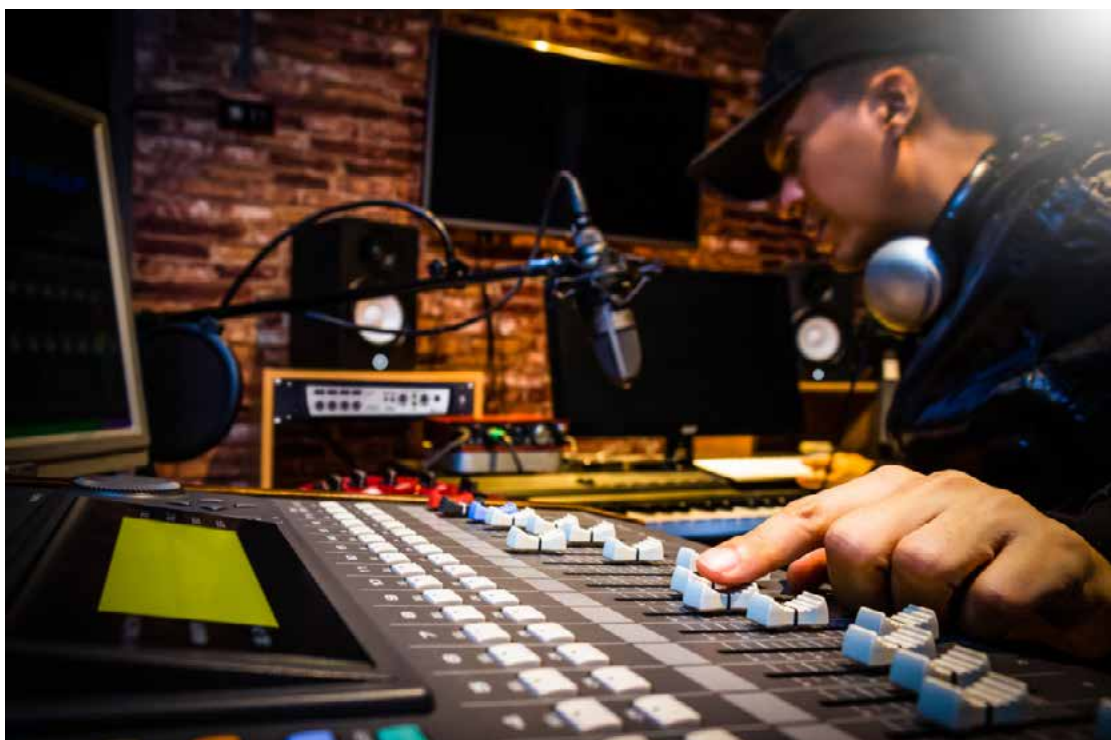


Diversity and equal opportunities in radio

Monitoring report on the UK radio industry



Published 13 June 2018

Chief Executive foreword

Radio matters to people in the UK. Nine-in-ten of us tune in each week. British radio, founded on nearly a century of broadcasting by the BBC, has grown into a world-class creative sector.



Commercial radio alone is worth half a billion pounds to the economy, supporting broadcast journalism and helping to fund our vibrant music scene. And the BBC offers a unique mix of genres, from medium wave to digital downloads, across our nations and regions.

Radio is also a powerful, personal medium, with a unique ability to inspire loyalty and speak directly to its audience. Listeners expect to hear programmes that authentically portray life across the UK, its nations and regions. But that is hard to achieve if people working in radio do not reflect the breadth of modern society.

This report, which follows our similar study of the UK television industry last year, sheds important light on the make-up of the radio industry. It covers off-air roles, such as engineering and administration; and on-air workers such as journalists and presenters – where, unlike in television, diversity cannot be seen by the audience.

Our findings reveal where radio can improve on representation. For example, people from ethnic minorities comprise just 6% of the radio workforce, versus 14% of the wider population. Male and female colleagues are well-balanced across the industry as whole, but women occupy just 37% of senior roles.

In many areas, there is a worrying lack of data, with some major broadcasters failing to assess the diversity of their employees across a range of characteristics. For example, data on disability is completely missing for 38% of radio workers, making it impossible for broadcasters to effectively include and support staff with disabilities.

Only transparency and accountability will help extend opportunities in radio to everyone. Encouragingly, there are signs of progress. The BBC has provided data on all the characteristics we requested for this report and set itself ambitious diversity targets. As the UK's only public service radio broadcaster, the BBC carries higher expectations, and should lead the way. But our paper also highlights the important steps other broadcasters are taking to broaden their workforces.

We are determined to work with broadcasters to help them build on the findings in this report and improve representation in radio. We have looked at the arrangements each has in place to promote equal opportunities. Where these are inadequate, we will inform broadcasters and work with them to improve their practices. We will also meet companies to discuss how they might overcome obstacles and share effective practices.

At Ofcom we are also working to improve our own diversity. As regulator for the UK, its nations and regions, we must reflect the society we serve.

Our radio sector has a huge opportunity to extend its reach and relevance to the whole UK. I am optimistic that those in control of major radio groups – three of which account for 80% of workers covered in this report – can help to lead change over time.

By drawing on the best talent from across the UK's communities, our great broadcasters can make even better radio, and ensure they stay relevant to the widest possible audience.

Sharon White
Chief Executive, Ofcom

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Summary

As the communications regulator, Ofcom aims to ensure people in the UK get the best from the services we regulate. Promoting greater diversity within broadcasting is a priority for Ofcom, and we are working with the industry and government to make progress¹.

About this report

Broadcasters should reflect, and provide relevant content for, their whole audience. The best way to make this happen is to ensure diversity in the workplace. However, this is not simply a matter of monitoring numbers within the workforce; it must include a cultural shift and an appreciation of difference: enabling people with different skillsets and talents to enter and progress in the industry.

This report, which follows our similar study on the television sector in September 2017², examines the diversity of the people working in UK radio. It presents our main findings across radio broadcasters and licensees regulated by Ofcom.³

We have required broadcasters to provide data on the three characteristics where we have powers to do so: gender; ethnicity; and disability. In addition, we have requested data on other 'protected characteristics' in the Equality Act 2010⁴: age; sexual orientation; religion or belief; pregnancy and maternity; and gender reassignment.

Of 404 radio organisations, 16⁵ met the minimum threshold⁶ to provide information on how they promote equality and diversity. This includes information about their workforce and any details on current arrangements they have in place, such as recruitment policies, staff training, equal opportunities policy statements and any monitoring they do on their workforce composition.⁷

Our report focuses on three of the main UK radio broadcasters: the BBC, Global and Bauer.

In addition to this report, Ofcom's online diversity hub⁸ provides further information on the methodology behind this report, including the legal basis for requesting this information from broadcasters. The data was collected via a questionnaire sent to broadcasters and is based on broadcasters' own reporting systems. As such, there may be some variation in how categories are defined.

1. Overview of Ofcom's work on diversity and equality 2018/19:

<https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/guidance/diversity/ofcoms-role/overview-work>

2. <https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/guidance/diversity/diversity-equal-opportunities-television>

3. This includes the BBC and Ofcom radio licensees.

4. The relevant protected characteristics for the purposes of the public sector equality duty in section 149 of the Equality Act 2010.

5. For a full list of the 16 broadcasters that met the threshold see the annex. Although Arqiva is an Ofcom licensee and met the threshold, it is predominantly focused on providing infrastructure for the radio industry rather than content. The focus of this report is on broadcasters making content for consumers and therefore Arqiva has not been included in the report.

6. The BBC and radio broadcasters licensed by Ofcom, authorised to broadcast for more than 31 days per year and with more than 20 employees, were required to provide diversity information. Broadcasters who did not meet this threshold were not required to do so. The full list of the broadcasters meeting the threshold can be found in the annex.

7. The data-period requested was January to December 2017.

8. <https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/guidance/diversity>

Summary of findings

1) Poor data collection:

Without comprehensive monitoring of the characteristics it is impossible for a broadcaster to understand the diversity of its workforce, or to identify what improvements are needed. Our findings show that too many broadcasters do not sufficiently understand the make-up of their employees and collect too little or no diversity data:

- All 16 broadcasters provided data on gender
- 11 out of 16 provided data on ethnicity
- 11 out of 16 provided data on disability
- 6 out of 16 provided data on age
- 4 out of 16 provided data on religion and belief
- 2 out of 16 provided data on sexual orientation

2) Women versus men:

Although representation of women across radio is in line with the UK population (51%), women are under-represented at senior levels, where 62% of senior managers are male, rising to 81% at Board level. However, the reality is more nuanced when the gender profiles of different job roles are considered:

- Technical and engineering roles are more likely to be filled by men (81%)
- Over half (52%) of roles in programming are filled by men (68% across commercial radio v 46% within BBC radio)
- In contrast, women account for more roles in marketing (70%), support (66%) and sales (63%)

3) Under-represented ethnic minorities:

Employees from an ethnic minority background are under-represented within radio, comprising 6% of the workforce versus 14% of the wider population. 11 out of 16 broadcasters provided data on ethnicity. Of the small amount of data provided at board level, there is no representation by anyone from an ethnic minority background among those who disclosed their data.

4) Invisibility of disability:

11 of the 16 broadcasters provided data about disability among their staff. Broadcasters did not provide data on 38% of people working in the radio industry. Although broadcasters refer to general equal opportunities policies and statements, not all refer to specific arrangements they have in place for people with disabilities including monitoring.

Overview of characteristics

Gender

Women are under-represented at senior levels across radio, with male employees accounting for 62% of senior management and 81% at Board level.

We received gender data for almost all employees – 8,842 employees out of a total of 8,879.

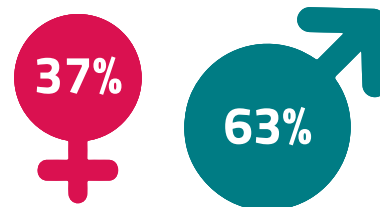
In general, women are represented within radio in line with the wider population (51%).

There are differences between radio broadcasters: 53% of commercial radio employees⁹ are female, dropping to 49% at the BBC.

There are also differences according to job role. For example, 81% of technical and engineering roles are filled by men. However, we acknowledge that this reflects the wider issue of encouraging women to pursue careers in science, technology, engineering and mathematics ('STEM'). For example, research indicates the UK has the lowest percentage of female engineering professionals across Europe.¹⁰

Gender in senior roles

More men at board or senior management level



There are also some differences in the gender profiles of other job roles. In programming, for example, across the industry¹¹, 46% of these roles are filled by women. However, there are differences in the profile of these roles across the main radio broadcasters: at the BBC, women occupy 54% of programming roles; at Global it is 32%, falling to just 19% at Bauer.

In contrast, across the industry, women account for more roles in sales (63%), marketing (70%) and support positions (66%).

Ethnicity

Overall, employees from an ethnic minority background are under-represented across the industry: they comprise 6% of the workforce, versus 14% of the wider population.

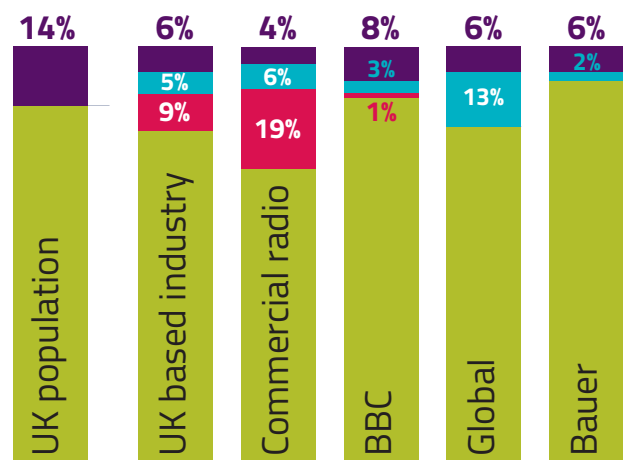
We received ethnicity data for 86% of employees, with a further 5% of employees choosing not to disclose (leaving 9% no data).

Of the small amount of data provided at Board level, there is no representation by anyone from an ethnic minority background among those who disclosed their ethnicity. Board-level positions are more likely to have no data submitted (58% 'no data').

The role within the industry with the lowest representation of ethnic minorities is sales (3%). This contrasts with programming (11%), journalism/news (8%) and technical/engineering (8%) roles.

Proportion from an ethnic minority

● White ● Ethnic minority
● Not disclosed ● No data



9. Throughout this report, where we reference commercial radio, this includes only those who met the minimum threshold to submit information

10. <https://www.wes.org.uk/content/wesstatistics>

11. Throughout this report, where we reference 'the industry', this includes only those who met the minimum threshold to submit information.

Disability

Only 11 of the 16 broadcasters provided disability data.

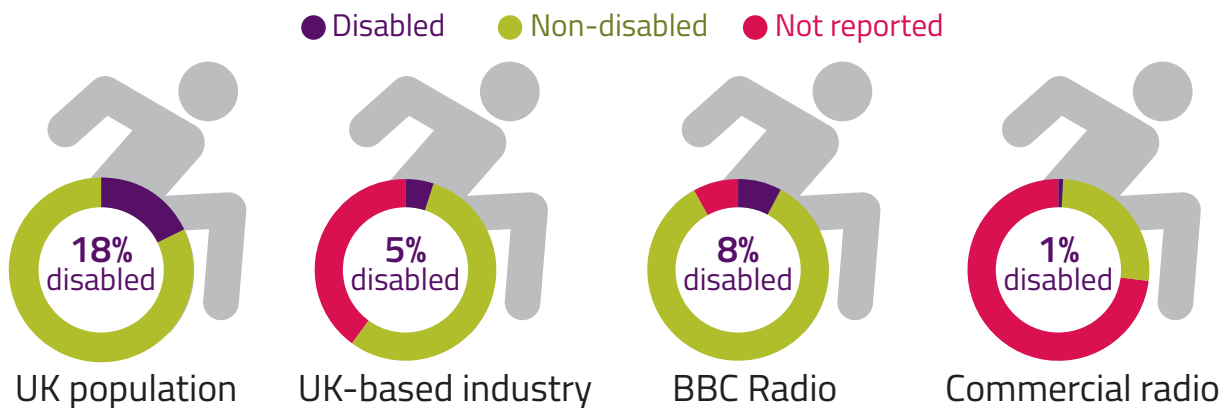
We received this data for 60% of employees from the 16 broadcasters, with a further 2% choosing not to disclose, leaving 38% of data unprovided.

Overall, disabled people appear to be significantly under-represented across the industry: only 5% of radio employees described themselves as disabled, compared to 18% of the UK population¹². While the UK population figure includes all adults, and not just those who are

in employment, research commissioned by Scope indicates that 19% of working age adults are disabled¹³; so the disparity within the radio industry profile appears significant.

Disability representation and monitoring varied greatly across the three main radio groups. The BBC had the highest proportion of disabled employees at 8%, and Bauer had just 3%. We are unable to report on the disability profile of employees at Global, as it did not monitor employees against this characteristic.

Proportion with a disability



Overview of characteristics: age, religion or belief, sexual orientation, and pregnancy and maternity

We received data from six of the 16 broadcasters on age, covering 6,118 (69%) of employees.

Only four broadcasters provided any information about religion or belief. This covered 4,704 (49%) of all employees.

Just two broadcasters provided any information about the sexual orientation of their employees, totalling 3,515 (37%).

The large employee numbers for these characteristics is primarily accounted for by the BBC who provided data on all three of these characteristics.

In addition, we received information from five broadcasters relating to pregnancy and maternity.

Under reporting of data



12. The UK profile is taken from the Census 2011 - Activity limiting health problem or disability (limited a lot or limited a little)

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilityinenglandandwales/2013-01-30>

13. <https://www.scope.org.uk/media/disability-facts-figures>

Next steps: action by radio organisations

The main conclusion from this first monitoring exercise across the radio industry is that change is required. There needs to be recognition of this and commitment from all broadcasters to improve their understanding of their workforce and to ensure adequate arrangements are in place to meet their licence obligation to promote equal opportunities¹⁴. We have identified three major steps for broadcasters to take:

- a) **Know your workforce:** Broadcasters should regularly measure and monitor the make-up of their workforce to a consistently high standard, having regard to Ofcom's guidance, capturing all characteristics and identifying imbalances between job roles.
- b) **Establish the goals:** We expect broadcasters to set diversity targets. All broadcasters should set clear targets on diversity, so their employees more accurately reflect the society we live in.
- c) **Take the lead:** We believe broadcasters should lead from the top. We want Chief Executives to be accountable for delivery against their diversity targets. Comprehensive diversity policies need to be embedded from the top down. Senior managers should lead the agenda, undergoing regular appraisals against diversity objectives, along with completing 'unconscious bias' training as part of a sustained programme of diversity training.

Radiocentre, the industry body for commercial radio, has acknowledged the importance of diversity for the whole industry. It is working with a number of partners on diversity and inclusion in the industry. For example, it is partnering with Creative Access and the BBC to try and improve representation of young people from ethnic minority backgrounds. In conjunction with the Employers Network for Equality and Inclusion, it has drawn up a diversity statement for the commercial radio industry and has committed to helping facilitate discussions going forward.

"Commercial radio has huge choice of stations and a diverse audience, so ensuring that we reflect our listeners will ultimately help make better radio. We know we can do more to improve the diversity of radio in the UK, so I look forward to working with industry over the next year to develop this important area. It's not only the right thing to do but also makes sound commercial sense."

Siobhan Kenny
CEO, Radiocentre

14. The licence condition relates to the mandatory characteristics of gender, race and disability. Across the 16 broadcasters there was no gender data for 0.2% of employees, no ethnicity data for 9% of employees and no disability data for 38% of employees.

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

16. <http://www.radiocentre.org/wp-content/uploads/2018/05/Radiocentre-diversity-statement-May-2018.pdf>

Next steps: action by Ofcom

Ofcom will actively engage with radio broadcasters to help improve the diversity of their employees. As part of our overall workplan we will:

- a) **Monitor the industry:** This is the first report looking at the diversity of the UK radio industry and it will be an annual process where we will continue to measure progress. This will include a full assessment of equal opportunity arrangements for each organisation. We will ask those we assess to have inadequate arrangements in place to explain how they intend to meet their obligations to promote progress.
- b) **Share best practice:** We will facilitate discussions with broadcasters with the aim of working together to improve diversity and equal opportunities. Our aim is to maximise shared learning and best practice.
- c) **Improve diversity guidance:** We will continue to review our guidance in this area as part of the evaluation of the monitoring process.¹⁷ We will also promote discussions on other key considerations such as social mobility.
- d) **Ensure broadcasters comply:** 63 licensees failed to respond to our stage 1 information request¹⁸ by the deadline. Because of this, we took enforcement action and 11 were found in breach of their licence conditions.¹⁹ In future, we will commit to enforcement action against broadcasters who fail to provide the required information.

17. In November 2017 we published revised guidance for broadcasters on making equal opportunities arrangements:

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

We have also produced guidance in collaboration with the Equality and Human Rights Commission called 'Thinking outside the box': https://www.ofcom.org.uk/_data/assets/pdf_file/0030/47496/increasing-diversity.pdf on what action can lawfully be taken to increase diversity in the industry, and have developed an online diversity resource hub which contains a wealth of information to help broadcasters: www.ofcom.org.uk/diversity.

18. To determine if they met the threshold to complete our more detailed questionnaire.

19. https://www.ofcom.org.uk/_data/assets/pdf_file/0012/112701/issue-351-broadcast-on-demand-bulletin.pdf and https://www.ofcom.org.uk/_data/assets/pdf_file/0009/113202/Issue-352-of-Ofcoms-Broadcast-and-On-Demand-Bulletin.pdf

Our findings

Glossary of terms

Mandatory characteristics

We have required broadcasters to provide data on the three characteristics where we have powers to do so: gender; ethnicity; and disability. In this report we term these as mandatory characteristics.

Voluntary characteristics

We have requested data on other 'protected characteristics' in the Equality Act 2010: age; sexual orientation; religion or belief; pregnancy and maternity; and gender reassignment. We have termed these voluntary characteristics.

Description of job roles

Broadcasters were asked to provide the number of employees who fall into six job role categories: programming, journalism, technical and engineering, sales, marketing, and support and administrative. We acknowledge that few broadcasters group their employees in exactly these ways, and so we asked them to input their information in the categories they considered most closely matched. This allows us to present like-for-like comparisons across the industry.

Workforce

This term is used throughout this report to refer to employees and contracted freelancers combined.

Provision of 'no data'

Broadcasters were given the option of completing a 'no data' field if they did not monitor that particular characteristic of their employees or freelancers.²⁰

Not disclosed

Even when broadcasters captured data about their workforce, individuals may have preferred not to disclose their individual information to the broadcaster. These individuals are therefore included in the totals but are not identifiable by category and their data are referred to as 'not disclosed'.

Data Gap

For this report we define the data gap as no data provided.

About this report

Out of 404 radio organisations²¹, 16 met the minimum threshold²² to provide information on how they promote equality and diversity. This includes information about their workforce and any details on current arrangements they have in place, such as recruitment policies, staff training, equal opportunities policy statements and any monitoring they do on their workforce composition.

Under their licences, or the Charter and Agreement in the case of the BBC, organisations were required to provide information about their workforce in relation to gender, ethnicity and disability. In addition, they were also asked to voluntarily provide information about arrangements they have in place in relation to the other protected characteristics.²³ Much of the detail we have included in this report on the voluntary characteristics is on age, sexual orientation and religion or belief, though the

20. For voluntary characteristics no data may also be used to describe data where broadcasters did not have individuals' consent to provide the data to Ofcom or chose not to provide it for some other reason.

21. For a full list of the 16 broadcasters that met the threshold see the annex. Although Arqiva is an Ofcom licensee and met the threshold, it is predominantly focused on providing infrastructure for the radio industry rather than content. The focus of this report is on broadcasters making content for consumers and therefore Arqiva has not been included in the report.

22. The BBC and radio broadcasters licensed by Ofcom, authorised to broadcast for more than 31 days per year and with more than 20 employees, were required to provide diversity information. Broadcasters who did not meet this threshold were not required to do so. The full list of the broadcasters meeting the threshold can be found in the annex.

23. See Equality Act 2010: <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

other characteristics (pregnancy and maternity, marriage or civil partnership, and gender reassignment) are referenced where they have been included in submissions from broadcasters. In addition, we also asked broadcasters to share any arrangements they have in place that cover social mobility. There was limited information on social mobility: only the BBC, UKRD and Wireless Group referred to it in their qualitative response. In terms of overall monitoring, we received substantive data on 8,879 employees working in the UK radio industry.²⁴

In addition to reporting on the overall radio industry²⁵, this report focuses on the three

largest radio broadcasters: the BBC²⁶, Global and Bauer. They each employ over 700 people and make up over 80% of radio industry employees we received data for.

The data was collected via a questionnaire sent to qualifying Ofcom radio licensees and the BBC and are based on the broadcasters' own reporting systems. As such, there may be some variation in how categories are defined.

A summary of the data received from each of the 16 broadcasters for each characteristic is provided in the annex to this report.

The data gap

Ofcom radio licensees urgently need to undertake better and more regular monitoring of their employees. All broadcasters provided information on the gender of their employees, but no ethnicity data was provided on 9% of industry employees or disability status data on 38% of employees. Excluding the BBC, these data gaps within commercial radio broadcasters increase to 19% for ethnicity and 72% for disability. Broadcasters provided even less data for other (voluntary) characteristics: there was no data on 31% on age, 60% on sexual orientation and 47% on religion or belief.

Eight of the broadcasters surveyed were unable to provide mandatory data. As the first report in what will be an annual process, we are using this as a benchmark, but we will be contacting each of these broadcasters to ensure they are aware of their obligations and our expectations in this area. In future, we expect broadcasters to clearly demonstrate that they have in place equal opportunities arrangements and effective monitoring of their workforce as outlined in their licence conditions and our guidance.

We also requested diversity information on freelancers working for each organisation. Only three broadcasters provided any information on these workers. Of the three main groups, only the BBC supplied data on their freelancers. In addition, Tindle Radio Ltd supplied freelancer data for gender, ethnicity and disability and the Wireless Group for gender. In total, there were 4,499 freelancers (34% of all workers) across the broadcasters who provided us with information.

Crucially, these shortfalls in data make it harder to assess how far the radio industry must go to reflect the wider population in their employment. For example, just 5% of radio industry employees described themselves as disabled, compared to 18% of the UK population. As we received no disability data for 38% (with a further 2% not disclosed by employees) of the industry, disability representation may be better or worse than the numbers suggest, depending on representation among those for whom we have no data.

24. Of these, 8,851 were based in the UK

25. Our report focuses on the main three broadcasters who employ over 700 people and reflects responses from the 16 organisations who met the threshold. However, Ofcom understands that beyond the small number of big groups, the radio industry is made up of a very large number of very small companies.

26. The BBC's UK public radio services which include: English Regions Local Radio; Nations Radio; News and Current Affairs Radio; and Network Radio. BBC World Service data is not included.

27. We are not able to distinguish if a broadcaster does not monitor the data on these 'voluntary characteristics' or if the broadcaster did not provide it to Ofcom, for example because they did not have their employees' consent to do so.

28. Tindle Radio Ltd owns and operates local commercial radio stations in the Channel Islands and the Republic of Ireland.

29. Wireless Group operates 23 radio brands across the UK and Ireland. These include local stations as well as national brands such as talkSPORT.

The table below provides a summary overview of the monitoring data we received. We have provided a UK population figure where possible by way of a benchmark.³⁰ The radio industry figures show the overall percentages for the data we received. We also detail the received data from the three main radio groups as well as an aggregated figure for the commercial radio industry (excluding the BBC).

For each characteristic we have also included a line to highlight where we received no data and what proportion the workforce for each group that represents. For example, for ethnicity, we received no data for 9% of the overall workforce covered in the report but this increases to 19% of the commercial radio workforce.

Profile of the UK-based radio industry by protected characteristic³¹

							UK radio industry	
	UK population**	UK radio industry	BBC	Global	Bauer	Commercial radio	Not disclosed	Data Gap (No data)
Gender								
Men	49%	49%	51%	43%	46%	46%	0%	0%
Women	51%	51%	49%	57%	54%	53%		
Women in senior roles*		37%	40%	34%	39%	33%		
Ethnicity								
Ethnic minority groups	14%	6%	8%	6%	6%	4%	5%	9%
No data	-	9%	1%	0%	0%	19%		
Not disclosed	-	5%	3%	13%	2%	6%		
Disability								
Those with disability	18%	5%	8%	No data	3%	1%	2%	38%
No data	-	38%	5%	100%	3%	72%		
Not disclosed	-	2%	3%	-	1%	1%		
Age								
Under 40 years old	51%	29%	36%	No data	62%	22%	0%	31%
Over 40 years old	49%	40%	64%	No data	38%	15%		
Women under 40 years old	50%	28%	39%	No data	63%	16%	0%	
Women over 40 years old	50%	36%	61%	No data	37%	10%		
Men under 40 years old	53%	25%	34%	No data	60%	17%	0%	
Men over 40 years old	47%	41%	66%	No data	40%	11%		
No data	-	31%	0%	100%	0%	63%		
Not disclosed	-	0%	0%	-	0%	0%		
Sexual Orientation								
Heterosexual	-	33%	63%	No data	No data	1%	3%	60%
Lesbian/Gay/Bisexual	-	3%	6%	No data	No data	<1%		
No data	-	60%	24%	100%	100%	99%		
Not disclosed	-	3%	7%	-	-	0%		
Religion and belief								
Religious	-	23%	42%	No data	No data	2%	1%	47%
Non-religious	-	30%	57%	No data	No data	1%		
No data	-	47%	0%	100%	100%	96%		
Not disclosed	-	1%	1%	-	-	1%		

*Senior roles = Board or senior management level

30. We acknowledge that some of these figures include people who are not working or retired.

31. **Sources used for UK population figures:

Gender = ONS annual population survey Jan 2016–Dec 2016

Ethnicity = ONS annual population survey Jan 2016–Dec 2016

Disability = Census 2011 - Activity limiting health problem or disability (limited a lot or limited a little)

Age = ONS UK population estimate mid 2015

The radio industry

By way of context, the radio industry is comprised of a wide range of stations in terms of coverage areas and in the type of audience they target. In addition to the national stations that broadcast to the whole of the UK, providing a variety of music genres and speech output, there is a much larger number of local and regional stations, as well as over 250 community radio stations, each providing content tailored for different types of audience. According to our Communications Market Report³², in May 2017 there were 588 stations (commercial, community or BBC) available across the UK on analogue (FM or AM) with a further 216 unique services available on DAB (digital audio broadcasting).³³

In contrast to the television industry where studios tend to be based in a limited number of production centres across the UK, local radio stations tend to be based in the areas

in which they broadcast. As some regions have lower ethnic minority representation compared to others, this can impact on how well broadcasters can improve their ethnic minority representation overall. For example, within the Heart South West area, 3% of the population are from an ethnic minority; within the BBC Radio Scotland area this increases slightly to 5%; and within the Kiss London area this increases still further to 29%.³⁴

However, we do not believe that this should impact on broadcasters ensuring their workforce is diverse overall.

We recommend radio groups consider whether individual stations in their company profiles reflect that station's audience demographic. For the purposes of this report the numbers would be too low for us to publish.

How do the main radio groups compare?

In this section we focus on the three largest radio broadcasters which each employ over 700 employees:

- a) **BBC** – public service radio broadcaster
- b) **Global Media & Entertainment Ltd** – commercial radio broadcaster
- c) **Bauer Radio Ltd** – commercial radio broadcaster

The BBC represents over half (51%) of all employees reported on at 4,527. This is followed by Global 1,836 and Bauer 746.

We have compared these groups across the six protected characteristics for which we have employee data, both against each other and with the industry as a whole.

Across these radio groups there were some substantial gaps in the data provided. The BBC provided information across all six characteristics. Bauer provided data on four characteristics (they did not provide any information on sexual orientation and religion or belief). Global only provided information relating to gender and ethnicity.

Taking each characteristic in turn, we compare the three main radio groups to the UK population averages (where available) as well as the overall radio industry, that is, the combined total of all data received from the organisations listed in our Annex. We have also included data for commercial radio separately, which excludes the BBC.

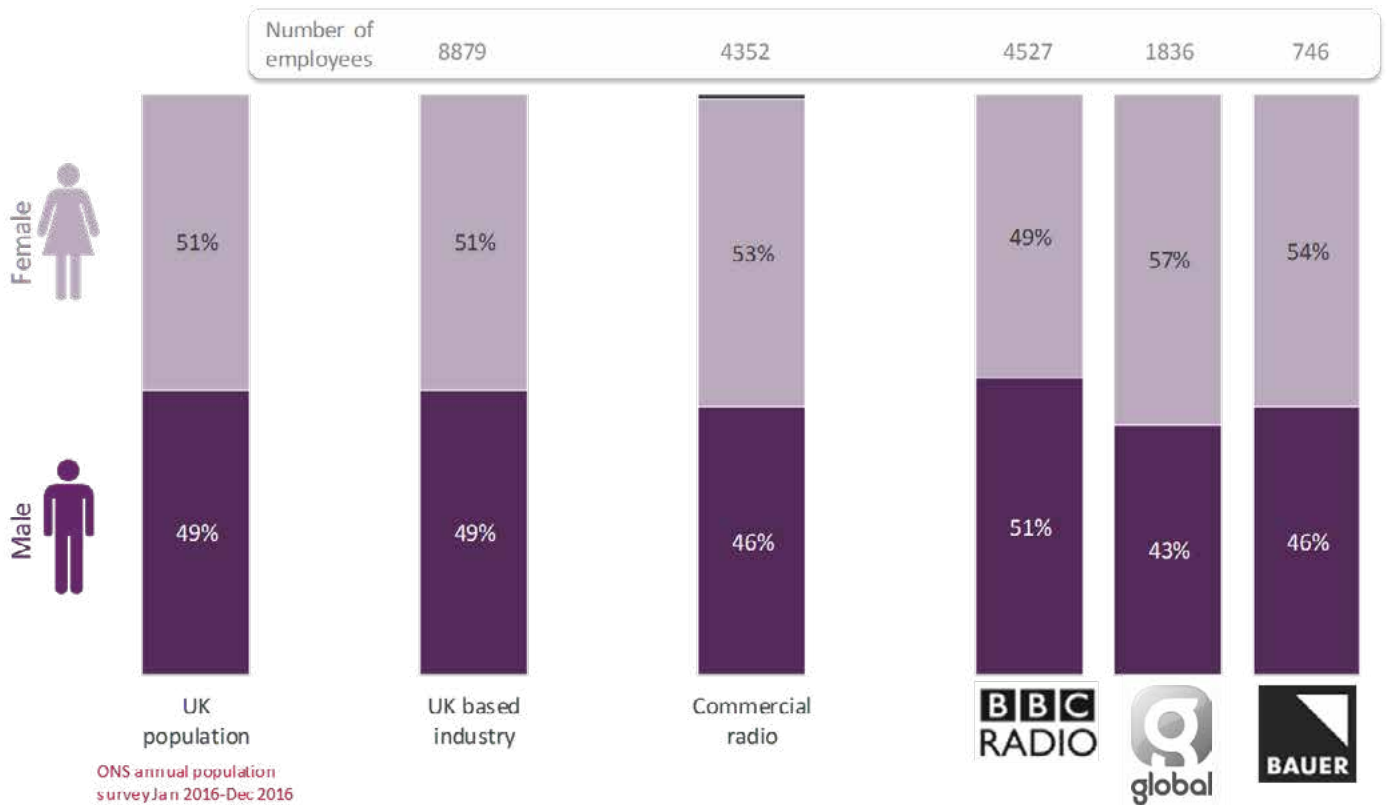
We consider it important that broadcasters seek to ensure their workforce composition reflects the wider population. Furthermore, unless an organisation understands the make-up of its workforce it cannot identify any potential areas where there may be a lack of inclusivity. This could have impacts in terms of recruitment, retention or progression of staff, or just their general well-being, and improvement will enable people with different skillsets and different talents to work together towards a common goal.

32. https://www.ofcom.org.uk/_data/assets/pdf_file/0014/105440/uk-radio-audio.pdf

33. Many analogue services are also simulcast on digital platforms (DAB, online and DTV).

34. RAJAR total survey area.

Gender



Overall 51% of employees in the radio industry are female, matching the wider population.

In contrast, the employees of commercial radio broadcasters are 53% female: Global has the highest proportion of female employees at 57%, followed by Bauer at 54%.

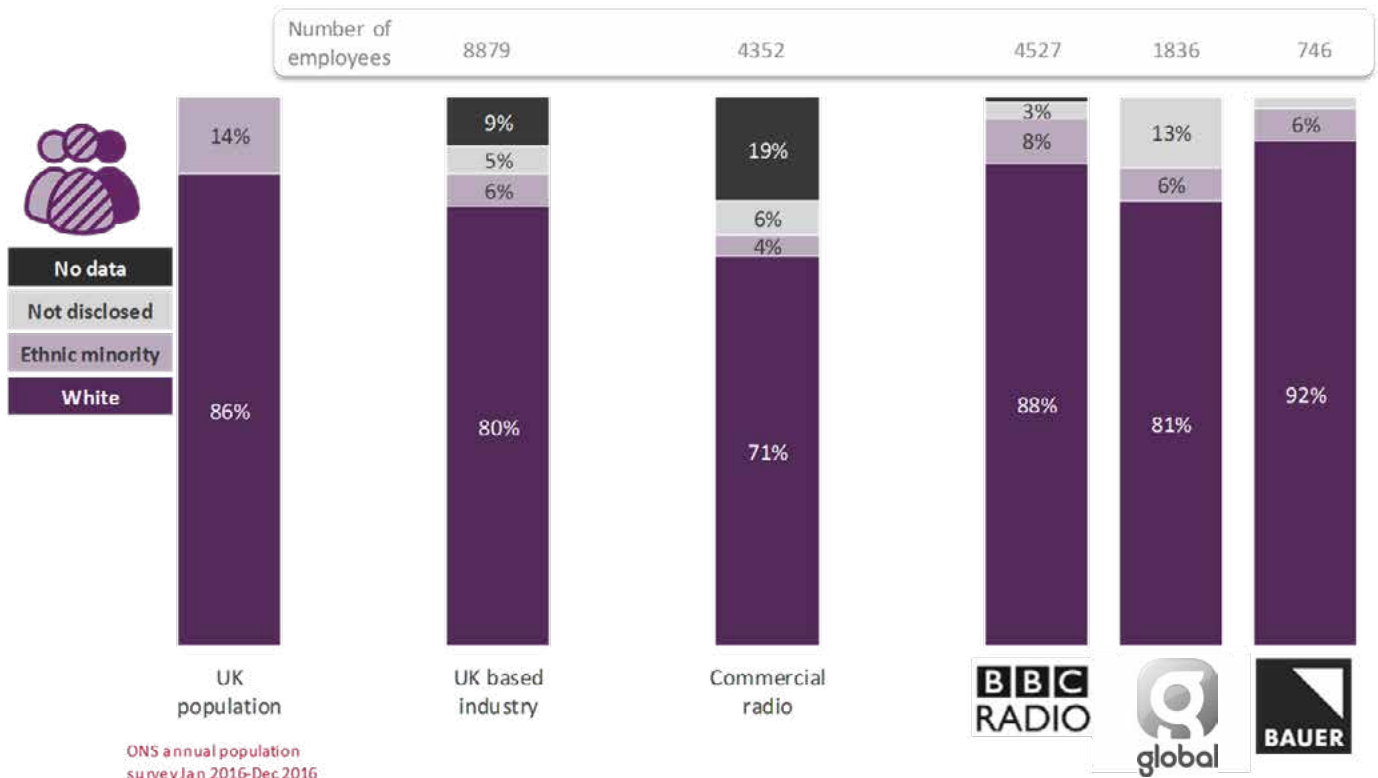
Women are represented less at senior levels across the industry. Male employees comprise 62%³⁵ of senior roles across the radio industry. All the three main radio groups have more men than women at senior management level. At the BBC 40% of senior roles are held by women, at Bauer the figure is 39% and at Global 34%.

Just over half (52%) of roles in programming are filled by men across the industry though there are differences across the three main broadcast radio groups: 46% of programming roles at the BBC are filled by men, 67% within Global and 81% at Bauer. In contrast, women account for more roles in sales at 63%, marketing at 70% and support positions at 66%.

Most technical and engineering roles are filled by men (81% v 19%).

35. Senior managers and board members/non-execs combined.

Ethnicity



Employees from an ethnic minority background are under-represented across the industry at 6%, versus 14% of the wider population. This figure is even lower across commercial radio at 4%.

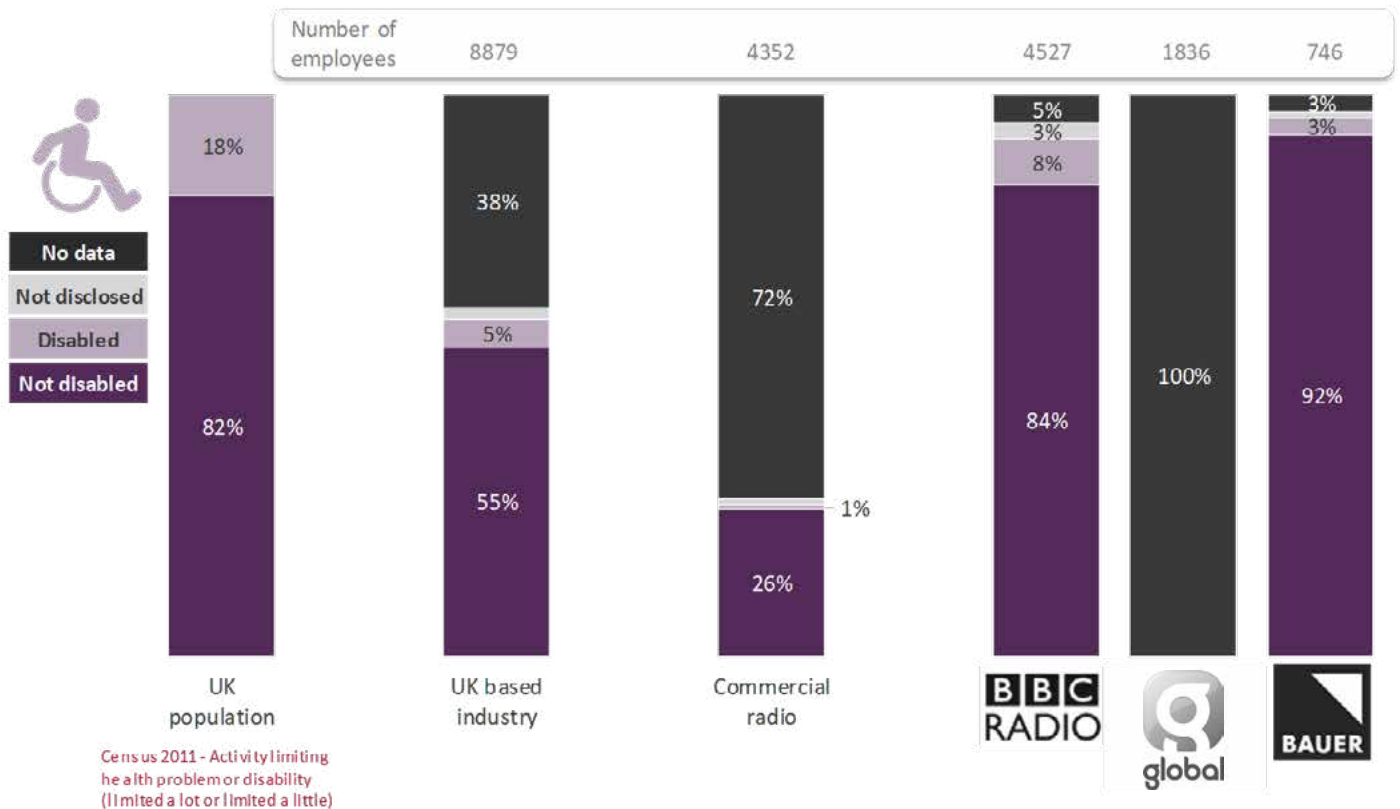
Ethnic minority profiles were also submitted for all three broadcasters though there was some missing data for the BBC, particularly in relation to their senior management. However, despite this, the BBC has the highest proportion of employees from an ethnic minority background at 8%. Excluding the BBC, the data gap within commercial radio broadcasters increases to 19%.

Across the radio industry, there is a higher degree of no data provided for Board-level positions, at 58%. Of the data provided, there is no representation by anyone from an ethnic minority background among those who disclosed their ethnicity.

There is also under-representation of employees from an ethnic minority background in senior management roles, at just 6%. While the BBC and Bauer provided ethnicity information across the majority of their employees, due to limitations with its HR system, Global was only able to submit ethnicity information for its senior management and Board-level and none for middle management or non-management positions.

Ethnic minority representation is higher within programming positions compared to other roles. Of those working in programming roles across the radio industry, 11% are from an ethnic minority background. The role with the lowest representation is sales (3%). Across the three main radio groups for which we have data, there are significant differences within programming roles: in Bauer, people from an ethnic minority background account for 7% of those roles, increasing to 10% for the BBC and rising further still to 19% for Global.

Disability



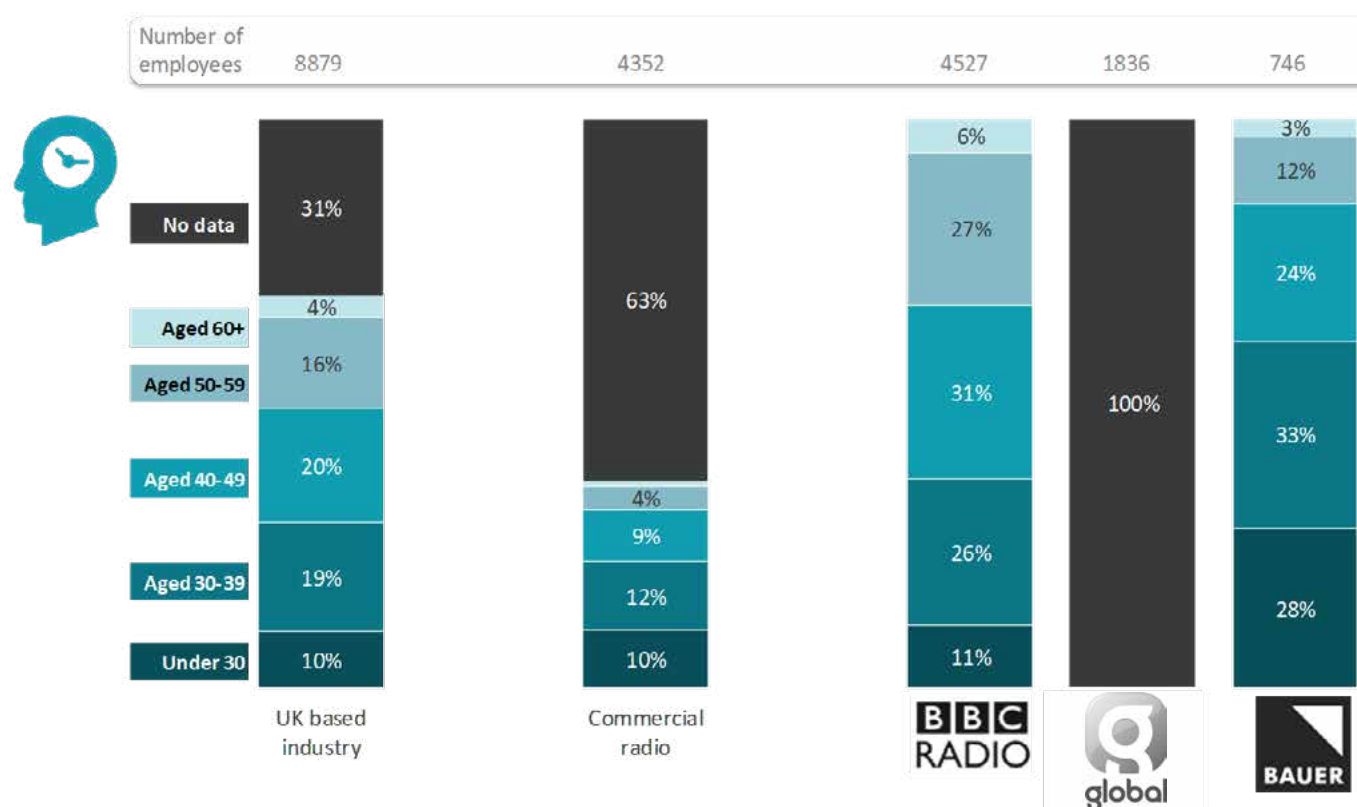
For disability, data is missing for 38% of employees, with only 11 of the 16 broadcasters submitting data. Excluding the BBC, the data gap within commercial radio broadcasters increases to 72%. Across the industry, only 5% of employees self-report as disabled, compared to 18% of the population.

While the BBC and Bauer provided disability status data for most of their workforce, Global did not submit any data for this characteristic. 8% of BBC employees self-report as disabled and just 3% of employees working for Bauer.

Across the industry, 79% of the data for this characteristic was missing for Board-level positions and 22% at senior management level.

From the disability data we did receive, the job roles that are less likely to have disability representation are within sales and marketing.

Age



We received data from six of the 16 broadcasters on the age of their employees. Global did not submit data, representing around a fifth of the employees we gathered data for in the industry.

We haven't included a UK population figure on this chart as this would include non-working people and we don't believe this to be a fair comparison. However, without collecting data on age it is impossible for an organisation to understand if there may be any issues with equal opportunities for particular age groups.

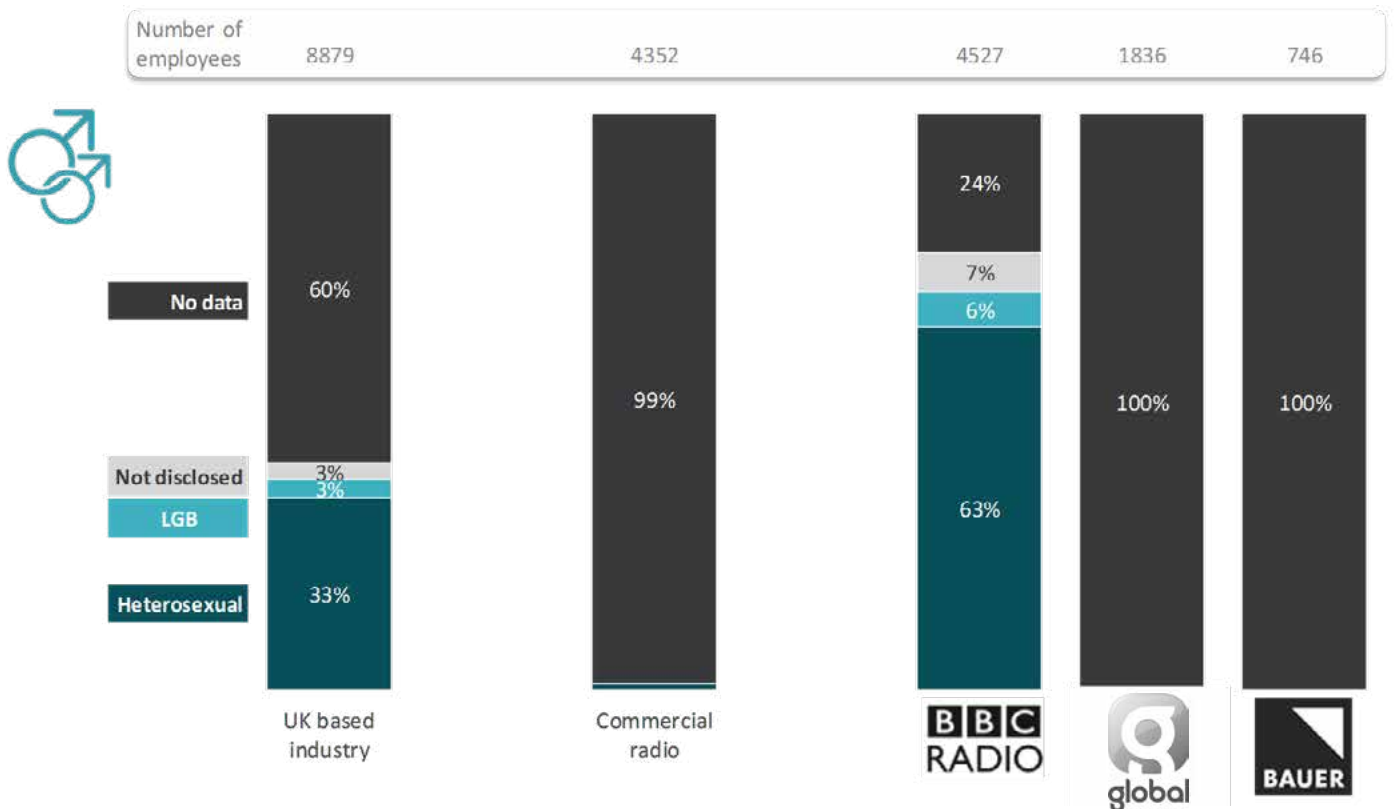
Across the industry, 29% of employees were aged under 40, though when only considering those who submitted data this increases to 43%. Among BBC employees, 37% are aged under 40 which compares to 61% of Bauer employees.

Of those who submitted data here, the age profile increases with job level. 48% of non-management roles are filled by those aged under 40³⁶, and that drops to 37% at Board-level.

Across the industry the roles with the youngest age profile are in support (46% aged under 40) and the oldest are within technical and engineering (32% aged under 40). However, within the BBC, the roles with the youngest age profile are marketing (68% aged under 40) and the oldest are within technical and engineering (69% aged over 40). At Bauer, the roles with the youngest age profile are journalism (87% aged under 40) and the oldest are technical and engineering (54% aged over 40).

36. Note: Due to rounding the figures may not add to 100% exactly.

Sexual orientation



We haven't included a UK population figure on this chart, as there is no agreed figure for this characteristic given the methodological sensitivities including the fact that some individuals do not wish to identify their sexual orientation. The Office for National Statistics³⁷ suggests that in 2016, 2% of the population identified themselves as lesbian, gay or bisexual (LGB), increasing to 4% among 16-24 year olds. However, these figures are below those published by the Treasury as they were preparing for the introduction of civil partnerships in 2006 when they estimated that LGB people made up 6% of the population.³⁸

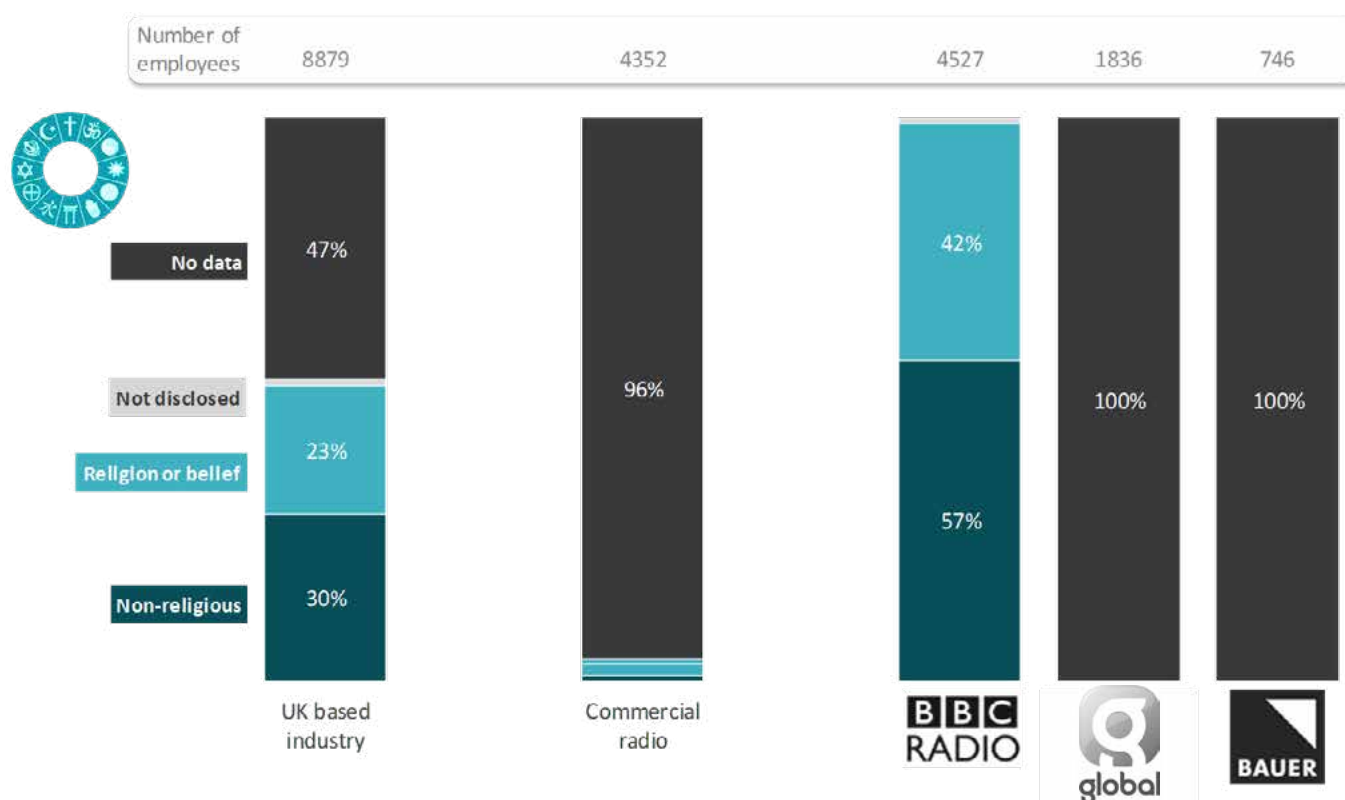
Only two broadcasters provided any information about the sexual orientation of their employees. Of the three main groups, only the BBC submitted data. In addition, Celador³⁹ also provided some data on this characteristic about their employees. For the BBC we received sexual orientation data for 69% of employees, with 7% choosing not to disclose, leaving 24% for which data were not provided. Among BBC employees, 6% consider themselves LGB. Celador provided sexual orientation data for 69% of employees, with 1% choosing not to disclose, and a further 50% for which data were not provided. Bauer and Global did not provide any information on the sexual orientation of their employees.

37. <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2016>

38. <https://www.theguardian.com/uk/2005/dec/11/gayrights.immigrationpolicy>

39. Celador Radio Broadcasting Ltd run a number of local commercial radio stations, primarily across the south of England including The Breeze network and Sam FM stations.

Religion or belief



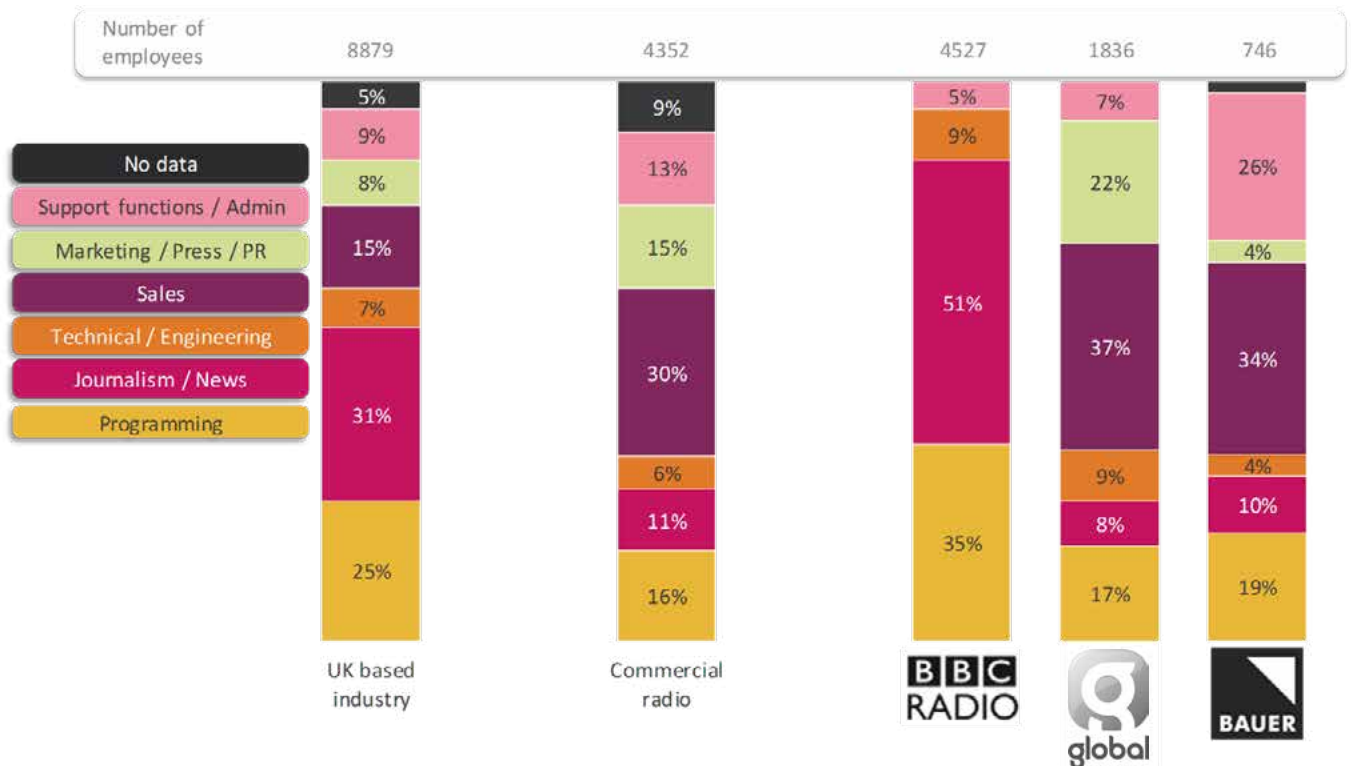
We have not included a UK population figure on this chart as there is no agreed figure for 'religion or belief'. According to the British Social Attitudes survey⁴⁰, 50% of the population do not regard themselves as belonging to a particular religion (belief was not included in the question). Again, the value in capturing this data is so an organisation can identify where there may be a lack of inclusivity.

Only four broadcasters provided information about religion or belief among their staff. Of the three main groups, the BBC reported on almost all of its employees, with 42% considering themselves to have a religion or belief. In addition, Celador reported on half of its employees. Thirty four percent of employees at Lincs FM Group⁴¹ chose not to disclose this information. Wireless Group provided limited information. Bauer and Global provided no information on this characteristic as they did not monitor it for their workforce.

40. <http://www.bsa.natcen.ac.uk/latest-report/british-social-attitudes-28/religion.aspx>

41. Lincs FM group is the parent company of a number of local commercial radio stations in England.

Job roles



Across the industry the highest proportion of roles are within journalism/news at 31% followed by programming at 25%.

When we only focus on commercial radio, the highest proportion are sales at 30% and programming at 16%.

The three main broadcasters

The next section includes more detailed information for each of the three main radio groups, including how each broadcaster's total number of employees breaks down by job level and job role. We also engaged with each group as part of the monitoring process and they provided additional information on their diversity strategies and their ambitions.

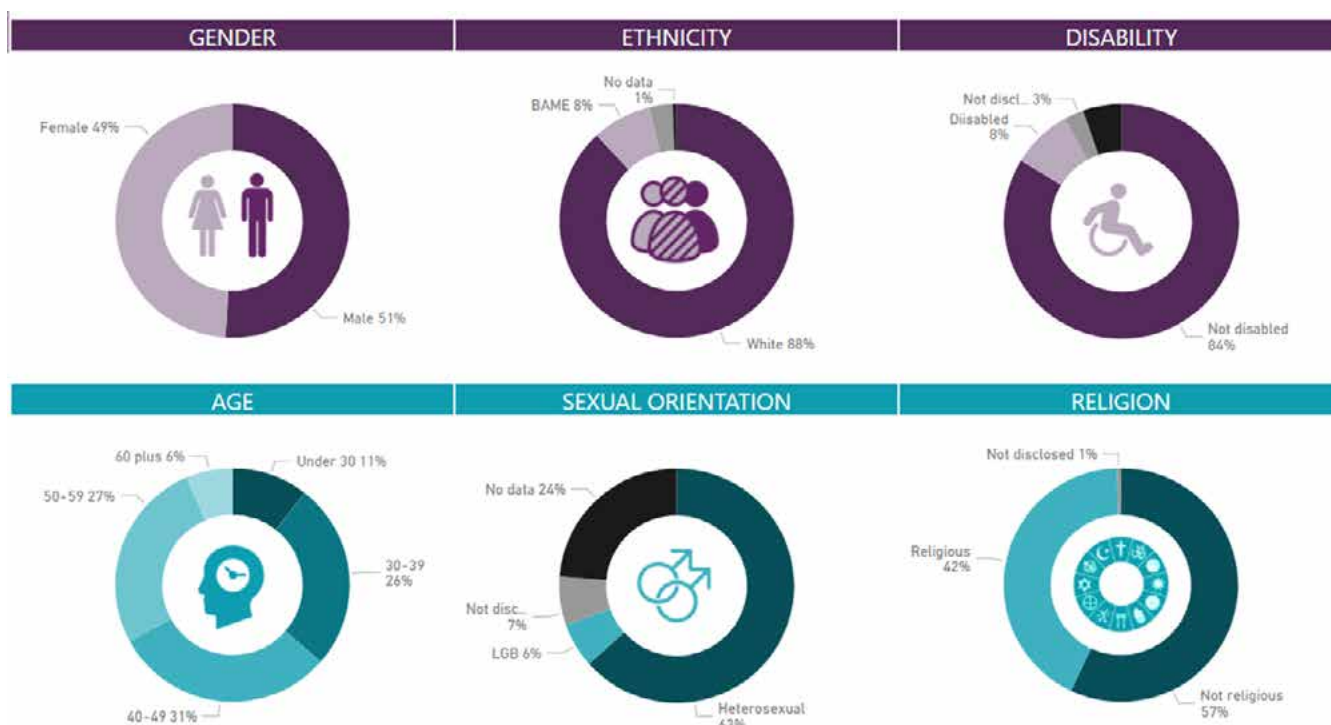
As part of those discussions we have been clear that more needs to be done and that change must be led from the top. Chief Executives need to provide clear direction to promote equal opportunities within their organisations. We invited the CEOs of Global and Bauer and the Director of BBC radio to summarise their ambitions for diversity and inclusion within their company.

How diverse is BBC Radio?⁴²

Key conclusions: The BBC is leading the radio industry on diversity and inclusion. It has taken steps to understand the composition of its workforce, set targets for four characteristics and has several initiatives in place to ensure improvements in particular areas.

BBC Radio broadcasts to the whole of the UK through a portfolio of network stations providing a range of speech and music output serving different types of audiences. In addition, it also

provides programming covering all English regions as well as specific stations for each of the devolved nations including some language services within the nations.



Each week around 35 million adults listen to BBC radio, almost two thirds (64%) of the population. The profile of the total weekly audience is: 51% male and 49% female; 91% white and 9% from an ethnic minority background. 32% of those listeners are aged under 40 and 10% consider themselves to have a disability.⁴³

The BBC has 4,527 employees working directly across its radio services. The data provided in the BBC's submission is for all staff who are connected with the provision of UK radio content only: English Regions local radio (1,432); nations radio (1,234); news and current affairs radio (562); network radio (1,299).

The BBC submitted data for all mandatory characteristics and the three voluntary characteristics. Including those who chose not

to disclose their data to the BBC, for gender, age and religion or belief, data were submitted for all employees (100%); for ethnicity, 99%; for disability, 95%; and for sexual orientation, 76%.

The BBC has a Diversity and Inclusion Strategy (2016-2020) with workforce, leadership and on-air targets for gender, ethnicity, disability and sexual orientation. The targets they have set themselves which they aim to be achieved by 2020, demonstrate their resolve in this area and the figures indicate they are already being delivered for parts of BBC Radio. For example, their overall ethnic minority target is 15% and they currently have 17% in news and current affairs. However, their figures also highlight that some progress is still needed as the overall proportion of ethnic minorities across the whole of BBC Radio is just 8%:

42. This report uses 2016 data and therefore differs from the BBC's equality information report (<http://downloads.bbc.co.uk/diversity/pdf/equality-information-report-2017.pdf>). The BBC's report explains how the BBC had a reporting drive in late 2016, the effect of which was to increase the employee information for 2017.

43. RAJAR Q4 2017; 12 month weight.

	% Ethnic minority (target 15%)	% Female (target 50%)	% Disabled (target 8%)	% LGB (target 8%)
BBC Radio	8%	49%	8%	6%
Network radio	10%	52%	9%	7%
Nations radio	2%	51%	8%	4%
News and current affairs	17%	40%	6%	8%
English regions local radio	7%	49%	9%	6%

Gender

Focusing first on gender, employees of the BBC are increasingly likely to be male the more senior their role. The BBC's senior management employees are 60% male. At mid-level management, which makes up two fifths or 43% of the organisation overall, 55% are male and at non-management levels, men account for 46%.

Over half of roles at the BBC are defined as being within programming. At 54%, employees in this job category are more likely to be female, as are those in marketing at 79% and also support/admin who are 80% female. In contrast, 53% of those in journalism/news are male and 80% of employees in technical and engineering.

Ethnicity

Ethnic minority representation is fairly consistent but varies slightly depending on job level: the profile within non-management roles is 7%, for middle-management 9%, but just 8% for senior management. All of these figures are significantly below the national average of 14%.

The roles most likely to be under-represented within BBC radio are technical and engineering with 7% of employees coming from an ethnic minority background. The roles with the highest representation are within marketing at 11%. Among employees who were promoted in the past year, 14% were from an ethnic minority background (compared to 81% white, with 5% either not disclosed or without data).

Disability

11% of those within senior management at the BBC self-report as disabled.

The job roles most likely to have employees with a disability are marketing at 16% and support roles at 13%.

Other characteristics

Employee age profile within BBC radio increases with job level: 43% of those in non-management roles are aged under 40 compared to just 13% of those in senior management.

There is more likely to be sexual orientation data provided for BBC employees the more senior their position: 26% of no data for those in non-management roles compared to 15% of those in senior positions.

10% of those who were promoted in the past year self-defined as LGB.

The BBC also provided additional information in relation to gender reassignment. They have stated that they are committed to supporting employees through a transition period including providing for paid time off. An individual action plan will be discussed and agreed with the employee, including approach to time off and the date from which their gender will be changed on all BBC records.

In addition, they have stated that all BBC buildings must provide non-gender specific toilets and changing rooms.

In terms of social mobility, the BBC began monitoring the social diversity of its staff in December 2016 and have this data for around 60% of their workforce. This has resulted in a programme of work to identify if social diversity affects career progression rates and the BBC will explore interventions once this work concludes.

Examples and initiatives at the BBC

Ofcom asked the BBC to provide details of the equal opportunity arrangements it has in place. In response, the BBC told us:

It has identified areas for improvement in increasing the number of women in more senior positions and increasing the overall profile of staff from an ethnic minority background. As part of this, it is taking action to look at new joiners, management programmes and recruiting to senior roles.

Specifically on gender, the BBC has a cross-BBC scheme that looks at progressing women into senior roles (Women in Leadership), particularly within the nations and regions. To date there have been a high number of applicants which has led to an expansion of the programme and the BBC is in the process of measuring outcomes.

Another initiative within gender is the Sandy Chalmers Radio Development Programme. This is a one year, radio-specific scheme focused on creative roles and the progression of women into senior positions, including using mentors from outside the BBC.

In terms of ethnicity, the BBC started a cross-BBC initiative (known as RISE) four years ago aimed at mentoring and progressing staff members from an ethnic minority background. In addition, staff members leaving are automatically contacted by the diversity team to understand any factors that have led to their departure.

For disability, the BBC's Elev8 Development Programme, also started four years ago, provides disabled staff in the middle grades with a senior level mentor and formal career development training.

The BBC said that the majority of participants on these initiatives do obtain new roles as a result of being on one of the development programmes. Examples include a person obtaining an internal promotion within local radio to work as a news editor and then a five-month attachment as a reporter on Radio 4. Another participant went from a series of short-term attachments to securing a permanent production role.

The BBC has also initiated several cross-division recruitment programmes in an attempt to broaden the pool from which applicants can be drawn. For example

- a) BBC Make It Digital (pre-employment) Traineeship: training in digital skills, social media, building websites, and creating videos for the web.
- b) BBC Make It Digital Virtual Traineeship: BBC Academy launched the first ever traineeship to run exclusively on social media. The 'virtual traineeship' is designed to help young people with limited work experience who may need a helping hand to get on the career ladder.
- c) Ring-fenced Work Experience Placements: working with job centres to offer places to young unemployed people.
- d) Open-Newsroom: working closely with News' Open News Room Event where the BBC ran careers workshops.

We will be seeking updates from the BBC on these initiatives as part of our ongoing monitoring.

"Nothing can be more important than ensuring that we represent our audiences and a vibrant, changing Britain with absolute authenticity. We must actively seek out and embrace a broad range of voices in all areas of the Radio programme-making process."

Bob Shennan
Director of BBC Radio

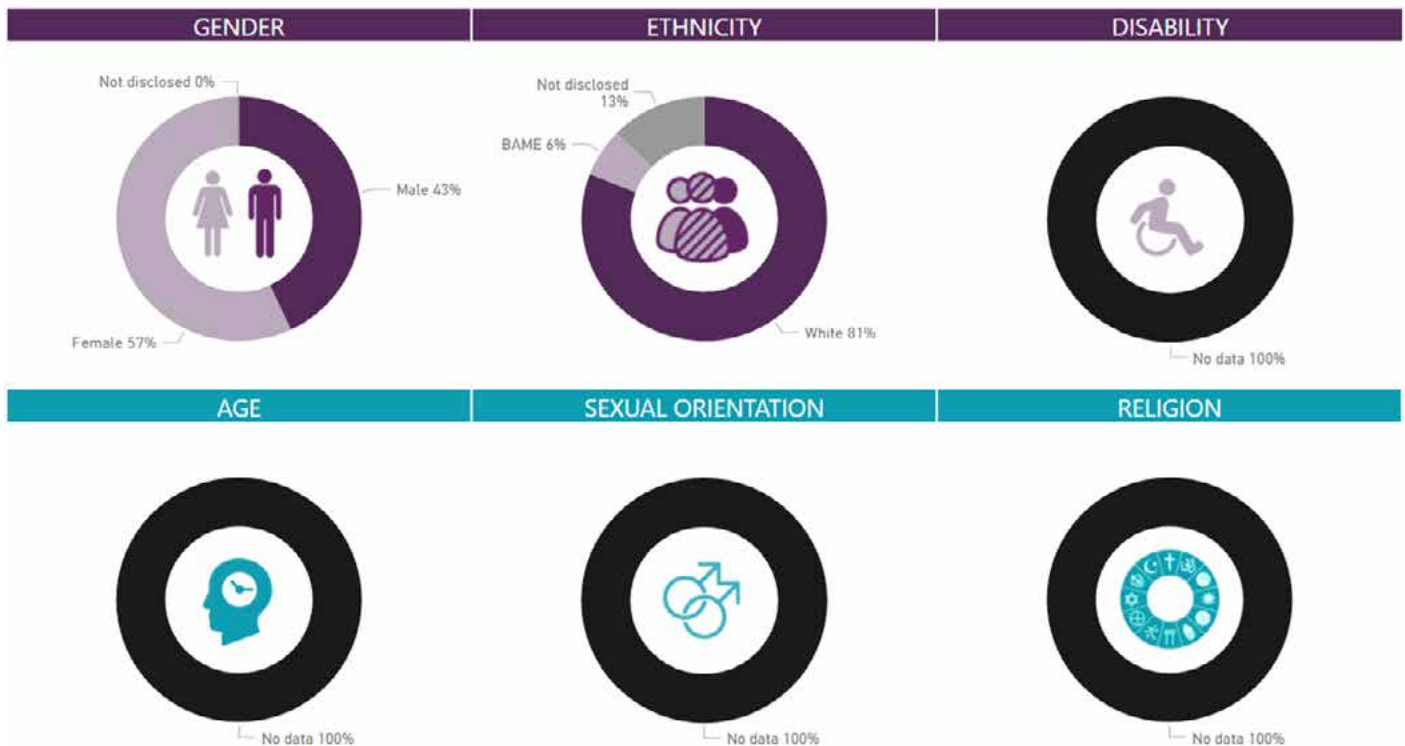
How diverse is Global?

Key conclusions: Global have acknowledged they do not have adequate monitoring processes in place to understand the profile of their staff. They have refreshed their internal systems and have now launched a diversity strategy.

Global Media & Entertainment Ltd is primarily a UK radio broadcaster with brands including Heart, Capital and Smooth. It broadcasts to the whole of the UK through a portfolio of network stations providing a range of speech and music output serving different types of audiences. In addition, it also provides local and regional stations covering the majority of England and Wales, with no local presence in Northern Ireland and very little in Scotland. The ethnicity profile of

the population can vary significantly depending on where a station is located.

Each week over 23 million adults listen to Global radio stations – over two fifths, or 43%, of the population.⁴⁴ The profile of the total weekly audience is: 46% male and 54% female; 86% white and 14% from an ethnic minority background; 43% are aged under 40; and 10% consider themselves to have a disability.



Global Radio has 1,836 employees and data were submitted for all employees for gender and ethnicity characteristics only. In 2017, Global implemented a people management system, 'Workday', to allow them to more effectively record employee data, having previously relied on manual processes.

Disability was not previously included as part of their internal monitoring process but Global tell us that it will be in future.

44. RAJAR Q4 2017; 12 month weight.

Gender

Although Global provided data for total number of employees (57% female), they did not provide overall numbers for middle- and non-management roles, as well as for those who have been trained in the past year. For the data they have supplied, 60% of senior management are male. They have committed to improving their internal processes, which will collect more detailed data across job level and function, and which should be in place by the end of 2018.

Global provided complete data on gender, including by job roles. There are significant differences in gender profiles depending on the job role. Technical and engineering roles are significantly more likely to be filled by men, 78% v 21%, as are programming roles, 67% v 32% with 1% not disclosed. Women however dominate marketing roles, 77% v 22% - with 1% not disclosed.

Ethnicity

As with gender, data is missing for middle and non-management jobs and for those who have been trained. For the data they have supplied the vast majority of those in senior management are white.

There was the highest proportion of employees from an ethnic minority background in programming roles at 19% and the lowest within journalism.

Disability

Global provided no information on disability in its workforce.

Examples and initiatives at Global

Ofcom asked Global to provide details of the equal opportunity arrangements it has in place. In response, Global told us:

It has committed to improving its monitoring of employee data. Global will evolve the capability of a recently implemented HR system to include the mandatory characteristics and will review how it monitors the voluntary characteristics.

Global did not provide an equal opportunities statement but has committed to rectifying this and we expect this to be included with the next annual monitoring.

In May 2018, Global launched a diversity strategy 'Different – Will Set You Apart'. The strategy will be focussed on developing an inclusive culture at the company. The strategy is underpinned by initiatives around education and training, developing a more diverse entry level talent pipeline, and the provision of accurate data to better understand and inform decisions.

Global currently offers a number of different training opportunities to encourage in-role development and to work towards a more diverse workforce. For example,

- a) In 2017, the broadcaster piloted 'Unconscious Bias' training and plans to embed it across the organisation in 2018.
- b) It offers internships and graduate appointments in addition to work experience. Global is currently reviewing the role of the Global Academy to support the development of new talent within the industry, particularly focused on people from ethnic minorities, women and also taking into account social mobility.
- c) An apprenticeship scheme will start from September 2018 where 15-20 individuals will be recruited into the business initially from the Global Academy – part of a drive to look for talent in different places and from different backgrounds. Unsuccessful applicants to the scheme will be given coaching and feedback. The company will also work with Creative Pioneers and All Spring Media who work to attract media talent from less traditional sources and who have their own targets.

- d) Global's Technology Director has helped to develop the TechTalentCharter, an external industry initiative which aims to promote the development, growth and retention of women in technology.
- e) In June 2017, Global created and appointed a new role, People and Culture Director. In December 2017, they launched a seven-month cultural change programme which involves engaging with all colleagues to

gain feedback from employees about their experience at Global. Following this engagement, Global plans to review its policies, processes and practices and make recommendations.

We will be seeking updates from Global on these initiatives as part of our ongoing monitoring.

"At Global we are about making connections with people. To make these connections, we know we need to attract people from different backgrounds and experiences who reflect our listeners, customers and audiences. Our ambition is to create an even more inclusive culture where every Globaler can do the best work of their career, a place for everyone.

We know we have some work to do, but we are committed to driving change internally, but also externally to make our industry accessible to everyone".

Sarah Homer
Director, People & Culture, Global

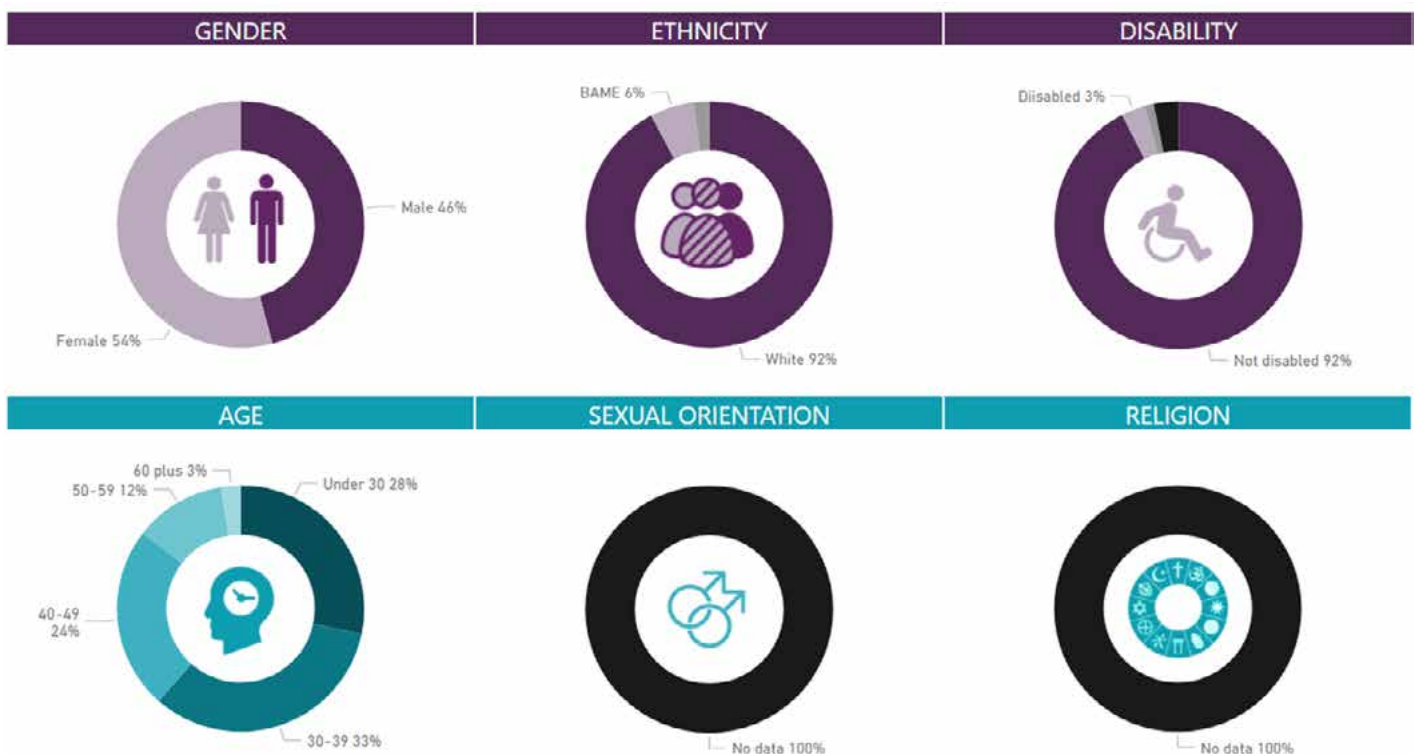
How diverse is Bauer?

Key conclusions: Bauer monitors the profile of its staff across all mandatory characteristics and some voluntary characteristics and is seeking to enhance this further still. It has a number of initiatives in place including the Bauer Academy which is particularly focused on progressing under-represented groups and promoting diversity across creative industries.

Bauer Radio Ltd is primarily a UK radio broadcaster with brands including Magic, Kiss and also regional brands within its Hits Radio Network (e.g. Metro Radio, Radio City). It broadcasts to the whole of the UK through a number of UK-wide stations providing a range of speech and music output serving different types of audiences. In addition, it also provides a number of local and regional stations with wide coverage across Northern Ireland and Scotland,

coverage across the main metropolitan areas in England, but very little coverage within Wales.

Each week almost 18 million adults listen to Bauer radio stations, which is almost a third, or 32%, of the population.⁴⁵ The profile of the total weekly audience is: 48% male and 53% female; 88% white and 12% from an ethnic minority background; 51% are aged under 40; and 9% consider themselves to have a disability.



Bauer radio has 746 employees and data was submitted for all employees for gender, ethnicity and age, and for the majority of employees for disability.

45. RAJAR Q4 2017; 12-month weight

Gender

Gender profiles are more likely to be male as the seniority of the role increases: 40% of those in non-management roles are male compared to 63% of those in senior management roles.

There are significant differences in gender profiles depending on the job role. Technical and engineering roles are significantly more likely to be filled by men (93% v 7%) as are roles in programming (81% v 19%), while sales and support roles are more likely to be filled by women (69% v 31%).

Ethnicity

92% of employees at Bauer are white and this varies little depending on job level.

Examples and initiatives at Bauer

Ofcom asked Bauer to provide details of the equal opportunity arrangements it has in place. In response, Bauer told us:

It collects data for new starters on their gender, age, ethnicity and disability which is captured via an electronic HR system. This does not currently cover sexual orientation or religion or belief.

Bauer recently introduced mandatory 'Code of Conduct' training for all managers within radio, which includes diversity and inclusion, and in 2017, 80% of managers were trained.

As part of the publication of its gender pay gap Bauer announced it is forming a Diversity and Inclusion Forum which will consider how opportunities at Bauer are created. The forum will be made up of representatives from all areas and levels within the business. This forum will report quarterly to the Executive Board on progress and actions initiated.

Bauer has undertaken a number of initiatives over the past five years focusing on diversity and inclusion:

- a) Worked in partnership with CATCH-22, a social enterprise that provided the UK creative industries with access to young diverse talent. CATCH-22 nurtured aspiring individuals and introduced them to some leading businesses in the media sector including Bauer, Trinity Mirror, The Economist and Associated Newspapers.
- b) GoThinkBig - a social action partnership created by O2 and Bauer Media that enables young people (aged 16-25) to achieve their career ambitions. During the three-year partnership, it facilitated 32,000 work experience opportunities and, of those, 10,616 took place across Bauer Media.

46. [Bauer Media Gender pay gap report 2017](http://www.bauermedia.co.uk/uploads/Bauer_GPG_Report_2017.pdf) (http://www.bauermedia.co.uk/uploads/Bauer_GPG_Report_2017.pdf)

47. European Social Fund.

- c) The Bauer Academy designs and delivers training programmes to progress under-represented groups and promote diversity across creative industries. A current example is Making Creativity Work, an ESF⁴⁷ funded London based training programme for unemployed people age 19+.
- d) It is partnering with Creative Access – a not-for-profit social enterprise that aims to fill a gap by helping young people from ethnic minority backgrounds to secure paid training opportunities in creative companies and supporting them into full-time employment.
- e) Bauer has signed up to the Radiocentre diversity statement – a commitment to diversity and inclusion across the industry.
- f) Bauer has said it will focus on employee wellbeing in 2018 including mental health to cover:
 - Resilience and wellbeing training available to everyone.
 - Training HR in understanding mental health illnesses to provide management help in identifying and supporting people in the right way.
 - Mental Health Media Charter – a pilot-programme focussed initially on the stations Heat, Kerrang and Planet Rock. This has included training on-air presenters on language and tone.
- g) Bauer is engaging with MyPLUS and the British Disability Forum to understand more about ‘non-visible’ disabilities, including learning difficulties, to ensure the scope of their Diversity and Inclusion Forum focuses on the right things for Bauer in relation to Disability.

We will be seeking updates from Bauer on these initiatives as part of our ongoing monitoring.

“We work hard to create a culture in which diversity is appreciated and supported, where opportunities are open to all, where people treat each other with respect and expect and get the same in return whatever their background, race or gender.”

Paul Keenan
CEO, Bauer Media UK

Diversity examples across the wider radio industry

This report has focused on the overall totals for the 16 radio broadcasters who met the threshold for submitting information about their diversity and equal opportunities arrangements, as well as further detail for the main three groups (in terms of employee numbers and radio listening market share).

We have been unable to report on the workforce numbers for the smaller commercial radio groups that met the threshold to provide us information. Companies such as Wireless Group, UKRD and Celador are too small to examine individually by characteristic and job roles. However, they provided us with additional detail on the arrangements they have in place.⁴⁸

Wireless Group provided data on gender, age and religion or belief. They provided no data for ethnicity, disability or sexual orientation. They did provide the following context to Ofcom:

- They have an Equal Opportunities statement in place.
- On 1 July 2017 Wireless Group became part of News UK. Since then it has been focused on integrating systems across the two groups and Wireless acknowledge a desire to better understand the make-up of its organisation and its diversity going forward.
- Members of the Wireless Group HR team have attended unconscious bias training and they are exploring rolling this out to the wider organisation. They recently launched a Management Foundations programme looking at issues around equal opportunities and diversity.
- It has in place partnerships with local colleges, and with the Radio Academy, actively seeks to encourage and sponsor schemes which attract new talent into the industry. The Wireless Group plans to extend this through the Government's apprenticeship levy scheme.⁴⁹

- In 2018 Wireless plans to develop a number of management and leadership programmes which will include unconscious bias training; reviewing recruitment practices to minimise unintended discrimination. In its Northern Ireland business, it is obliged to monitor the diversity of all community groups, and this information is recorded and reported on to the Equalities Commission.

UKRD provided data on gender and age but on no other characteristic.

- UKRD has said that it offers values-based training⁵⁰ for all employees on an annual basis – though this is not specifically diversity-related.
- UKRD told us that its approach to the employment of their staff, in any position and at any level, is based upon a set of core values which specifically requires those responsible for recruitment to apply fair and objective criteria. The company says it believes this approach leads to the appointment of the best and most appropriate person for any role, irrespective of gender, ethnicity or disability. As such, UKRD does not believe that structured monitoring is necessary.⁵¹

Celador provided data on all six characteristics (gender, ethnicity, disability, age, sexual orientation and religion or belief). Celador also told us:

- It has an Equal Opportunities policy in place which staff are made aware of when they join the company.
- It conducts an annual diversity monitoring exercise across all staff and freelancers.

48. For further detail on workforce percentages for the smaller broadcasters see annex.

49. <https://www.gov.uk/government/publications/apprenticeship-levy-how-it-will-work/apprenticeship-levy-how-it-will-work#pay-apprenticeship-levy>

50. UKRD told Ofcom this training was based on the company's 6 core values: Open, Honest, Fair, Professional, Unconventional and Fun. UKRD said while the training was not specifically designed to promote equal opportunities it will inevitably do so by its very nature.

51. While broadcasters are not required to carry out structured monitoring, a key recommendation in Ofcom's guidance is monitoring, and broadcasters are obliged under their licences to have regard to our guidance in making and reviewing their arrangements.

Diversity in Community Radio

The radio sector is full of other stations that cater for and broadcast to different types of audiences across the UK.

This includes community radio stations and niche independent local stations. This section provides more detail on some of these stations and demonstrates how they are embracing diversity and inclusion in their businesses.

Ofcom currently licenses more than 250 community radio stations across the UK. These stations typically cover a small geographical area with a coverage radius of up to 5km and are run on a not-for-profit basis.

Community radio broadcasters vary in how they fulfil their role; there are specialist stations that focus on specific interest groups within communities, such as stations aimed at audiences from an ethnic minority background or age group. There are also stations that cater to a broad cross-section of the community they serve. A community radio station's programmes should reflect the needs and interests of its audience and the station is expected to become a central part of its community.

Although community radio stations can be hampered by a lack of resource and are largely run on the goodwill of volunteers, there are positive examples of stations which have incorporated diversity and equal opportunities through training initiatives, recruitment and programming.

Examples of these stations include:

- **Reprezent FM**, a youth-led music community station based in Brixton, London, aimed at a 13-25-year-old audience, many of whom are from an ethnic minority background and typically from socially marginalised areas.

A team of mentors now facilitate more than 2,000 young people each year through various training workshops and initiatives across all areas of radio broadcasting.

The station has also become an incubator for new talent, providing a platform and career path for radio presenters and music artists, some of whom have gone on to achieve mainstream success in the music industry.

- **Bradford Community Radio** seeks to reflect the diversity of the community it is part of. The station's programming schedule includes a broad range of targeted programmes that focus on women, LGB+ audiences, a daily Asian language show, a show for Arab audiences, as well as programming aimed at older listeners.

Among its various training initiatives, the station runs a project to support the learning disabled. There is also strong representation amongst those from an ethnic minority background in the station's volunteer recruitment as well as on its management committee.

Recommendations

This section outlines the conclusions we have drawn from the data, and the recommendations to improve representation across the UK's radio industry.

In November 2017 Ofcom published new guidance for broadcasters, although the information gathered for this report applied to a period before it was published.

However, broadcasters should have regard to our new guidance which reflects and builds on some of the key recommendations in this report.

1. Know your workforce

The BBC and Ofcom licensees have an obligation to take measures to promote equality of opportunity in employment. Without accurate monitoring, it is unclear how broadcasters can identify any gaps, ensure the relevance of their equality and diversity policies, and plan engagement with their employees to promote these policies.

With the exception of the BBC, broadcasters need to improve their monitoring to:

- cover all protected characteristics;
- include all employees, capturing all main job levels and job types;
- ensure the data is regularly updated.

Sixty three licensees failed to respond to our stage 1 information request⁵² by the deadline. Because of this, we took enforcement action and 11 were found in breach of their licence conditions.⁵³ In future, we will commit to enforcement action against broadcasters who fail to provide the required information.

Broadcasters should regularly measure and monitor the make-up of their workforce to a consistently high standard, having regard to Ofcom's guidance⁵⁴, capturing all characteristics and identifying imbalances between job roles.

2. Establish the goals

The BBC is the only organisation we received data from who have demonstrated that they have set diversity targets. We expect all broadcasters in the radio industry to set clear targets on diversity, so the make-up of their employees better reflects the society we live in.

Broadcasters across the radio industry must work to tackle cross-industry under-representation. In particular, our report indicates the focus should be on women in senior positions and STEM areas, and promoting equal opportunities for employees who are disabled

or are from an ethnic minority background. Broadcasters should consider joint initiatives which are properly scoped, funded for the long term and consistently evaluated, in order to improve the representation across the whole industry and to share learnings and best practice.

We will assess the equal opportunities arrangements of the 16 broadcasters who met the minimum threshold. We will be contacting those we feel to have inadequate arrangements and will work with them to ensure progress is made.

52. To determine if they met the threshold to complete our more detailed questionnaire.

53. https://www.ofcom.org.uk/_data/assets/pdf_file/0012/112701/issue-351-broadcast-on-demand-bulletin.pdf and https://www.ofcom.org.uk/_data/assets/pdf_file/0009/113202/Issue-352-of-Ofcoms-Broadcast-and-On-Demand-Bulletin.pdf

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

3. Take the lead

We believe broadcasters should lead from the top. We want Chief Executives to be accountable for delivery against their diversity targets. Comprehensive diversity policies need to be embedded from the top down. Senior managers should lead the agenda, undergoing regular appraisals against diversity objectives, along with completing 'unconscious bias' and diversity training.

We will facilitate discussions with broadcasters from across the industry with the aim of working together to improve diversity and equal opportunities. Our aim is to maximise shared learning and best practice. We will also promote discussions on other key considerations such as social mobility.



Annex

Proportion of gender, ethnicity and disability by organisation

	Employees	Licences	GENDER			No data	ETHNICITY		DISABILITY	
			Male	Female	Not Disclosed		Provided data	Employees with data (inc 'not disclosed')	Provided data	Employees with data (inc 'not disclosed')
TOTAL	8879	298	49%	51%	0%	0%	11	91%	11	62%
Bauer Radio Ltd	500+	64	46%	54%	0%	0%	Yes	100%	Yes	97%
BBC Radio	500+	0	51%	49%	0%	0%	Yes	99%	Yes	95%
Belfast Citybeat Ltd and Northern Media Group Ltd	21-100	8	46%	54%	0%	0%	No	0%	Yes	100%
Celador Radio Broadcasting Limited	101-499	29	50%	50%	0%	0%	Yes	99%	Yes	50%
Communicorp UK	101-499	9	38%	62%	0%	0%	Yes	100%	No	0%
Global Media & Entertainment Limited	500+	90	43%	57%	0%	0%	Yes	100%	No	0%
INRIX Media Limited	101-499	1	59%	41%	0%	0%	Yes	100%	Yes	1%
Nation Broadcasting	21-100	14	30%	28%	7%	35%	Yes	63%	Yes	63%
Premier Christian Communications Ltd	101-499	5	43%	57%	0%	0%	No	0%	Yes	100%
SSVC	101-499	14	55%	45%	0%	0%	Yes	100%	No	0%
The Lincs FM Group	21-100	10	57%	43%	0%	0%	Yes	100%	Yes	100%
Tindle Radio	21-100	2	43%	57%	0%	0%	Yes	100%	Yes	100%
Touch Broadcasting Limited	21-100	7	38%	62%	0%	0%	No	0%	Yes	100%
UKRD Group Limited	101-499	23	57%	43%	0%	0%	No	0%	No	0%
United Christian Broadcasters Ltd	101-499	1	44%	56%	0%	0%	Yes	100%	Yes	100%
Wireless Group	101-499	21	59%	41%	0%	0%	No	0%	No	0%

Specific numbers on ethnicity and disability have been removed from this table to protect personal data.

Proportion of age, sexual orientation and religion or belief by organisation

	Employees	Licences	AGE		SEXUAL ORIENTATION		RELIGION OR BELIEF	
			Provided data	Employees with data (inc 'not disclosed')	Provided data	Employees with data (inc 'not disclosed')	Provided data	Employees with data (inc 'not disclosed')
TOTAL	8879	298	6	69%	2	40%	4	53%
Bauer Radio Ltd	500+	64	Yes	100%	No	0%	No	0%
BBC Radio	500+	0	Yes	100%	Yes	76%	Yes	100%
Belfast Citybeat Ltd and Northern Media Group Ltd	21-100	8	No	0%	No	0%	No	0%
Celador Radio Broadcasting Limited	101-499	29	Yes	100%	Yes	50%	Yes	50%
Communicorp UK	101-499	9	No	0%	No	0%	No	0%
Global Media & Entertainment Limited	500+	90	No	0%	No	0%	No	0%
INRIX Media Limited	101-499	1	No	0%	No	0%	No	0%
Nation Broadcasting	21-100	14	No	0%	No	0%	No	0%
Premier Christian Communications Ltd	101-499	5	No	0%	No	0%	No	0%
SSVC	101-499	14	No	0%	No	0%	No	0%
The Lincs FM Group	21-100	10	Yes	100%	No	0%	Yes	100%
Tindle Radio	21-100	2	No	0%	No	0%	No	0%
Touch Broadcasting Limited	21-100	7	No	0%	No	0%	No	0%
UKRD Group Limited	101-499	23	Yes	100%	No	0%	No	0%
United Christian Broadcasters Ltd	101-499	1	No	0%	No	0%	No	0%
Wireless Group	101-499	21	Yes	100%	No	0%	Yes	5%

Specific numbers on ethnicity and disability have been removed from this table to protect personal data.