
Updating quantitative data collection tools

Equity, diversity and inclusion in broadcasting

STATEMENT:

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1. Overview

In April this year we published a Call for Inputs on developing our quantitative data collection questionnaire that measures the diversity of the broadcasting workforce. We used the information provided in response, as well as input from internal and external experts, to inform the changes detailed in the statement below.

All the changes to the way we collect this data have been made to help us achieve our objectives to identify where underrepresentation for certain groups of people may exist in broadcasting and identify barriers that individuals or groups may face in entering and/or progressing within the industry.

The updated quantitative data questionnaire will be sent to broadcasters in April 2023 for completion.

2. Background

Why we collect quantitative data

- 2.1 Since 2016, Ofcom has collected and reported broadcasters' workforce diversity data using an annual quantitative questionnaire. This allows us to monitor the makeup of broadcasters' staff.
- 2.2 Each year, we publish a report on our data findings. This is used to provide a comprehensive picture of the make-up of broadcasters' workforces, identifying those groups who are under-represented alongside potential barriers to progress for those groups. It allows Ofcom to hold broadcasters accountable for the progress of their equity, diversity and inclusion ('EDI') practices. We expect broadcasters to use the data to evaluate their own diversity and inclusions strategies and to stimulate honest conversations both internally and in collaboration with other broadcasters on what is working well and where changes could be made to improve equal opportunities for all employees.
- 2.3 We have powers to require broadcasters to supply data on certain characteristics (sex, race and disability) under the Communications Act 2003 (the 'Act'), and also ask for data on some of the other protected characteristics defined in the Equality Act 2010 ("the Equality Act") on a voluntary basis (religion and belief, sexual orientation, and age). We also ask broadcasters to volunteer data on the socio-economic background of their workforces.
- 2.4 The broadcasting industry also relies heavily on freelancers working for both broadcasters and independent production companies. We collect limited data on freelancers working within broadcasters, but can only request this on a voluntary basis.¹ Our Guidance encourages broadcasters to monitor the diversity of their freelance staff alongside their employees holding permanent positions and we encourage broadcasters to support the Creative Diversity Network² in their work to monitor the diversity of the freelance section of the industry and consider how else they can positively influence the make-up of the wider workforce within the sector.

Five-year review and call for inputs

- 2.5 In our Five-year review of diversity and equal opportunity in UK broadcasting, published in 2021,³ we said that given the changes in society and the sector over five years of monitoring and reporting on broadcasters' workforce data, the time was right to take stock of the data we collect and how we collect it. We said that this would allow us to set clear updated expectations of broadcasters, and to provide more consistent and comparable feedback. We stated we would launch a review of Ofcom's workforce data collection. This

¹ This is because our legal duties set out in the Act only pertain to employees of the broadcasters.

² The [Creative Diversity Network](#) is an organisation that promotes diversity and inclusion in the UK broadcasting industry with a particular focus on freelancers. It monitors the diversity of the freelance sector using its 'Diamond' data collection and reporting tool.

³ Ofcom's [Five-year review](#).

began with targeted stakeholder engagement and the publication of a Call for Inputs ('CfI') in April 2022.

- 2.6 The CfI focused on the quantitative section of our workforce questionnaire. The main objectives of the review were to determine:
- Are we asking the right questions to identify underrepresentation and potential barriers to progression?
 - Are we using the most appropriate and inclusive language in our questions?
 - Are there new areas of data we should collect?
 - Are we effectively benchmarking our data in order to draw meaningful conclusions from it?
- 2.7 In developing the CfI we consulted with a range of stakeholders individually and in roundtables. The information and opinions collected in this process have fed into the changes to the quantitative data collection tool as well as the questions within the CfI.
- 2.8 We received a total of 22 responses to our CfI on updating Ofcom's workforce data collection, which have been published in full on [our website](#). The responses came from a broad range of stakeholders, including:
- 11 TV and Radio broadcasters (including the BBC, BT Sport, Channel 4, ITV, S4C and STV).
 - Nine industry bodies, public bodies and charities (the Advisory Committee for Scotland, Antisemitism Policy Trust, Colour Blind Awareness, Directors UK, the Film and TV Charity, Screen Scotland/Creative Scotland, Share My Telly Job, the Royal National Institute for Deaf People and the Writers' Guild of Great Britain).
 - One governmental body (the Scottish Government).
 - One individual respondent.

3. Overarching changes to the quantitative data collection

Sources used to inform changes

- 3.1 In developing the questions for data collection, we consulted with various teams within Ofcom, in particular the Research and Intelligence team and employee networks, and we analysed the Cfl responses from broadcasters, charities and other organisations, industry bodies and individuals.
- 3.2 We also consulted directly with interested parties, including advocates and charities as well as broadcasters, to ensure our processes are aligned.
- 3.3 In addition, we conducted desk research with a particular focus on understanding the 2021 Census of England and Wales questionnaire⁴ and harmonised question development.
- 3.4 We have decided to implement the following changes:

Workforce questionnaire section	Summary of changes
Sex and Gender Identity	Substituted three questions on sex and gender identity.
Sexual Orientation	Expanded response options available.
Race and Ethnicity	Alphabetised the response options available. Removed 'BAME' from the 'Other' option list. Expanded the 'White' selection list to include 'Roma' in line with the Office of National Statistics ('ONS'). Removed the term 'racial group' from the questionnaire.
Disability	Expanded questions to incorporate a functional definition of disability.
Socio-economic background	Amended the occupational descriptions. Removed two response options for state run-schools (selective and non-selective). Amended question asking for information on whether either of an employees' parents had attended university by the time they were 18.
Caring responsibilities	Added a new voluntary question asking for information on caring responsibilities.

⁴ Information on how the Census questions were developed can be found on the ONS [website](#)

Workforce questionnaire section	Summary of changes
Religion	No changes
Age	No changes
Cross-sectional data	Added questions requesting information on four cross-sectional data points: Race and ethnicity X socio-economic background Race and ethnicity X disability Race and ethnicity X sex Disability X socio-economic background
Nations and regions	Added a voluntary request to submit data on sex, race and ethnicity, socio-economic background and disability by nation and region.
Management	Separated 'junior/middle management' into two distinct categories, 'junior' and 'middle' management.
Job role groups	Renamed the categories to give a clearer understanding of what is meant by each group.

Overall principles and changes that affect all questions

When deciding on the changes made to the questionnaire, we were guided by four key principles – consistency, benchmarking, proportionality and inclusivity. Below is an explanation of these principles and some key rationale that applies to all the changes we made.

All the changes have been made to help us achieve our objectives to identify where underrepresentation for certain groups of people may exist in broadcasting and identify barriers that individuals or groups may face in entering and/or progressing within the industry.

These principles and decisions apply to all the changes below. Where additional or specific rationale applies to a question we explain this in the section 'Changes to the data collection by question' below.

Consistency

- 3.5 We have only made sizable changes to questions where we believe it will significantly improve our ability to gain further transparency about who is working in broadcasting. Elsewhere we have kept questions consistent with the previous quantitative surveys. This is important as it enables us to continue to track broadcasters' progress over time.

- 3.6 There are no changes to the way we ask for data broken down by joiners, leavers, training and promotions as well as management/seniority and job type for each question.
- 3.7 The categories of mandatory data collection are unchanged. All requests for new data will be made on a voluntary basis, in line with the limitations of our powers.

Benchmarking

- 3.8 Ofcom's role is to monitor the broadcasting industry as a whole and ensure broadcasters are meeting their licence conditions. To achieve our objectives we need to understand whether broadcasters' workforces reflect the diversity of the UK working population more generally.
- 3.9 We have decided in most instances to align our questions with the ONS. This is because where questions are asked by the ONS at UK level in a particular way, it is useful for us to use the same wording in order to obtain comparable data against these UK 'benchmarks'. We recognise that this sometimes means we have to sacrifice collecting granular data on some characteristics to align with these benchmarks.
- 3.10 Where advantageous and possible to do so, without skewing the data or affecting our ability to benchmark, we have adjusted the ONS questions so we can collect more insightful data. This decision applies to almost all questions below.
- 3.11 Where we have decided to expand the list of response options available for employers to select, for example in the sexual orientation and gender identity questions, we have drawn up the list of options based on research and in consultation with broadcasters. We will look to update these lists in line with the responses received by ONS through their "write in" box for the 2021 Census when the results are published.
- 3.12 We use ONS data to benchmark where possible, including Census and labour workforce data, except for socio-economic background where we benchmark against data provided by the Social Mobility Commission, as they provide the most comprehensive data on this subject. Where ONS data relate only to England and Wales, we will benchmark against Census data from the National Records of Scotland and the Northern Ireland Statistics and Research Agency; where there is no Census data that correlates to our questions, we will request data from those statistical agencies directly. We will use the ONS as a benchmark for data by regions in England.

Inclusivity

- 3.13 In developing the questionnaire, we aim to improve the inclusivity of the language and questions. In doing so we hope this will increase data disclosure and improve our understanding of how particular groups are represented in the broadcasting sector.
- 3.14 While we cannot directly influence the way broadcasters ask for this data from their employees, we hope that they will use our questions as a springboard to improve the inclusivity of their own data collection practices. We have provided some suggestions on how broadcasters might do this at the end of this chapter.

- 3.15 Many respondents to our CfI noted that we should avoid using the term ‘other’ to capture minority groups whose characteristics are not listed. We have chosen to change our language to variations on the phrase ‘characteristic not listed’. We consider that this phrase better captures that the characteristic has not been listed by Ofcom, rather than ‘othering’ employees.

Proportionality

- 3.16 Ofcom’s actions in monitoring the diversity of the broadcasting sector must be proportionate. We must be able to justify the regulatory burden our data requests place on broadcasters, by demonstrating how the information will be used. All the following data requests help us to achieve our overall objectives of highlighting underrepresentation and barriers to progress for minority groups. In each section we have set out how specific data will be used, and below set out more general points on use of the data collected.

How Ofcom will use this data

- 3.17 In accordance with our powers under the Act, reporting workforce data about sex,⁵ race and ethnicity and disability will be mandatory for broadcasters.
- 3.18 Where the number of employees with a certain characteristic is below 10, we do not report it to protect personal data. In these cases, we may choose to aggregate these employees across broadcasters to gain a picture of their representation across the industry at large. This is particularly likely to be the case for some of the expanded lists of identities and characteristics, such as sexual orientation or gender identity. We think there is value in tracking these numbers and reporting on representation, no matter how small the number, as far as we are able.

⁵ Data collected on employees who are intersex will be voluntary.

4. Changes to the data collection by question

Sex and gender identity

In our Cfl we asked whether we should start to collect data on gender identity as well as the protected characteristic of sex. We requested suggestions on how it would be best to collect this information, noting that we were inclined to align with the ONS to allow us to compare the data against the 2021 Census results.

Cfl responses

- 4.1 Ten respondents explicitly stated that changes should be made to the sex and gender identity section of the workforce questionnaire. Most who supported changes suggested that we use a more inclusive term than 'Other' to describe gender identities not listed in the question option list. Similarly, three respondents⁶ suggested that we further expand the list of options available to those completing the workforce questionnaire. Common suggestions included 'trans', 'non-binary', 'non-gender' and 'Queer'.
- 4.2 Five respondents⁷ recommended that there should be two questions in the sex and gender section of the questionnaire as is, set out in the ONS 2021 Census.
- 4.3 Two respondents⁸ suggested that no changes were needed to the way we ask for information on sex and gender in the workforce questionnaire. One individual respondent suggested that the way we currently ask for this information is already reflective of sex and gender identities present in society.

Additional rationale for changes

- 4.4 It is important for us to have a better understanding of the representation of and barriers facing trans people and people with minority gender identities, so we have expanded this section to reflect this.
- 4.5 It was clear from the Cfl responses that our existing questions for broadcasters in this area are lagging behind that of the broadcasters themselves. Six of the nine broadcasters that responded to the Cfl with information about their own data collection methods, already collect some information about gender identity. This indicates to us that the additional request should not prove too burdensome for broadcasters.
- 4.6 These changes will allow us to compare data with nationally representative benchmarks.
- 4.7 We understand that many trans or non-binary employees may not be 'out' at work or do not feel comfortable reporting their personal data to their employer,⁹ so while the data

⁶ BT, S4C and STV

⁷ The Advisory Committee for Scotland, Channel 4, Directors UK, ITV and the Writers' Guild for Great Britain

⁸ Share My Telly Job and an individual from the general public.

⁹ [Stonewall's LGBT in Britain work report](#), page 10

collected will not provide a complete picture, we hope that over time trust and disclosure rates will grow.

- 4.8 We use data on sex to help broadcasters understand key issues that face women and men, for example, the data can contribute to tracking women leaving the industry when they have children or get older.

Existing question

[Mandatory question 1] What is the breakdown of your workforce by sex?

- Male
- Female
- Other (eg intersex, non-binary) *[this option is a voluntary selection]*
- Employee preferred not to say

New questions

[Mandatory question 1] What is the breakdown of your employees by sex?

- Male
- Female
- Intersex *[this option is a voluntary selection]*
- Employee preferred not to say

[Voluntary question 2] How many of your employees identify as a gender that is different from their sex registered at birth?

- *[insert number]*
- Employee preferred not to say
- Data not collected
- Data collected but no consent to provide data to Ofcom

[Voluntary question 3] Within this group, how many employees identified with the following gender identities?

- Man / Trans man
- Woman / Trans woman
- Non-binary
- Queer
- Gender identity not listed
- Employee preferred not to say
- Data not collected
- Data collected but no consent to provide data to Ofcom

Sexual orientation

In the Cfl we explained our current approach to collecting data in this area is based on the Equality Act definition but asked for input on whether it was time to expand the list of sexual orientations to broaden our understanding of the representation of the LGBTQ+ community in broadcasting.

Cfl responses

- 4.9 Eight respondents suggested that changes should be made to the way we ask for information on sexual orientation in the workforce questionnaire. Four respondents¹⁰ recommended that we expand the list of options available to those completing information on sexual orientation in the questionnaire. This included adding options for 'Asexual', 'Queer' and 'Pansexual' to the sexual orientation section.
- 4.10 Three respondents¹¹ suggested that we should consider removing gender from descriptions of sexual orientation. This would ensure that gay people who do not identify as a man or a woman would have an option to select.
- 4.11 Some respondents also suggested that we re-evaluate the language we currently use in the workforce questionnaire. For instance, Channel 4 recommended that we stop using 'straight' as a term to describe heterosexuality due to its non-inclusive connotations.
- 4.12 Four respondents¹² stated that they felt that no changes were needed to the sexual orientation section of the workforce questionnaire.

Additional rationale for changes

- 4.13 We have historically collected information about gay men and gay women and lesbians separately because we know that there is more underrepresentation of gay women and lesbians in broadcasting than of gay men.¹³ There is anecdotal evidence that gay women and lesbians and gay men in broadcasting may face different barriers to progress. We believe it is important to be able to accurately track this issue. We do, however, recognise the importance of collecting data about gay people who do not identify as a man or a woman, so we have added in a third option to help capture this group.
- 4.14 We appreciated there are some negative connotations with the term 'straight', however it is our understanding that the term can still be a useful option for some people who do not feel comfortable selecting the term 'heterosexual', for example some trans and non-binary people. As such, we have decided to keep both terms in the selection.

¹⁰ The Advisory Committee for Scotland, BT Sport, S4C and the Writers' Guild for Great Britain.

¹¹ Channel 4 and two confidential respondents.

¹² The BBC, ITV, Share My Telly Job and STV.

¹³ In 2018/19, 2% of employees identified as gay men, compared to 1% of employees as gay women/lesbian. See Ofcom, 2019. [Diversity and equal opportunities in television: monitoring report on the UK-based broadcasting industry](#), p.25. This is compared to the nation average of 2.9% gay men and 2.5% gay women or lesbians in 2019 according to the [ONS](#).

Existing question

[Voluntary] Employee work force by sexual orientation:

- *Heterosexual/ Straight*
- *Gay men*
- *Gay women/ Lesbian*
- *Bisexual*
- *Other sexual orientation*
- *Employee preferred not to say*
- *Data not collected*
- *Data collected but no consent to provide data to Ofcom*

New question

[Voluntary] How many of your employees are:

- *Heterosexual / straight*
- *Gay man*
- *Gay woman / Lesbian*
- *Gay non-binary*
- *Bi-sexual*
- *Asexual*
- *Pansexual*
- *Queer*
- *Sexual orientation not listed*
- *Employee preferred not to say*
- *Data not collected*
- *Data collected but no consent to provide data to Ofcom*

Race and ethnicity

In the Cfl we asked for input on whether we should expand the ethnicities listed to improve our understanding of the nuances of the data, or whether we should stick faithfully to the ONS question to ensure we could effectively benchmark the data against UK population data.

Cfl responses

- 4.15 Four respondents¹⁴ suggested removing the use of the term B.A.M.E. from section D of the workforce questionnaire, highlighting that many broadcasters have made concentrated efforts to phase out its use.

¹⁴ BT Sport, Channel 4, Directors UK and the Film and TV Charity

- 4.16 Two respondents¹⁵ also recommended that we recognise the relationship between nationality, religion and race and ethnicity in the questionnaire. In particular, S4C highlighted that the 'White' option in the race and ethnic background section is listed according to nationalities but this is not the case with some other racial groups.
- 4.17 Additionally, several recommendations were made to expand the existing list of options available in the workforce questionnaire. It was frequently suggested that we move the 'Middle Eastern, including Arabic' option from the 'Other' option and split these out to be more specific. Similarly, it was also suggested that we include 'South East Asian' as an option.

Additional rationale for changes

- 4.18 Key to achieving our objectives is the ability to compare data to national and regional averages. However, to recognise the value of gathering more detailed data where possible, the list of selections available for employees from Asian backgrounds is broader than the Census and in line with how we previously collected the data. This does not affect our ability to compare with ONS data as we can aggregate the additional categories we use into 'any other Asian background' to align with the nationally representative data. Similarly, we have separated Arab and 'other ethnic background' as this does not affect our ability to compare with Census results by aggregating data we collect.
- 4.19 We considered the other suggested additions, including adding Jewish as an ethnic group and other African backgrounds to the options, but this would have affected our ability to benchmark as it could skew the categories within which respondents are placed when compared to Census data. The complexity and nuance of race and ethnicity (and religion) mean that for many people a number of options may apply. If we expand the list of ethnicities for certain groups this might mean respondents selecting a different sub-category than they might select for the Census, making it difficult to compare the data.
- 4.20 We have decided to list the umbrella categories in alphabetical order, to reflect the practice of many broadcasters.
- 4.21 'BAME' was previously given as an option category for smaller broadcasters who do not collect detailed ethnicity data to ensure they could still report their data. We recognise that EDI discourse and our expectations for organisations has moved on since the "BAME" category was listed in 2017. As such we have removed 'BAME' and expect all broadcasters to be able to provide at least top line data on the number of employees in their organisation from each of the sub-categories in bold in the table below.
- 4.22 We have also removed the term 'racial group' from our questionnaire. This was originally included to align with the wording that confers our powers under the Act.¹⁶ We recognise that this language feels dated and is no longer commonly used. So, we have amended the title of this section to 'race and ethnic background'.

¹⁵ Antisemitism Policy Trust and S4C

¹⁶ Section 27 (4)(b) of the Communications Act 2003

Existing question

[Mandatory] Employee workforce by racial group:

White:

- *English /Welsh /Scottish /Northern Irish /British*
- *Irish*
- *Central and Eastern European*
- *Gypsy or Irish traveller*
- *Other white background*

East Asian / East Asian British:

- *Chinese*
- *Other East Asian background*

South Asian / South Asian British:

- *Indian*
- *Pakistani*
- *Bangladeshi*
- *Other South Asian background*

Black / African / Caribbean / Black British:

- *African*
- *Caribbean*
- *Other Black /African /Caribbean background*

Mixed:

- *White and Black Caribbean*
- *White and Black African*
- *White and Asian*
- *Other mixed/multiple racial background*

Other:

- *Middle Eastern, including Arabic origin*
- *Other ethnic group*
- *Black, Asian and Minority Ethnic (BAME)*
- *Employee preferred*
- *Data not collected*

New question

[Mandatory] How many of your employees are:

Black/African/Caribbean/Black British

- *African*

- *Caribbean*
- *Any other Black/African/Caribbean background*

East Asian/East Asian British

- *Chinese*
- *Any other East Asian background*

Mixed/multiple ethnic groups

- *White and Black Caribbean*
- *White and Black African*
- *White and Asian*
- *Any other Mixed/multiple ethnic background*

Middle Eastern/Arab

- *Arab*
- *Any other Middle Eastern background*

South Asian/South Asian British

- *Indian*
- *Pakistani*
- *Bangladeshi*
- *Any other South Asian background*

White

- *English/Welsh/Scottish/Northern Irish/British*
- *Irish*
- *Gypsy or Irish Traveller*
- *Roma*
- *Any other White background*
- *Ethnic background not listed*
- *Employee preferred not to disclose*
- *Data not collected*

Disability

In the Cfl we asked whether we should move towards a ‘social model’¹⁷ approach for collecting data on disability and whether we should include a question which aligns with the Government Statistical Service’s harmonised standard for questions about impairment.

Cfl responses

- 4.23 Ten respondents¹⁸ recommended that changes should be made to the way we ask for information on disability. Many of these suggested that we take a more inclusive approach to disability by expanding the list of options available. For instance, including more options for neurodivergent, hearing and vision related disabilities and impairments.
- 4.24 Three respondents¹⁹ to our Cfl stated that they believed that no changes needed to be made to the disability section of the workforce questionnaire, with Directors UK suggesting that the way in which this question is asked is less significant than the action which broadcasters should be taking to improve disabled representation.

Additional rationale for changes

- 4.25 In our discussions with disability charities and activists many participants advocated moving away from a medical model of disability to a social model. This would suggest moving towards questions about how employees' day-to-day activities are affected by their condition or impairment rather than those which focus on the specific illness, medical conditions or impairments people have.
- 4.26 This approach is in line with the Equality Act definition and the 2021 ONS census questions on disability, which ask about long-term conditions which have a substantial effect on a person's ability to carry out day-to-day activities.
- 4.27 Question 1 is linked to the 2021 Census question. However, we consider it is also useful to retain a question to identify underrepresentation in relation to specific types of condition. This could help to identify specific obstacles facing potential employees with those conditions. We understand that people with the same medical condition (for example) may experience very different barriers but believe that there is still value in identifying broad patterns of disadvantage. For example, if we see that people who have a hearing impairment are leaving the industry at a disproportionate rate, we could infer that broadcasters are not doing enough to adapt their workplaces to accommodate this group.
- 4.28 Question 2 now aligns with the Government Statistical Service's harmonised impairment question,²⁰ for the purposes of benchmarking, and in order to provide more detailed information about particular conditions (e.g. hearing impairment) where available. Broadcasters will still be able to enter data in relation to broader sub-groups (e.g., sensory disability) if this is the only data they have collected.

¹⁷ Scope charities [definition of the social model of disability](#).

¹⁸ the BBC, BT Sport, Channel 4, Colour Blind Awareness, the Film and TV Charity, ITV, S4C, Share My Telly Job, the Royal National Institute for the Blind and the Writers' Guild for Great Britain)

¹⁹ The Advisory Committee for Scotland, Directors UK and STV

²⁰ Information on the harmonised impairment question can be found on the Government [website](#)

Existing question

How many of your employees have

- *No disability*
- *Sensory Disability (e.g. hearing/visually impaired)*
- *Physical Disability / Muscular-skeletal (inc co-ordination, dexterity, mobility, wheelchair user)*
- *Mental illness (inc. serious depression, bipolarity)*
- *Cognitive/learning disabilities (inc. dyslexia, Down's syndrome, autism)*
- *Multiple, long term or other disability / condition (This includes conditions such as diabetes, epilepsy, arthritis, asthma, speech impairments, facial disfigurements)*
- *has a disability*
- *Employee preferred not to disclose*

New questions

[Mandatory question 1] *How many employees have a disability, defined as a long term illness, condition or physical or mental impairment which has a substantial and long-term (12 months or more) adverse effect on that person's ability to carry out normal day-to-day activities?*

- *No illness, condition or impairment*
- *Has an illness, condition or impairment*
- *Employee preferred not to say*
- *Data not collected*

[Mandatory question 2] *Do these illnesses, conditions or impairments affect employees in any of the following areas? Respondents can select more than one per employee.*

Sensory

- *Vision (for example blindness or partial sight)*
- *Hearing (for example deafness or partial hearing)*

Physical

- *Mobility (for example walking short distances or climbing stairs)*
- *Dexterity (for example lifting and carrying objects, using a keyboard)*
- *Stamina or breathing or fatigue*

Cognitive and social or behavioural

- *Learning or understanding or concentrating*
- *Memory*
- *Socially or behaviourally (for example associated with autism spectrum disorder which includes Asperger's, or ADHD).*
- *Mental health*
- *Other not listed (this could include conditions such as diabetes, epilepsy, speech impairments, facial disfigurement)*

- *Employee preferred not to say*
- *Data not collected*

Socio-economic background

In the Cfl we asked for comments on whether the questions we ask are the best for assessing socio-economic background. We also explained that our approach so far has been to focus on people's backgrounds rather than their current economic status, we welcomed comments on this approach.

Cfl responses

- 4.29 Six respondents²¹ stated that changes should be made to the socio-economic background section of the questionnaire. The Advisory Committee for Scotland suggested that our current approach excludes key aspects associated with socio-economic background: quality of education, upbringing in urban versus rural communities and the socio-economic background of minority ethnic groups. It further recommended that Ofcom should collect information on the number of people dependent on an employee's income.
- 4.30 Four respondents²² said they felt no changes were needed to the way we ask for information on socio-economic background from broadcasters. Directors UK highlighted that our current approach aligns with the Government's recommendations for measuring socio-economic background within workforces. Similarly, the Writers' Guild of Great Britain recommended no change, as our current approach aligns with the Social Mobility Commission's Social Mobility Toolkit. While STV suggested that no changes should be made to the way we ask for information on socio-economic background, it did state that Ofcom providing greater clarity on the population comparator for each question and how the socio-economic background questions can be related to the social mobility of respondents would be beneficial.
- 4.31 The BBC highlighted that it may be too strenuous for broadcasters to collect information for all four questions used in our current approach. It suggested instead collecting information on all questions except question 3 (questions listed below).
- 4.32 Channel 4 recommended that while we should retain the current approach in our questioning, we should review the categorisation of profession used in the occupation of main household earner question. The Film and TV Charity suggested splitting the "Overseas" category into "State-overseas" and "Private-overseas" in the question relating to education of employee.

²¹ This included the Advisory Committee for Scotland, BBC, the Film and TV Charity and Share My Telly Job.

²² Directors UK, ITV, STV and the Writers' Guild of Great Britain).

Additional rationale for changes

- 4.33 There is no single question that can get to the root of an employee's socio-economic background so we will ask four questions that, taken together, build a picture of the socio-economic background of a broadcaster's workforce. This approach is recommended by the [Social Mobility Commission](#) and the [Sutton Trust](#).
- 4.34 We have amended the questions on socio-economic background to align with the latest recommendations from the Social Mobility Commission.²³ Their recommendations primarily focus on simplifying questions to encourage disclosure.²⁴ With the exception of question 3 the changes do not affect our ability to benchmark or compare data from previous years.²⁵
- 4.35 For question 2 we have deviated slightly from the Social Mobility Commission's recommendation of adding an option where the bursary received is specified at 90% or more.²⁶ We believe the specificity of this option would create an additional burden for broadcasters in collecting and reporting the data, so we have used more general language to encourage disclosure. Similarly, we have removed the two options for state-run schools (selective and non-selective) as this approach is not a primary recommendation of the Social Mobility Commission and we hope that simplifying the question will increase disclosure rates.²⁷
- 4.36 We have not added another category to the overseas schooling option as we would be unable to benchmark this data and consider the benefit of collecting the data would not outweigh the additional burden placed on broadcasters.
- 4.37 We have avoided adding more questions to this section as disclosure rates for socio-economic background are not high²⁸ and we would not have robust comparable national data for these questions. We have instead focused on ways we can improve disclosure rates to improve our understanding of the representation of people from different socio-economic backgrounds in broadcasting.

Existing questions

[Voluntary question 1] *Occupation of main household earner when employee was aged 14.*

a) Modern professional occupations (such as teacher, nurse, physiotherapist, social worker, musician, police officer [sergeant or above], software designer).

²³ Social Mobility Commission, [report on the summary of measurement changes](#).

²⁴ [Social Mobility Commission report](#), p.5-6.

²⁵ Question 3 has changed significantly, meaning we will not be able to compare data prior to 2023. However, the question is now significantly simpler, and the change is recommended by the Social Mobility Commission.

²⁶ [Social Mobility Commission report](#), p.17.

²⁷ [Social Mobility Commission report](#), p.18.

²⁸ In 2021 the average disclosure rate across the four questions was 33.5%.

- b) Clerical and intermediate occupations (such as secretary, personal assistant, clerical worker, call centre agent, nursery nurse).*
- c) Senior managers or administrators - usually responsible for planning, organising and co-ordinating work, and or finance (such as finance manager, chief executive).*
- d) Technical or craft occupations (such as motor mechanic, plumber, printer, electrician, gardener, train driver).*
- e) Semi-routine manual and service occupations (such as postal worker, machine operative, security guard, caretaker, farm worker, catering assistant, sale assistant).*
- f) Routine manual and service occupations (such as HGV driver, cleaner porter, packer, labourer, waiter/waitress, bar staff).*
- g) Middle or junior managers (such as office manager, retail manager, bank manager, restaurant manager, warehouse).*
- h) Traditional professional occupations (such as accountant, solicitor, medical practitioner, scientist, civil / mechanical engineer).*
- i) Long term unemployed (claimed Jobseeker's Allowance or earlier unemployment benefit for more than a year).*
- j) Inactive (including those that were retired).*
- k) Don't know / not applicable*
- l) Employee preferred not to disclose*
- m) Data collected but no consent to provide to Ofcom*
- n) Data not collected*

[Voluntary question 2] *What type of school employee attended for the most time between the ages of 11 – 16.*

- a) State-run or state-funded school – selective on academic, faith or other grounds*
- b) State-run or state-funded school – non-selective*
- c) Independent or fee-paying school – bursary d) Independent or fee-paying school – non-bursary*
- e) Attended school outside of the UK*
- f) Don't know*
- g) Employee preferred not to disclose*
- h) Data collected but no consent to provide to Ofcom*
- i) Data not collected*

[Voluntary question 3] *Highest level of qualification achieved by either of parent(s) or guardian(s) by the time employee was 18.*

a) Degree level or degree equivalent or above (e.g first or high degrees, postgraduate diplomas, NVQ/SVQ, level 4 or 5 etc)

b) Qualifications below degree level (e.g A-Level, SCE Higher, O-Level, SCE Standard / Ordinary, NVQ/SVQ, BTEC etc)

c) No qualifications

d) Don't know

e) Employee preferred not to disclose

f) Data collected but no consent to provide to Ofcom

g) Data not collected

[Voluntary question 4] *Whether employee was eligible for Free School Meals at any point during their school years.*

a) Yes

b) No

c) Not applicable (finished school before 1980 or went to school overseas)

d) Employee preferred not to disclose

e) Data collected but no consent to provide to Ofcom

f) Data not collected

New questions

[Voluntary question 1] *Occupation of main household earner when employee was aged 14.*

- *Modern professional & traditional professional occupations such as: teacher, nurse, physiotherapist, social worker, musician, police officer (sergeant or above), software designer, accountant, solicitor, medical practitioner, scientist, civil / mechanical engineer.*
- *Senior, middle or junior managers or administrators such as: finance manager, chief executive, large business owner, office manager, retail manager, bank manager, restaurant manager, warehouse manager.*
- *Clerical and intermediate occupations such as: secretary, personal assistant, call centre agent, clerical worker, nursery nurse.*
- *Technical and craft occupations such as: motor mechanic, plumber, printer, electrician, gardener, train driver.*
- *Routine, semi-routine manual and service occupations such as: postal worker, machine operative, security guard, caretaker, farm worker, catering assistant, sales assistant, HGV driver, cleaner, porter, packer, labourer, waiter/waitress, bar staff.*
- *Long-term unemployed (claimed Jobseeker's Allowance or earlier unemployment benefit for more than a year)*

- *Small business owners who employed less than 25 people such as: corner shop owners, small plumbing companies, retail shop owner, single restaurant or cafe owner, taxi owner, garage owner*
- *Other such as: retired, this question does not apply to me, I don't know*
- *Employee preferred not to say*
- *Data not collected*
- *Data collected but no consent to provide to Ofcom*

[Voluntary question 2] *Type of school employee attended for the most time between the ages of 11 to 16.*

- *A state-run or state-funded school*
- *Independent or fee-paying school*
- *Independent or fee-paying school, where employee received a bursary covering most of employees tuition fees*
- *Attended school outside the UK*
- *Other such as home schooled*
- *Employee did not know.*
- *Data collected but no consent to provide to Ofcom*
- *Employee preferred not to say*
- *Data not collected*

[Voluntary question 3] *Did either of employees parents attend university by the time the employee was 18?*

- *No, neither of employees parents attended university*
- *Yes, one or both of employees parents attended university*
- *Employee did not know / not sure*
- *Data collected but no consent to provide to Ofcom*
- *Employee preferred not to say*
- *Data not collected*

[Voluntary question 4] *If the employees finished school after 1980, were they eligible for free school meals at any point during your school years?*

- *Yes*
- *No*
- *Not applicable (finished school before 1980 or went to school overseas)*
- *Employee did not know*
- *Data collected but no consent to provide to Ofcom*
- *Employee preferred not to say*
- *Data not collected*

Caring responsibilities

We did not ask about caring responsibilities in the Cfl, but we asked if there were any other areas in which we should collect data and this was an area some respondents flagged.

Cfl responses

- 4.38 Five respondents²⁹ suggested that we include a question in relation to caring responsibilities.

Additional rationale for changes

- 4.39 We agree that this is an important area to look at as caring responsibilities can disadvantage people if they do not work in an inclusive and flexible environment.³⁰
- 4.40 The data we will collect is more limited in scope than the ONS version of this question, only highlighting where employees have caring responsibilities rather than the extent to which these responsibilities impact their lives, unlike the ONS who collect hours per weeks spent fulfilling these obligations. We feel that this additional level of detail would be too burdensome for broadcasters to collect and report so we have simplified the question for our purposes.

New question

[Voluntary] Do you look after, or give any help or support to, anyone because they have long-term physical or mental health conditions, or problems related to old age?

- *Have caring responsibilities*
- *No caring responsibilities*
- *Employee preferred not to say*
- *Data not collected*

²⁹ including BT Sport, Channel 4, Directors UK and Share My Telly Job

³⁰ Broadcaster responses to last year's questionnaire suggested that new working practices resulting from Covid-19 measures offered welcome flexibility for carers in the sector and charity [Carers UK](#) note how flexible working can help carers balance work with caring responsibilities.

Religion or belief

We did not ask about religion in the Cfl, but we asked if there were any other questions we should look to amend and some respondents had comments in this area.

Cfl responses

- 4.41 Channel 4 suggested that we expand the list options available for questions regarding religion by including 'Atheist', 'Agnostic', 'Humanist' and 'Spiritual' to the existing list.

Additional rationale for changes

- 4.42 To help us achieve our objective of identifying underrepresentation and obstacles in place for minority groups we think we need to be able to compare to population data. This section has, therefore, not been amended (other than a small terminology change) and it reflects the way in which the ONS ask about religion.
- 4.43 In consultation with our employee networks and to align with the ONS we have decided to amend 'not religious' to 'no religion'.
- 4.44 We will update the guidance that goes along with the questionnaire to ensure broadcasters know where to place employees who have, for example, listed themselves as atheist. We know this has been a problem in the past.

Existing question

[Voluntary] What is the religion or belief of your employees?

- *Not religious*
- *Christian*
- *Hindu*
- *Sikh*
- *Muslim*
- *Buddhist*
- *Jewish*
- *Other religion or belief*
- *Employee preferred not to disclose*
- *Data collected but no consent to disclose to Ofcom*
- *Data not collected*

New question

[Voluntary] What is the religion or belief of your employees?

- *No religion*
- *Christian*
- *Hindu*
- *Sikh*
- *Muslim*
- *Buddhist*
- *Jewish*
- *Other religion or belief*
- *Employee preferred not to disclose*
- *Data collected but no consent to disclose to Ofcom*
- *Data not collected*

Age

We did not ask about age in the Cfl, but we asked if there were any other questions we should look to amend and some respondents had comments in this area.

Cfl responses

- 4.45 Two respondents³¹ provided views on this area. Specifically, Directors UK suggested that questions regarding age should be moved into the mandatory data collection category.

³¹ the Advisory Committee for Scotland and Directors UK

Additional rationale for changes

- 4.46 Although age is a protected characteristic under the Equality Act, the Communications Act 2003 does not give Ofcom power to mandate the collection of data on this characteristic. Therefore, this section will remain voluntary for broadcasters to complete.
- 4.47 The question about age will remain unchanged.

Cross-sectional data

In the Cfl we explained our intention to start collecting cross-sectional data and asked for views on which cross-sections of data are likely to shed light on compounded disadvantage and potential barriers to full representation.

Cfl responses

- 4.48 Eleven respondents³² supported the collection of some new cross-sectional data. These respondents felt that it is a necessary process to gain a more nuanced understanding of barriers to entry and progression within the broadcasting industry.
- 4.49 While supportive of cross-sectional data collection, the BBC recommended that we begin the process on a small scale with particular characteristics to avoid an “unwieldy” inflow of data.
- 4.50 Two respondents³³ said that they felt Ofcom should not begin collecting cross-sectional data. BT Sport felt that it would be difficult for smaller broadcasters to take part in cross-sectional data collection due to data protection related issues.

Additional rationale for changes

- 4.51 The concept of intersectionality recognises that people’s identities and positions in society are shaped by multiple factors. We think it important that we begin to collect more nuanced data that allows us to better understand where disadvantage or underrepresentation is compounded, and possibly identify where disadvantage is associated with another factor, like socio-economic background. So, we have decided to begin to collect cross sectional data.
- 4.52 We currently collect cross sectional data on sex and age. In future we will collect data on the intersections between race and ethnicity and sex, race and ethnicity and disability, race and ethnicity and socio-economic background and disability and socio-economic background.
- 4.53 This new data collection will be voluntary, and we understand that it may present an administrative challenge for broadcasters. Broadcasters are already requested, and in

³² The Advisory Committee for Scotland, Antisemitism Policy Trust, the BBC, Channel 4, Directors UK, the Film and TV Charity, ITV, S4C, the Scottish Government, Screen Scotland/Creative Scotland and the Writers’ Guild for Great Britain

³³ BT Sport and STV

some cases required, to ask individuals in their organisations for the data on individual characteristics which feature in these questions so we do not anticipate that it will be too onerous for broadcasters to report this data. It is our understanding through discussion with broadcasters that reporting this cross-sectional data will not represent a significant challenge for many of the larger broadcasters.

- 4.54 We consider the data points selected will allow us to get a better understanding of the representation of groups at the greatest risk of marginalisation within broadcasting.
- 4.55 We understand that for smaller broadcasters the numbers within these categories may be small, so to protect personal data we are likely to aggregate these characteristics across the industry when reporting.
- 4.56 We will consider expanding the number of cross-sectional data points we collect and report on in the future, once we have assessed how well this new section works.

New questions

[Voluntary question 1] Race and ethnicity X socio-economic background

- Black/East Asian/Mixed/Other ethnic background/South Asian/White X lower socio-economic
- Black/East Asian/Mixed/Other ethnic background/South Asian/White X intermediate
- Black/East Asian/Mixed/Other ethnic background/South Asian/White X professional

[Voluntary question 2] Race and ethnicity X disability

- Black X has a long term illness, condition or impairment
- Black X does not have a long term illness, condition or impairment
- East Asian X has a long term illness, condition or impairment
- East Asian X does not have a long term illness, condition or impairment
- Mixed ethnic background X has a long term illness, condition or impairment
- Mixed ethnic background X does not have a long term illness, condition or impairment
- Other ethnic background X has a long term illness, condition or impairment
- Other ethnic background X does not have a long term illness, condition or impairment
- South Asia X has a long term illness, condition or impairment
- South Asian X does not have a long term illness, condition or impairment
- White X has a long term illness, condition or impairment
- White X does not have a long term illness, condition or impairment

[Voluntary question 3] Race and ethnicity X sex

- Black X woman
- Black X Man
- East Asian X Woman
- East Asian X Man
- Mixed ethnic background X Woman
- Mixed ethnic background X Man
- Other ethnic background X Woman
- Other ethnic background X Man
- South Asian x Woman
- South Asian X Man
- White X Woman
- White X Man

[Voluntary question 4] Disability x socio-economic background

- Has/does not have a long term illness, condition or impairment X lower socio-economic
- Has/does not have a long term illness, condition or impairment X intermediate
- Has/does not have a long term illness, condition or impairment X professional

Nations and regions data

In the CFI we asked whether we should begin to collect diversity data specific to the regions and nations in which broadcasters operate. We asked for input on how this data should be collected and how we should benchmark it.

Cfi responses

- 4.57 Thirteen respondents³⁴, said that Ofcom should proceed with collecting diversity data in relation to nations and regions. Most respondents holding this view suggested that this information should be collected using both office location and home postcode data. Several respondents recommended only collecting the first three digits of postcodes to avoid breaches in data protection laws.
- 4.58 One respondent³⁵ said that that we should not start collecting diversity data in relation to nations and regions.

Additional rationale for changes

- 4.59 As the industry's EDI practice matures, so should the benchmarks we use to track progress. There have been calls from governments³⁶ and researchers³⁷ to better understand how representative the large broadcasters' workforces are at a national and regional level.
- 4.60 Ofcom's reports can be used as a tool and data source for broadcasters to better understand their progress and we think having an accurate understanding of whether they are representative of the areas in which they are based is an important part of this.
- 4.61 We have decided to ask broadcasters to collect information by employee home postcode (aggregated into nations/regions) rather than office hub. This will future proof the collection process as we recognise that employees work in an increasingly flexible way, with some employees reporting to multiple hubs and others working predominantly at home. Collecting data in this way will still allow us to assess whether broadcaster workforces are representative of the areas from which they draw staff.
- 4.62 This request creates significant work for broadcasters. We have, therefore, decided only to request information in this way for the three mandatory characteristics – sex, race and ethnicity, and disability – and the question on socio-economic background relating to parental occupation at 14. It is our ambition to expand the data collection to all characteristics when broadcasters have had an opportunity to put in place effective processes for collecting data in this way.

³⁴ including the Advisory Committee for Scotland, the BBC, BT Sport, Channel 4, Directors UK, the Film and TV Charity, ITV, S4C, the Scottish Government, STV, Share My Telly Job and the Writers' Guild of Great Britain.

³⁵ An individual from the general public.

³⁶ For example, see the Scottish Government's [response to Ofcom's proposed plan of work 2022/23](#).

³⁷ Page 27, [Beyond Black to Front](#), Lenny Henry Centre.

- 4.63 We want to ensure that the creative economy is thriving across the UK and believe that broadcasters need to be utilising diverse talent in every region and nation to achieve this. This data will be used to help identify where broadcasters' workforces are not representative of the available workforce in a particular region or nation and may help broadcasters assess how to tackle the skills shortages they face.
- 4.64 We anticipate that this data will also be used to enable broadcasters to set more ambitious targets for themselves in the future in particular areas.

New request

[Voluntary] Provide diversity workforce data on sex, race and ethnicity, disability and socio-economic background (parental occupation at 14) by nation and region.

Employees should be grouped into:

- *Scotland*
- *Wales*
- *Northern Ireland and*
- *North East England*
- *North West England*
- *Yorkshire and the Humber*
- *East Midlands,*
- *West Midlands,*
- *East of England*
- *South East England*
- *South West England*
- *London*

We will ask broadcasters to collect the data by employee postcode, rather than by office location. We ask that broadcasters aggregate the data into the nations and regions provided before reporting to us. Ofcom will provide a list of which postcodes sit within which nation or region. The division of regions is taken from the Government Offices for the English Regions.

Management data

In the Cfl we stated that we were considering how we could re-evaluate the groupings used for job levels and titles to gain more transparency and better understanding of seniority and influence within the broadcasters' organisations.

Cfl responses

- 4.65 Five respondents³⁸ suggested that changes could be made to the way we ask broadcasters for information on management experience and promotions in the workforce questionnaire. The Film and TV Charity and the Writers' Guild of Great Britain argued that the management categories used in the current workforce questionnaire are too broad and do not identify where decision-making positions reside within UK broadcasting. ITV also suggested we use the pay gap quartiles to standardise both the measure of seniority in our reporting and definitions of seniority within the broadcasting industry.
- 4.66 Four respondents³⁹ said that no changes should be made to the way we ask for information on management experience and promotions.

Additional rationale for changes

- 4.67 We consider there is value in better understanding the diversity of middle managers in particular as research has found that middle managers are important to the delivery and impact of EDI strategies.⁴⁰
- 4.68 We have also more clearly defined how employees should be categorised. The purpose of this section is to understand diversity across different levels of seniority – having people management responsibilities is usually a good indicator of seniority, but we recognise that in broadcasting there are often senior technical staff with a lot of influence but no direct reports. These employees should be assigned into the relevant category based on their seniority. The non-management category should be reserved for junior staff. This should give us a better picture of the distribution and progress of employees from minority groups.
- 4.69 ITV's idea of splitting seniority by pay quartiles is interesting; however, we believe there is value in understanding the breakdown of characteristics by management experience specifically for the reason set out above.

³⁸ including, the Film and TV Charity, ITV and the Writers' Guild of Great Britain

³⁹ including Channel 4, Share My Telly Job and STV

⁴⁰ World Economic Forum, [Why middle managers could be the 'lynchpin' of inclusivity in the workplace.](#)

Existing request

[Voluntary]

- *Senior managers*
- *Junior/middle managers*
- *Non-management*
- *No data*

New request

[Voluntary] For each characteristic place your employees into the relevant management/seniority category:

- *Senior managers (inc. senior leadership teams, department heads, c-suite)*
- *Middle managers (e.g., employees with hiring power and/or decision making power and/or significant line management responsibilities)*
- *Junior managers (e.g., employees with limited hiring power and/or some decision-making responsibilities and/or some line management responsibilities)*
- *Non-managers (this should only include junior members of staff, senior or influential employees without management responsibilities should be assigned one of the other categories based on their other responsibilities and status.)*
- *No data*

Job role groups

In the Cfl we asked for views on how we could change these to better reflect the realities of the job types and functions in broadcasting.

Cfl responses

- 4.70 Five respondents⁴¹ suggested that changes should be made to the job role groups we use in the workforce questionnaire.
- 4.71 The Advisory Committee for Scotland said that job role groupings alone cannot fully inform management experience and promotions and suggested that additional questions on the department of work and its size would provide deeper insights. The Film and TV Charity and the Writers' Guild of Great Britain suggested that the current job role groupings do not identify the decision-making positions and gatekeepers within the broadcasters' structure. The Film and TV Charity recommended that Ofcom should "identify the key job roles that concentrate the decision-making power in broadcasting, then look at the diversity of the job holders in these positions and the methods of access to these positions". Similarly, the Writers' Guild of Great Britain stated that job role types should be expanded, and

⁴¹ Including the Advisory Committee for Scotland, the Film and TV Charity and the Writers' Guild of Great Britain

questions should be included into the workforce questionnaire to identify the number and profiles of those holding decision-making positions.

- 4.72 Four respondents⁴² recommended that no changes were needed to the job role groups used in the workforce questionnaire.
- 4.73 It was raised in consultation with broadcasters that the current job role groupings did not always map easily onto their businesses. Broadcasters also mentioned they could benefit from some additional guidance as to how to use the groupings.

Additional rationale for changes

- 4.74 We have renamed the categories to give a clearer understanding of what is meant by each group. We consulted with broadcasters on the new list to ensure that the groups mapped more effectively onto their organisational structure.
- 4.75 To date we have provided radio and TV with separate job groupings. These groups were actually very similar and so we have decided to use the same list for both sectors and reduce the administrative burden. We provided the largest radio broadcasters with the opportunity to feed back on the job roles to ensure they aligned with their organisational structures.
- 4.76 The redesign of the categories goes some way to addressing suggestions raised by The Film and TV Charity and the Writers' Guild of Great Britain in identifying those in the industry with key decision-making power. Our view is that the 'commissioning and programming roles' category represents a significant concentration of influence. We could have broken the categories down further to achieve this objective, but we felt it would represent too great a burden for the broadcasters and we want to encourage them to provide data in this area, which they may not do if the process is overly onerous.
- 4.77 Ofcom uses this data to highlight where there is underrepresentation of groups in certain job functions. We know that a lack of diversity in creative and commissioning roles has a direct impact on the type of stories that make it to air and the representation and portrayal of those featured in the content served up to audiences, but we also understand diversity across all of job roles. We need to understand if people with certain characteristics are falling into particular roles and are underrepresented in other roles.

⁴² including Channel 4 and STV.

Existing request

[Voluntary]

TV

- *Broadcast management*
- *Creative and content role*
- *Journalism role*
- *On screen talent role*
- *Business management and administration*
- *Organisational, technical, engineering and data analytics role*
- *Sales and marketing*

Radio

- *Programmes / programming role*
- *Journalism and news role*
- *Technical / engineering role*
- *Marketing / press / PR role*
- *Support functions / admin role*

New request

[Voluntary] For each characteristic place your employees into the relevant job function:

TV and radio

- *Commissioning and programming roles (eg commissioning editors, channel controllers, programming managers)*
- *Creative and production roles (e.g producer/directors, exec producers, editors, researchers, production managers, camera operators, sound engineers)*
- *Journalism and news roles (e.g journalism researchers, news multimedia producers)*
- *On-screen/on-air talent (e.g presenters, news reporters)*
- *Technical and engineering roles (e.g transmission operators, studio managers, broadcast engineer, data analyst)*
- *Operational and administrative roles (e.g legal, accounting, HR)*
- *Commercial and communications roles (e.g. advertising sales, marketing, distribution, product development)*

5. How broadcasters should implement these changes

Below are some details on how we would suggest broadcasters collect and report data based on the changes we have made. We will provide more detailed guidance on how to fill out the questionnaire when we have finalised the online reporting tool.

From 2023 the questionnaire will be distributed online, improving functionality and streamlining the data collection process. More details on this will be announced at the end of 2022.

Collecting employee data

- 5.1 We encourage broadcasters to allow employees to respond to questions about their identities using free text boxes to help avoid the use of 'other' categories. We will provide new user guidance alongside the new questionnaire to help broadcasters complete the questions.

Providing limited data

- 5.2 If a broadcaster does not collect detailed data on ethnic background, they will be able to aggregate data and input the total number of employees who sit within the sub-headings in bold in the race and ethnicity question table included above. We expect that only the smaller broadcasters will need to use this function.
- 5.3 For question 2 in the disability category, we believe that the existing question broadly maps onto the new options provided. We understand that broadcasters cannot change their data collection methods instantly, so we would encourage them to map their data to these new options as best they can and amend their own data collection to reflect this new approach when they can. For broadcasters who do not collect any information on specific types of impairment or condition we will provide an option for them to provide us with data on broader sub-headings that better reflect the way in which Ofcom previously collected this data. Broadcasters will be able to fill in the sub-categories in bold in the disability question table included above. However, we would encourage broadcasters to change their own data collection to collect information about specific impairments and conditions so they can increase understanding of the barriers their employees may face.
- 5.4 Data collection on socio-economic background is voluntary and we know that a large number of broadcasters do not collect this data. We understand that different broadcasters are at different stages of the EDI journey, but we strongly encourage all broadcasters to collect data on socio-economic background. Research shows that the question on parental occupation age 14 has the highest disclosure rates and is a robust

indicator of socio-economic background,⁴³ we would suggest that if broadcasters do not yet feel able to ask all questions, they begin with question 1.

- 5.5 Regarding the cross-sectional data request, we recognise that not all broadcasters collect data on socio-economic background; we would encourage those broadcasters to fill out any part of this section they have data for.

Providing aggregated data

- 5.6 Ofcom recognises that some broadcasters may wish to collect data on some characteristics at a more detailed level than we ask for it, we would encourage broadcasters to collect as much data as they deem useful and appropriate. When reporting to Ofcom broadcasters should then aggregate their data into the categories provided.

Providing personal data

- 5.7 Broadcasters will not be asked to share postcode data with Ofcom when filling in the nations and regions data requests; they will be required to aggregate their data into the nations or regions requested before reporting.

⁴³ Social Mobility Commission, [Simplifying how employers measure socio-economic background: An accompanying report to new guidance](#), Updated 21 May 2021