
60+	3%	3%
Not disclosed	Zero	Zero
No consent	Zero	1%
Not collected	29%	14%

2.78 Compared to 2016 the overall picture for age is much more complete, with 14% of employees missing data in 2017/18, falling from 29% last year. This makes it difficult to directly compare changes in the proportions for individual age groups. However, the increase in representation appears to have made the profiles younger in general, with under 30s increasing the most (from 12% to 18%); in other words, it suggests that the previously missing data that has now been collected has predominantly come from younger employees.

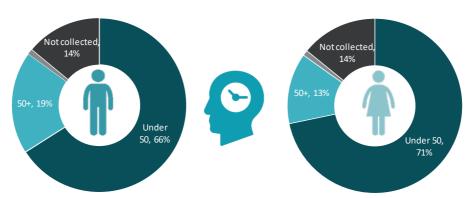


Figure 21: UK-based employees - Age by gender

- 2.79 Age was also broken down by gender, and this shows that female employees are generally younger (71% aged under 50) than male employees (66% aged under 50) within the UK-based TV industry
- 2.80 Compared with the UK workforce average at 31%, the proportion of women that are aged 50 or over is further from the average (18pp) than it is for men (12pp).⁴¹

What are broadcasters doing on age?

2.81 No broadcaster has additional arrangements or initiatives in place to support employees related to age. Though most work experience and apprenticeship schemes mentioned by broadcasters elsewhere were aimed at school leavers and students, these were not targeted at age specifically, but were rather aimed at increasing access into the industry. No broadcaster noted schemes or initiatives that encouraged career changes or opportunities to engage older people. Two broadcasters mentioned an upcoming focus on age, with Phoenix Chinese Entertainment and UKTV stating that they aim to provide more opportunities for younger talent.

⁴¹ 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 women/men

⁴² See section on work experience, apprenticeships and internships on page 40.

Parents, carers and flexible working

- Twenty three of the broadcasters analysed said they have in place specific initiatives or arrangements related to pregnancy, maternity, parents and carers. ⁴³ The majority of these (20 out of 23) spoke about the use of flexible working, although broadcasters differed in the formality of these arrangements as well as how widely they are offered. ⁴⁴ For example, AMC, Channel I and Immediate Media stated that flexible working requests can be submitted by parents or carers returning to work, and that these are assessed on a case by case basis. On the other hand, Discovery's flexible working policy is open to all employees at any time, and one of its offices is piloting a flexible working model which gives employees the option to work from home for two days a week. Turner said that it was planning to start promoting the option of flexible working more clearly to employees, while UKTV stated that about 20% of its colleagues have formal flexible working, as well as a number of informal arrangements.
- 2.83 Four broadcasters referred to having policies in place to support parents and carers, including flexible working policies, paternity leave policies and shared parental leave policies, though did not give detail on what these policies involve. 45 STV said that it has already delivered training on its family friendly policies to 64 managers across the business, though again did not expand on the detail of these policies. A further three broadcasters mentioned the use of enhanced pay for maternity, shared parental leave, surrogacy and adoption. 46
- 2.84 Four broadcasters spoke about options for colleagues to take time off for family or caring duties.⁴⁷ For Channels Incorporated, this could include days off for child vaccinations or school runs, while Discovery offers 15 fully paid days per year for backup emergency care of children or dependants. In a similar vein, Fashion One said that they provide additional leave credits for single parents.
- 2.85 Four broadcasters stated that they provide support for employees returning to work after a period of extended leave, although did not give concrete detail of what this support involves. 48 Three different broadcasters mentioned 'keep in touch days' as an example of this kind of support, which allows those on maternity or paternity leave to remain in contact with their teams. 49

⁴³ A+E, Alghad, AMC, BBC Worldwide, Channel I, Channels Incorp, CNBC/NBC, Columbia Pictures, Discovery, Fashion One, Immediate, Nordic, Public TV, Sat-7, Sports, Star, STV, Disney, TJC, Turner, UKTV, Viacom France, Viasat.

⁴⁴ AMC, BBC Worldwide ,Channel I, Channels Incorporated, CNBC/NBC, Columbia, Discovery, Fashion One, Immediate, Nordic, Public TV Armenia, Sat-7 , Sports, Star, STV, Walt Disney, TJC, Turner, UKTV, Viasat.

⁴⁵ Nordic, Star, UKTV, Walt Disney Company.

⁴⁶ Columbia, Discovery, Immediate. Sports offer a 'maternity bonus' for those returning from maternity leave.

 $^{^{\}rm 47}$ Channels Incorporated, Discovery, STV, Viacom France.

⁴⁸ Sat-7, Star, STV, Turner Broadcasting, Viacom France.

⁴⁹ Alghad, CNBC/NBC. Discovery. Discovery offer 20 fully paid 'keep in touch days' for those on extended leave.

2.86 STV will provide a 'Transition programme', supporting colleagues who have taken extended leave through meetings with key stakeholders, access to a peer support network, and mentoring. Both BBC Worldwide and CNBC/NBC also mentioned the use of mentoring for parents returning from maternity leave, while A+E, Discovery and UKTV also have support networks in place for parents returning to work. For example, the Parents@A+E network shares information on flexible working and return to work, as well as promoting guest speakers and lunchtime discussions.⁵⁰

Social Mobility

- 2.87 Eleven of the broadcasters analysed here have in place specific initiatives or arrangements related to social mobility.⁵¹ Of these 11 broadcasters, four said that they were either about to start collecting data on social mobility or were in the process of looking into data they have already received.⁵² For example, Turner included questions on social mobility in their last staff survey, and subsequently reported the findings to the board.
- 2.88 Six of the 11 broadcasters spoke about working with the local community as a way of promoting social mobility. 53 BT and STV have both partnered with local schools to raise awareness of the different career options in the industry, while Turner participate in 'Aspiration Days' at disadvantaged schools, as well as encouraging applications for apprenticeships and internships from local colleges and organisations. Each year, Discovery holds an international 'Impact Day' across all of its regional offices, where employees take a day out of their usual work to take part in a group charity event. These events are curated by each regional office in order to be most beneficial for the local community, and have previously included CV-writing workshops for students in underprivileged areas.
- 2.89 Four broadcasters mentioned the use of apprenticeships and work experience.⁵⁴ For its recently launched apprenticeship scheme, Columbia has engaged a recruiter who specialises in reaching out to socio-economically disadvantaged job seekers. STV has started to provide apprenticeships in finance, IT and payroll, as well as over 50 work experience placements across the business, which aim to provide an alternative entry route into the industry, as well as combining academic learning with vocational and transferable skills. UKTV also offers its paid apprenticeship opportunities to young people who have A-levels but not degrees, in order to open up opportunities to young people who do not have connections in the industry and may have never considered a career in the field.⁵⁵

⁵⁰ Discovery has an online community called The Maternity League where parents on or returning from maternity leave can connect and support each other. UKTV's Working Families Group is more policy focused, and its member discuss what more the business can be doing to support those juggling work and family life.

⁵¹ A+E, BBC Worldwide, BT, Channels Incorporated, CNBC/NBC, Columbia, Discovery, Immediate Media, STV, Turner, UKTV.

⁵² A+E, BBC Worldwide, Immediate Media, Turner.

 $^{^{\}rm 53}$ BBC Worldwide, BT, Discovery, Immediate, STV, Turner.

⁵⁴ Columbia, STV, Turner, UKTV.

⁵⁵ UKTV also remarked that it has removed the requirement for candidates to have degrees for the majority of roles across the business.

- 2.90 Finally, four broadcasters spoke about their work or partnerships with external organisations. ⁵⁶ CNBC/NBC have partnered with The Prince's Trust to offer two programmes for young people who are either unemployed or struggling academically at school, which provide an introduction to the media industry and encourage participants to consider its early careers programmes. ⁵⁷ Discovery has worked with the Will and Jada Smith Family Foundation (WJSFF) by hosting a Careers-in-Entertainment Day at its US offices, which targeted underprivileged students from lower social-economic backgrounds, ⁵⁸ while BT partners with organisations such as the Rio Ferdinand Foundation and the ALETO foundation to take part in their cross-organisational mentoring programmes. ⁵⁹ Similarly, Turner participates in the Media Trust's mentoring scheme for young disadvantaged people who want to enter the media industry.
- 2.91 Ofcom has so far focused engagement on social mobility and social and economic background with the main five broadcasters. For this reason, the social mobility section and advice from the social mobility consultants the Bridge Group⁶⁰ has been included in the In-focus report. Over the next year Ofcom will engage more with broadcasters on this area and begin asking broadcasters for data ahead of the next Diversity in television report.

⁵⁶ BT, CNBC/NBC, Discovery, Turner.

⁵⁷ CNBC/NBC also pointed out that its early careers programmes target approximately 20 different universities across the UK, ranging from Russell Group to former polytechnics.

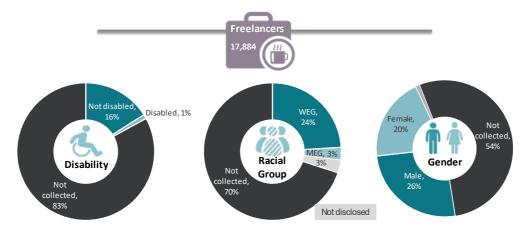
 $^{^{58}}$ In 2019 Discovery hopes to work with WJSFF and other external organisations on social mobility projects.

⁵⁹ The Rio Ferdinand Foundation engages young people from deprived communities in sports, arts and media activities. The ALETO foundation provides opportunities for young people from a range of backgrounds.

⁶⁰ https://thebridgegroup.org.uk/

3. Freelancers

Figure 22: Freelancer profiles across the UK broadcasting industry⁶¹



- 3.1 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 creative industries, to do more to support freelancers.
- 3.2 Across the 72 broadcasters who provided us with data, 63 of them had freelancers working for them in the period of April 2017 to March 2018, which amounted to 17,884 freelancers in total across the industry. We asked broadcasters to voluntarily provide data for freelancers on the three characteristics of gender, racial group and disability. A third (21) did so for any of the characteristics ten broadcasters provided any data for one characteristic (primarily gender), five provided data for two characteristics, and six provided data for all three characteristics. Therefore, the data is clearly limited due to low response rates.
- 3.3 As shown in Figure 22, the data represents fewer than half of freelancers for all three of the characteristics, with the proportion of data not collected being 54% for gender, 70% for racial group, and 83% for disability.
- 3.4 From the data provided, the proportion of females (20%) is lower than that for males (26%). Three percent of freelancers self-define as being from minority ethnic groups (compared to 24% who self-define as being from white ethnic groups), and just 1% self-define as disabled (compared to 16% not disabled).
- 3.5 We are aware that these data capture 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 Diamond⁶² if involved in content produced for one of the main five broadcasters. However, we expect that there is 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.

⁶¹ This includes all freelancers mentioned by the 72 broadcasters, whether employees are based inside or outside the UK.

⁶² https://creativediversitynetwork.com/diamond/

4. Steps broadcasters are taking to promote equal opportunities, diversity and inclusion

- 4.1 In November 2017 Ofcom updated its diversity guidance, which broadcasters must have regard to when considering equal opportunities arrangements. As a result, we also updated the qualitative questions we asked broadcasters to reflect the different recommendations in the guidance.⁶³
- 4.2 We have reviewed the responses to each question for the purposes of this summary and will be assessing each broadcaster's overall arrangements after publication. We will investigate any broadcasters who are unable to demonstrate that they have in place arrangements for promoting equal opportunities as required by their licence condition.
- 4.3 This summary includes all broadcasters that met the employee threshold, ⁶⁴ whether through UK-based or international employees, as all broadcasters were asked to complete the same qualitative questions and are required to have arrangements in place to promote equal opportunities. In addition, S4C and one other broadcaster that provided information voluntarily are also included in this section. ⁶⁵ This summary does not include the five main broadcasters as those arrangements are instead included in the main summary report and In-focus report. ⁶⁶

Definition of Equal Opportunities

- 4.4 **Broadcasters were asked how their organisation defines equal opportunities**, to get a sense of how much consistency there is across the industry in terms of how this principle is understood.
- Of the broadcasters analysed here who answered the question, the majority (33 out of the 55 who answered) articulated equal opportunities as a principle of non-discrimination, defined by equal treatment of all colleagues, regardless of personal characteristics. Adhering to this principle means that no colleague is disadvantaged on the basis of their membership of a particular group, and so decisions relating to employment are based on merit and objective factors. Two broadcasters (Alghad TV Limited and Viacom France) also made reference to the equal provision of benefits or training as being part of this principle of non-discrimination.
- 4.6 Many of these broadcasters stated that they extend this definition to all employees, and across all facets of employment: including recruitment, training, promotion, disciplinary

⁶³ A full list of the questions sent to broadcasters can be found in the Methodology report.

⁶⁴ Only broadcasters with 21 employees or more were required to complete the questionnaire.

⁶⁵ The other broadcaster providing information voluntarily was below the employee threshold and therefore was not required to provide information. Due to small numbers it was not included in the data analysed in other sections.

⁶⁶ This section does include broadcasters linked to the main five that were reported on separately. For example, the main report includes information on the BBC Public Television Service but this section separately reports on BBC Worldwide and BBC Global News which completed separate submissions. Similarly, Viacom France was submitted separately to Viacom featured in the main report which is UK- based.

- procedures, and termination. Some broadcasters, such as CNBC/NBC and UKTV Media, said that they also apply this principle to suppliers, visitors, clients and members of the public.
- 4.7 Several broadcasters (15 out of 55) defined equal opportunities in terms of the legal obligations placed on them relating to the 'protected characteristics', on which it is unlawful to discriminate. These characteristics include disability, race, sex, gender reassignment, religion or belief, age, marital status, pregnancy or maternity and sexual orientation.
- 4.8 Fewer broadcasters (12 out of 55) spoke about an inclusive and supportive working environment as being built into the definition of equal opportunities. For those that did, an inclusive working environment means that all colleagues are treated with dignity and respect, which some broadcasters linked to allowing employees to do their best work. Immediate Media TV Limited based their whole response around this principle, writing that it defines equal opportunities as having a welcoming and inclusive workplace that allows all staff to reach their potential, an attitude which feeds into how it manages, promotes and rewards employees. Seven other broadcasters associated providing equal opportunities with maximising organisational performance. For example, STV Group wrote that diversity contributes to innovation, and that an inclusive culture allows creativity to flourish.

Equal opportunities objectives

- 4.9 Broadcasters were asked to share their organisation's equal opportunities objectives, which can broadly be defined as principles which guide an organisation's efforts towards achieving equality of opportunity. The majority of broadcasters (42 out of 49) spoke about a general objective to eliminate discrimination in employment decisions and achieve an inclusive culture where no-one is treated unfairly on the basis of having a protected characteristic. Seven broadcasters added that they were committed to creating a workforce capable of reflecting the diverse communities they serve.
- 4.10 Several broadcasters gave more specific objectives related to the scope and application of their equal opportunities policy. Four broadcasters spoke about extending equal opportunities to their whole workforce, to ensure all agency, freelance, part-time and volunteer staff were valued and respected. Similarly, three broadcasters said they aim to make their equal opportunities policy known to their external partners, consultants and contractors. Four broadcasters said they aim to ensure action is taken against alleged breaches of their equal opportunities policy, for example incidents of discrimination, bullying and victimisation.
- 4.11 Seven broadcasters responded that one of their equal opportunities objectives was to recruit the best talent from diverse backgrounds, though none of them referenced here any formal recruitment targets they were aiming for. Sports Information Services were the only broadcaster to mention gender pay equality as one of their objectives.
- 4.12 **Broadcasters were also asked how these equal opportunities objectives will be met.** The responses here were generally more specific, though the level of detail given about the various measures being taken varied between the broadcasters.

- 4.13 Fourteen of the 49 broadcasters who answered this question said that they would achieve their equal opportunities objectives by employees working together to create an inclusive and non-discriminatory environment in day-to-day working life. The majority of these broadcasters did not give specific details about what this entails in practical terms. However, nine broadcasters mentioned the existence of employee communities, diversity networks and dedicated teams who raise awareness and promote inclusivity across the organisation. Vice spoke about its Diversity and Inclusion Advisory Board, which works alongside employees and HR in order to create a more inclusive and supportive workplace. In a similar vein, seven broadcasters spoke about the importance of an effective grievance procedure, where employees have a safe and effective process with which to make a complaint about unequal treatment.
- 4.14 Some broadcasters spoke about more targeted ways they were seeking to make their working culture more inclusive. QVC and BT both considered the importance of flexible working and accommodating employees' different circumstances, with BT creating a maternity handbook to educate managers on how to make employees returning from maternity leave feel included.
- 4.15 Twenty five broadcasters spoke about recruiting diverse talent as a way of achieving their equal opportunities objectives and 15 broadcasters mentioned the provision of training as part of how they will meet their equal opportunities objectives. More information on these practices can be found in the sections on recruitment and training below.

Equal opportunities targets

- 4.16 Equal opportunities targets are often associated with an objective, and are used as a tangible way to ensure that such objectives are met. As such, they tend to be quantitative, to allow for success to be measured more easily.
- 4.17 Over half of the broadcasters (39 out of the 61 who answered) said they currently have no equal opportunities targets at their organisation. Of these, only six respondents said that setting targets was on their agenda for the future. Perform Investment Limited said it has commissioned a group to help it set realistic targets for 2019, while QVC stated that it was considering introducing targets within its diversity strategic plans. LFC TV said that it was exploring the use of targets to address its gender pay gap, and Turner Broadcasting System Europe said that its strategy to increase the number of women in senior roles may include targets in some areas. Although Immediate Media TV Limited has targets in place for gender parity, it said that it will be investigating further to develop targets relating to increasing representation of all protected characteristics.
- 4.18 Eight broadcasters who stated that they do have equal opportunities targets lacked a measurable or specific action to aim towards. Answers of this kind ranged from aiming to be more representative of its customers and community, to ensuring hiring decisions are based on merit rather than personal characteristics. Turner and Viacom France both referenced increasing the number of women in certain roles, however neither of them has put a formal target in place.

In contrast, nine broadcasters stated that they have formal equal opportunities targets in place. Several of these focused solely on gender, with four broadcasters citing a target to achieve 50:50 gender parity in senior roles, in the next five years at the latest. Bloomberg stated that while it has no targets at an enterprise level, individual businesses are encouraged to identify them in their annual plans. Bloomberg's news division has a number of specific targets, though they almost exclusively focus on gender equality. Targets relating to ethnicity include increasing the number of ethnically diverse hires and increasing the ethnic representation of those it promotes. This comes in contrast to their more tangible gender targets, such as aiming for 50% of hires to be female and increasing the number of women featured in stories by 30%. BT has focused on both gender and ethnicity, with senior leadership targets applying to both demographics. BBC Worldwide offered the most extensive response of this kind, with workforce, leadership and apprenticeship targets for women, LGBT, disabled and minority ethnic employees set out for 2020.

Equal opportunities policy documents

- 4.20 Having a written equal opportunities policy demonstrates an organisation's commitment to improving diversity. It can be an important part of raising employees' awareness about respect and fairness in the workplace, as well as providing reassurance to colleagues that such issues will be taken seriously. We asked broadcasters to outline details of their equal opportunities policy documents, to give an idea of how often such policies are reviewed, and to what extent they are shared across the organisation.
- 4.21 The majority of broadcasters have reviewed their equal opportunities policy in the last year. Eleven out of the 52 who answered the question said that they reviewed their equal opportunities policy annually, with ten stating they last reviewed it in 2017, and eight having last reviewed it in 2018. 4 Dimensions Media Network stated that it reviews its policy every three months. Four broadcasters said they were currently reviewing their policy, with Ginx TV adding that this process was prompted by Ofcom's review. Five broadcasters were less explicit and stated that they reviewed their policy 'regularly' or 'periodically', with one broadcaster stating that no such reviews take place.
- 4.22 The broadcasters outlined a range of ways they share their written equal opportunities policy with employees. Thirty six out of the 61 broadcasters who answered the question stated that employees are able to access this type of information at any time, either through the intranet, shared company drive, or online system. Bloomberg has its own Diversity and Inclusion online portal for employees to access resources such as toolkits and research, as well as information on the company's diversity strategy and agenda. Similarly, LFC TV said there is a dedicated Equality, Diversity and Inclusion page on its employee intranet.

⁶⁷ BBC Worldwide and BBC Global are separate from BBC Public Television Service and we ask them to complete separate information requests. While some of their initiatives are in line with the BBC Public Television Service's initiatives, they do have their own initiatives and arrangements as well.

- 4.23 Twenty seven out of 61 broadcasters said they share this type of information when new employees join, for example as part of an HR induction, employee handbook, or in their employment contract. Bloomberg explained that part of its on-boarding programme is to educate new starters on its approach to diversity and inclusion, as well as flagging relevant events and resources. Two broadcasters (CNBC/NBC and QVC) conduct mandatory compliance training to educate employees on equal opportunities within the organisation, which includes material on the arrangements in place.
- 4.24 Twenty five broadcasters said they use internal communication processes such as emails, team meetings and messages from HR to share equal opportunities arrangements with employees. Five broadcasters mentioned the use of events as a way of sharing information about equal opportunities, with BT stating that it holds regular inclusion campaign events updating colleagues on the plans and progress of the policy, which are streamed across the organisation. NHK Cosmomedia stated that it carries out bi-annual interviews with each employee to talk about these arrangements, while Fashion One said it conducts a general assembly meeting every six months where employees can ask questions about the equal opportunities policy. Two broadcasters have no written equal opportunities policy in place.

Role of senior management in equal opportunities arrangements

- 4.25 **Broadcasters were asked to what extent their senior management team are involved in the creation and promotion of their equal opportunities arrangements**. Responses to this question were mixed, with broadcasters offering a range of roles that their senior management play.
- 4.26 Ten of the 61 who responded stated that senior management have overall responsibility for the implementation of equal opportunities arrangements. Lancaster LLC said that this involves determining the general steps to be taken to ensure adherence to equal opportunities arrangements, introducing new practices, and monitoring their implementation. Seven broadcasters responded that senior management are responsible for ensuring the equal opportunities policy is adhered to, and the policy itself implemented fairly.
- 4.27 Fewer broadcasters cited specific roles that senior management play in tasks relating to equal opportunities. Four broadcasters said that senior managers are responsible for reviewing the equal opportunities policy, with Marjan Television Network adding that the recent review carried out by senior management resulted in the policy being redrafted, as well as introducing new recruitment guidelines and internal diversity monitoring. Three broadcasters said that their senior management play a direct role in developing action plans and strategies to support the equal opportunities policy. CNBC/NBC stated that its senior management teams review the results of annual workforce surveys, and work with HR to develop these strategies.
- 4.28 Some broadcasters emphasised the importance of the 'soft powers' used by senior management with regard to promoting equal opportunities arrangements. Eleven out of 61 spoke about the way senior management act as champions of diversity and inclusion,

- who lead the conversation on equality both internally and externally. For example, two broadcasters said that senior management are responsible for cascading information effectively through the organisation, and three broadcasters responded that senior management are invited to sponsor relevant events and initiatives.
- 4.29 Some broadcasters spoke of the way senior management inspire colleagues across the organisation. BT, Bloomberg, and Columbia Pictures all mentioned the responsibility of senior management to be visible role models, while BT, Channels Incorporated, and UKTV Media all mentioned the use of mentorship from senior management as a way to empower colleagues from a wide range of backgrounds.
- 4.30 Similarly, seven broadcasters emphasised the way that senior management are responsible for making unbiased decisions, and applying the equal opportunities practice when making recruitment or employment decisions to ensure that discrimination does not occur. Ten broadcasters focused instead on how senior management lead the way in setting a standard of equal treatment and are responsible for fostering a positive and inclusive culture where all colleagues can thrive. Bloomberg and STV Group said that the promotion of this kind of environment is embedded in specific objectives for senior managers, with Bloomberg adding that this diversity metric forms part of managers' performance evaluation assessments.
- 4.31 Several broadcasters appeared to have no specific role for senior management in their equal opportunities arrangements, either giving a general answer about how senior colleagues support the policies or offering ways that colleagues of all levels are involved in promoting equal opportunities.

Arrangements promoting equal opportunities at board level

- 4.32 **Broadcasters were also asked whether they have any arrangements in place that aim to promote equal opportunities at board level.** The most common response (23 out of the 60 who answered) was that they have no such arrangements, with reasons ranging from the company being too small, to the Board not being based in the UK. Four of these respondents said that they hope to review this, with a view to introducing some kind of arrangements in the future.
- 4.33 Twelve broadcasters said that while they have no arrangements to promote equal opportunities at board level specifically, their inclusive recruitment policy is such that it applies equally to those on the board. Three broadcasters mentioned the use of succession planning to have a broader view of the talent pipeline into the board, though did not go into more detail.
- 4.34 Several broadcasters went further and stated ways they were ensuring their recruitment practices at board level are inclusive. For example, both BT and Discovery mentioned that their senior leadership team undertake unconscious bias training to ensure recruitment decisions, including those at board level, promote diversity. Channel I UK Limited focus its efforts on the Trustees themselves, introducing a 'Recruitment, Selection and Induction Policy' to attract more diverse board members and better equip them if they are recruited.

- Fox Networks Group said that for board level opportunities it uses executive search professionals who are briefed to source a wide range of candidates, while Columbia said it has reviewed its job descriptions for exclusionary language or criteria. Finally, both Immediate Media TV Limited and Sports Information Services mention the use of recruitment shortlists to mitigate unconscious bias in the selection process.
- 4.35 Two broadcasters have made use of mentoring or leadership programmes to increase representation at senior levels, with A+E Networks' next mentor programme featuring an all-female line-up. BT and CNBC/NBC said that the diversity of their most senior employment levels is reported and discussed internally, with BT setting a target of 40% women in its senior leadership team by 2020.

Diversity monitoring data

- 4.36 We asked broadcasters when and how often their employees provide monitoring data on characteristics such as gender, racial group and disability, as well as what information is shared with employees about the data collected.
- 4.37 Eighteen broadcasters who answered the question said they collect such information from their employees annually. Twenty eight of the broadcasters said that they collect monitoring data when a new employee joins. Five of these are part of the 18 who also collect this information annually. Seven broadcasters stated they collect this information at the application and recruitment stage.
- 4.38 Fifty five broadcasters collect at least some diversity monitoring information from employees. Some broadcasters also told us about techniques they are using to encourage employees to provide this data. CNBC/NBC, UKTV Media and BT all said that they run publicity and awareness campaigns which encourages participation and explains the purpose of the data collection. Similarly, STV Group tells employees that by filling in their personal information they will assist the company in measuring the impact of their commitment to diversity and inclusion.
- 4.39 As part of our assessment of broadcasters we will be reviewing the details provided about their monitoring process and the data disclosed to Ofcom.
- 4.40 When asked what information is shared with employees about the monitoring data, and how this information is used to inform equal opportunities arrangements, broadcasters' responses were mixed.
- 4.41 Fifty nine broadcasters answered the question, 18 said that monitoring data is not shared with employees but the majority did not provide a reason for this
- 4.42 Of the broadcasters who do share this data with employees, responses were generally vague as to what exactly this entails, with the majority of broadcasters giving minimal detail about which data is shared and in what form.
- 4.43 In terms of how this information is used to inform equal opportunities arrangements, 11 broadcasters referenced using data related to recruitment, promotion and retention to inform their diversity strategies: tracking performance against goals, identifying gaps and

- potential areas of focus, and helping to set targets or objectives. CNBC/NBC said that information is shared with the HR leader and is then taken into consideration when priorities are being defined. Current projects it has identified as a result of this process include increasing the pipeline of talent from lower social and economic backgrounds, and initiatives to increase the number of women in technology and production roles.
- 4.44 Ten broadcasters interpreted this question as asking what information is given to employees when they are asked to fill out their data. Within this, five broadcasters stated that they inform employees this data is gathered to monitor and promote diversity within the organisation, with BT adding that the data will enable it to understand how included and engaged different communities of employees feel. The remaining five broadcasters gave a more generic rationale to employees, relating to how data is collected, used and stored, with some of these referencing privacy policies mandated by the EU General Data Protection Regulation.

Equal opportunities measures in place in terms of recruitment practices

- 4.45 When asked to outline the equal opportunities measures they have in place in terms of their recruitment practices, many broadcasters offered a range of initiatives and methods used at various stages of the recruitment process.
- 4.46 Five broadcasters stated that they either undertake analysis of their recruitment processes or monitor the diversity of leavers and joiners, in order to understand what the general trends are and whether there are any obvious problem areas to work on.
- 4.47 In terms of the application process itself, many broadcasters spoke about efforts to make their advertising and applications more inclusive. Five broadcasters said that they ensure their stated selection criteria are objective, and do not directly or indirectly disadvantage certain groups. Twelve broadcasters explained ways that they ensure their job advertising reflects their commitment to diversity and equal opportunities. Eight of these said that they ensure their careers website includes a statement confirming that they are an equal opportunities employer, and welcome applicants from any background. Bloomberg stated that part of its strategy for diverse recruitment is to use branding to position itself as a diverse employer of choice, for example using social media to publish diversity and inclusion related content. Columbia Pictures said that it will add logos from the DWP's Disability Confident Scheme, Stonewall's Diversity Champions and other inclusive employer schemes to its recruitment literature to visually demonstrate its commitment to equal opportunities. The remaining broadcasters (five out of 12) said that they look to eliminate any signs of biased or exclusionary language in the way their job adverts are worded, especially with regard to gender – with UKTV Media adding that they are trialling the use of a product which tests the gender neutrality of job specifications.
- 4.48 Eight broadcasters make use of external partnerships and targeted advertising to ensure their job adverts reach a wide range of people. Of these, BBC Worldwide, Bloomberg and UKTV Media said they use the job board Vercida, which specifically aims at promoting diversity and inclusion. Similarly, Discovery stated that its membership of organisations

- such as Stonewall and EmployAbility allows it to advertise jobs on their online platforms which target these specific groups.
- 4.49 Four broadcasters cited tangible measures designed to expand their talent pipeline and ensure a diverse range of candidates. Some focused on the interview process, with Sports Information Services using recruitment shortlists to improve minority ethnic and female representation, and Vice ensuring that hiring managers are part of a diverse panel in order to minimise subjective biases.
- 4.50 Almost half of the broadcasters who responded (27 out of 63) spoke about the use of training as an equal opportunities measure in their recruitment process. Some of these broadcasters (three out of 28) focused on training aimed at prospective candidates and employees. For example, Turner offers training designed to help employees make more of an impact in the recruitment process, which emphasises the importance of providing new ideas and perspectives to the company. However, the majority of these broadcasters (25 out of 28) referred to training designed specifically for hiring managers and interviewers, aiming at ensuring a fair and objective interview process. The most common forms of this were unconscious bias and interview skills training, though some broadcasters mentioned training in the organisation's equal opportunities policy and how it is applied.
- 4.51 Relatedly, seven broadcasters mentioned that they currently or aim to use shortlists as a way of ensuring the pool of candidates is diverse. A further three broadcasters spoke about the use of balanced interview panels as ways to make recruitment decisions more likely to be objective and non-biased. Finally, four broadcasters said that they ask candidates to let them know any reasonable adjustments they have, especially related to disability, so that these can be accommodated in the recruitment process and their potential future role.
- 4.52 Twenty broadcasters either stated that they have no specific equal opportunities measures in their recruitment practices, or instead outlined general components of their recruitment process which were not aimed at promoting diversity.

Training or schemes to promote a diverse workforce

- 4.53 We asked broadcasters to outline any training or schemes offered by their organisation to promote a diverse workforce or to encourage an inclusive working environment.
- 4.54 Of the 61 broadcasters who answered the question, 30 said that they have some training or scheme in place aimed at promoting diversity. Nine broadcasters said that they have no such training schemes in place, while 15 spoke instead about general skills training they offered to all employees. Those that do provide training or other schemes varied in both the extent of what they cover, as well as what form the training or scheme takes. Twelve broadcasters said that they offer general training on equality, diversity and inclusion in the workplace, either as part of general 'code of ethics' training for employees, or as a dedicated e-learning course. Six broadcasters spoke about training specifically centred around anti-discrimination and anti-harassment, some of which were in the form of mandatory compliance training on respect and sensitivity in the workplace. Several broadcasters provide training specifically for managers, to equip them in how to encourage

and lead a diverse workforce. Nine of these offer unconscious bias training for managers, designed to help them develop an awareness of the way biases may impact the decisions they make at work. Some broadcasters make this training mandatory, for example Bloomberg, who are working towards 100% completion for managers. Six broadcasters provide more skills-based training in how to be an inclusive leader – including how to integrate diverse policy, how to face the challenges that diversity and inclusion might pose to a manager, and how to manage diverse and remote teams. Several broadcasters also spoke about training in terms of equal access to opportunities. Eleven broadcasters stated that they were committed to providing equal access to training and promotions, to ensure the same opportunities for development within the organisation.

- 4.55 The majority of broadcasters mentioning training in their equal opportunities arrangements, spoke about training offered to employees at all levels to educate them about the organisation's equal opportunities policy, and how it should be applied. Vice, for example, provide mandatory workplace behaviour training for all employees, which specifically addresses what constitutes discrimination.
- As well as training schemes, six broadcasters spoke about the use of events as a way of promoting a diverse workforce and encouraging an inclusive environment. 4 Dimensions Media Network, CNBC/NBC and Discovery all mentioned the celebration of cultural or community events such as Chinese Lunar New Year, Diwali and Pride. Immediate Media put on a 'Wellbeing Week', which involves activities aimed at helping employees better understand mental health and how to look after their own wellbeing. CNBC/NBC, Discovery and The Walt Disney Company also spoke about the use of panel events and speaker sessions as a way of raising awareness and starting a dialogue around diversity and inclusion. The Walt Disney Company arranged a 'Diversity Month' in 2018, which provided a speaker and training programme with titles such as 'Talking to young people about LGBT+ inclusivity', 'Empowering Allies', 'Age is just a Number', and 'Diversity and Inclusion in the Sporting World'.
- 4.57 Some broadcasters mentioned other initiatives or schemes put in place to promote diversity. Four spoke about the use of mentoring, with UKTV Media recently announcing a Diversity Mentoring scheme which pairs colleagues with internal and external mentors from diverse backgrounds. Four broadcasters mentioned the existence of internal forums and focus groups, where employees' feedback about the issues they face at work is used to inform the diversity and inclusion strategy going forward. Similarly, three broadcasters have put in place a diversity and inclusion council or advisory board, made up of either senior leaders within the business or external experts working with HR departments, who are tasked with looking for ways to improve diversity and inclusion within the business.
- 4.58 There were also some examples of more informal and ongoing arrangements used by broadcasters to promote diversity and inclusion. Four broadcasters spoke here about the initiatives they have in place in terms of parents, carers and flexible working, which ranged from a networking group for parents, to creating an environment which supports flexible working patterns.

Work experience, internships or other schemes which aim to attract new talent

- 4.59 Broadcasters were asked about any work experience, internships or other schemes they offer which aim to attract new talent to the industry. We asked them to specify whether these are targeted to particular protected groups, and whether they are paid or unpaid.
- 4.60 Of the 63 broadcasters who provided a response, the majority provide some kind of internship or work experience opportunities, though many of these are not targeted to a particular protected group. Eighteen broadcasters offer paid internships which are not targeted to any specific group, which range between formal or annual schemes and ad hoc opportunities provided on request. Four broadcasters offer paid work experience which is not targeted to any one group, two broadcasters provide paid apprenticeships which are not targeted, and two broadcasters have a paid graduate scheme which is also not targeted. In terms of unpaid roles, 11 broadcasters offer non-paid work experience which is not targeted to any specific group, and four broadcasters provide non-paid internships which are not targeted.
- 4.61 As referenced in Ofcom's Thinking outside the box guidance, ⁶⁸ companies should aim to reduce the use of unpaid internships as these can disadvantage those who do not have independent financial resources or support. However, several broadcasters offer internship, work experience and apprenticeship opportunities which do aim to encourage particular groups to enter the industry. For example, three broadcasters have designed internship schemes specifically aimed at young disabled people. IMG Media stated that it targeted candidates from minority ethnic backgrounds for its paid summer intern programme and advertises the scheme on diversity job boards. It added that four slots are reserved for candidates from The Prince's Trust, which supports vulnerable young people from socially disadvantaged backgrounds.
- 4.62 Five broadcasters provide apprenticeships or work experience which aim at improving social mobility. This includes BT's 18-month paid apprenticeship scheme aimed at 18-24-year olds, which is targeted to those living in the Olympic boroughs (Newham, Hackney, Tower Hamlets, Waltham Forest and Greenwich) as a way to reach out to people with differing social, economic and ethnic backgrounds. Vice has also recently launched a sixmonth paid apprenticeship programme, which provide career opportunities for people who have previously been imprisoned.
- 4.63 Other examples of targeted programmes include STV Group's partnership with a 'career wise' programme, which aims to recruit women into a paid technology placement within the company. Bloomberg outlined a number of initiatives it has either designed or supported, including its 'Relatable Role Models' programme which helps students from minority ethnic backgrounds gain employability skills, as well as its 'Initiative Africa' which

⁶⁸ https://www.ofcom.org.uk/ data/assets/pdf_file/0030/47496/increasing-diversity.pdf - page 10

- provides scholarships and training opportunities to graduate students from various universities in Africa.
- 4.64 As well as internship and work experience schemes, some broadcasters spoke about the use of events and initiatives as a way of attracting new talent and raising awareness of the opportunities available. Vice has recently hosted two separate workshops which gave unemployed or under-employed young women and students from minority ethnic backgrounds the chance to hear stories and advice from their journalists and film-making staff.
- 4.65 Finally, six broadcasters spoke about organisations and charities they have partnered with to allow them to reach out to more groups and communities. BT Sport has partnered with the Premier League to provide funding and resources to give local disabled people access to sport, while CNBC/NBC partner with The Prince's Trust to offer a programme of events for young people from disadvantaged backgrounds.

Broadcasters' priorities for the coming year

- 4.66 **Broadcasters were asked to share what priorities their organisation has in terms of promoting equal opportunities during the next 12 months.** Of the 59 responses, broadcasters varied in the specificity and clarity of the priorities they had set for the following year.
- 4.67 Ten broadcasters did not have any specific priorities, with some saying they would continue doing what they are currently doing, and others saying that they do not set priorities which are time-bound. A further seven broadcasters offered priorities which revolved around generally eliminating discrimination in their organisation and promoting an inclusive workforce, though without a focused plan as to how this would be achieved.
- 4.68 However, several broadcasters reported tangible priorities to promote equal opportunities. For example, six broadcasters said that they will be focusing on improving their diversity monitoring process, with Discovery stating that it is initiating a new data collection strategy to increase the scope of employee data it collects. Over the next 12 months it will monitor trends in the data which in turn will allow it to set KPIs with regards to its diversity.
- 4.69 Some broadcasters have chosen to prioritise a particular demographic, targeting efforts to improve representation of certain groups. Eleven broadcasters cited a focus on gender representation and female progression, with two of these (LFC TV and QVC) specifically referring to efforts to address their gender pay gap.
- 4.70 Other priorities listed by broadcasters included: improving recognition of themselves as an equal opportunities employer, increasing training and development opportunities, providing more support to diversity networks within the organisation, increasing diversity at senior and board level, updating, reviewing or sharing their diversity and inclusion policies, introducing a mentoring initiative, increasing intern recruits, and embedding the equal opportunities policy into the organisation.

Other arrangements in place to support equal opportunities

- 4.71 We asked broadcasters to outline if their organisation has any other arrangements in place to promote equal opportunities which weren't mentioned elsewhere. Out of the 78 broadcasters included in the questionnaire, 15 provided some information on additional initiatives or programmes they have in place.
- 4.72 The most common initiative cited here (six out of 15 broadcasters) was the use of employee forums and networks. For example, BT said that it has active employee networks representing gender equality, ethnic diversity, LGBT, Disability, Carers, and two faith groups. These networks are said to be a key part in delivering the company's goals related to diversity and inclusion, as each group has a charter with objectives to deliver benefits to its members. Similarly, Bloomberg's eight 'Communities' Abilities, Black Professionals, Intergenerational, Latino, LGBT and Ally, Military and Veterans, Pan-Asian, Women's, Working Families serve as a forum for employees to share ideas, concerns and successes, and lead the dialogue on diversity and inclusion at Bloomberg.
- 4.73 Discovery and STV Group both mentioned the use of programmes to help develop both existing and new employees. STV Group said it will work with industry to develop a 'Back to Business' programme to support women and men re-entering the workplace who have had a voluntary career break to care for children or dependents. This will involve rotational placements with the industry partners to give participants the opportunity to apply for roles at the end of the programme.
- 4.74 Other arrangements mentioned here include a mentoring scheme (BBC Worldwide), high-profile equality campaigns and partnerships (MUTV and STV Group), participating in a new 'national inclusion standard' (Columbia Pictures Corporation), anti-harassment and bullying training (Marjan Television Network), Mental Health First Aid training (Discovery), and offering more flexible working (Perform Investment).

5. Broadcasters: In Focus

5.1 Of the 60 broadcasters with UK-based employees a total of nine broadcasters had more than 500 UK-based employees. Ofcom's main report focuses on the main five broadcasters who have over 750 employees and provided data on the three mandatory characteristics: gender, racial group and disability. The remaining four broadcasters with more than 500 employees are therefore covered in this section. Our account of their diversity and inclusion activities is drawn from information provided by the broadcasters.

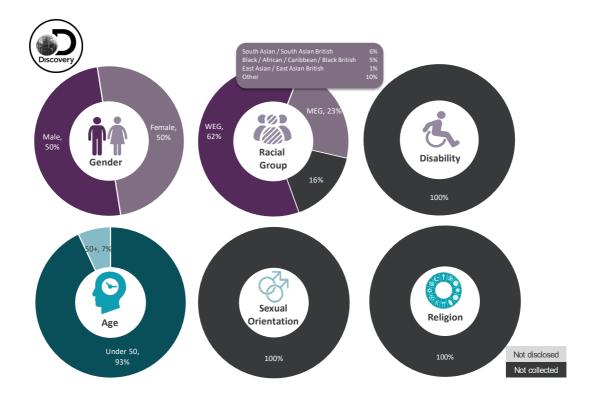
How diverse is Discovery?

5.2 Discovery is a global media company focusing on real-life entertainment, producing content for audiences around the world. Following the acquisition of Scripps in March this year, Discovery hosts a portfolio of diverse brands with a global reach and is available in 220 countries and territories and 50 languages. Its first launched a channel in the UK in 1989 and today is a UK business consisting of 16 channel brands, including Discovery Channel, Eurosport, TLC, Animal Planet and free to air channels Quest and Quest Red. A full list of channels can be found on the Discovery website.⁶⁹



Figure 23: Discovery UK-based employees summary

⁶⁹ www.discoveryuk.com/find-us-on-tv



What Discovery said about diversity: "Discovery values the unique point of view each member of staff brings to the workplace, not only our employees but also our highly valued agency, casual and freelance staff. Discovery strives to recruit and maintain a workforce that meaningfully represents the diverse and culturally rich audiences we wish to attract and serve. We aim to ensure equal opportunities for all, not only at the recruitment stage but also in our approach to promotion, transfers, training, benefits, facilities and underlying process and procedures."

- 5.3 More than half of Discovery's 2,019 employees are based outside the UK, leaving 923 employees based in the UK. In addition, Discovery has 1,076 freelancers working for it who it doesn't collect diversity information on. Only information on gender is collected on employees outside the UK.
- 5.4 Discovery's Global Chief Diversity Officer is based in the USA and is supported by the global offices and the LifeWorks and Inclusion department. Discovery is in the process of reviewing its recruitment process to ensure it consistently uses inclusive language in its communications, both internally and externally. Discovery is an employer member of organisations such as Stonewall⁷⁰ and EmployAbility⁷¹ which it says provide access to valuable resources such as guidance, employee training and advertising spots on their online platforms to target job advertisements.

⁷⁰ https://www.stonewall.org.uk/

⁷¹ https://www.employ-ability.org.uk/

Disability

- 5.5 Though not monitored, employees with a disability and their carers are supported through Discovery's employee network group 'ableD', which aims to provide a network of support and understanding. Discovery's LifeWorks and Inclusion team additionally works with organisations such as EmployAbility and JOLT academy⁷² to increase its talent pool by advertising roles, as well as working with individuals to ensure disabled people with can access not just the physical environment, but also navigate themselves in the workplace. For example, Discovery is currently working with disabled people to see how the workplace can be more accessible such as increasing accessibility by installing audio in the lifts for people with visual impairment, and automatic door openers for wheelchair users.
- 5.6 Discovery also provides an Employee Assistance Program (EAP) via Optum, as well as mental health first aid training to managers. For physical health, Discovery has set up a medical centre in its London office, which provides free GP and nurse appointments, as well as a free 360-degree health check.
- 5.7 We are disappointed that for a second year running, Discovery has not collected information on disability or provided data for the voluntary characteristics of sexual orientation and religion or belief. However, we are glad that increasing the scope of employee data collected is described as one of its main priorities for the next 12 months and work is ongoing with senior management to develop a new data collection strategy. Discovery also says that once it has figures that reflect the wider workforce it can set key performance indicators, and the senior management are also considering whether to set targets, which is something Ofcom recommends in its diversity guidance.

Racial Group

- 5.8 Twenty-three percent of Discovery's UK-based employees are from minority ethnic backgrounds, 10pp higher than the UK-based industry average. Discovery provided no racial group data for 100% of their non UK-based employees.
- 5.9 Discovery is currently looking to increase awareness of two international employee network groups across its European teams the Asian Cultural Alliance (ACA) and the Black Cultural Alliance (BCA). Both groups seek to promote cultural exposure and education, provide networking and leadership development opportunities, and to give members the opportunity to develop initiatives that will influence the business. Discovery also engages with Aperian Global⁷³ to conduct cross-cultural training and face-to-face workshops for its employees. These sessions help employees to understand cross cultural differences and to work more effectively together.

⁷² http://joltacademy.co.uk/

 $^{^{\}rm 73}$ a global organisation that focuses on cross-border innovation and solutions.

Gender

- 5.10 Discovery's UK-based workforce has an even split across gender. This compares to 54% female among non UK-based employees, and when put together it gives 53% female among the total employee base. At a senior level, women make up 45% of Discovery's senior management.
- 5.11 Discovery doesn't have any particular schemes that support the progression of women, but the Discovery Women's Network is described as focusing on the unique needs of professional women and has the goal of "delivering programs and events that support, coach, and empower women to discover and leverage their full potential to be the best leaders they can be in both work and life." Throughout the year, the group runs a speaker series, hosting inspiring women from across all industries, runs workshops and networking events, and promotes and holds events around International Women's Day.
- 5.12 Discovery Corporate Services⁷⁴ reported a mean gender pay gap of 13.5% and a median gender pay gap of 3.3%.⁷⁵

Sexual Orientation

5.13 Discovery has the employee resource group (ERG) 'priDe' for LGBTQ+ allies which promotes understanding and inclusion via activities such as celebrating Pride Month, Eurovision Contest Screening, IDAHOT⁷⁶ and other events. Discovery is working with Stonewall to promote campaigns and recruitment with targeted advertising. On top of these initiatives, Discovery promotes inclusion for LGBT employees by focusing on inclusive behaviour from allies, by sharing toolkits and encouraging members of the PriDe ERG to attend InterTech and Intermedia UK⁷⁷ seminars and talks to educate themselves on topics such as LGBT parents, legal rights of same-sex marriages and the challenges faced by LGBT people in other countries with non-inclusive legislation. Discovery launched gender-neutral bathrooms during Pride Month to raise awareness of the transgender population and other people identifying as outside of the gender binary.

Religion or Belief

5.14 For religion or belief, Discovery has a Wellness Room which employees can access as a quiet place for contemplation and prayers. Discovery also celebrates cultural events such as Lunar New Year, Diwali and Eid to educate employees on the history and cultural heritage of these celebrations and to foster a sense of community.

⁷⁴ Discovery Corporate Services Limited (DCSL) is the legal entity that is the licensee for all Ofcom licensed linear services, as well as an ODPS licence that covers several on-demand services. Data included in this report focus on employees who work on DCSL Ofcom licensed services only.

https://gender-pay-gap.service.gov.uk/viewing/employer-%2cjRmNeKXAfxf1C-gArdrDlw!!/report-2017; https://corporate.discovery.com/wp-content/uploads/2018/03/Discovery-UK-Gender-Pay-Gap-Report-2017 FINAL.pdf

⁷⁶ International Day against Homophobia - https://dayagainsthomophobia.org/

⁷⁷ LGBT network for the Tech and Media industry

Age

5.15 The majority of Discovery's employees are under 50 years old, 93% with only 7% are aged over 50%, compared to the UK workforce average of 31%. In terms of age by gender, Discovery employ a comparable proportion of men and women aged over 50, 8% and 7% respectively.

Social Mobility

5.16 In 2017, Discovery US successfully worked with the Will and Jada Smith Family Foundation (WJSFF), 78 an independent foundation primarily focused on social, health and arts education, to offer internship positions to students from a lower social-economic background by hosting a Careers-in-Entertainment Day. In 2019, Discovery hopes to work with WJSFF and other external organisations on social mobility projects.

Flexible working, parents and carers

Discovery UK offers enhanced maternity, shared parental leave and adoption pay for both male and female employees. Discovery's flexible working policy is open to all employees and the London office is piloting a further flexible working model for five departments, which involves core hours and the option to work from home for two days per week. Discovery also offers paid days of backup emergency child or dependant/eldercare and has a new internal online group called The Maternity League, which connects Discovery parents before/during maternity/other leave to enable them to share tips and support each other.

Inclusion, networks and policies

- 5.18 In addition to the employee networks mentioned above, Discovery has the Generation D (GenD) network that focuses on improving innovation in the company by providing a platform for employees across different generations to learn from one another, and the Discovery Family Forum (DFF) network which provides support and encourages information sharing for Discovery's working parents and carers.
- 5.19 Discovery has policies covering equal opportunities, anti-harassment and anti-discrimination, and has operated an annual paid internship and graduate scheme to attract new talent to the industry. This scheme is currently in review for the 2018/2019 intake as they look to make improvements. Each year Discovery holds an international 'Impact Day' across all its regional offices, where all employees take a day away from their regular work to work with other employees as part of a group charity event.

⁷⁸ http://www.wjsff.org/

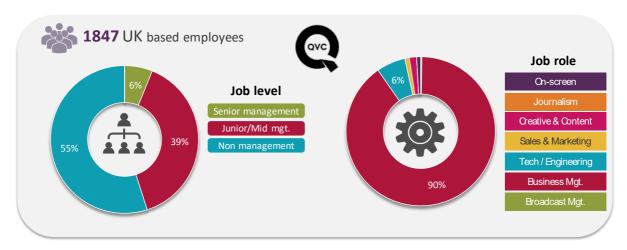
Leading from the top

5.20 Another of Discovery's key priorities is to increase visibility of diversity and inclusion activity at board level and build on existing support at the senior management level. In the next 12 months, Discovery will work towards this through its established unconscious bias training, which will be undertaken by the global CEO and his global management team by the end of year, and by reviewing its recruitment process and other processes to ensure it is inclusive.

How diverse is QVC?

5.21 QVC is a multi-media retailer, part of a large global group. It is retail combined with live TV and an online presence on web and mobile. QVC's UK teleshopping channels include the main QVC channel and others such as QVC Beauty and QVC Style. ⁷⁹







⁷⁹ QVC is part of the Qurate Retail Group - https://www.qurateretailgroup.com/

^{*} QVC do collect data on age but did not provide this data to us.

What QVC said about diversity: "QVC values the diversity of its people, customers and suppliers alike, and aims to be an equal opportunity employer to encourage and foster greater creativity and innovation and continue as a high performing business."

5.22 All 1,847 of QVC's employees are based in the UK. QVC also has a number of freelancers working for it who it doesn't collection diversity information on. Of the six characteristics, information was only provided on gender and racial group.

Monitoring

- 5.23 QVC does not collect disability data and did not provide us with any data for the voluntary characteristics (though has confirmed to us that it does collect data on age).
- 5.24 Ofcom strongly recommends that QVC begin to monitor the diversity characteristics of all employees, especially the disability status of their employees, given the broadcaster has a licence obligation to promote equal opportunities for disabled people. Ofcom's diversity guidance contains further details and recommendations 80.
- 5.25 QVC shared its future diversity and inclusion plans, which include establishing diversity and inclusion goals, capturing "baseline team member demographic metrics" and setting diversity and inclusion KPIs and potential targets. We would encourage QVC to make this a priority as many broadcasters with similar employee numbers have already implemented effective arrangements and monitoring and have such targets in place.

Gender and Racial Group

- 5.26 QVC's workforce has a female skew of 58% which is 12pp higher than the industry average. However, at a senior level this figure is 51% (which is still 10pp above the UK-based industry average, and 2pp higher than 2016).
- 5.27 QVC explained that it has continued its affiliation with the 'Women in Business' organisation and has established a working group to understand the flow of talent through its business and how this affects gender balance at all levels, highlighting and addressing any barriers that may exist. This year QVC launched a team member resource group for women.
- 5.28 QVC reported a mean gender pay gap of 13.8% and a median gender pay gap of 14.7% in 2017.81
- 5.29 QVC did not provide data on racial group last year but has this year provided information to Ofcom. The proportion of employees who self-define as being from minority ethnic backgrounds is 8%, which is 7pp below the industry average.

⁸⁰ https://www.ofcom.org.uk/ data/assets/pdf file/0010/108100/guidance-diversity-broadcasting.pdf

⁸¹ https://gender-pay-gap.service.gov.uk/viewing/employer-%2c12QkZkkDfQZ6ATZKAVKzHA!!/report-2017; https://www.qvcuk.com/UK/html/QVC_UK_Gender_Pay_Gap_Report.pdf

Equal opportunities policy, leadership engagement and targets

- 5.30 QVC is part of the Qurate Retail Group which has a Global Head of Diversity & Inclusion, based in the US a dedicated function established in 2017. In the UK the HR director and CEO are responsible for the effective operation of QVC's equal opportunities policy, but every employee has personal responsibility for its implementation. QVC explained the policy applies to all aspects of employment including advertisements, recruitment, interviews, assessment and training, terms and conditions, personal development reviews, development and training, change management, promotions, grievance and disciplinary procedures, and reasons for termination of employment. It also applies to relationships with external suppliers and contractors, as well as to potential employees.
- 5.31 Line managers have responsibility for ensuring the successful implementation of the policy within their own departments and for taking steps to create a positive culture. Senior leaders are also expected to be the advocates and ambassadors of QVC's culture to ensure equal opportunities.
- 5.32 In the last year QVC has launched a global diversity and inclusion council, which it plans to reorganise in future to reflect the broader company retail group. The broadcaster explained it runs various initiatives aimed at reinforcing its inclusive culture e.g. sponsoring London Pride, and celebration of International Women's Day.

Training, development and flexible working

- OVC states that it recognises the importance of providing training in diversity and equal opportunities to employees at all levels of the organisation at regular intervals throughout their employment. QVC explained that all employees receive training as part of their Corporate Induction, including the Diversity Policy and how it applies at QVC.
- 5.34 Mandatory compliance training is in place to ensure employees are educated on topics relating to inclusivity, such as the importance of monitoring and reporting equal opportunities, and talent acquisition training is provided for leaders who are interviewing and selecting prospective candidates.
- 5.35 QVC also offers a cultural programme for all team members that focuses on team work and collaboration and a 'Culture Wizard program' for leaders managing team members from other countries and cultures remotely.
- 5.36 QVC has a training and development policy which it says applies to all employees equally. QVC explained that it considers requests for flexible working under its policies in a way that fairly balances the needs of the individual and business.
- 5.37 QVC's future plans include exploring and deploying further team training opportunities as well as unconscious bias training.

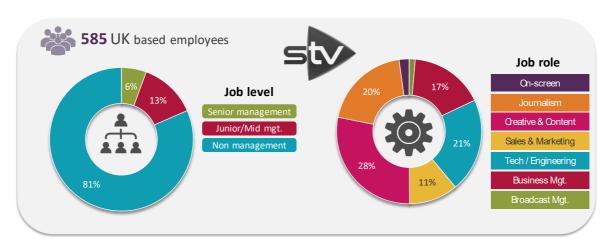
Recruitment, work experience and engagement

- 5.38 In addition to the training for recruiters mentioned above, QVC explained it has reviewed and developed its recruitment practices to encourage applications from, and the employment of, people of all backgrounds. Procedures for testing or assessment are to be reviewed so as not to disadvantage any applicant.
- 5.39 QVC explained that its graduate schemes are paid. QVC has an affiliation with a school in a deprived social economic area local to QVC's distribution and call centre facilities in Knowsley, Merseyside. The broadcaster provides students with insight into the working environment and develops skills such as emotional intelligence by providing mentoring and coaching.
- 5.40 QVC also explained that through its QVC employee forum the broadcaster takes steps to encourage the participation of all employees to ensure that, wherever possible, its employment practices recognise and meet their needs. It will involve its staff in determining what can be done to make sure they develop and use their abilities at work and to create a positive and supportive environment for all.
- 5.41 QVC referred to one of its future plans being to launch more team resource groups, as at the moment there is only a group for gender.
- 5.42 QVC also mentioned it has a harassment policy and that no form of bullying or discrimination will be condoned at work.

How diverse is STV?

5.43 STV is a Scottish digital media brand providing content on air, online and on demand. STV's TV channel reaches 3.5 million people a month.

Figure 24: STV UK-based employees summary⁸²





What STV said about diversity: "STV Group plc is committed to promoting equality, diversity and inclusion and promoting a culture that actively values difference and recognises that diversity contributes to creativity and innovation. Our objectives are to create an inclusive culture where

⁸² For racial group and disability, STV do collect this information but we are unable to report due to low numbers.

- creativity can flourish. We want to attract diverse talent and foster equality of opportunity for all in the recruitment, development and retention of our people."
- 5.44 All 585 of STV's employees are based in the UK. STV also has 450 freelancers working for it who it doesn't collect diversity information on. Of the six characteristics, information was only provided on gender, racial group and age.

Monitoring

- 5.45 STV does not collect diversity data on disability, sexual orientation or religion or belief. Furthermore, racial group data was missing (not collected) for 29% of employees. However, it says in its equal opportunities policy that it recognises that the regular monitoring of diversity characteristics and applicants is essential to the thorough review of the effectiveness of the policy and to this end the company will initiate equal opportunity monitoring⁸³. The policy was last updated in April 2018 so we hope to see more complete data in future.
- 5.46 STV told us it notified employees of its regulatory reporting and the GDPR obligations in early 2018. The objective of this notification was two-fold: to feed into an overarching review of diversity in the broadcast industry as required by Ofcom; and to contribute to its commitment to ensuring it is a diverse and inclusive employer. STV advised employees that, in updating their personal information, they would assist in measuring the impact of this commitment. STV has committed to requesting that employees review their own personal information annually.
- 5.47 Ofcom recommends that when STV runs its annual campaign, it shares information on why monitoring diversity data is important, how the information will be used and that employees are given the option to provide information on more characteristics.

Racial group

5.48 STV do collect racial group data of their employees, however the proportion of employees from minority ethnic backgrounds is too small to report on. STV's minority ethnic group representation is much lower than the national population and the minority ethnic group population in Glasgow, where the broadcaster is based which is 12%.⁸⁴

⁸³ STV does not mandate that employees provide data about disability, sexual orientation or religion or belief so monitoring and reporting is based on information that is provided from those employees who elect to share this information with them. However, as part of our equal opportunities policy STV regularly (at least annually) ask employees to share personal data about disability, sexual orientation or religion in order to monitor diversity and equality. The request is not mandatory and therefore employees may choose not to share the information. Where the information is provided, then they collect and keep a record of it.

⁸⁴ <u>Scotland's Census 2011 - National Records of Scotland Table KS201SC - Ethnic group.</u> Note: this differs to the UK or London benchmarks as they are among the working population.

5.49 STV explained that its board is committed to improving diversity in its board membership in the broadest sense, as a diverse board provides a range of perspectives, insights and challenges that are needed to support good decision making.

Disability

- 5.50 As mentioned above, STV does not collect diversity data across all their employees on disability⁸⁵, but the broadcaster explained it has an objective to be an access-friendly organisation and intends to ensure that its office provides an environment where its disabled colleagues can feel confident in their surroundings. STV plans to review its buildings and technology to ensure that they are as accessible as possible, and that any new installations or upgrades are implemented in accordance with the most up to date building regulations.
- 5.51 STV informed us it is an accredited disability confident employer the broadcaster encourages job applications from disabled people and is committed to ensuring it provides full and fair consideration during the selection process. STV is introducing a new application form, which will be available in accessible formats and enables all candidate profiles to be anonymised, so that hiring managers make selection decisions based on skills and experience alone.
- 5.52 As part of STV's commitment to continue to enhance its working environment, it informed Ofcom it has attained a Bronze Level Accreditation Healthy Working Lives award. STV hosts a comprehensive wellbeing programme of events and information campaigns and has an on-site Occupational Health Advisor available to anyone across the business.
- 5.53 Last year, STV provided mental health awareness training to staff and managers in partnership with the Scottish Association for Mental Health (SAMH). In 2018 STV also intends to establish a small network of trained mental health champions who colleagues can approach confidentially for support if they have a problem or concern.

Gender

- 5.54 STVs workforce is 51% male, which is 3pp lower than the industry average. However, it is much more male skewed at senior level, 67% (8pp higher than the UK-based industry average). Both of these figures have remained relatively stable since 2016 (53% and 66%)
- 5.55 STV has launched a new career development programme, Pathway, within STV News, designed to support and accelerate the development of high potential staff and create a pipeline of talent for succession. Further programmes are planned across other areas each will comprise a 50:50 gender balance and include mentorship, coaching and external training 86.

⁸⁵ Disability data was provided for less than 10 employees so we are unable to publish this data.

⁸⁶ STV told us that it has put in place diversity programmes across its employee centres. These programmes are not TV/broadcast programmes but rather, engagement development programmes including: a mentoring programme – where

- 5.56 This year STV told us it is working in partnership with Equate's Careerwise programme to provide a paid STEM (Science, Technology, Engineering and Mathematics) placement within its technology team aimed at encouraging women to consider STEM subjects in their academic and career choices.
- 5.57 STV reported a mean gender pay gap of 22.8% and a median gender pay gap of 17.3%. 87

 To address its gender pay gap STV reported that it will introduce a target to achieve gender balance in the top 25% of roles by earnings by 2021, as well as continuing to progress a programme of measures to improve diversity and inclusion. These measures include widening the pool in recruitment activities; focusing on opportunities for accelerated career development; extending family friendly policies and further training across the organisation to raise awareness of unconscious bias.

Social inclusion and partnerships

- 5.58 STV aims to provide opportunities such as apprenticeships and work experience for young people from diverse backgrounds to develop their employability within the media industry through alternative entry routes, regardless of social background.
- 5.59 In 2017, STV provided apprenticeships in Finance, IT and payroll. STV also partners with Glasgow Clyde College and the National Union of Journalists (NUJ) on an MA in Creative & Digital Media. STV said its commitment to supporting this apprenticeship as an alternative entry route to a career in journalism in 2018 will be the fifth year that the broadcaster has supported the programme. Last year STV also provided over 50 work experience placements across the business to support young people in developing their careers through alternative access routes that augment academic learning with vocational and transferable skills.
- 5.60 STV continues to be an employer partner for the Developing the Young Workforce schools and business partnerships programme in Scotland,88 which creates long-term, sustainable relationships between schools and businesses. STV explains it works closely with its partner school, Lochend Community High, to deliver a programme of activities that provides industry insight, practical employability skills and equips young people with an understanding of what is required in their future careers.
- 5.61 STV believes it has developed effective relationships with its educational partners across Scotland including Caledonian University, University of West Scotland, Napier University, University of Edinburgh, Robert Gordon University and North East Scotland College. The broadcaster told us it actively supports the development of emerging talent in journalism, TV production and technology roles, regardless of background.

a member of staff is paired with a mentor; a coaching programme – where specific one to one coaching is provided; and external training – where employees are appointed to attend – all for self-development purposes. Across all of these development programmes they strive for gender balance.

 $^{^{87} \, \}underline{\text{https://gender-pay-gap.service.gov.uk/viewing/employer-\%2cSz4GwK7t1bQEnJJFU-rGiQ!!/report-2017}} \, ; \\ \underline{\text{http://www.stvplc.tv/corporateresponsibility/our-people/gender-pay-report}} \, ; \\ \underline{\text{http://www.stvplc.tv/corporateresponsibility/our-people/gender-pay-report}} \, ; \\ \underline{\text{http://www.stvplc.tv/corporateresponsibility/our-people/gender-pay-report}} \, ; \\ \underline{\text{https://gender-pay-report}} \, ; \\ \underline{\text{https://gender-pay-report}} \, ; \\ \underline{\text{http://gender-pay-report}} \, ; \\ \underline{\text{$

⁸⁸ STV began this partnership in 2015.

5.62 STV also intends to create peer networks to facilitate groups and events of interest that profile and discuss key issues relating to equality and inclusion. In 2017 and 2018, STV joined forces with Women in Journalism Scotland to host training and networking events about providing a stronger voice for women in the media. STV has committed to continuing to actively engage with this forum and any others that address the interests of its colleagues.

Flexible working and parents

- 5.63 STV explained that one of its objectives is to support colleagues in balancing their career with parental or carer responsibilities through its family friendly policies. STV said it fully considers all flexible working applications to ensure its approach to work patterns is as open and inclusive as possible, whilst balancing the needs of the business.
- 5.64 STV intends to support flexible and home working and has improved the ease with which resources can be accessed remotely. Last year, STV delivered training on family friendly policies to 64 managers across the business and this year has committed to promoting its time out options for anyone who needs additional leave for childcare or dependants, including buying additional annual leave, requesting up to four weeks unpaid leave per annum, or making an application for extended leave through its sabbatical policy.
- 5.65 STV also explained that to support primary carers in achieving a smooth transition to and from maternity, shared parental or adoption leave, it will establish a 'Transitions programme' including meetings with key stakeholders, the offer of a mentor and access to a peer support network for those returning from leave, to facilitate continuity of key relationships, accelerate confidence building and understanding of current business issues.
- 5.66 STV has committed to working with industry partners to develop a 'Back to Business Programme'. The objective of this programme is to support talented women (and men) who have had a voluntary career break of two years or more to care for children or dependants in gaining re-entry to the workplace. 89 Participants will benefit from training, experience and exposure as they work through rotational placements with the industry partners to provide the best opportunity for them to apply for roles at the end of the programme.

Recruitment, training and work experience

- 5.67 STV has told us it is undertaking a review of its recruitment and selection processes and will deploy recruitment strategies to support greater diversity of candidate interest in roles.
- 5.68 Working with organisations such as Equate Scotland, Creative Access and Mama Youth, STV will highlight opportunities for talented candidates from diverse backgrounds to

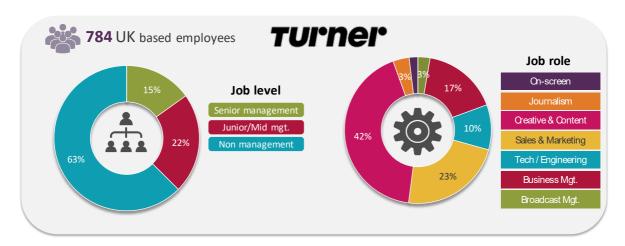
⁸⁹ The programme aims to create opportunities to recognise and refresh the skills and experience that participants have gained in their careers prior to taking a break, and to support attainment of related roles

- develop their skills at STV and foster increased diversity in its pipeline of talent. STV also strives to achieve balanced interview panels for all roles.
- 5.69 STV has also raised awareness amongst all colleagues of the role and responsibility they hold in supporting equality of opportunity for all through an annual 'Open Access' information campaign, and by incorporating equality, diversity and inclusion training into its induction programmes for new joiners.
- 5.70 STV informed us that all senior managers have a specific objective to lead the business towards equality, diversity and an environment in which colleagues can thrive, regardless of any personal characteristic. To support achievement of these aims, in 2018 STV provided equality, diversity and inclusion training for all its people managers, to raise awareness of the value the business places on diversity and their role in enabling progression and mindfulness of unconscious bias. This training will also be available for all employees throughout 2018.
- 5.71 STV plans to establish an Open Access steering group, with Executive sponsors for charter commitments for its consumers, colleagues and partners, to ensure that debate and action is championed at the highest level. STV has said it will work with peers, mentors and external speakers to reflect colleague interests and provide a diverse range of insights as to how to further evolve equality of opportunity for all.

How diverse is Turner?

5.72 Turner operates versions of core Turner brands, including CNN, TNT, Cartoon Network, Boomerang and TCM Turner Classic Movies. It manages the business of pay- and Free-TV-channels, as well as Internet-based services, and oversees commercial partnerships with various third-party media ventures.

Figure 26: Turner UK-based employees summary





What Turner said about diversity: Diversity is a business imperative. Diversity is more than a value or goal. It is fundamental to who we are, how we work, and how well we perform as a company....

An open, inclusive culture gives rise to bold thinking, creative breakthroughs, and original voices that stand up, speak out, and push boundaries on and off screen."

- 5.73 All 784 of Turner's employees working on Ofcom licenced channels are based in the UK. Turner also has 426 freelancers working for it who it doesn't collect diversity information on. Of the six characteristics, information was only provided on gender and age. Turner has previously collected information on all six characteristics but is currently reviewing its survey collection strategy in light of GDPR rules and its international structure.
- 5.74 Turner told us that the company's diversity policies and equal opportunities arrangements are under constant review and that Turner has two employees working full time on global inclusion, including a vice president who reports to the global president of the company.
- 5.75 As Turner is a global company, its overarching policies come from the US headquarters and are shared with the London office on the local intranet. Turner explained it has regular 'Town Hall' events for employees where diversity and inclusion are always on the agenda, and global and regional division meetings are held to discuss issued raised.
- 5.76 Turner has an equal employment opportunity policy statement that applies to all employment actions and has been running its 'Turner For All' campaign for many years with a variety of initiatives and staff surveys, mentioned in more detail below.

Gender

- 5.77 Gender is one of only two characteristics that Turner currently collects employee data on. The gender makeup of Turner's workforce is 51% male (3pp lower than the UK-based industry average) but much more male skewed at senior level, 67% (8pp higher than the UK-based industry average). However, compared to 2016 the proportion of males has increased both at a total level (+3pp) and among senior managers (+12pp).
- 5.78 In 2017/18 the broadcaster conducted a major piece of research called 'Women at Turner' which investigated the reasons why there are fewer women in senior roles and what are the barriers to progression. The sessions included a discussion of what Turner can do to better support women and parents returning to work and clarification on which measures staff believe are most relevant and effective for achieving meaningful change as quickly as possible. Following this, Turner employed a consultant in female progression to hold focus groups with staff to identify the most effective remedies and used this to inform its equal opportunities arrangements and plans.
- 5.79 Turner explained that its priority for 2018 is on increasing the number of women in senior roles and the strategy it is developing to achieve this may include targets in some areas, although it will primarily be aimed at improving the picture throughout the organisation. The next step is to implement the ideas and introduce policies and activities which will happen in Q3 of 2018.
- 5.80 Turner told us it offers 'breakthrough leadership training' to give high potential women executives an opportunity to build on their leadership success and develop a strong network of cross-divisional colleagues, as well as enhance skills such as strategic networking, negotiating for leadership success, and identifying new business opportunities. Anchored in 360° feedback, participants explore the successes and challenges that comprise their leadership story and define the leader they want to be.

- 5.81 Turner also said that International Women's Day has become a major event at its offices and this year was celebrated with a live interview with Erin Brockovich, photo sessions for staff, volunteering opportunities, a breakfast meeting, banners, balloons and cakes.
- 5.82 Turner reported a mean gender pay gap of 30.2% and a median gender pay gap of 28.6%. 90

Monitoring and staff surveys

- 5.83 Turner does not collect employee data on disability, racial group, sexual orientation or religion or belief at the moment. Turner told us it is currently reviewing its approach to monitoring in line with the new GDPR rules. Subject to legal approval, Turner plans to either have continuously updated information or regular surveys. Ofcom guidance recommends regular, detailed monitoring of employees and we support Turner's considerations.
- Turner said that in the past it has used Survey Monkey to gather information and that these anonymous surveys showed that the proportion of employees from minority ethnic backgrounds rose from 12.8% in 2009 to 23% in 2015. If this figure has remained stable over the last three years, then Turner is likely to be representative of the UK population for minority ethnic employees. Turner told us that the surveys had also shown an increase in LGBT employees and highlighted the need for more work in disability which continues to be a major focus for Turner.
- 5.85 Turner told us that it shares all headline information from previous ad hoc employee surveys with employees on the company intranet and in presentations to new starters. Full details are presented to the executive team to highlight the areas that need attention, and this informs its diversity strategy.

Disability

5.86 Turner's work on disability includes internships with Leonard Cheshire Disability, 91 sponsorships and open days. Turner is a Disability Confident employer, a member of the Creative Diversity Network, holds the 'Open Newsroom' open day every year, sponsors the Oska Bright disabled film festival, sponsors disabled people to attend the Edinburgh TV Festival's training scheme and runs advertisements specifically targeting disabled people in publications including Able and Pos'Ability.

Sexual Orientation

5.87 Turner told us that it has an active and well-funded employee group, supporting LGBT colleagues and which arranges events throughout the year. In 2017 their float at London

⁹⁰ https://gender-pay-gap.service.gov.uk/viewing/employer-%2cS1ngE1xmkVwknq0s3m_eXA!!/report-2017; https://www.turner.com/s3fs-public/Turner_UK_Gender_Pay_Gap_Report_2017.pdf

⁹¹ Leonard Cheshire Disability's Change 100 scheme which gives three month paid internships to disabled people straight out of college and had three very successful placements at Turner in 2017 with more in 2018

- Pride was a classic open London bus decorated with banners, and employees were invited to participate. The group also hold talks, film screenings and other events.
- 5.88 Internationally Turner has a multi-year, signature partnership with GLAAD that includes platinum sponsorship of the GLAAD Media Awards across multiple cities and also founding sponsorship of the GLAAD Grants programme, which funds filmmakers from the LGBTQ community. 92

Gender reassignment

Turner informed us that in 2017 it donated half of its Pride float to the Mermaids charity⁹³ and that high profile, trans actor Jake Graf was on board the bus along with many people from the charity. Turner explained its diversity and inclusion policies are currently under review, and gender reassignment is on the agenda. Turner is moving offices in 2018 and plans are being made to include gender neutral toilets.

Flexible working and freelancers

- 5.90 Turner explained that it provides employees with flexibility in managing their work and family responsibilities and offers flexible work arrangement to allow them to modify their schedule so that they can contribute to Turner's success while balancing their work and personal obligations.
- 5.91 Turner has also committed to expanding its flexible working policy and encouraging this more in the coming year. Internal focus groups have highlighted employee desire for more flexibility in working patterns. Turner has offered flexible working for years but is now promoting this more clearly to enable parents, carers or prospective parents to achieve working patterns that function best for everyone. Turner is also planning to introduce more support for women returning from maternity leave with a variety of programmes currently under discussion.
- Turner does not currently monitor freelancers, but it is under consideration for the future. The main challenges Turner mentioned on doing this are the volume and variety of freelancers that it has (some are just contracted to write a short article for example) and that there are data protection issues in obtaining sensitive data that it hasn't yet considered in relation to freelancers. As mentioned in the main Diversity and Equal Opportunities in Television report Ofcom are keen for broadcasters to work together to highlight the challenges and work together to find a way to address them. Ofcom is keen to facilitate further discussions, cross broadcast and the wider creative industries, to do more to support freelancers.

⁹² www.glaad.org

⁹³ https://mermaidsuk.org.uk/ - The charity works 'to raise awareness about gender nonconformity in children and young people amongst professionals and the general public.' They 'campaign for the recognition of gender dysphoria in young people and lobby for improvements in professional services.'

Social mobility

- Turner explained that social mobility is on its agenda, as the broadcaster used a set of social mobility questions in its last staff survey ⁹⁴and reported the findings to the board. Following this David Johnston, CEO of the Social Mobility Foundation, addressed board members and other staff, and the survey questions are being used to review Turner's plans and strategies in this regard.
- 5.94 Initiatives that aim to improve social and economic diversity in Turner include participation in the Media Trust's mentoring scheme for young disadvantaged people wanting to work in the industry, the job shadow scheme, the CNN Open Newsroom days, Turner's participation in Aspirations Days at disadvantaged schools, its outreach to organisations and colleges to encourage less advantaged people to apply for its internships and apprenticeships, and the broadcaster's open events with various organisations and charities.

Leading from the top

- 5.95 Turner explained it works closely with its parent company in the US which promotes diversity and inclusion internationally, with executive sponsors from the senior leadership team and many new initiatives such as 'Conscious Inclusion' training, regular 'Town Hall' meetings for all staff, promotional materials and new Business Resource Groups.
- 5.96 John Martin, CEO of Turner during this period of the report said, "Hiring and growing a wide range of diverse voices and perspectives, in front of and behind the camera, is critical to our success as a global media company. If we want to truly and deeply connect with fans around the world, we need to be an authentic reflection of who they are."
- 5.97 Mr Martin appointed a global head of diversity and inclusion and Turner told us that together they ensure that every division is diverse and inclusive and that this is led by the local senior teams. In London the president and his team have diversity and inclusion constantly on the agenda, and the team are invited to sponsor events and activities.
- 5.98 The mentioned internal gender diversity review research was presented to the Turner board and will be used in 2018 to put in more arrangements for equal opportunities at board level.

Recruitment and work experience

5.99 Turner told us it offers training on 'Bold Hiring', a reinvigorated approach to hiring which includes a sharper focus on bringing new ideas, perspectives and experiences to teams across the company. The training is designed to help employees identify key moments of

⁹⁴ Thinking about your education when you were growing up between the ages of 11 and 16/What type of school did you attend?/I would describe my highest level of academic qualification attainment as/ My parents or guardians highest level of academic attainment as/ Thinking back to when you were aged about 14, please tick one box which best describes the sort of work each of your parents did in their main job?

choice within the hiring process and give them the tools and tips they need to make more of an impact with every job opening. Turner believes participants see how making the decision to 'choose different' can improve their team and make an important impact on Turner too.

- 5.100 Turner describes its recruitment programme as strategically driven and effective in achieving broad outreach to potential applicants. Turner also invites student and school groups from deprived areas in to see what working life at Turner is like, and regularly attends 'Aspirations Days' at schools to inspire the students to think about aiming for a role in the media. Many staff mentor young disadvantaged people through the Media Trust scheme.
- 5.101 Turner explained that it wants to support and inspire people from diverse backgrounds who may be considering a career in the media industry and reduce the traditional barriers to entry. Turner offers 32 paid internships in CNN every year as well as job shadowing opportunities, and introduced a new Early Careers programme with 12-month placements, summer internships and apprenticeships in the non-news areas of the business. Turner told us it is partnering with agencies such as the MediaTrust and the Renaissance Foundation to advertise and promote its entry level opportunities.

Training and engagement

- 5.102 Turner reported that all its employees attend a two-day orientation, which includes a session on diversity and inclusion where the company diversity and inclusion policy is presented. Turner explained this commitment to diversity is reinforced with the 'Turner For All' intranet, posters, banners and mugs promoting the campaign.
- 5.103 Turner explained it offers conscious inclusion training which educates staff on what unconscious bias is and the potential negative impact it can have on engagement and contribution throughout the organisation. Leaders also identify what their roles should be in leading others to be more intentional in their reactions to differences.
- 5.104 The broadcaster also told us it is launching other training courses this year, in partnership with Mindgym, aimed at promoting diversity and inclusion in all its forms. These include Building Bridges which helps people create a sense of belonging for everyone, Breaking Bias which helps people to take charge of their unconscious biases, so they don't control them and Knowing Me, Knowing You which explores who we naturally connect with, and why, enabling people to become more mindful of how they respond to those they perceive as different.
- 5.105 Turner is currently running a series of employee focus groups to allow its staff to share their thoughts on equal opportunities and career progression at Turner, and what makes an inclusive workplace. Participation in these focus groups is open to everyone and is under the guidance of Turner's female progression and inclusion consultant, as mentioned above. Ideas arising from these sessions will inform its future strategy.

6. Broadcaster Overview Tables

The following tables show, for each of the 75 broadcasters who provided us with data⁹⁵ the proportion of all employees (UK and non UK-based) across the three mandatory characteristics (gender, racial group and disability).

The arrows signify whether percentage figures (to the nearest whole percentage) have increased \uparrow , decreased ψ or stayed the same \rightarrow since 2017 (Jan-Dec 16). It is important to note that these are not necessarily statistically significant changes ⁹⁶.

Where all fields are greyed out for a particular characteristic, it indicates that for this broadcaster one or both of the two identifying codes (e.g. Male OR Female) relates back to 1-9 employees and so cannot be reported.

Figure 27: Summary of individual broadcaster profiles for mandatory characteristics – All employees 2017/18 vs. 2016

						RACI	IAL (SROUP				DISABILITY													
Broadcasters with 500+ employees	All employees	Licences	Male	Fem	ale	No disclo		No collec		White Ethnic Group	c	Minorite Ethnic Groups	·	Not disclos	ed	Not collecte	ed	Not disabl		Disab	led	Not disc	losed	Not collect	
TOTAL (ALL 72 BROADCASTERS)	49901	752	58%	41	%	0%	6	1%	6	55%	Ś	11%		3%		30%		619	6	4%	,	2%	6	33%	,
BBC UK Public Television Services	A) 500+	0	55% 🤿	45%	•	0%	->>	0%	4	83%	4	13%	₽	3%	->>	2%	ŵ	81%	4	10%	•	3%	4	5%	•
Bloomberg LP	A) 500+	3	53% 🤿	47%	-	0%	->>	0%	-	52%	•	24%	•	15%	-	9%	•	38%	•	2%	•	1%	-	60%	•
Channel 4 Television Corporation	A) 500+	18	44%	56%	4	0%	-	0%	-	80%	•	18%	€	0%	-	2%	•	73%	•	11%	-	2%	•	13%	•
Discovery Corporate Services Limited	A) 500+	102	47%	53%	4	0%	>	0%	>	28%	-	10%	ų.	0%	-	61%	⇒	0%	-	0%	-	0%	->>	100%	>
ITV Broadcasting Limited	A) 500+	76	46% 🌗	54%	•	0%	⇒	0%	⇒	59%	•	8%	∌	1%	-	32%	ŵ	71%	•	2%	•	0%	⇒	26%	•
JSC Channel One Russia Worldwide	A) 500+	1	45% 🌗	55%	•	0%	->>	0%	⇒	0%	>	0%	€	0%	-	100%	⇒	96%		4%	-	0%	⇒	0%	>
New Delhi Television Limited	A) 500+	2	76% 🌗	24%	•	0%	⇒	0%	⇒	0%	-	0%	ų.	0%	-	100%	ŵ	0%		0%	-	0%	⇒	100%	>
Nordic Entertainment Group UK Limited	A) 500+	29	59%	41%	4	0%	->>	0%	⇒	7%	•	1%	ų.	1%	•	90%	ŵ		4		-		4		•
Pakistan Television Corporation Ltd	A) 500+	1	94%	6%		0%	1	0%		0%		0%		0%		100%		99%		1%		0%	1	0%	П
Perform Investment Limited	A) 500+	2	69%	31%	•	0%	->>	0%	⇒	15%	•	6%	r	0%	•	79%	•	100%	ŵ	0%	•	0%	•	0%	•
QVC UK	A) 500+	5	42%	58%	•	0%	-	0%	-	86%	•	8%	r	0%	-	6%	•	0%	-	0%	-	0%	->>	100%	->>
Sky UK Limited	A) 500+	58	62% \Rightarrow	38%	•	0%	-	0%	-	75%	•	15%	→	2%	-	8%	Ŷ	50%	4	3%	-	1%	-	46%	•
STV Group PLC	A) 500+	16	51%	49%	•	0%	->>	0%	⇒		4		ŵ		>		•		4		-		→		•
Turner Broadcasting System Europe Limited	A) 500+	29	51%	49%	•	0%	->>	0%	⇒	0%	⇒	0%	∌	0%	>	100%	->>	0%	⇒	0%		0%	⇒	100%	->>
Viacom International Media Networks UK	A) 500+	43	47%	52%	ŵ	0%	->>	0%	→	75%	ŵ	19%	ŵ	1%	->>	6%	•	74%	4	8%	•	0%	→	17%	•

					G	ENDER							DISABILITY											
Broadcasters with 101-499 employees	All employees	Licences	Male	F	emale		lot losed	No collec		White Ethnic Group	:	Minorit Ethnic Groups	1	Not disclose	ed	Not collecte	ed	Not disable		Disabl	ed	Not discl	losed	Not collected
A+E Networks UK	B) 101-499	25	43% 📲	57	7%	> 0%	-	0%	4	60%	4	19%	€	1%	4	20%	•	86%	4	0%	-	0%	>	14%
Abu Dhabi Media Company PJSC	B) 101-499	1	69% 📲	31	1%	> 0%	→	0%	→	93%	•	7%	ı,	0%	-	0%	→		Ψ.		r		-	-
Al Jazeera Media Network	B) 101-499	2	57%	43	3%	0%	-	0%	→	0%	•	0%	₽.	0%	-	100%	•	100%	•	0%	•	0%	-	0% 🤿
Alaraby Television Network Limited	B) 101-499	1	74% 🏚	25	5%	0%	→	0%	→		r		r		r		₽		•		€		⇒	•
AMC International Networks UK	B) 101-499	30	40%	60	0% 4	0%	•	0%	-	19%	•	6%	r	65%	₩	10%	r		→		•		⇒	•
British Telecommunications Plc	B) 101-499	17	75%	25	5% 4	0%	→	0%	-	37%	•	8%	r	0%	•	55%	r		•		Ψ.		⇒	•
Channels Incorporated Limited	B) 101-499	1	78%	22	2% 4	0%	→	0%	-	0%	→ :	100%	≫	0%		0%	→	100%	→	0%	→	0%	-	0% 🤿
CNBC (UK) Limited	B) 101-499	3	56% 🛊	44	4%	0%	-	0%	-		→		ı,		•		•	24%	•	0%	•	1%	₩	75%
Columbia Pictures Corporation Ltd	B) 101-499	47	47%	53	3%	0%		0%	•	0%	→	0%	€	0%	-	100%	→	0%	→	0%	→	0%	>	100% \Rightarrow
Fox Networks Group UK Ltd	B) 101-499	10	44%	56	6%	0%		0%	->>	8%	•	9%	ı,	0%	-	83%	•	100%	⇒	0%	→	0%	>	0% 🤿
Gemporia Limited	B) 101-499	2	31%	69	9% 4	0%	-	0%	•	0%	→	0%	€	100%	•	0%	₩.	0%	€	0%	⇒	0%	-	100% \Rightarrow
Hochanda Ltd	B) 101-499	2	43% 📲	56	6%	0%	→	1%	•	85%	•	15%	r	0%	•	0%	→	100%	•	0%	•	0%	-	0% 🤿
Ideal Shopping Direct Limited	B) 101-499	6	58%	42	2% 4	0%	→	0%	-		₩.		€		r		→	26%	•	30%	•	44%	•	0% 🤿
Immediate Media TV Limited	B) 101-499	3	39%	61	1%	0%	→	0%	-	71%	•	7%	r	1%	r	22%	₽		Ψ.		→		•	•
Marjan Television Network Limited	B) 101-499	1	56%	44	4%	0%	→	0%	->>	28%	•	72%	r	0%	•	0%	→		⇒		⇒		→	-
NBC Universal International Networks	B) 101-499	27	43%	57	7%	0%	-	0%	-	24%	•	6%	r	0%	>	70%	4		•		⇒		->>	•
Public Television Company of Armenia / AMPTV	B) 101-499	1	64%	36	6%	> 0%		0%	->>	100%	→	0%	€	0%	-	0%	→	98%	•	2%	⇒	0%	>	0%
S4C	B) 101-499	0	16%	30	0%	1%	•	53%	•	47%	•	0%	€	0%	•	53%	•	44%	•	0%	•	3%	4	53%
SNI/SI Networks LLC	B) 101-499	1	45%	55	5%	0%		0%		0%		0%		100%		0%		0%		0%		100%		0%
Sports Information Service Limited	B) 101-499	7	73% 🚽	27	7%	0%	→	0%	->>	83%	•	10%	₽.	7%		0%	→		•		•		-	-
The Walt Disney Company Limited	B) 101-499	20	42%	58	8%	> 0%	-	0%	-	0%	→	0%	€	0%	-	100%	→	0%	⇒	0%	⇒	0%	-	100% 🧇
UKTV Media Limited	B) 101-499	20	39%	61	1%	0%	-	0%	-	77%	•	16%	ı,	1%	r	7%	4		•		•		•	•
Viacom International Media Networks France	B) 101-499	7	52%	48	8%	0%		0%		0%		0%		0%		100%		0%		0%		0%		100%
YouView TV Limited	B) 101-499	1	77%	23	3% 4	0%	→	0%	-	79%	•	20%	î	0%	₩	1%	•	0%	→	0%	→	0%		100% 🤿

⁹⁵ This includes the 72 who form the basis of our reporting throughout, plus three who submitted after the cut-off date.

⁹⁶ Where no arrows exist it indicates that particular broadcaster did not submit a response in 2017, so cannot be compared year-on-year. Note that some of the broadcasters are named differently to 2017, and these are outlined in the methodology document.

					GEN	NDER			RACIAL GROUP							DISABILITY									
Broadcasters with 21-100 employees	All										White		Minority Ethnic			П		N						Not	
	employees	Licences	Male	ė	Fema	le	Not disclos		Not collect		Group		Groups		Not closed		Not llected	disa		Disat	oled	Not disc	losed	collect	
4 Dimensions Media Network Ltd	C) 21-100	1									0%		100%	0	%	0	%	91%	Ś	0%		4%		4%	П
Al Shirkatul Islamiyyah	C) 21-100	5		4		1		€		€	0%		100% \Rightarrow	0	%	0	% 🚽	>	→		→		-		→
Alghad TV Limited	C) 21-100	1									0%		100%	0	%	0	%	1009	%	0%		0%		0%	
APGO Media Limited	C) 21-100	1	37%	•	44%	•	0%	⇒	19%	•		ŵ	•			>	4)	>	r		-		->>		•
BBC Global News Limited	C) 21-100	1	52%	•	48%	•	0%	⇒	0%	€	77%	•	17%	4	% 4	2	% 🏺		•		r		•		•
BBC Worldwide Limited	C) 21-100	10	44%	⇒	56%	→	0%	⇒	0%	€	62%	•	19%	5	% 4	14	1% 🛖		•		r		•		•
Bite Broadcasting Services Limited	C) 21-100	6									0%		0%	0	%	10	0%	0%		0%		0%		100%]
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Eleven Sports Network SP. ZO.O.	C) 21-100	4		4		1		€		⇒	100%	-	0% \Rightarrow	0	%	O	% 🤿	0%	•	0%	-	0%	->>	100%	•
Fashion One Television Limited	C) 21-100	4	77%	•	23%	•	0%	⇒	0%	€		•	•			>	4)	1009	% 🤿	0%	-	0%	->>	0%	⇒
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IMG Media Ltd	C) 21-100	4	48%		49%		3%	1	0%	П	0%		0%	0	%	10	0%	0%		0%		0%		100%	11
Lancaster LLC	C) 21-100	1	0%	→	0%	-	0%	₽	100%	⇒	0%	-	0% 🍚	0	%	10	0% 🤚	0%	4	0%	4	0%	->>	100%	-
LFC TV	C) 21-100	1	77%	4	23%	•	0%	→	0%	€	15%	•	0% 🤿	67	'%	19	9% 🏤		4		→		•		•
London Live	C) 21-100	2	46%	4	54%	ŵ	0%	⇒	0%	⇒	0%	>	0% \Rightarrow	10	0%	0	% 🐠	0%		0%	-	100%	•	0%	4
Made Television Ltd	C) 21-100	14	0%	4	0%	ψ	0%	→	100%	•	0%	-	0% 🤿	0	%	> 10	0% 🤿	0%	→	0%	>	0%	-	100%	->
Media Liberty Limited	C) 21-100	1		4		1		⇒		€	0%	•	100%	0	%	0	% 🤿	1009	%	0%	-	0%	->>	0%	•
MUTV Limited	C) 21-100	1	65%	•	20%	•	2%	•	13%	•		•	•			b 🗌	Ŷ		4		-		->>		•
NDTV Lifestyle Limited	C) 21-100	2	69%	•	31%	•	0%	⇒	0%	€	0%	-	0%	0	%	▶ 10	0%	0%	-	0%	4	0%	->>	100%	•
NHK Cosmomedia (Europe) Limited	C) 21-100	2	34%	ŵ	48%	4	10%	r	0%	⇒	0%	-	90%	10	1%	0	% 🐠		r		ŵ		•		4
Phoenix Chinese News and Entertainment Limited	C) 21-100	2	56%	•	44%	ψ	0%	→	0%	€	0%	•	100%	0	%	O	% 🤿	1009	% ⇒	0%		0%	-	0%	->
Sanskar Info TV UK Limited	C) 21-100	1	0%		0%		0%		100%		0%		99%	1	%	0	%	99%	ó	0%		0%		1%]
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Shorts International Limited	C) 21-100	1		4		1		•		€		ŵ	•			b 🗌	4)	>	4		r		•		⇒
Star Advertising Sales Ltd	C) 21-100	3	37%	•	24%	•	0%	⇒	39%	•		ŵ	•			>	4		4		r		->>		•
The Box Plus Network Limited	C) 21-100	9	51%	ŵ	49%	₩	0%	⇒	0%	⇒	73%	•	17%	0	%	10)% 🛖	73%	5	0%	>	0%	->>	27%	•
TJC	C) 21-100	3	69%	ŵ	31%	•	0%	→	0%	⇒		4	r			>	4)	>	4		→		->>		•
Txt Me TV Limited	C) 21-100	3		Ψ		4		→		•		r	r			>	4		•		r		->>		•
Viasat World Limited	C) 21-100	22	35%	•	65%	4	0%	→	0%	€	77%	ŵ	21%	1	% 4	0	% 🐠		Ŷ		•		•		•
Vice UK TV Limited	C) 21-100	5	50%	4	39%	•	0%	→	11%	•	60%	ŵ	15%	14	%	1:	l% 🏺	0%	•	0%	-	0%	->>	100%	•

						GEN	NDER						RAC	IAL	. GROUP			DISABILITY								
Late submissions (not included in data-set)	All employees	Licences	Male	:	Fema	le	No:		Not collect		Whit Ethni Grou	ic	Minori Ethni Group	ε΄	Not	ed	Not	ed	Not disabl		Disabl	ed	Not disclos		Not collect	
Iroko Partners Limited	B) 101-499	1		•		•		P		П	0%	•	0%	•	0%	P	100%	•	0%	4	0%	d)	0%	4	100%	
Scripps Networks International (UK) Limited	B) 101-499	10	40%	•	60%	•	0%	4	0%	П	0%	4	0%	9	0%	1	100%	4	0%	4	0%	4	0%	4	100%	4
Racing UK Limited	C) 21-100	1	76%	•	24%	P	0%		0%		*		*		*		*		*		*		*		*	

^{*}Racing UK provided us with data for racial group and disability, but we are unable to include as neither added up to the total number of employees.

Figure 28 shows, for each of the 60 broadcasters who had at least one UK-based employee,⁹⁷ whether they provided data and the proportion of UK-based employees collected, across the three voluntary characteristics (age, sexual orientation and religion or belief).

Figure 28: Summary of individual broadcaster monitoring for voluntary characteristics – UK- based employees

DATA COLLECTION* SEXUAL ORIENTATION **RELIGION OR BELIEF** **Not disclosed' and 'No consent (to provide to Ofcom)' are counted as provided data. TOTAL UK BASED INDUSTR 36947 714 30 86% 22 59% 20 56% **BBC UK Public Television Services** A) 500+ 0 100% 85% 99% A) 500+ 18 100% 94% 94% Channel 4 Television Corporation A) 500+ 102 No No 100% 0% 0% Discovery Corporate Services Limited 76 A) 500+ No **ITV Broadcasting Limited** 100% 74% 0% A) 500+ QVC UK No 0% No 0% No 0% A) 500+ 58 Sky UK Limited 100% 55% 55% STV Group PLC A) 500+ 16 100% Nο 0% Nο 0% Turner Broadcasting System Europe Limited A) 500+ 29 100% No 0% No 0% Viacom International Media Networks UK A) 500+ 43 100% 84% 83% A+E Networks UK B) 101-499 25 100% No 0% No 0% Al Jazeera Media Network B) 101-499 No No 0% No 0% 0% B) 101-499 Alaraby Television Network Limited No 0% No 0% No 0% B) 101-499 AMC International Networks Uk 30 100% No No B) 101-499 No 0% No 0% No 0% Bloomberg LP 17 British Telecommunications Plc B) 101-499 No 0% No 0% No 0% B) 101-499 CNBC (UK) Limited 100% 26% 100% B) 101-499 47 No No No Columbia Pictures Corporation Ltd 0% 0% 0% B) 101-499 10 Fox Networks Group UK Ltd 100% No 0% No 0% Gemporia Limited B) 101-499 No 0% No 0% No 0% B) 101-499 0% Hochanda Ltd No No 0% No 0% Ideal Shopping Direct Limited B) 101-499 6 No 0% No 0% No 0% Immediate Media TV Limited B) 101-499 100% 73% 73% Marjan Television Network Limited B) 101-499 No No No 0% 0% 0% NBC Universal International Networks B) 101-499 100% 39% 39% 29 Nordic Entertainment Group UK Limited B) 101-499 100% 100% 100% Perform Investment Limited B) 101-499 No 0% No No 0% S4C B) 101-499 0 44% 47% 46% Sports Information Service Limited B) 101-499 No 0% No No 0% 20 0% The Walt Disney Company Limited B) 101-499 No No 0% No 0% UKTV Media Limited B) 101-499 20 100% 51% 43% B) 101-499 YouView TV Limited No No No 0% Al Shirkatul Islamiyyah C) 21-100 No 0% No 0% No 0% Alghad TV Limited C) 21-100 100% 100% 100% **BBC Global News Limited** C) 21-100 100% 99% 99% BBC Worldwide Limited C) 21-100 10 100% 100% 100% Channel I UK Limited C) 21-100 100% No 0% No 0% No No No Cruise1st C) 21-100 0% 0% 0% C) 21-100 Freesat (UK) Limited 3 No 0% No 0% No 0% Ginx TV Limited C) 21-100 92% Nο 0% Nο 0% Governance Ministries C) 21-100 No 0% No 0% No 0% IMG Media Ltd C) 21-100 4 No 0% No 0% No 0% LFC TV C) 21-100 No No London Live 100% 100% No C) 21-100 0% Made Television Ltd C) 21-100 14 No 0% No 0% No 0% MUTV Limited C) 21-100 No 0% 87% 87% NHK Cosmomedia (Europe) Limited C) 21-100 100% 100% 100% Phoenix Chinese News and Entertainment Limited C) 21-100 No No 0% 0% 0% Shorts International Limited C) 21-100 1 No 0% No 0% No 0% 100% 97% The Box Plus Network Limited C) 21-100 C) 21-100 100% 100% Nο 0% Txt Me TV Limited C) 21-100 3 No 0% No 0% No 0% 22 100% 100% Viasat World Limited C) 21-100 100% Vice UK TV Limited 100% No No 0% C) 21-100 0% 4 Dimensions Media Network Ltd D) <21 100% 100% 100% APGO Media Limited D) <21 No 0% No No 0% Bite Broadcasting Services Limited D) <21 6 Nο 0% Nο 0% Nο 0% Media Liberty Limited D) <21 No 0% No 0% No 0% Sanskar Info TV UK Limited D) <21 No 0% No 0% No 0% SAT-7 PARS Media Trust No D) <21 0% No 0% 100% Star Advertising Sales Ltd D) <21

⁹⁷ It excludes the 12 broadcasters who were solely non UK-based.