
Diversity at Ofcom 2019/20

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

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1. Overview

It is crucial for Ofcom to be a diverse and inclusive organisation if we are to make communications work for everyone. In our [diversity and inclusion strategy](#) we have set out our diversity targets for 2021 to 2026, alongside our vision and the priority areas to which we will give particular focus.

This statistical report contains some of the data that has informed the development of our diversity and inclusion strategy. It sets out the diversity make-up of our workforce overall as well as the outcomes for particular groups of colleagues, from joining us to leaving us. Data in this report covers some of the protected characteristics under the Equality Act 2010 but also includes characteristics that are not.

Most of the information is based on data to end of March 2020 because we publish a report like this every year based on financial years. We have included a snapshot of data to end of September 2020 at the end of this report. We will publish an update in July 2021 covering the 12 months to end of March 2021.

Ongoing data analysis will inform our annual progress updates against our Diversity and Inclusion strategy.

2. Ofcom's diversity profile

About our data

When people join Ofcom, we ask them to complete a diversity monitoring form and to review their information annually or when details need to be updated.

Data in this report is based on information provided by our workforce which is fed into our HR people system and covers the reporting period of April 2019 to March 2020, unless indicated otherwise. At the end of this report is a table outlining our diversity profile by key characteristic groups as at the end of September 2020, for a more up to-date-picture.

The questions we ask colleagues cover gender (referred to as "sex" in the Equality Act 2010 and by which we mean the sex assigned to a person at birth or the sex a person has legally transitioned to), ethnicity ("race" in the Equality Act), disability, sexual orientation and religion or belief. In the last few months, we have added new questions on caring responsibilities, gender identity (by which we mean an individual whose gender is different to or does not sit comfortably with, the sex they were assigned at birth), category of disability and a set of questions to gauge socio-economic background. Age data is taken from date of birth information and part-time working is from people's contractual hours once they join us. People can prefer not to answer the voluntary questions, and these are included in our datasets. We also use information from our recruitment system, which is held separately. We have more work to do to improve data completion of applicants here, and so there are some limitations when viewing this data.

Only data that covers at least 10 people has been shown, to protect confidentiality. There will therefore be some data points where we either aggregate data or where we don't show any data points at all. This is often the case for ethnicity and any ethnicity breakdowns as well as sexual orientation and sexual orientation breakdowns. Internally we are considering all data points and will keep focusing on differences in representation and experiences for different groups within Ofcom.

Over the past year we have, through an internal campaign, encouraged our employees to share their diversity data with us. This has notably decreased our 'no data' gaps, particularly around disability, sexual orientation and religion or belief. 'No data' gaps are where our people have not provided their information to us at all, which is different to choosing 'prefer not to say'. Closing our 'no data' gaps has given us a much more accurate reflection of the profile of our workforce in these areas, which enables us to better understand the impact of our processes, policies and systems around areas such as progression and retention. Compared to March 2019, our no data gap for disability has reduced from **24% to 9%**, for sexual orientation from **17% to 10%** and from **18% to 9%** for religion or belief.

Our 2015-2020 targets

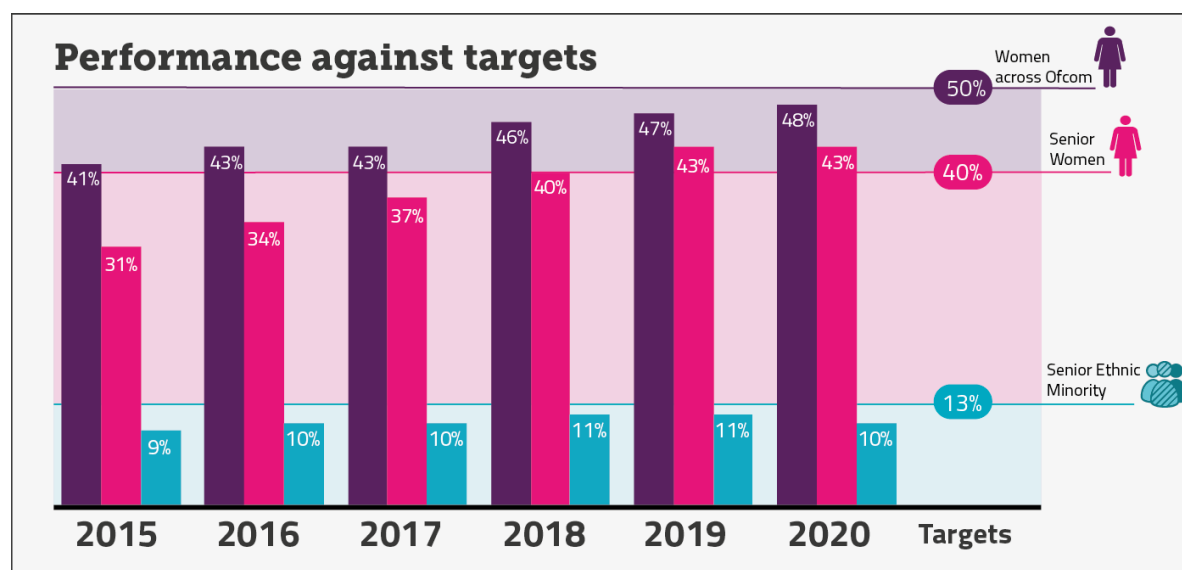
In 2015, we set ourselves three workforce diversity targets to be achieved by the end of 2020:

- **equal gender balance:** women to make up 50% of colleagues across Ofcom;

- **more women at senior level (Principal and senior managers and specialists):** women to make up at least 40% of colleagues at senior level; and
- **ethnic diversity:** 13% of colleagues at a senior level to be from a minority ethnic background.

Where we refer to women in our targets and throughout this report, we currently mean people born with characteristics that are labelled as female as well as people that may have legally changed their sex to female. We have recently introduced a question in our people and recruitment systems to better capture gender identity, including non-binary.

As at the end of March 2020 48% of our entire workforce were women. Since then, in September 2020, we met our overall gender target and achieved an equal gender balance. Forty-three per cent of senior positions at Ofcom are held by women, exceeding our current target, and as at September 2020, this is up to 45%. We have made some progress on our senior ethnicity target but not enough to have met our ambition; 10% of senior roles are currently held by colleagues from minority ethnic backgrounds (a slight increase to 11% as of September 2020). Our new diversity and inclusion strategy sets out our ongoing focus on ethnic and gender representation at senior levels, alongside disability across our entire workforce. This includes new workforce targets in these areas.

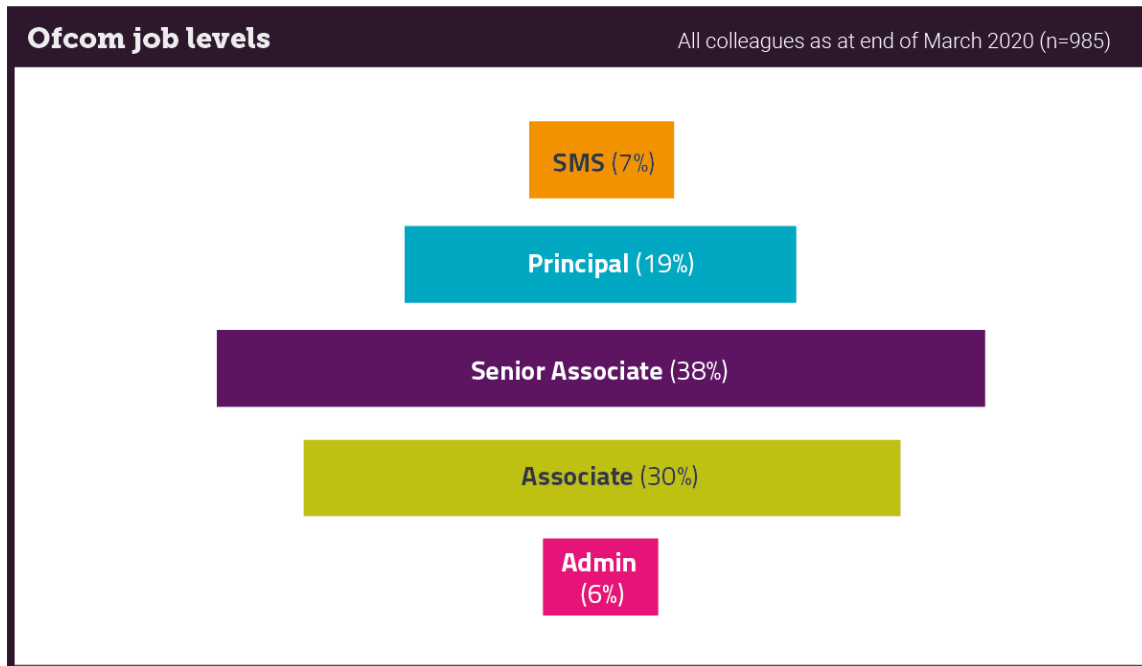


Covers the 2015-2020 target period. Base: all Ofcom colleagues as at the end of March in each year.

Organisational portrait

- 2.1 Ofcom is a vibrant organisation of just under 1,000 people. We have colleagues based in London, Birmingham, Warrington and Baldock as well as Cardiff, Edinburgh and Belfast.
- 2.2 Eighty-two per cent of our colleagues use London as their primary base and 18% are based outside of London.

2.3 There are five grades across Ofcom ranging from Administrator to Senior Management and Specialists ('SMS' – director level). The largest proportion of employees are Senior Associates (38%) followed by Associates (30%). There are similar proportions of SMS (7%) and Administrators (6%) and a fifth (19%) are Principals.



Base: all Ofcom as at the end of March 2020 (n=985)

Our workforce diversity

This section will focus in more detail at the diversity make up of our organisation overall, as well as across the following areas:

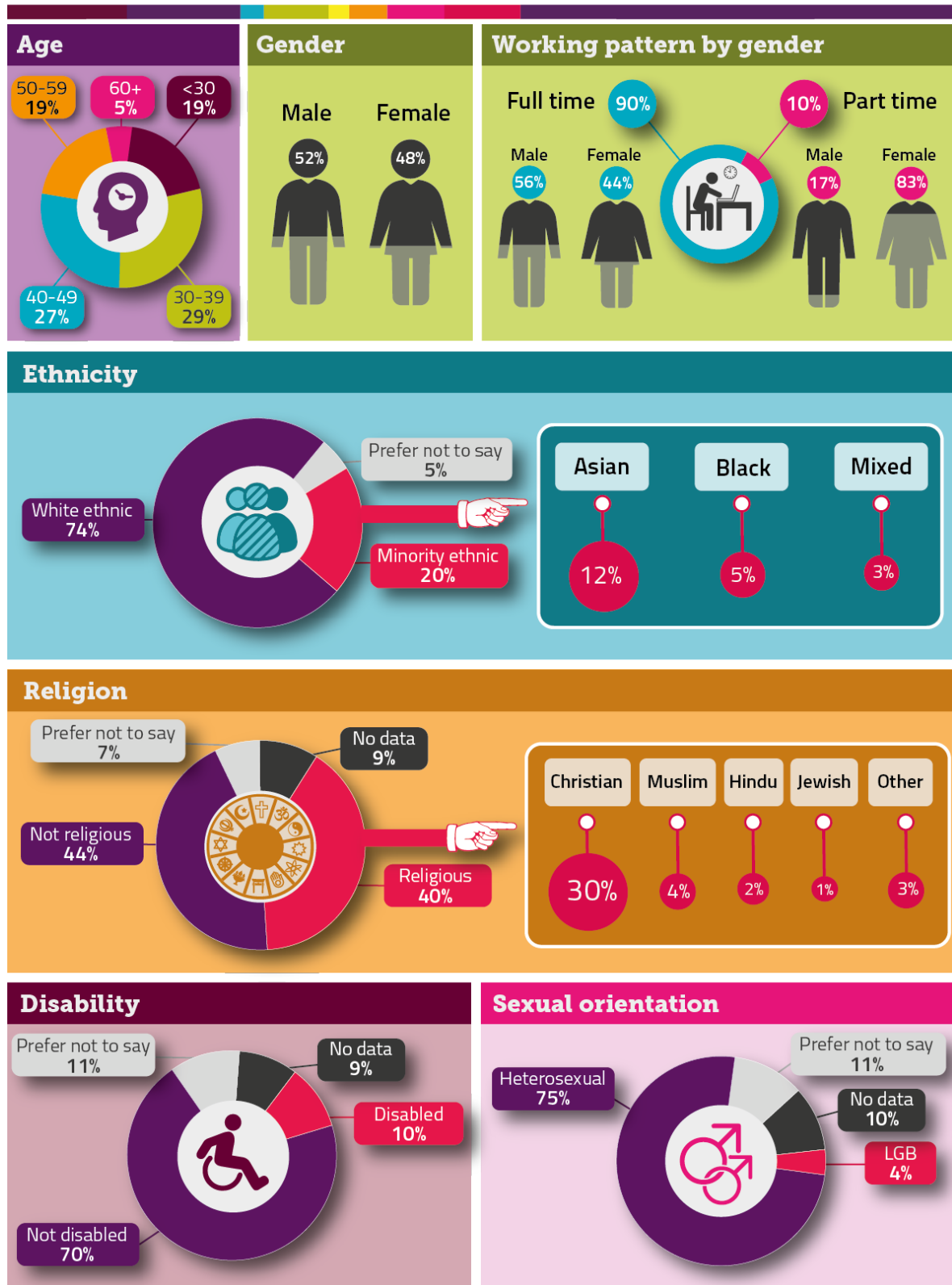
- job level
- line managers
- recruitment stages
- new starters
- performance ratings
- promotion outcomes
- leavers

To make sense of the data and give it context, we compare the proportions of each diverse group to the proportions they represent at Ofcom overall for each measure. As well as some 'no data' gaps in our statistics, 'prefer not to say' can also play into the results displayed and what we can take away from the numbers, particularly where the proportions they account for are larger. To narrow or close both these gaps, we will continue to build on previous internal campaigns to encourage our people to fill in their diversity data and to build a culture in which people feel comfortable sharing their information with us.

Some of the data shown may not add up to 100% due to rounding of values.

OFCOM PROFILE

All colleagues as at end of March 2020 (n=985)



White ethnic = White British, Irish, Gypsy or Irish traveller and any other White ethnic background.
Religious = Christian, Muslim, Hindu, Sikh, Jewish, Buddhist, other religion/faith.

Forty-eight per cent of our workforce are women, comparable to the UK working age population of 47%. Female representation in each of our grades range from 43% at our most senior grades of Principals and SMS combined to 67% at our most junior grade of Administrator. Recognising that some people might not identify as either male or female, we recently introduced a question in our people and recruitment systems to make sure people can share their gender identity with us. This will allow us to see what our non-binary profile is like, as well as allow us to track feelings of inclusion and outcomes in the workplace for our non-binary colleagues in the future.

Twenty-per cent of our colleagues are from minority ethnic backgrounds, above the working age population of 12% across the UK. Of this 20%, colleagues from Asian backgrounds make up the largest proportion at 12% followed by Black colleagues (5%) and colleagues from mixed heritage backgrounds (3%). Looking at the breakdown of these groups further, of Asian people at Ofcom 5% are of Indian heritage, Pakistani, Chinese, and other Asian backgrounds each account for 2% and those from a Bangladeshi background 1%. Among the 5% Black colleagues at Ofcom, those of African heritage make up just under 3% while just under 2% are of Caribbean heritage.

Further analysis of our data shows us that our minority ethnic population is not evenly spread across our organisation. We need to improve representation across our different professions and also aim for a more even distribution across our grades (see Job levels section below). Minority ethnic representation in each of our grades range from 27% in our Administrator and Associate levels respectively to 10% at our highest grades of Principals and SMS combined.

A tenth (10%) of our staff have told us that they are disabled. This is below the working age population of 19%, which is why this is a priority area of focus for us in the next five years, supported by our new workforce target on disability. We have recently introduced a question asking our disabled people to share with us the particular 'category' of disability or long-term condition that they have. This will help us to understand and identify where we can offer more or better targeted support.

On sexual orientation, 4% of our workforce have shared that they are lesbian, gay or bi-sexual (LGB). In September this was 5%. Creating a culture of inclusion will be key for us to drive increased representation of LGB colleagues. We also enter Stonewall's Workplace Equality Index each year, a benchmarking initiative that measures our progress on, and lived experiences of, LGB and trans people in our workplace.

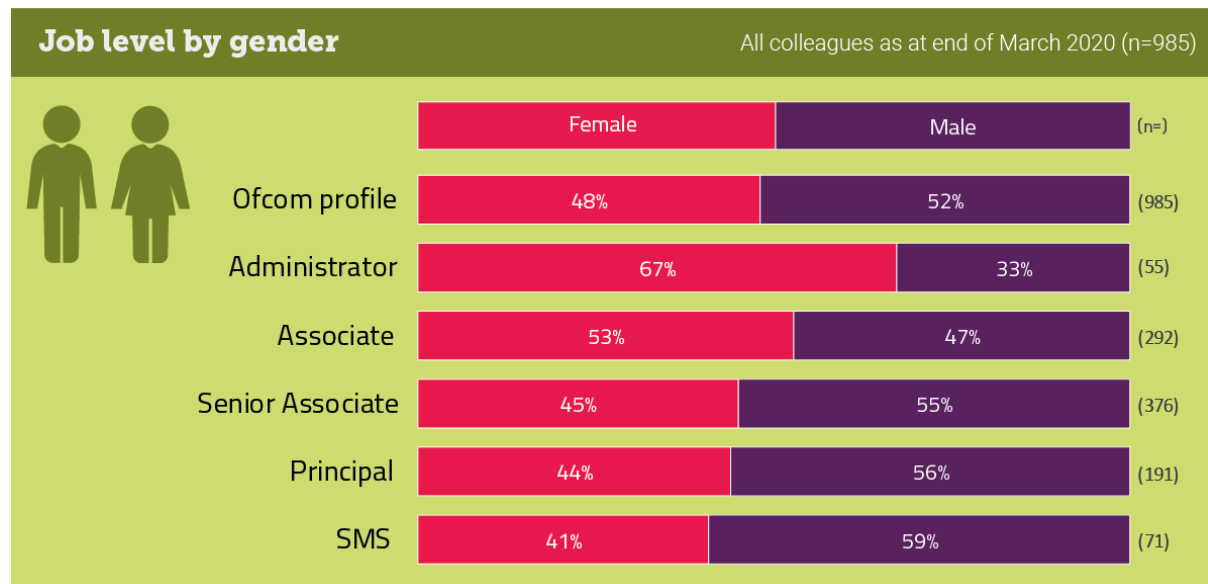
Forty per cent of our colleagues are religious and 44% are not. Of those that say they have a faith, the majority (30%) are Christian. Four per cent are Muslim, 2% are Hindu, 1% are Jewish and 3% are from a combination of other religions/faiths.

By age, a quarter (24%) of colleagues are aged 50 years and above. 19% are below 30 years old. The highest concentration of colleagues is in the 30-39 age bracket (29%), followed by 40-49 (27%), accounting for a combined 56% of our workforce.

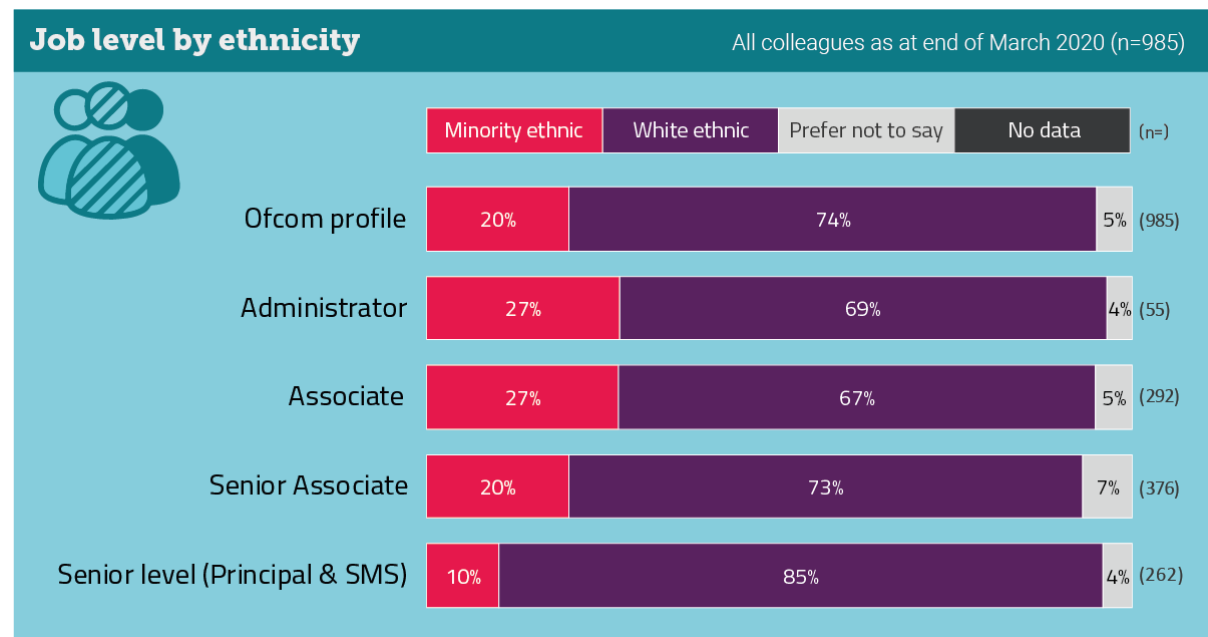
Colleagues who work part-time make up 10% of Ofcom and of this 10%, 83% are women.

Job level

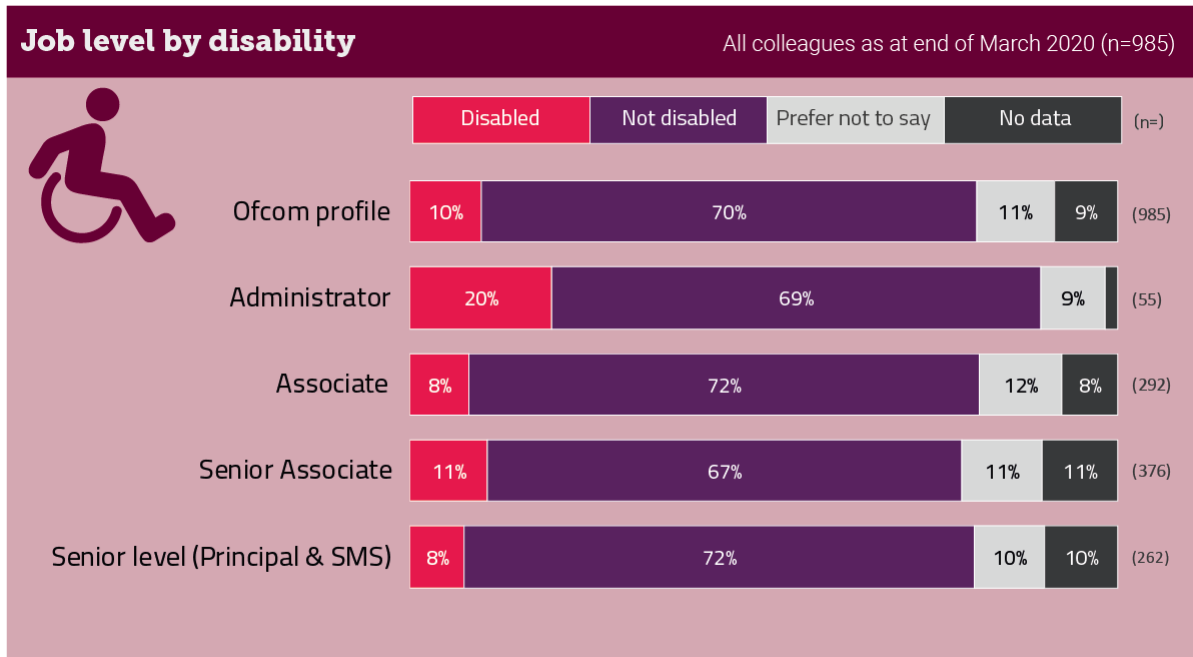
We have five job levels across Ofcom; Administrator, Associate, Senior Associate, Principal and SMS.



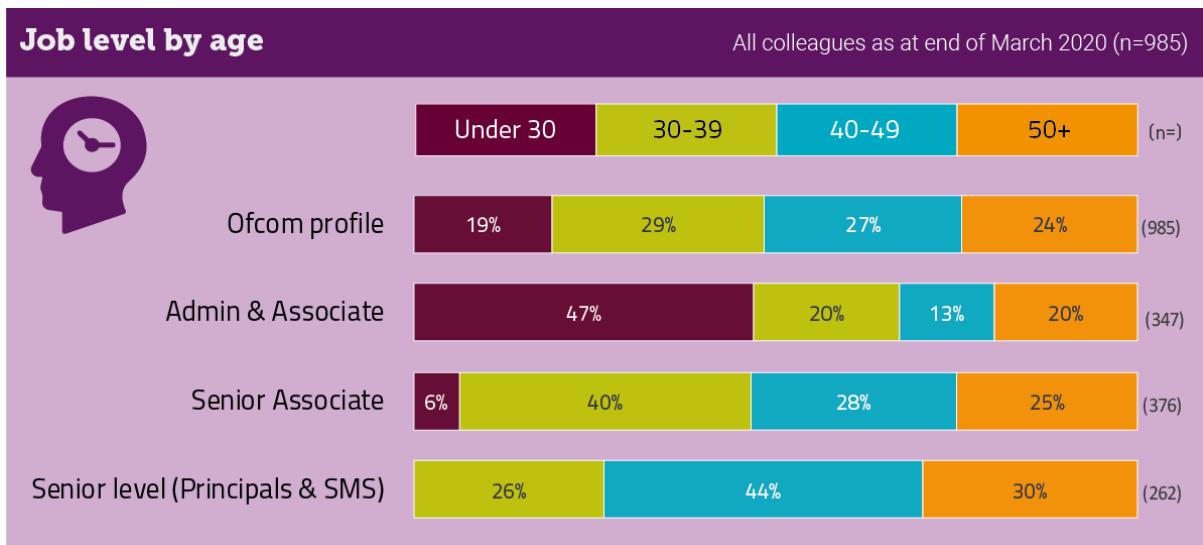
Compared to our overall gender profile of 48%, women make up an above average proportion in our Administrator roles and Associate roles. Representation begins to fall below average at our Senior Associate, Principal, and SMS levels.



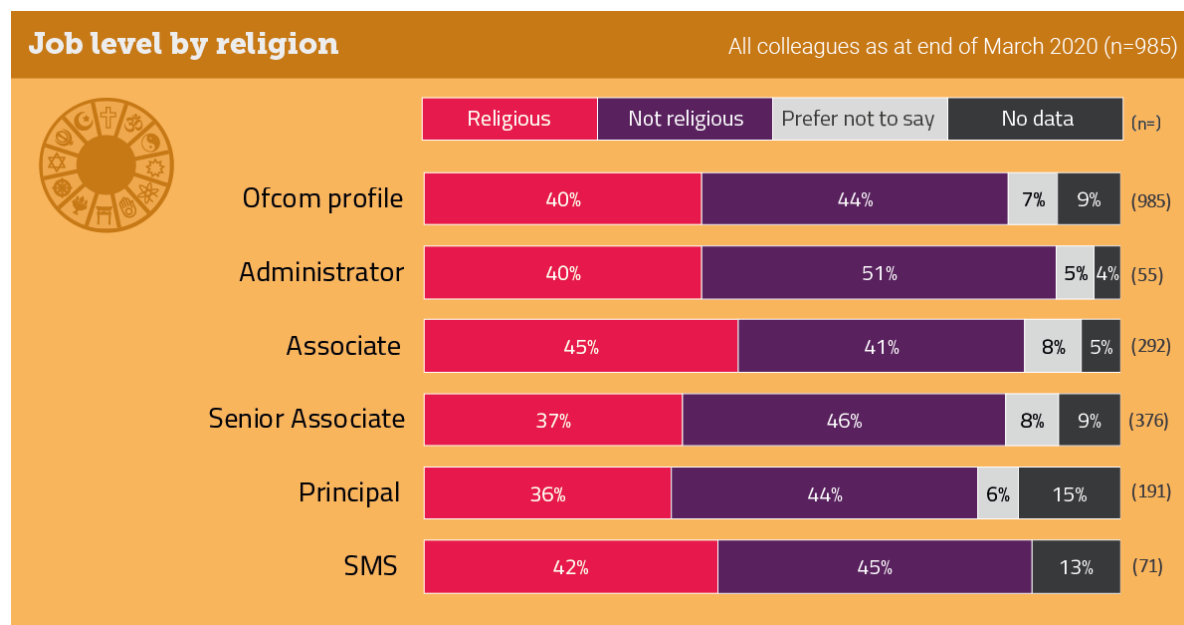
A higher proportion than average of our minority ethnic colleagues is in our two more junior grades. The proportion of minority ethnic colleagues at Senior Associate grade is reflective of the Ofcom average, and the proportion of minority ethnic colleagues is below the Ofcom average in our two highest grades.



At double the Ofcom average, 20% of colleagues in Administrator roles are disabled. Disabled representation at Associate, Senior Associate and Principal and SMS levels are broadly consistent with our average disability profile.



Almost half (47%) of our youngest colleagues (under 30 years) are in our most junior Administrator and Associate grades combined with none in our most senior positions. Most of this will be driven by our graduate and apprentice cohorts who are at the start of their careers. At Senior Associate level, the largest proportion of colleagues (40%) are aged between 30-39 years while the largest proportion of colleagues in our top two job bands are aged between 40-49 years (44%). The proportion of colleagues aged 50+ years at Senior Associate level is consistent with the Ofcom average profile but increases to above average in our two most senior bands.

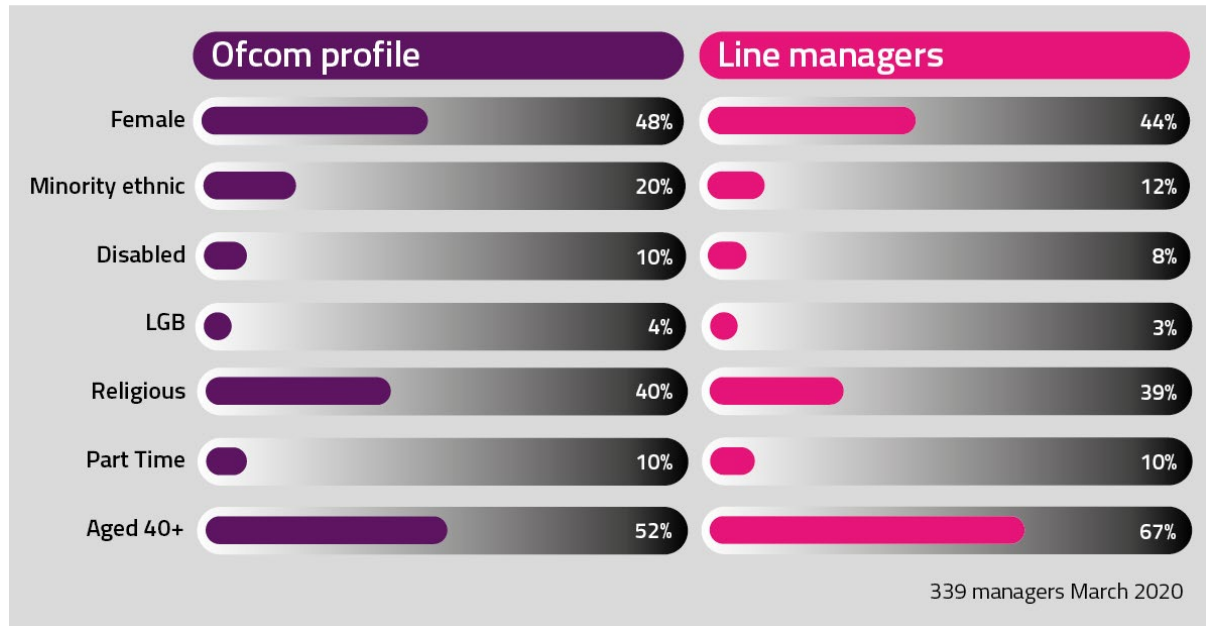


The balance between colleagues who have a faith and those that say they have no religion across each of our grades varies. Colleagues who are not religious make up a higher proportion in Administrator roles at 51% (above our average profile of 44%), while the highest proportion of colleagues who say they are religious are Associates (45%), above the overall average of 40%.

Line managers

Just over a third (34%) of colleagues at Ofcom have line management responsibility.

Women make up 44% of our line management population, just under their 48% representation at Ofcom as a whole. There is lower representation of minority ethnic line managers at 12% compared to the 20% minority ethnic average profile at Ofcom. Representation of disabled, LGB, colleagues of faith and colleagues who work part time are broadly reflective of, or in line with, their Ofcom profile. There is a higher proportion than average of line managers in the 40+ age bracket at 67%.

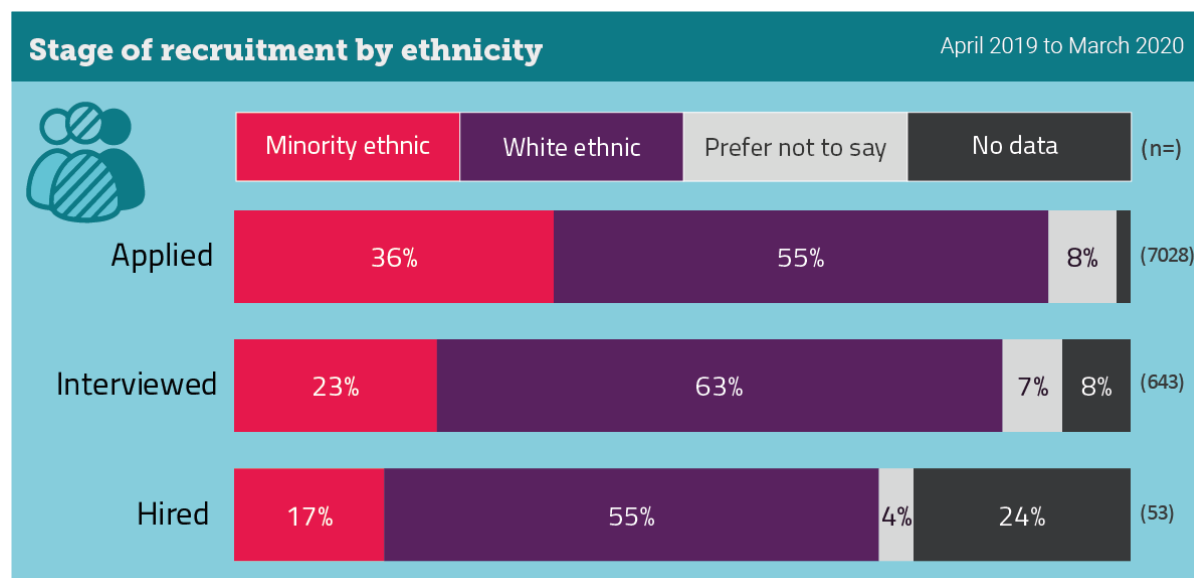


Recruitment

Our recruitment information is taken from our online recruitment system and from our recruitment partners. When people apply for jobs with us, we ask them to fill in a diversity monitoring form. We have a lot more work to do to encourage people to share their information with us, particularly applicants coming through our external recruitment partners. We will make this an area of focus in the coming year so that we can have a fuller and clearer picture of diversity at every stage of recruitment.

Of applicants, a lower proportion of women (41%) applied for jobs with us than men and we maintained this level to 40% of eventual hires. On ethnicity, just over a third (36%) of applicants were from minority ethnic backgrounds with the proportion reducing during the interview stages (23%) and eventual hire (17%).



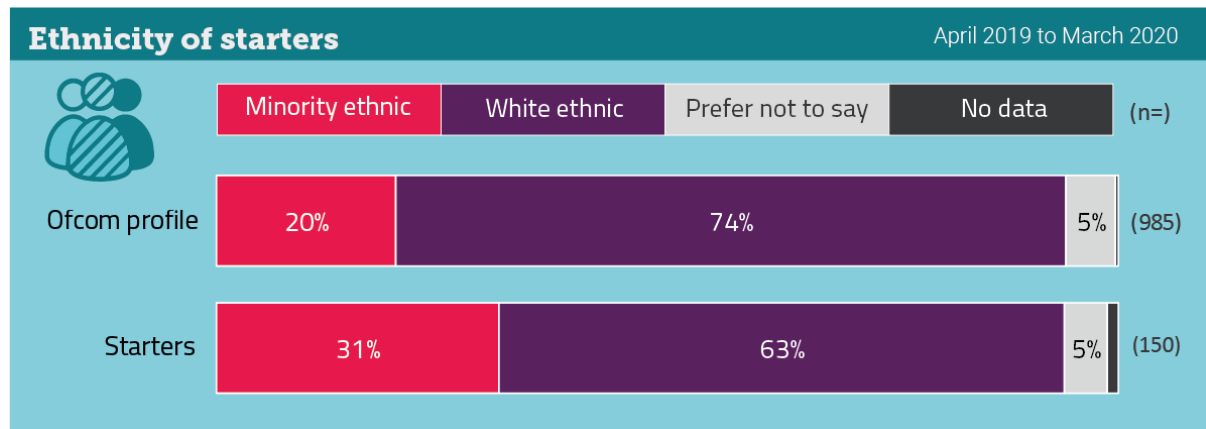
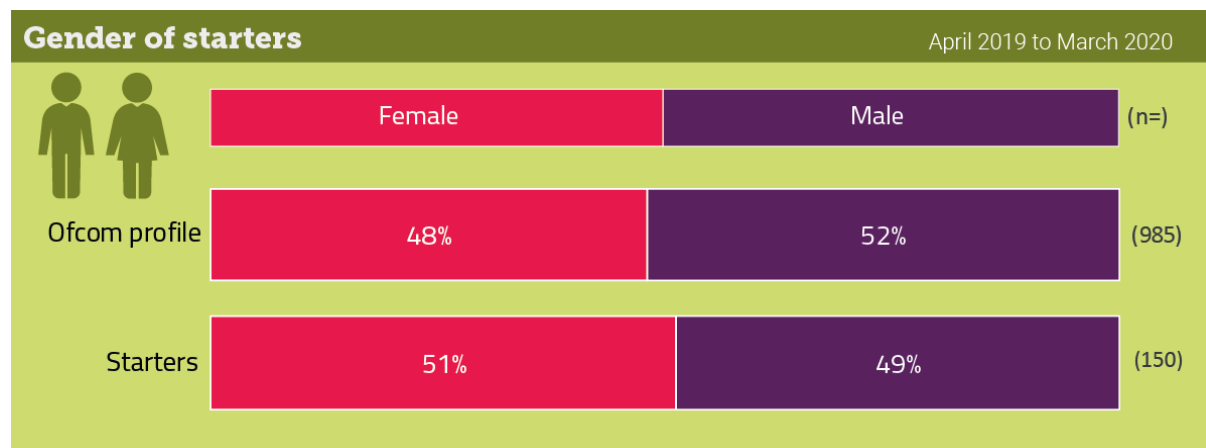
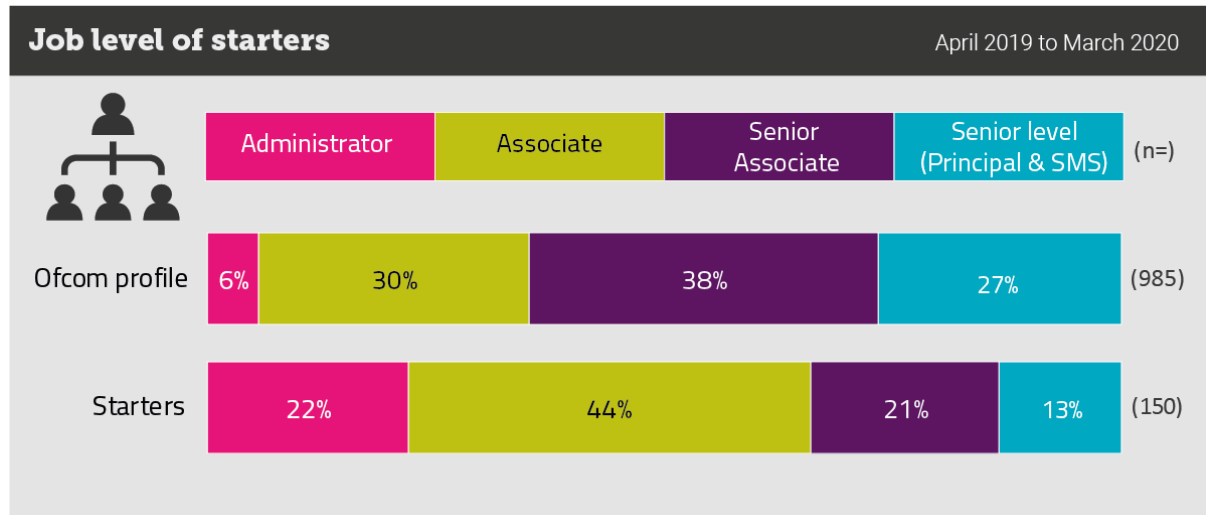


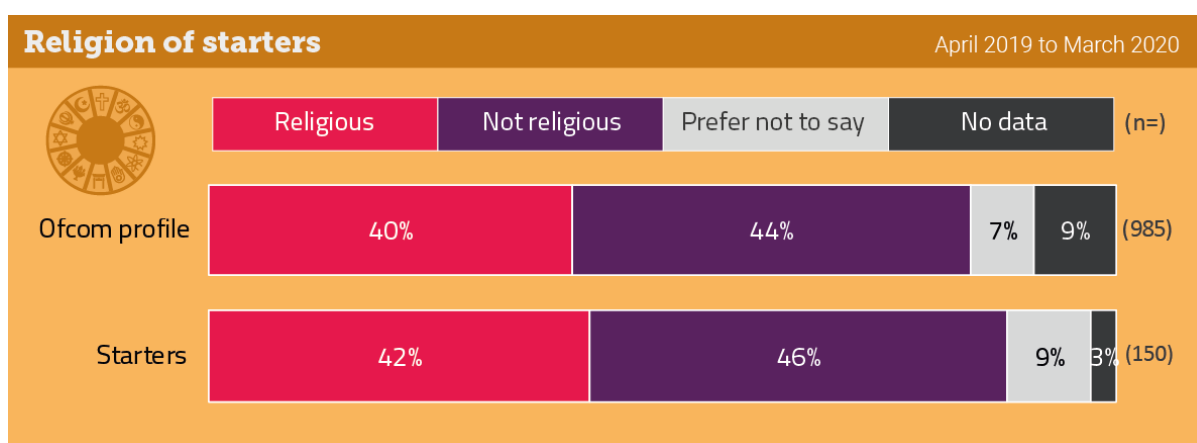
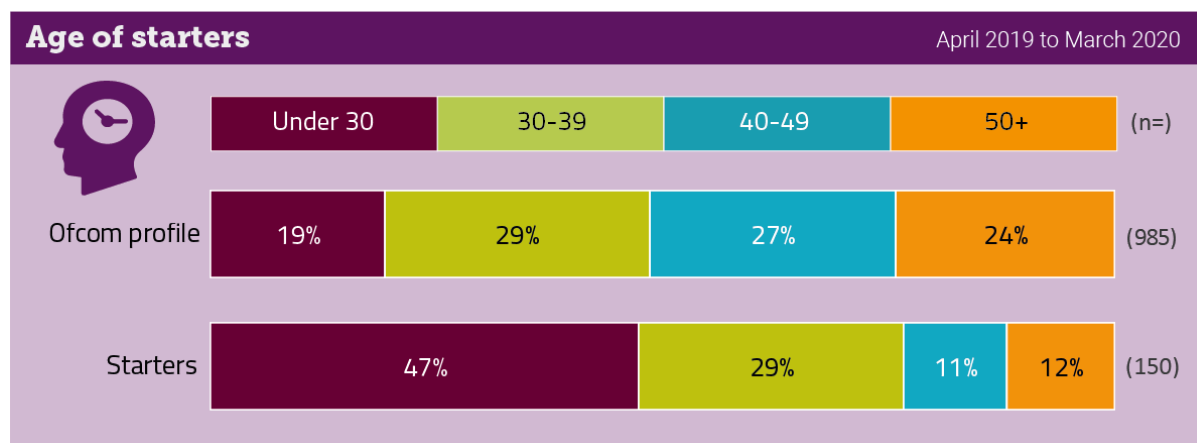
Starters

Once colleagues start jobs with us, they are asked to fill in a new employee diversity form. They are also able to check their diversity information at any time through a self-service online HR people database.

In the last year 150 people joined Ofcom. Most of our intake was linked to our early careers strategy and were therefore in our lower grades of Associate (44%) and Administrator (22%). Senior Associates made up a fifth (21%) of new colleagues joining us and 13% took up jobs at Principal and SMS grades.

Fifty-one per cent of starters were female and around a third (31%) were from minority ethnic backgrounds – above our average minority ethnic profile (20%). By age, the highest proportion of new starters were under 30 years at 47%. The proportion of new starters aged between 30-39 years was the same as the Ofcom average profile for this age group while we recruited much lower proportions of people in the 40-49 and 50+ years age brackets, relative to their average presentation at Ofcom. A slightly higher proportion of people who joined us said they were religious (42%) compared to the average (40%).





Performance

We evaluate the performance of colleagues with equal emphasis on what colleagues have achieved against their objectives as well as how well their behaviour has reflected our values. This approach results in a double letter assessment reflecting the what and the how. The ratings are ‘developing’, ‘performing well’ and ‘excelling’. It’s important to note that developing doesn’t always indicate under performance as it can also indicate someone is new in role.

Our people and transformation team brought more rigour and challenge to our annual performance evaluation process in April 2018. They now report in real time on the distribution of performance ratings by diversity in the moderation process, as decisions are made about colleagues, to ensure challenge and fairness.

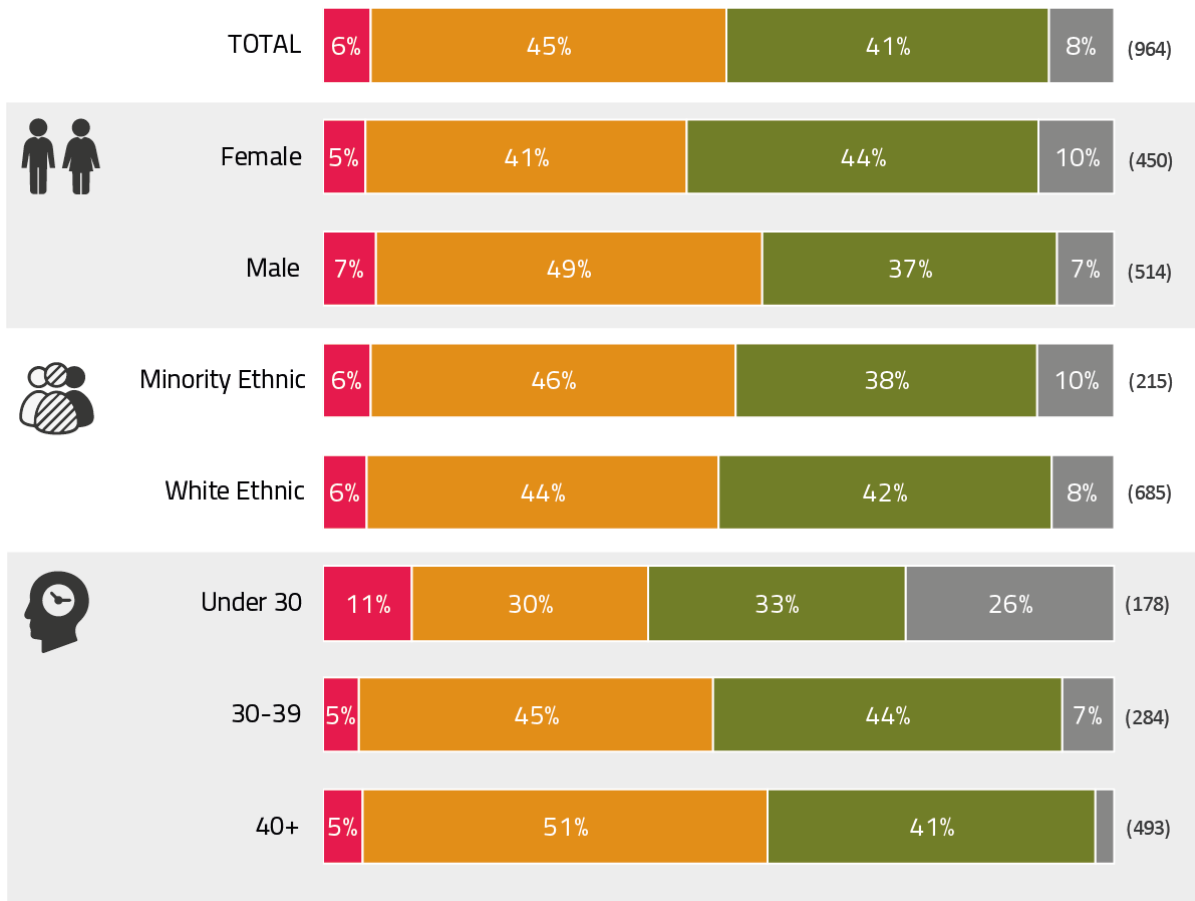
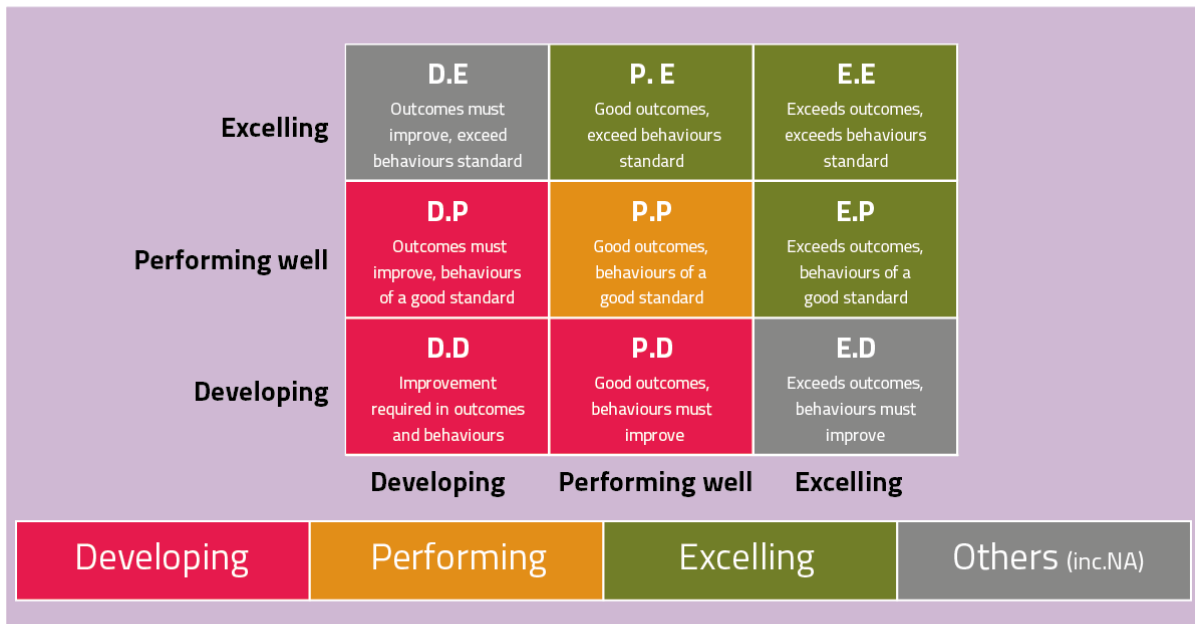
This year, as last year, a higher proportion of female colleagues received an excellent rating compared to male colleagues. The proportion of female and male colleagues receiving a developing rating are consistent with each other while a higher proportion of male colleagues were rated performing. There is a comparable distribution of ratings for minority ethnic colleagues and white ethnic colleagues. Thirty-eight per cent of minority ethnic colleagues were assessed as excellent to 42% of White ethnic colleagues, the proportions rated performing were 46% and 44% respectively and 6% of minority ethnic colleagues and White ethnic colleagues were considered developing.

Younger colleagues (under 30 years) were more likely to receive a developing rating than other age groups – 11% compared to 5% each for colleagues aged 30-39 and 40+ years. A lower proportion of

under 30s were also rated as excelling compared to other age groups. The proportions achieving an excelling assessment generally increases with age. Factors to explain this pattern can be younger colleagues being at the start of their careers and growing into their roles and building their expertise.

PERFORMANCE

April 2019 - March 2020 (n=964)



Base: all colleagues eligible for a performance rating. Excelling = exceeded objectives and the expectations for the job role and job grade throughout the year, as evidenced by feedback. Performing = performing well. Meeting objectives and expectations of the job role and job grade, are delivering good outcomes and living our values. Developing = recognises development needs to reach the required level of the job role and/or grade and

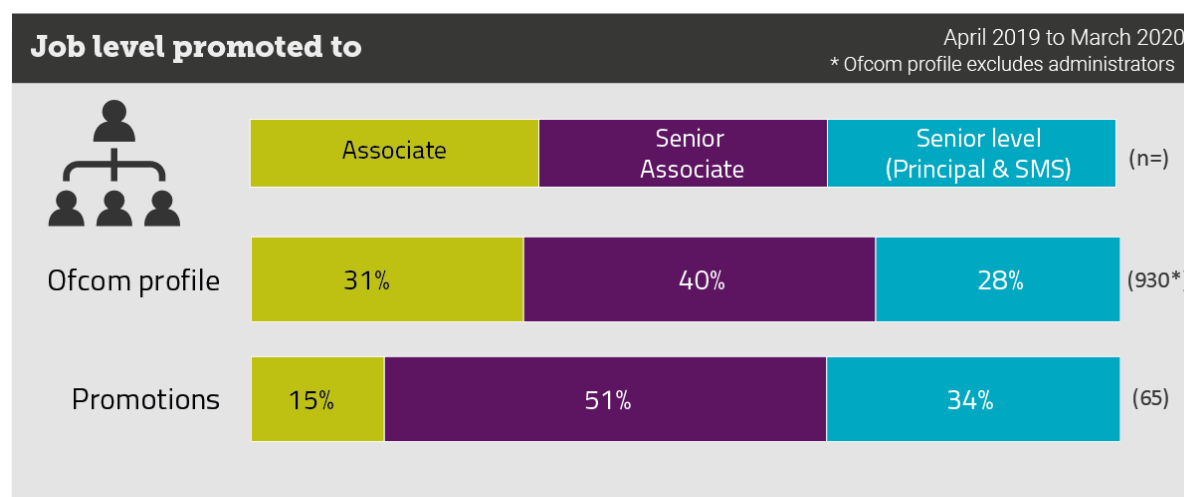
does not automatically indicate under-performance. Examples include colleagues who are new in their role, or where standards of work have dipped below of that expected of their job role or grade or in their behaviours. Others = includes colleagues who have been rated as DE or ED or who are too early in role to be formally rate (for example, in the role for less than six months).

Promotion

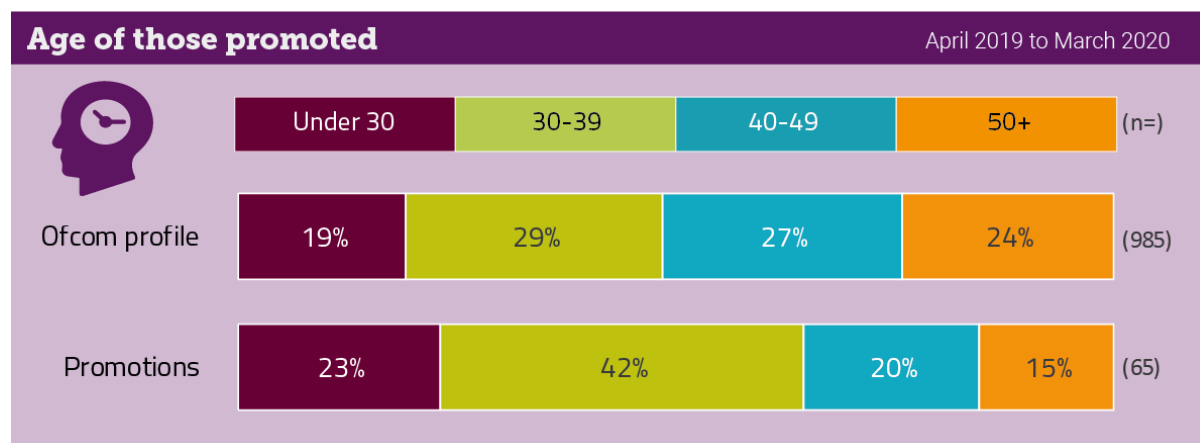
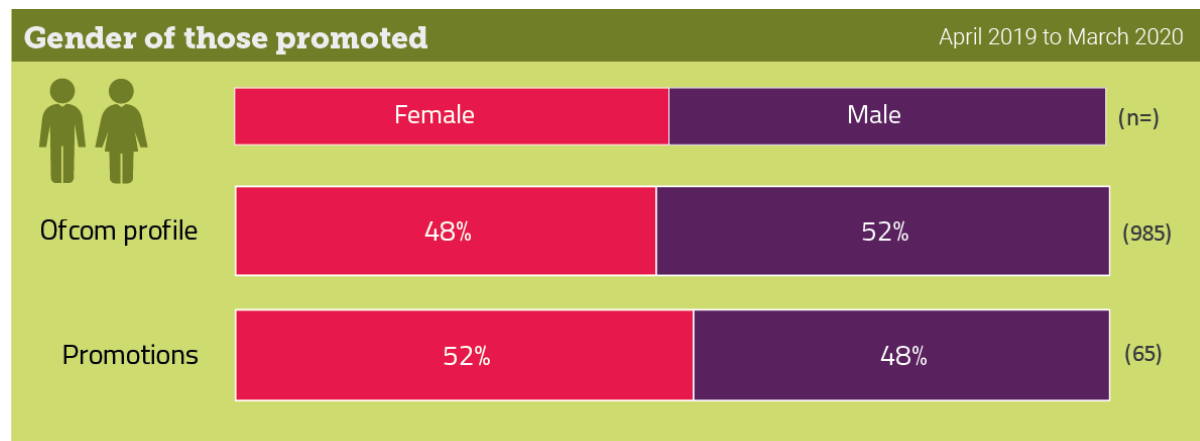
Sixty-five colleagues were promoted during 2019/2020. Promotions take place as part of our internal promotion process or by colleagues successfully applying for positions at a higher level which are widely advertised internally and externally. In-role promotions are open to Administrators and Associates to the level above. Their application is endorsed by their line manager once they have consistently excelled at their objectives and have demonstrated the competencies required of the grade above.

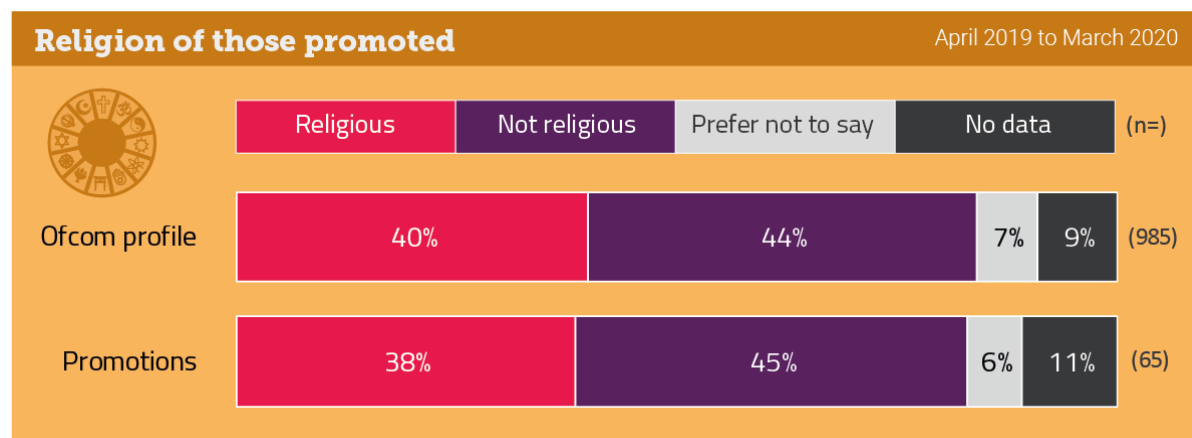
Across the last year, the majority (51%) of promotions were into a Senior Associate role. A third (34%) were into our top two most senior positions while 15% were into Associate grade.

Fifty-two per cent of promotions were to women, slightly above the Ofcom female profile of 48%, and 17% were to minority ethnic colleagues (compared to 20% Ofcom profile). A slightly higher proportion of colleagues under 30 years were promoted compared to their representation Ofcom wide while it was lower for both 40-49-year olds and those aged 50+ (they make up a combined 74% of Principal and SMS grades more generally which explains this lower rate). The highest proportion of promotions by age overall were to colleagues aged 30-39; 42% compared to 29% of them Ofcom wide. The proportions of colleagues who say they are religious or non-religious that were promoted were broadly in line with their representation across the organisation as a whole.



The grades shown are the grade that a colleague is promoted to. Associates were formerly Administrators, Senior Associates were Associates, Principals were Senior Associates and SMS were formerly Principals. Base = Associate levels upwards only (n=930) therefore the Ofcom grade profiles here will be different to the proportions shown for the full base of 985 colleagues.





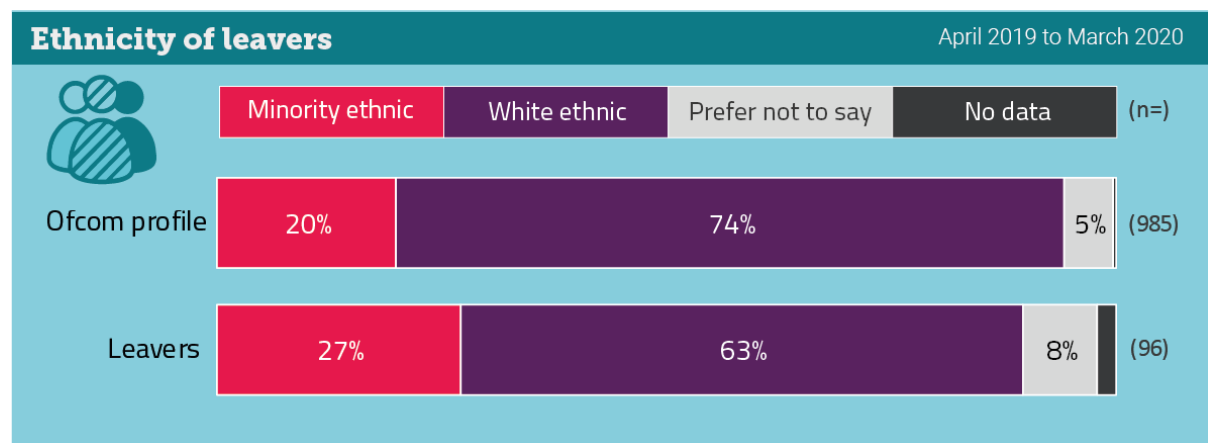
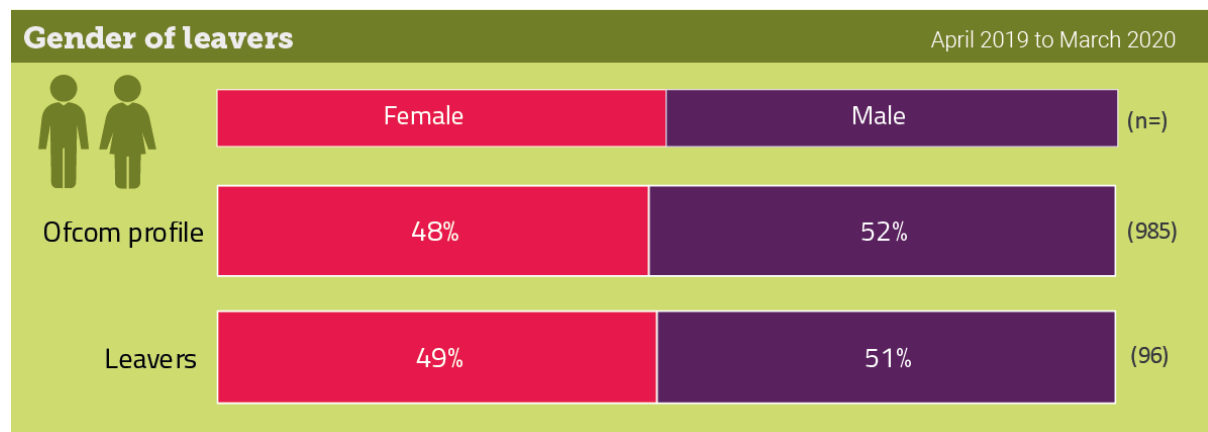
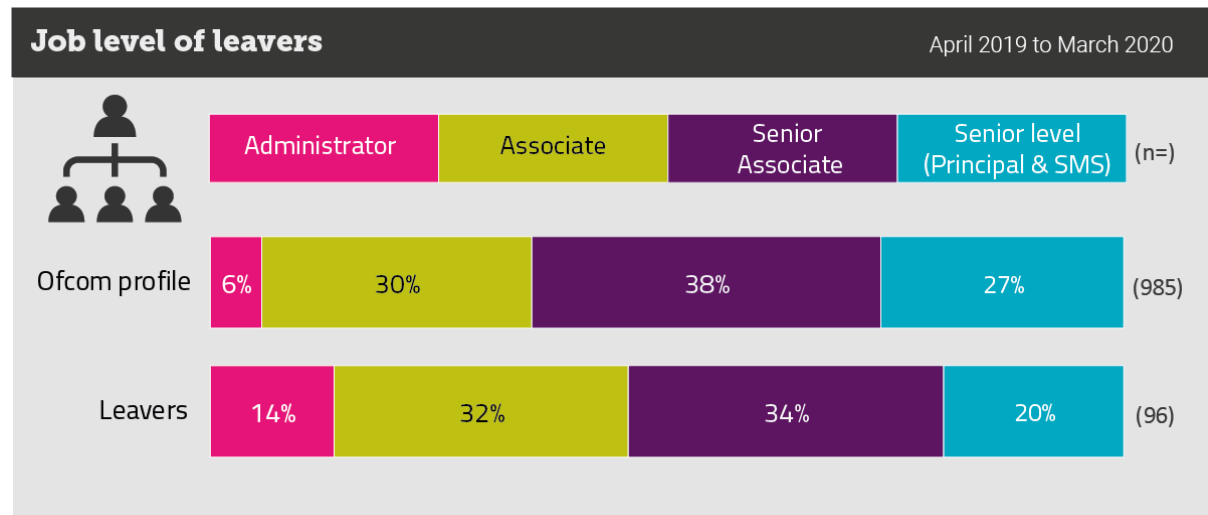
Leavers

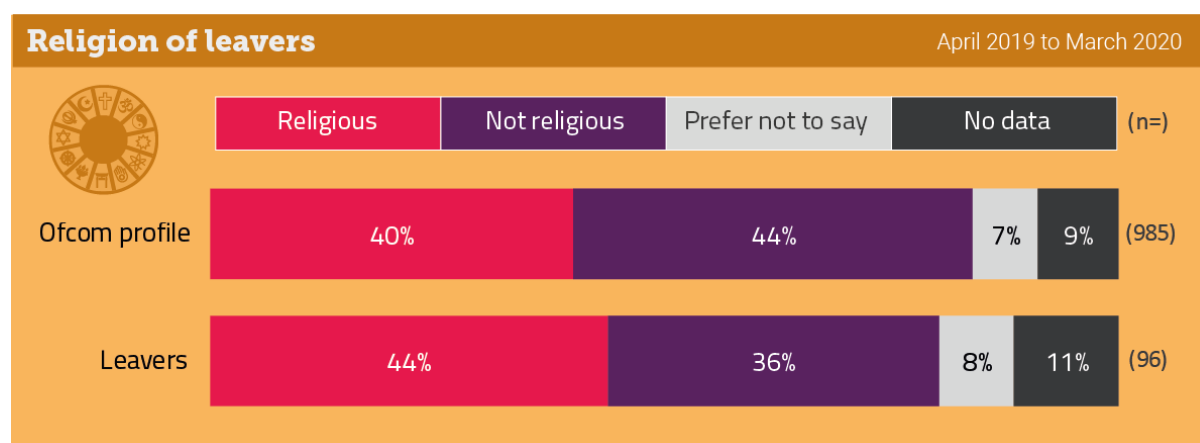
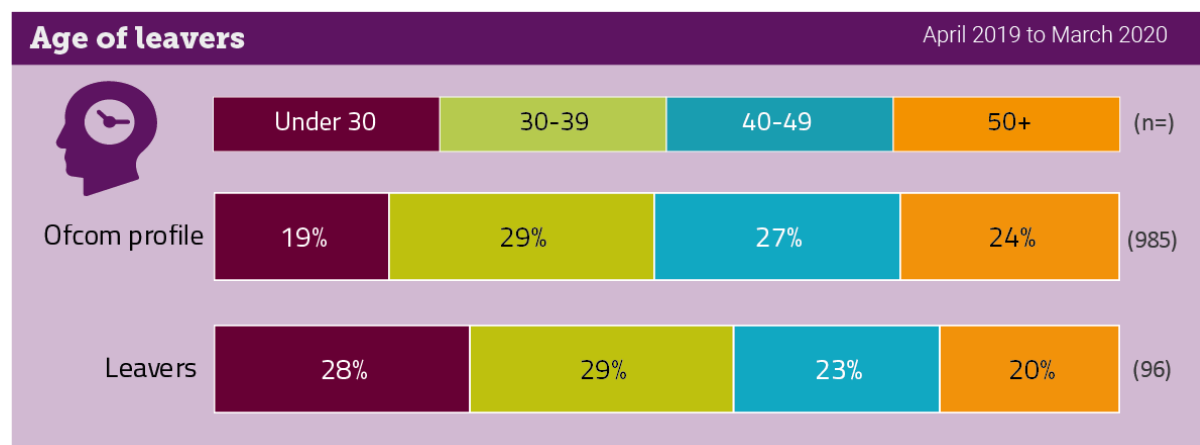
Ninety-six people left Ofcom across 2019/2020, a leavers rate of 10%. This was similar to our leavers rate across 2018/19 when it was 11% (101 colleagues). To give context to the leavers rate, we compare the statistics for each grade against their organisational profile. The bigger the proportion of leavers relative to their profile, the lower the retention rate.

The proportion of Administrators who left Ofcom was just over double their 6% profile, the lowest retention rate of all the grades (though Administrators account for the lowest absolute numbers of colleagues overall).

The leavers rate for Associates was broadly in line with their organisational profile, while it was below average for Senior Associates. Of all grades, the variance between the leavers rate and the profile for Principals and SMS combined shows that retention is highest at these most senior levels.

By gender, the leavers rate for male and female colleagues was almost identical to the proportions they represent Ofcom-wide. However, by ethnicity, above average proportions of minority ethnic colleagues left us. By age, the highest proportions of leavers were in the under 30 age bracket and much higher than their 19% profile across Ofcom as a whole. The leavers rate for 30-39-year olds was the same as their Ofcom representation while it was below average for the 40-49 and 50+ age brackets. 44% of colleagues of faith moved on from Ofcom, slightly above the 40% Ofcom average they represent, while the proportion of non-religious colleagues who left us was below their representation at Ofcom overall.





Our diversity make-up as at end September 2020 vs March 2020

In September 2020 we achieved our gender target of 50% Ofcom wide (48% in March). We continued to increase the proportion of women in senior positions to 45% in September from 43% in March (our target was 40%). We increased the representation of minority ethnic people at senior levels to 11% from 10% in March but did not meet our target of 13%. Our target levels in September were the same as the final levels we achieved at the end of December 2020.

All our other diversity data points remain largely unchanged between March and September (any changes are mostly by 1 to 2 percentage points) but there was a more notable shift in the split between men who work part-time and women who work part-time. Although the proportion of colleagues who work part-time remained constant at 10%, in September, 86% of this were women compared to 83% in March.

	September 2020	March 2020
Gender:		
Men	50%	52%
Women	50%	48%
Women at senior levels	45%	43%

Ethnicity:		
White ethnic	73%	74%
Minority ethnic:	21%	20%
Asian ethnic	12%	12%
Black ethnic	5%	5%
Mixed ethnic	3%	3%
Prefer not to say	6%	5%
No data	0%	0%
Minority ethnic colleagues at senior levels	11%	10%
Disability:		
Disabled	11%	10%
Not disabled	70%	70%
Prefer not to say	11%	11%
No data	8%	9%
Sexual orientation:		
Heterosexual	76%	75%
LGB	5%	4%
Prefer not to say	11%	11%
No data	8%	10%
Age:		
Under 30	20%	19%
30-39	29%	29%
40-49	25%	27%
50-59	20%	19%
60+	5%	5%
Religion or belief:		
Religious:	41%	40%
Christian	30%	30%
Muslim	4%	4%
Hindu	2%	2%
Jewish	2%	1%

Other faith/belief	2%	2%
Not religious	45%	44%
Prefer not to say	7%	7%
No data	8%	9%
Working pattern:		
Full time	90%	90%
Part time	10%	10%
Men who work part time	14%	17%
Women who work part time	86%	83%
Location		
London	81%	82%
Out of London	19%	18%