Diversity and equal opportunities in television

In-focus report on ten major broadcasters
## Contents

**Section**

1. Introduction 1
2. How diverse is the BBC? 3
3. How diverse is Channel 4? 19
4. How diverse is ITV? 32
5. How diverse is Sky? 46
6. How diverse is Viacom? 61
7. How diverse are the other five major broadcasters? 74
1. Introduction

1.1 This report provides more in-depth data and analysis across each of ten major broadcasters. Sections 2 to 6 report on the main five broadcasters (BBC, ITV, Channel 4, Sky and Viacom, which is the owner of Channel 5), each of which has over 750 employees. These sections should be read in conjunction with the main report. Section 7 reports on the remaining five broadcasters that each have over 500 employees (STV, Turner, Discovery, Perform Investment Ltd and QVC).

1.2 For each of the ten broadcasters we provide an overview of the six protected characteristics for which we collected data, showing profiles for all UK employees across each broadcaster. The infographics in purple show profiles for gender, racial group and disability, for which data provision was mandatory. The infographics in blue show profiles for age, sexual orientation and religion or belief, for which provision was voluntary. This is also the first year we have requested that broadcasters voluntarily submit data for social mobility. Many broadcasters have either not yet begun collecting this data or have only just started, so robust analysis of the UK industry in terms of social mobility is not currently possible.

1.3 Though broadcasters were not required to provide the information that was requested on a voluntary basis, we consider these to be equally important characteristics that should be monitored, to assess effectively how well equal opportunities are being promoted across the industry. As was the case last year, we once again made it clear in our information request that, to provide context and transparency, we would continue to publish information on who did and didn’t provide the data requested. Along with asking broadcasters to list new arrangements and initiatives, this year, for the first time, we have requested that the five main broadcasters evaluate their ongoing initiatives in terms of how they are progressing and their effectiveness in improving specific representation.

1.4 For each broadcaster, we look at the individual characteristics in turn and, where possible, break them down into the following subgroups:

- Job level: senior managers, middle/junior managers and non-managers;
- Job role: broadcast management, business management and administrative, technical engineering and data analytics, sales and marketing, creative and content production, journalism, and on-screen talent;
- Joiners: those who joined the organisation across the period\(^1\);
- Leavers: those who left the organisation across the period; and
- Trained: those who received training (related to developing in their role) across the period;
- Promoted: those who were promoted across the period.

\(^1\) April 2018 – March 2019
1.5 We also cover in-depth the various initiatives and strategies each broadcaster has implemented to tackle under-representation by characteristic, covering such areas as:

- nations and regions;
- flexible working, parents and carers;
- recruitment, partnerships and training; and
- encouraging social mobility/social and economic diversity.

1.6 We have also reported the gender pay gap of each broadcaster. For consistency, we have used the figures each submitted to the Gender Pay Gap Service for its 2018/19 report, although some broadcasters may have made a subsequent submission to it and/or published more recent figures.

1.7 As part of Ofcom’s commitment to promoting diversity and equal opportunities in the broadcasting sector, we have, this year, also asked the main five broadcasters to provide us with information on how they have been evaluating progress on the ongoing diversity initiatives they shared with us in last year’s report or activities implemented and completed in the last year. We also sought detail on new initiatives that the broadcasters have implemented.

1.8 This year, broadcasters’ activities that relate to on-screen work and the wider production sector will be reflected in a new freelancer report.

---

2 ITV is required to submit to the gender pay gap service separate information for four different ITV companies. Turner is required to submit separate information for two different companies. For each broadcaster, reported pay gap figures therefore reflect analysis of the combined employee figures of their respective companies.
2. How diverse is the BBC?\(^3\)\(^4\)

Figure 1: Job level and role employee profiles for BBC UK Public Television Services

2.1 The BBC’s Diversity and Inclusion strategy and targets run across all the BBC services, whether on or off-screen. However, our report focuses on the diversity and inclusion work that has supported those BBC employees working on, or in relation to, television in the UK Public Services over the period April 2018 to March 2019.

2.2 In our 2018 report we referenced several BBC schemes aimed at promoting equal opportunities. The BBC informed us that its plan for 2018/19 was to continue progress against its 2020 targets and take forward its Diversity and Inclusion Strategy, published in 2016, looking forward to 2020. The BBC also publishes an annual Equality Information Report and diversity information as part of its Group Annual Report and Ofcom will be reviewing the BBC public purpose \(^4\) as part of its wider review of BBC performance in its second annual report on the BBC later this year.

2.3 Beyond the BBC’s 2020 targets and strategy, towards which it continues to work, the BBC published, over the last year, five separate reports from diversity workstreams, which reviewed the culture and progression of those from diverse backgrounds at the BBC. A member of the executive committee or a senior leader sponsored each review and 128 recommendations were developed overall. The BBC has told us that 50% of these recommendations have now been completed and 48% are in progress. The progress of this work is overseen by the executive committee and BBC Board on a regular basis. Given how

---

\(^3\) The data provided in the BBC submission is for all employees connected with the provision of TV content for the BBC’s UK Public Television Services. This includes all of the BBC’s Content Division but parts of four other BBC divisions, i.e. News & Current Affairs (i.e. TV news), Radio & Education (i.e. children’s TV), English Regions, and Nations & Regions. The data also covers employees engaged in group functions for the BBC, e.g. human resources, finance, policy, etc. This comprises two BBC Divisions – the Deputy Director General’s Group and Corporate, Policy and External Affairs. The group functions of the BBC support not only its work on TV but also its other functions (UK radio and online services, the World Service, and the BBC’s commercial activities).

\(^4\) Senior Management in this report covers BBC employees at Grade E or above.

\(^5\) This is: “Reflecting, representing and serving the diverse communities of all of the United Kingdom’s nations and regions and, in doing so, support the creative economy across the United Kingdom.”
close we are to 2020, these steps will prove crucial in advancing both representation and better inclusion.

2.4 The BBC has told us that, over the last six months, it has run a number of sessions aimed at connecting better its various diversity networks with the business, as well as raising awareness of policies, processes, sharing insights and helping in communicating better its progress to members. The BBC hosted its first AGM for its diversity networks, in which an increase in its financial commitment to its networks was made.

Disability

Figure 2: Disability profile of BBC UK Public Television Services employees

2.5 There has been little to no change in the representation of disabled people at the BBC, or across the industry, year on year. As was the case in 2017/18, disabled people are under-represented across the UK-based industry, at 6%, compared to the UK population aged 16 to 64, at 18%\(^6\). Representation of disabled people at the BBC is at 10%, with 9% of its senior management self-defining as disabled, 10% of its middle/junior management and 11% of those in non-management roles. By job role, the highest proportion of disabled employees is in broadcast management (12%) and sales and marketing (12%), whereas the lowest is in on-screen talent at 6% this year.

2.6 The proportion of those who completed training who self-define as disabled (10%) is in line with the profile of all employees. Of those employees promoted, 12% said they were disabled.

2.7 Since 2017 there has been no change in terms of the overall proportion of employees for which data is not collected (still at 5%). However, there have been some improvements in reporting by category – the ‘not collected’ figure has fallen significantly for joiners from

---

\(^6\) ONS Labour market statistics A08: Labour market status of disabled people (Average of Apr-Jun18, Jul-Sep18, Oct-Dec18, Jan-Mar19). Proportion of all 16-64 who are ‘Harmonised Standard Definition Disabled’ (18%).
10% last year to only 2% this year. This is a positive sign for the future and we hope that it signals a marked shift towards increasing staff disclosure of disability at the BBC.

2.8 Last year, we reported that the BBC had committed to conducting a review of its career progression and culture for disabled employees so that it could understand better their experiences at the BBC and identify how any barriers can be removed. This initiative launched in April 2018, sponsored by Anne Bulford, Deputy Director-General and involved feedback from over 140 employees. The findings of the review and subsequent recommendations were published by the BBC in its publication, Report on career progression and culture for disabled staff at the BBC. The report includes several recommendations, now agreed by the BBC’s executive board, and include:

- increasing the BBC’s target for disability in its workforce from 8% in 2020 to 12% in 2022;
- gaining a better understanding of its workforce through asking supplementary questions in its staff census;
- including disabled employees in all development and leadership programmes;
- ensuring recruitment processes and trainee and apprenticeship schemes provide specific support for disabled applicants, which is made clear when people apply for roles;
- introducing a centralised ‘BBC Passport’ to inform managers about the support each person needs; and
- mandatory disability awareness training for all team managers.

2.9 Following on from this, the BBC has introduced compulsory Disability Confident training for all its employees (reporting a completion rate of 78.4%) and has received Disability Confident Employer accreditation, moving it to the second of three levels in the scheme. The BBC’s disability confidence course covers key concepts of disability equality, including behaviours and responsibilities under equality law, and illustrates best practices to promote a culture of disability confidence and inclusion among all staff. It also has a comprehensive Access Service, which arranges reasonable adjustments for disabled candidates and employees.

2.10 BBC Ability, the broadcaster’s disability network, continues to provide support and a collective voice for disabled staff, and has played its role in helping the BBC become Disability Confident.

2.11 The BBC has continued to run several other initiatives targeting a relatively small number of employees at different levels of progression, such as its employee development programmes, which include Creative Access Internships and Extend. Through these initiatives, 10% of places on all of the BBC’s training schemes are ring-fenced for disabled people.

---

7 The Department for Work & Pensions Disability Confident scheme helps employers to recruit and retain disabled people and those with health conditions. There are three levels of accreditation. Disability Confident Employer is level 2.
2.12 Elev8 is a BBC development and mentoring programme that was launched in 2014 and aims to inspire, help develop potential and overcome barriers to progression for colleagues with a disability. The programme offers 50 places to colleagues and runs for 12 months. The BBC has evaluated this ongoing initiative before, during and after each annual cycle, and has relied mainly on feedback from mentors/mentees, service providers, line managers and facilitators. The BBC has found that providing the relevant support and guidance for colleagues to progress their careers has been central to meeting its aim, with 35% of scheme participants having expressed an increased confidence in conducting open and honest conversations with managers and seeking career opportunities. Greater visibility of, and access to, senior leaders, together with opportunities for people who have participated in the scheme are outcomes that have become the main measure by which the BBC evaluates the scheme’s success. As part of its post-2020 diversity and inclusion strategy, which will provide an opportunity for the BBC to consider the potential skillsets and development needs for the organisation, the BBC plans to carry out an in-depth review of this initiative.

2.13 The BBC also evaluated its Fast-Tracked Disabled Presenters initiative, which was launched in 2016 and aimed to train and place disabled presenters across its flagship brands and events. The initiative ran for two years and the BBC has told us that it keeps track of appearances and provides ongoing mentoring to the presenters via a relevant commissioner. Its Diversity Lead in Content also maintains contact with their agents and with commissioners to ensure that the presenters are considered for all relevant opportunities.

2.14 The BBC has not provided or published any other updates on the progress of its various initiatives or recommendations. We would like to see these, as we are particularly keen to know how broadcasters track their initiatives as part of their assessments. We are, however, pleased to hear of an update for the above-mentioned BBC passport scheme, which will be launched on 3 December 2019 to coincide with the International Day of Disabled People.
Racial group

Figure 3: Racial group profile of BBC UK Public Television Services employees

2.15 Employees from minority ethnic backgrounds make-up 13% of employees, which is in line with the UK workforce average of just over 12% but below the BBC’s 2020 target of 15%. This overall figure is the same as last year and, although there is a slight increase at middle/junior management level (15% compared to 13% last year), representation at senior management level remains low, at 9% (8% in 2017).

2.16 As was the case last year, employees from minority ethnic backgrounds remain under-represented across all job roles within the BBC, except for business management and administration (17%), and technical, engineering and data analytics (14%).

2.17 This year the proportion of joiners from minority ethnic backgrounds has increased to 20% (from 17% last year) and there has been no change in the proportion who were promoted (15%). However, the proportion of minority ethnic employees leaving the BBC increased by 4% from 16% of leavers in 2017/18 to 20% in 2018/19. The proportion of those who completed training is 13% this year (12% last year).

2.18 The BBC recognises that it needs to do more to increase the number of minority ethnic employees in order to meet its 2020 target of 15% workforce. Due also to the high proportion of BBC employees based in London, we reiterate what we said last year: the BBC should consider the national labour force percentages as the minimum it should be reaching overall, as minority ethnic group representation is much higher in London (and other major cities). In its latest annual report, the BBC divisional breakdowns still show that the nations and regions have a lower proportion of employees from minority ethnic backgrounds, as may be expected, but other teams, with more employees based in major

---


9 pp: percentage points
cities including London, are not reaching the higher proportions of employees from minority ethnic backgrounds we may expect from those populations.

2.19 Last year we reported that the BBC had published a plan to address the under-representation of minority ethnic employees at the BBC in its report, **BAME Career Progression and Culture**. The report made recommendations based on five areas of focus to improve minority ethnic diversity, including a BBC commitment to having at least two members from a minority ethnic background on the executive committee and Divisional Senior Leadership Teams by 2020, for shortlists to include at least one person from an ethnic minority background, and for better representation of people from minority ethnic backgrounds across interview panels and on development and leadership programmes. It also stated that implementation of these was due to begin in June 2018.

2.20 Of the twenty full recommendations identified in the report, the BBC has told us that 40% have been completed and 60% are in progress. Further details of steps and implementation over the last year include:

- the BBC’s Diversity “Statement of Intent” now embedded within its Code of Conduct;
- the BBC having appointed Gautam Rangarajan as Director of Strategy to its Executive Board;
- unconscious bias training having been mandated across the business, with high completion rates;
- mandatory inclusive culture training having been launched for all staff;
- having shortlists include at least one person from a minority ethnic background;
- 31% of the BBC’s apprenticeship intake in the last year having been from minority ethnic groups;
- the BBC having launched new leadership development programmes, with combined minority ethnic representation of 16%; and
- all team managers applying for roles now having to provide evidence of contribution towards championing diversity and inclusion.

2.21 The BBC’s Clore Leadership Programme has supported seven Clore Fellows and 12 staff on Clore Leadership short courses. It is aimed at addressing minority ethnic and disabled employees’ representation at senior leadership level at the BBC. Running for 12 months, it aims to increase successful delegates’ participation in the leadership of arts, culture and broadcast industry; is open to all disabled and ethnic minority employees in grades D to E; and provides a number of development opportunities.

2.22 The BBC also cites initiatives it has in place to promote opportunities for people from minority ethnic backgrounds, details of which follow.

2.23 The BBC continues to deliver its RISE mentoring and development programme aiming to provide people from minority ethnic backgrounds in middle grades with a senior level mentor and formal career development training. Launched in 2015, this initiative has been reviewed annually, to ensure it remains fit for purpose and provides the relevant support and guidance for participants. The BBC has evaluated it in a very similar way to its Elev8
initiative (see Disability, above). Participants’ feedback on this initiative has found that 60% of them reported an increase in confidence and in their ability to progress their careers, most also applying for a new opportunity in the BBC, within the first 3 months of completing the 12-month course. As with its Elev8 initiative, the BBC plans to carry out an in-depth review of RISE as part of its post-2020 diversity and inclusion strategy.

2.24 The BBC’s Commissioner Development Programme, which was launched in 2014 and focuses on providing opportunities to people from a minority ethnic background and people and/or with a disability to train as commissioners of BBC content, is currently recruiting for its third intake. The BBC has evaluated the success of this initiative through monitoring progress into commissioning roles across the industry, together training course evaluations, candidate and line manager feedback and regular process reviews. ScreenSkills and the Creative Diversity Network have also carried out with independent reviews of the initiative.

2.25 The BBC has found this initiative to be extremely successful, bring a wider range of voices, ideas and perspective to commissioning teams across the organisation, with participants having secured commissioning roles and forged relationships with small and diverse independent producers, thereby championing a fresh wave of new and diverse talent. We are encouraged by the initiatives’ reported success and the BBC’s tracking of its outcomes and progress. Since evaluating the scheme, the BBC has adapted the length of training to suit the progress made by participants.

2.26 The BBC Asian Network’s Big Comedy Night seeks to promote minority ethnic talent and reach wider audiences through its availability on BBC iPlayer.

2.27 In its Statutory Gender Pay Gap Report 2019, the BBC reported a Black, Asian and minority ethnic median pay gap of -1.1% and a mean pay gap of 3.2%. While the median pay gap is the same as last year, the mean pay gap is down, from 4%. It is positive that the BBC publish this figure and we encourage all broadcasters to publish an ethnicity pay gap alongside annual pay reporting.

Nations and regions

2.28 BBC Scotland is working in partnership with Scotland Boost Employability, a charity providing industry-led broadcast training. Their courses enable participants to compete for entry-level work in the industry and to develop valuable life skills. As well as the creative industries, the skills are also transferrable to a range of workplace settings. The courses are for people who have a passion for the creative industries and who are unemployed. As a result of this partnership, the BBC has employed diverse talent who have gone on to work on its new Scotland channel and across show such as the flagship weeknight shot, ‘The Nine’.

2.29 Earlier this year, the BBC launched a new youth panel, BBC Scotland NEXT, which saw thirty young people selected from over two hundred applicants, with a 50:50 gender split and from across a wide geographical spread across Scotland. Over a third of the panel are drawn from C2DE backgrounds and aim to reach beyond only those seeking to work in the media sector.
2.30 The panel is aimed at helping BBC Scotland understand young audiences and will feed into creative development, ideas and process. The panel will work with BBC staff and services to develop findings and report with recommendations on how BBC can engage more with young people.

2.31 The BBC launched MentorUp, which is under-30s reverse mentoring scheme aimed at placing a group of young employees at BBC Scotland as mentors to senior staff and/or members of Scotland’s Executive Board for a period of twelve months. The objectives of the scheme are to empower younger employees in decision-making for younger audiences, sharing of experience and challenge between senior leaders and younger employees, driving cultural change by enhancing collaboration opportunities and helping senior leaders understand the viewing habits of younger audiences.

2.32 BBC Wales has run a mentoring scheme for all employees since January 2018 which is open to anyone working for the BBC across all of Wales and those working for departments that are not formally part of BBC Wales as a division, e.g. Finance Central, BBC Studios, D&E team.

Gender

Figure 4: Gender profile of BBC UK Public Television Services employees, by job level

<table>
<thead>
<tr>
<th>Employees</th>
<th>All UK-based employees</th>
<th>Senior mgt.</th>
<th>Mid/Junior mgt.</th>
<th>Non-mgt.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>56%</td>
<td>57%</td>
<td>58%</td>
<td>48%</td>
</tr>
<tr>
<td>Female</td>
<td>44%</td>
<td>43%</td>
<td>42%</td>
<td>52%</td>
</tr>
</tbody>
</table>

2.33 Overall, BBC employees are 56% male (55% in 2017/18), and they are increasingly likely to be male the more senior their position. As was the case last year, almost three-fifths of the BBC senior management and middle/junior level management employees are male (58%). This contrasts with non-management positions which are 52% female (53% in 2017/18).

2.34 As was the case last year, close to a third (29%) of the roles in the BBC are defined as being within journalism, and 7% are within creative and content production. Male employees continue to hold just over half of the roles in journalism (52%), whilst employees in creative and content production roles are more likely to be female (53% vs. 54% last year). Women remain over-represented in broadcast management (78% vs. 80% last year), business management/administration (63% vs. 64% last year) and sales/marketing roles.
In-focus report on ten major broadcasters

(62% vs. 61% last year). In contrast, men are over-represented in technical, engineering and data analytics roles at 75% (76% last year).

2.35 The proportion of those who were promoted who were women was higher than the proportion of women in the organisation (47% vs. 44%). This was also the case for those who joined the organisation (51% vs. 49% last year), but the female proportion is the same as last year among leavers at 51%. The proportion of women who completed training was in line with the company profile at 44% (the same as in 2017).

2.36 The BBC has a 2020 target of ensuring half of the BBC’s senior management and on-screen roles are held by women. Given this aspiration and the fact that the BBC is still behind two of the other main five broadcasters when it comes to the proportion of women in senior management (it was the same last year), the BBC will need to accelerate progress on this front in the year ahead.

2.37 Last year, we acknowledged that the BBC’s report, Making the BBC a Great Workplace for Women, had made a number of recommendations around the working practices and recruitment of women. The steps that have been taken to address the barriers identified since these recommendations include action such as: gender-neutral adverts; female representation on all interview panels; and a focus on flexible working arrangements and opportunities under a “Fresh Look at Flex” programme. These are positive developments, but greater focus is needed if the BBC intends to meet its 2020 targets.

2.38 In addition, the BBC has development programmes in place specifically aimed at women, such as the Hilda Matheson Women into Leadership programme for women based outside of London who want to develop their careers at the BBC. Focusing on women in the middle of their career at the BBC to take charge of their own career and equip them with the skills to progress within the organisation. The BBC has told us that a hundred and fifty-five women have taken part in the programme over the last two years and that 98% of the cohort have said that they have since felt equipped to change their behaviour, with the same amount rating the programme as ‘good to excellent’. Since the programme began there have been over thirty job changes into higher graded positions from within the cohort.

2.39 The BBC reported an 8.4% mean and 7.6% median gender pay gap (as at 31 March 2018) in its submission for the Gender Pay Gap Service’s 2018/19 report. This shows an improvement on its 2017/18 figures, which were 10.7% and 9.3% respectively. However, the BBC has pledged to close the gap by 2020 and will therefore need to improve at a faster rate if it is to reach its goal.

2.40 In 2018, the BBC was listed as one of the Times Top 50 Employers for Women for the first time.

2.41 The BBC’s ‘Women at the BBC’ network continues to support the career development, wellbeing and progression of women at the broadcaster. It has an important role to play in helping to voice the changes needed for women to prosper at senior levels of the organisation.
Religion or belief

Figure 5: Religion profile of BBC UK Public Television Services employees

2.42 As was the case last year, over half (54%) of the BBC employees self-define as not religious, compared to 37% religious - most of the latter identified as Christian (29% of all employees). The BBC has not mentioned any initiatives aimed at increasing inclusion for employees of different religions at the BBC and 8% of employees continue to prefer not to disclose their religion. Of the protected characteristics in the Equality Act, Religion or Belief has the highest percentage of employees choosing not to disclose their data at the BBC.

Sexual orientation

Figure 6: Sexual orientation profile of BBC UK Public Television Services employees
As was the case last year, BBC employees who self-define as lesbian, gay or bisexual (LGB) make up 7% of BBC employees (no change in representation), with just over half of these being gay men (4%).

Last year, through its culture and progression workstream, the BBC found that data doesn’t wholly reflect the lived experiences of LGBT employees, particularly when it comes to progression and opportunities for lesbian and transgender people. We were therefore keen to see the progress that has been achieved since 2017.

Following the Culture and Career Progression review, the BBC launched the LGBTQ+ Allies programme last year and has trained three hundred people across multiple sites including Birmingham, London and Glasgow - with over two hundred and fifty people signed up as Allies. Further sessions are planned for other locations, including Belfast.

James Purnell, a Director on the executive committee, is the BBC’s champion for LGBT issues.

The broadcaster’s LGB network, BBC Pride, continues to bring together people of all sexualities working at, or in partnership with, the BBC. The network has been active in coordinating Pride events across the BBC’s main sites, including London and Northern Ireland.

**Gender reassignment**

The BBC Employee Assistance Programme, which is part of Stonewall’s diversity programme, continues with the Manager Advice team, to provide practical advice and support throughout the process, to fully equip managers who may have a colleague that is considering or progressing through gender transition. However, the BBC says it is still developing its specific guidance on gender reassignment for employees and managers and we are disappointed that this has not been issued in the last year.

The BBC launched the online managers’ guide to transgender to help managers to better support their colleagues who are transitioning at work.
Age

Figure 7: Age profile of BBC UK Public Television Services employees

2.50 As was the case last year, more than a quarter (27%, the same as in 2017) of BBC employees are aged 50 or over and the BBC employs more men than women in this age bracket, a 7pp difference (this figure is also identical to last year).

2.51 Following the youth panels mentioned in last year’s report, The BBC has recently launched a Youth Talent Network for BBC staff under the age of 30. The aim is for the network to support younger staff in developing their careers and for them to feed into the business and content of the BBC so that they can reflect the voice of younger audiences.

2.52 From the information provided, it does not appear that the BBC has considered our recommendation in last year’s in-focus report to run employee focus groups on age and progression, to complement its work on supporting the progression of senior women in the organisation.

Flexible working, parents and carers

2.53 The BBC has a flexible working policy and communicates this to staff, as well as providing it on their intranet site. It is also looking to set up a staff network for parents and carers and is liaising with workingmums.co.uk and workingdads.co.uk about the support they can provide.

2.54 Last year, the BBC said it would take forward its Culture and Career Progression review recommendations around flexible working, such as promoting a job share register across the BBC. In its 2019 Annual Report, the BBC reported that it had provided training to its team leaders on flexible working and that a new job sharing register had been launched, adding that its vacancies are now required to be advertised with the ability to work flexibly unless there is a valid business reason not to. Since then, the BBC has told us that it has launched a new flexible working policy and that 78% of all jobs are advertised flexibly. The BBC has also launched a new jobs register and run flexible working webinars.
Social mobility

2.55 For the first time this year we requested, on a voluntary basis, data from all broadcasters on the social and economic background of their workforces. Four questions were asked, comprising parental occupation when aged 14, type of school attended between 11-16, highest level of education achieved by parents when 18 and eligibility for free school meals.

2.56 For the purposes of our monitoring, the BBC was able to collect data on 60% of its employees on their socio-economic background.

2.57 From the visible data\(^{10}\) provided by the BBC, 29% of employees had parents who were in modern professional occupations when the employee was aged 14, compared to only 5% who had parents in routine manual and service occupations.

2.58 We can also see from the visible data that 52% of the BBC’s employees attended non-selective state-run or state-funded schools between the age of 11-16, compared to 24% attending schools that were selective on academic, faith or other grounds, and 14% who attended independent or fee-paying schools.

2.59 For the question we asked about the highest level of education achieved by parents of employees when they were aged 18, 49% of the BBC’s employees said that their parents had qualifications that were of degree level or equivalent or above, and 46% said that their parents held qualifications below degree level.

2.60 Last year we reported that the BBC was the first broadcaster to monitor and publish the social and economic diversity of all its employees, asking about the type of school they attended, their parents’ occupation and the highest level of education of their parents. This particular data is reported on in the BBC’s Equality Information Report.\(^{11}\)

2.61 Following this, the BBC has developed a series of recommendations to increase the social diversity of the organisation and ensure a good culture with progression opportunities for those working at the BBC, which are reported in its report, Reflecting the Socio-economic Diversity of the UK within the BBC Workforce. These include offering 70% of places on new entry schemes, apprenticeships, traineeships, internships and work experience to candidates working class and lower middle-class backgrounds as measured by parental occupation when growing up.

2.62 Across the last five years, the BBC has offered industry-designed apprenticeships and pre-employment opportunities aimed at non-graduates. As was the case last year, there remain currently nearly 350 apprentices and graduate trainees at the BBC.

\(^{10}\) Visible data are data that exclude: data ‘not disclosed’ (i.e. when an employer requests data and, in their response, the employee declines to share their individual information with it); ‘no consent’ (when the employee discloses their individual information to the employer but they (or the employer) do not consent to it being shared with Ofcom); and data ‘not collected’ (i.e. where an employer has not requested data or the employee has not responded at all to the request for data, or the employer left a section of our questionnaire blank, without explanation).

\(^{11}\) The Equality Information Report can be found on page 277.
2.63 In February 2018, the BBC announced two new initiatives to help young people from low income families compete for future apprenticeships at the BBC, one of which was based in London and Salford, and the other in Cardiff. These schemes featured in our last in-focus report. However, the BBC has provided no update or evaluation on them.

2.64 The BBC has also told us that it will be launching a new socio-economic diversity network in October. We look forward to seeing how new network-led activity will facilitate further conversations and actions around social mobility at the broadcaster.

Recruitment, Partnerships and Training

2.65 This year, in terms of progressing through the organisation, the proportion of employees who received training who were women (44%, the same as last year) or from minority ethnic backgrounds (13%, a slight increase from 12% last year), was in line with the average representation across the organisation. The proportion of LGB employees and employees who self-define as disabled who received training was also in line with the average across the organisation (7% and 10% respectively).

2.66 The BBC continues to provide a range of different training options which are compulsory for employees and managers. These include:

- unconscious bias training (with completion rates reported as 84.4% for all staff and 94.4% for leaders), disability confidence training (with a 78.4% completion rate), Stonewall diversity training and diverse recruitment training;
- a new disability awareness training package (detailed under Disability, above);
- the Elev8 development programme (detailed under Disability, above);
- the Commissioner Development programme (detailed under Racial Group, above); and
- the RISE mentoring programme (detailed under Racial Group, above).

2.67 The BBC continues to monitor diversity at all stages of recruitment and reports on processes to assess the impact of recruitment on diversity. For all schemes, applications and CVs are anonymised by the recruitment team before they are passed to the BBC hiring manager and all employees involved in recruitment are required to complete the BBC’s unconscious bias training. All interviews are conducted by at least two people, and recruitment panels must have as diverse a mix of levels of seniority, gender and background as possible. Reasonable adjustments and access services and communication support for deaf or hard of hearing candidates are also arranged.

Evaluation of broadcaster initiatives

2.68 The BBC has evaluated four of its diversity initiatives12, all of which are continuing activities from last year. Information on these evaluations has been included under the relevant characteristics, above.

---

12 The four initiatives are: Commissioner Development; Fast Tracked Disabled Presenters; RISE; and Elev8.
2.69 It is positive to see evidence of the BBC evaluating its initiatives, particularly ahead of the organisation establishing a new diversity and inclusion strategy beyond 2020. However, we consider there is value to be gained in assessing the progress of people’s career opportunities and prospects after an initiative has ended, as the BBC could have done in the case of colleagues who had completed its Fast-Track Disabled Presenters programme (see the freelancer report).

2.70 There is under-representation at the BBC for disabled and minority ethnic talent at senior levels. We note that many participants in the broadcaster’s RISE and Elev8 initiatives have subsequently reported increased confidence levels. However, significant proportions of participants in these initiatives have not (40% and 65% respectively), which may indicate that the BBC could benefit from setting targets and consider how to improve them.

2.71 The BBC’s evaluations of its ongoing initiatives appeared thorough and robust, with the broadcaster citing: pre- and post-evaluation reviews; five-year evaluation reviews that include retention rates; monthly updates; progress logs; and feedback from mentors/mentees, service providers, line managers and facilitators, as having contributed to the evaluations of its RISE and Elev8 initiatives.

2.72 We recommend that all broadcasters establish a thorough and consistent approach to evaluating their initiatives as each permits, to ensure robust findings and to allow for the effective comparison of their success as appropriate.
Key conclusions

The BBC has a set of 2020 targets for its workforce diversity and, although there is still work to be done in order to meet all these targets, progress is being made in some areas.

We welcome the fact that the BBC leads the industry on the collection of disability data and has set itself a new 2022 target of 12% representation across its workforce. We would like to see how new measures suggested for the BBC staff census might encourage staff disclosure further and promote an inclusive culture for disabled people.

We are also encouraged that the BBC is an industry leader when it comes to the collection of data on the social and economic background/social mobility of its workforce. We are keen to see how the BBC’s recent initiatives in this area will further improve key elements such as progression and inclusion for employees from low-income backgrounds.

Over the last year, there has not been a significant improvement in the representation of people from a minority ethnic background at the BBC, particularly at senior levels. Given the BBC’s 2020 targets in this area, it is discouraging to note the rise in the proportion of minority ethnic employees leaving the BBC in the last year (from 16% in 2017 to 20% in 2018). We would expect to see accelerated progress on the retention of these employees if the BBC is to reflect the true diversity of its audiences, right across the UK.

Similarly, there has not been any noticeable improvement in the representation of women at both senior levels and across the organisation. Given the BBC’s 2020 target for 50:50 representation for women at senior levels, we expect to see further progress on the current figure for women in senior management, which is 43%.

The BBC should consider whether the actions recommended in its report regarding the recruitment and working practices of women, as well as its initiatives such as the Hilda Matheson Women into Leadership programme are sufficient to ensure that more women will progress into senior management roles in the coming year.

We will be discussing with the BBC how it can further improve the overall representation and career progression for women and minority ethnic groups within its workforce.
3. How diverse is Channel 4?

3.1 Channel 4 has published annual updates on its progress on diversity and inclusion schemes and targets set out in its 360° Diversity Charter since 2015.

3.2 Since last year, Channel 4 has gone through a significant period of transition in which the broadcaster has seen significant changes in its Executive Team roles and the move towards a multi-site operation. Now in the advanced stages of implementing its ‘4 All the UK’ plan, Leeds will be home to Channel 4’s National HQ and Bristol and Glasgow will be the locations of its two new creative hubs. Consequently, the broadcaster is now developing a new diversity and inclusion strategy.

Disability

Figure 9: Disability profile of Channel 4 employees
3.3 There has been little change in the proportion of disabled employees across Channel 4 since last year. Disabled employees still make up 11% of employees, which compares to 18% across the UK population (aged 16-64)\(^\text{13}\), and there has been no significant improvement in their representation at senior management level (9% in 2017, 8% in 2018). There also remains little difference in terms of the proportion of those in non-management roles who are disabled (12%) compared to more senior roles (10% across senior/middle/junior management).

3.4 As was the case last year, across job roles, business management and administrative roles still had the highest proportion of disabled employees at 14% (16% in 2017), while in contrast this figure was 9% among those in broadcast management roles (8% in 2017).

3.5 Once again, identically to last year, while 10% of those who joined the organisation self-define as disabled, this figure was slightly lower (8%) for leavers. However, for the latter there were 12% who had no data (compared to 4% of joiners) so they still cannot be directly compared this year. The proportion of those who were promoted and self-define as disabled was in line with the company average. As was the case in 2017, Channel 4 did not provide any data on those who completed training.\(^\text{14}\)

3.6 Last year we reported on Channel 4 achieving Disability Confident Leader status. Since then, it has been developing best practice measures, including publishing a guide for the TV sector on employing disabled talent and organising a Disability Confident conference in Chester, to share insights from the broadcasting sector with other industries.

3.7 Channel 4’s disability network ‘4Purple’ has hosted sessions to improve understanding of different disabilities, including sessions around visual impairment and dyslexia, and the broadcaster marked last year’s International Day for Persons with Disabilities and the #PurpleLightUp campaign, which celebrates the economic contribution made by disabled people. 2018 also saw the first ever live signing of Channel 4 News, as well as an ad-funded short film “I Don’t Work Properly”, which featured The Last Leg’s Adam Hills and highlighted the value of disabled employees and, this year, Channel 4 will publish its disability pay gap for the first time.

3.8 It has continued to deliver a package of work on mental health that cuts across its programming, supply chain and its workforce, by:

- developing a mental health action plan, as a result of its re-signing the Time to Change Employer Pledge that it reported last year;
- continuing to train Mental Health First Aiders, to which it committed last year. 10 more employees have been trained, bringing the total up to 90, all of whom are part of the broadcasters 4Mind employee network and now make up over 10% of Channel 4’s staff;

---

\(^{13}\) ONS Labour market statistics A08: Labour market status of disabled people (Average of Apr-Jun18, Jul-Sep18, Oct-Dec18, Jan-Mar19). Proportion of all 16-64 who are ‘Harmonised Standard Definition Disabled’

\(^{14}\) Due to system restrictions Channel 4 does not currently collect any information on the breakdown of employees who have been trained.
• 4Mind having a designated space on Channel 4’s intranet, for sharing information and resources, and organising talks and workshops, to kick start staff conversations around mental health, in order to educate, break down stigma, and equip employees to feel confident talking about mental health; and
• hosting a number of industry events in order to start a conversation about mental health within its supply chain and the wider industry, including an RTS event for Mental Health Awareness Week.

3.9 Channel 4 has evaluated its Spotlight on Directors initiative. Reported as a new initiative last year, having launched in 2017, its aim was to progress 40 directors who were women and/or had a disability and/or a minority ethnic background, by challenging entrenched hiring practices and promoting opportunities through director placements. Channel 4’s Creative Diversity team has continually monitored progress of directors on this initiative during their director placements, to ensure they were getting the experience agreed with the relevant production. In evaluating the process, it has found that, while this process was agreed from the outset, it might have benefited from a focus on a smaller group and a formal process of agreement of written objectives at the start of each director’s placement.

3.10 The initiative was evaluated after its first year and was continued for a second year on the basis of its success for both directors and indies. Talent was tracked over the entire period of the initiative and a brochure was produced, both to celebrate the participants’ success and to raise their industry profile and achievements. Moving forward, the initiative will give more focus to smaller groups. It also intends to track talent more meaningfully over a longer evaluation period, to improve assessment of the initiative’s impact. However, Spotlight on Directors will be working with a group of 10 female APs and producers, to grow a strong cohort of top factual directing talent in 2019. They will receive more direct training and support, including NFTS camera training and leadership training, with the initiative now aiming to even the gender balance across Channel 4’s factual shows and to respond to the findings of Cut Out of the Picture, a Directors UK study on gender inequality amongst film directors in the UK film industry.
A fifth of Channel 4 employees (19%, compared to 18% in 2017) are from a minority ethnic background, which brings them close to achieving their 20% target for minority ethnic employees across the organisation.

The proportion is still higher at non-management level (23%, compared to 21% last year) than more senior positions.

In broadcast management and those in technical, engineering and data analytics, the proportion of employees from minority ethnic backgrounds is slightly higher than the Channel 4 average at 21% and 22%, respectively.

This year, in terms of progressing through the organisation, the proportion of promoted employees who were from minority ethnic backgrounds was 18%, an improvement on last year (15%), but still below the proportion of minority ethnic employees represented across the organisation (19%).

This year, there has been a surge amongst those from minority ethnic backgrounds who joined Channel 4 (30%, compared to 19% last year). However, amongst those leaving the organisation, this figure also increased (from 24% in 2017) to 27%.

In 2018, Channel 4 published its pay gap results for those from a minority ethnic background for the first time. Although not required to publish this data, they did it in the interests of transparency and shared a mean pay gap of 19.1% and a median pay gap of 14.3%.

Channel 4’s recently appointed new Head of Inclusion & Diversity, Yasir Mirza, and Chief Human Resources Officer, Caroline Ross, have been working in partnership with Channel...
4’s BAME network, The Collective, to review the best approach to addressing progression of minority ethnic employees.

3.18 The Collective has focused on the problem of unlocking the potential of the ‘frozen middle’, i.e. middle managers who are the gateway between junior to mid-level employees and leaders in the corporation, and to nurture the progression of BAME employees into leadership roles. As we said in last year’s main report, The Collective has also been working with other ethnicity-focused employee networks from across the sector, to collaborate on improving the wider picture.

3.19 The broadcaster has established a target of 20% of Channel 4 Leaders (top 100 by pay) being from minority ethnic groups by 2023.

3.20 4Stories is a series for Channel 4, which takes three new diverse writers and three directors, and supports them, to make their first network drama. This initiative prioritises support for people from minority ethnic background and women. The deliverable is a script or production, but it also aims to launch the careers of those selected and establish them as regular talent for the channel. It has been running for over two years.

3.21 As part of the evaluation of this initiative after the first year, an independent consultant was brought in to report on the experiences of participants. Channel 4 considered this an invaluable step for honest and constructive feedback on the scheme, which fed into the approach taken for year two. Feedback was sought from writers and directors, as well as the production company involved with the scheme.

3.22 Channel 4 will be appointing an independent mentor with expertise in script development and running new talent programmes, to support people throughout the programme. An initial workshop day was held by Channel 4 as part of its support for the scheme and the broadcaster aims to continue seeking feedback from participants after the programme, as well as assessment and feedback from the independent mentor attached to it.

Nations and regions

3.23 In 2018 Channel 4 announced its ‘4 All the UK’ plan, described as ‘the biggest change in its history’. The plan is to make the broadcaster more open to people from across the UK and increase its impact in the nations and regions.

3.24 The ‘4 All the UK’ strategy is aimed at ensuring that Channel 4 serves the whole of the UK. Through increased spend, boosting regional representation, moving jobs and creating new ones, it aims to reflect the full diversity of Britain, on and off screen.

3.25 The strategy will see an increase in Channel 4’s Nations and Regions content spend, from the current quota of 35% to 50% of main channel UK commissions by 2023 (worth up to an additional £250 million over this period). This increase is aimed at benefiting all areas of the UK, as opposed to specific locations. We recognise that Channel 4 anticipates this strategy “will support up to 3,000 production jobs in the Nations and Regions economy”\(^\text{16}\). However, it may also present challenges in attracting employees from minority groups that

\(^{16}\) See: 4 all the UK.
may be less represented in populations outside of London, which Channel 4 is working hard to address in its new diversity and inclusion strategy.

3.26 Channel 4 is to open a new studio and also run a new daily show from Leeds, while Channel 4 News will also have a new hub in Leeds, operated by ITN in a new building that will include a studio from which it will regularly co-anchor.

3.27 Channel 4 has evaluated its 4Talent Pop Ups initiative, a series of events that have reached beyond the narrow pool of talent to target communities across the UK. Launched in 2015, in partnership with social enterprise, MyKindaFuture, it has aimed to level the playing field in the provision of high-quality careers advice and skills to young people from areas of high social disadvantage. Over four years, 4Talent Pop Ups have welcomed over 2600 attendees at 22 events in 18 towns and cities in the UK. Channel 4 has evaluated this initiative yearly, and at the end of the four-year period. A Social Impact Report was published by Channel 4 at each of these points. Feedback from participants was sought as a means of evaluating the initiative, as well as data on their diversity and information on what they have gone on to do.

3.28 Channel 4 regards 4Talent Pop Ups to have worked very well in the short-to-medium term, in terms of uncovering talent. The partnership with an education and outreach specialist for this programme enabled Channel 4 to reach participants beyond its networks. However, the broadcaster felt that the initiative was less successful in connecting young people with creative opportunities in their local city and this is something the broadcaster aims to address in the 2019 programme, focusing more on the methods of engagement around this initiative and seeking to empower a group of young people to design and deliver it themselves. Channel 4 aims to continue to work in partnership with organisations in the cities the initiative visits, build lasting relationships and offer longer term opportunities for participants.

Gender

Figure 11: Gender profile of Channel 4 employees, by job level

<table>
<thead>
<tr>
<th></th>
<th>Employees</th>
<th>Senior mgt.</th>
<th>Mid/Junior mgt.</th>
<th>Non-mgt.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>All UK-based employees</strong></td>
<td>943</td>
<td>52</td>
<td>305</td>
<td>586</td>
</tr>
<tr>
<td><strong>Female</strong></td>
<td>57%</td>
<td>44%</td>
<td>55%</td>
<td>59%</td>
</tr>
<tr>
<td><strong>Male</strong></td>
<td>43%</td>
<td>56%</td>
<td>45%</td>
<td>41%</td>
</tr>
</tbody>
</table>
3.29 Employees are more likely to be female overall (57%, compared to 56% in 2017), across non-management (59%) and middle/junior level management (55%). This trend remains reversed at senior management level which is male skewed at 56% (compared to 58% last year, and 64% in 2016).

3.30 Female employees are over-represented in broadcast management and business management/administrative roles (59% and 73% respectively), while men are over-represented in technical, engineering and data analytics roles at 59% (compared to 66% in 2017).

3.31 As was the case last year, in terms of progressing through the organisation, the proportion of promoted employees who were women (55%) was just below the proportion represented across the organisation (57%).

3.32 Channel 4 reported a 22.6% mean and 23.3% median gender pay gap (as at 31 March 2018) in its submission for the Gender Pay Gap Service’s 2018/19 report. This shows an improvement on its 2017/18 figures, which were 28.6% and 24.2% respectively. In June 2018, Channel 4 also announced that its mean Bonus Gap had reduced from 47.6% in 2017 to 39.4% in 2018. This was driven particularly by an increase in the number of women employed in senior positions.

3.33 In September 2018, following an internal review on improving female career progression mentioned in last year’s report, Channel 4 launched RISE, a new Women’s Development Programme that aims to boost the progression of women at senior levels. It has reached over 200 women across different levels at the organisation and has been run across three cohorts (role models, catalysts and energisers), giving women the chance to spend time together, thinking about their future career paths and opportunities for their development and progression. The initiative sought to create a network of women with diverse experiences and viewpoints, to support each other and drive change through the business and motivate them to take on ambitious roles and act as mentors. Key themes covered have included confidence, control and creating allies.

3.34 Though still in its first year, Channel 4 has carried out an evaluation of RISE, which sought to measure: attrition rates, the number of women that have become mentors/mentees, the increase in female promotions, the increase in female confidence, self-belief and resilience (through line manager feedback), the increase in the performance of line managers in leading the development of women. Feedback was sought from participants and line managers, as well as heads of departments, resulting in a white paper. The long term aim of the programme is to reduce Channel 4’s gender pay gap and achieve a 50:50 gender split among the top 100 earners by 2023.

3.35 Channel 4 felt that the initiative has worked well in the short-term and has shown cross-team collaboration to deliver a big project in a short space of time. It has also given managers a mechanism to talk about performance and reaching meaningful outcomes. Lessons taken from evaluating this initiative were to: communicate the programme wider; be clearer on the nomination process of selection; improve the management of both
3.36 Although RISE is focused on women, it has had a positive intersectional impact across other protected characteristics, particularly employees from minority ethnic backgrounds.

3.37 Channel 4’s 4Women employee network is sponsored by Executive member Sarah Rose, has 350 members and runs training sessions, talks from inspiring women and ‘Come Dine with Me’ lunches hosted by senior Channel 4 women. The group also collaborates with its HR team to influence and clarify policies that disproportionately impact women, such as family and flexible working policies. Members of the 4Women committee are also involved with the RISE programme.

Religion or belief

Figure 12: Religion profile of Channel 4 employees

3.38 As was the case last year, 41% percent of those promoted self-define as religious, but this figure is lower than the proportion of employees across the whole organisation (48%).

3.39 Channel 4 has a religion and belief policy in place, with which all line managers are asked to familiarise themselves.

---

17 As religion or belief is unknown for 14% of employees (not collected or not disclosed) this figure could be higher.
Sexual orientation

Figure 13: Sexual orientation profile of Channel 4 employees

3.40 Channel 4 employees who self-define as lesbian, gay or bisexual (LGB) make up 8% of the workforce (7% in 2017).

3.41 4Pride is Channel 4’s LGBT network that holds regular events, discussions, organises Pride event attendance and helps to influence positive change for LGBT employees. This year, to mark the 50th anniversary of the Stonewall riots, Channel 4’s Diversity in Advertising Award focused on LGBT representation, after research found that people from the LGBT community feature in just 3% of advertisements and these are often tokenistic or stereotypical representations.

3.42 Channel 4 has told us that it will publish its LGBT pay gap for the first time in 2019.

Gender reassignment

3.43 Over the last year Channel 4 has continued to roll out Trans Allies training for employees, with all senior leaders and Executive teams taking part, following last year’s initial cohort. The Trans Allies programme empowers straight, lesbian, gay and bisexual people to be active trans allies with the confidence, knowledge and skills to bring about positive change in workplaces and communities for all trans and non-binary people.

---

18 See news release, C4’s £1m Diversity in Advertising Award to highlight LGBT+ representation.
Diversity and equal opportunities in television: In-focus report on ten major broadcasters

Age

Figure 14: Age profile of Channel 4 employees

Similar to last year, Channel 4 employees are still amongst the youngest of the five broadcasters (only Viacom is younger), with 87% aged under 50, compared to the UK industry average of 69%. Last year 9% of all female employees at Channel 4 were aged over 50. This year that figure is 12%.

Channel 4 is committed to ensuring equality across all age groups and, as far as practicable, respecting employees’ wishes to work beyond the ‘standard’ retirement age of 65.

Flexible working, parents and carers

Channel 4’s Family Friendly policy covers a range of types of leave and entitlements and aligned its shared parental leave to its maternity and adoption leave entitlement. Mentoring and coaching schemes are offered, including parental coaching for staff taking maternity, adoption and shared parental leave.

Social mobility

Channel 4, working with the Bridge Group and LSE academic, Sam Friedman, determined that the main question, which provides insight into social mobility is parental occupation when aged 14.

Channel 4 has found that, since it carried out research in 2016, it has seen an improvement in the socio-economic diversity of its workforce. Its latest data, from October 2018, shows that the broadcaster was able to collect socio-economic background data on 72% of its employees.

From the visible data provided by Channel 4, 16% of employees had parents who were in modern professional occupations when the employee was aged 14, compared to 10% who
had parents in routine manual and service occupations. Channel 4 did not provide data on the other three questions 19.

3.50 From the broadcaster’s own data sources, we are told that the proportion of staff coming from socio-economic backgrounds defined as ‘working class’ has increased from 9% to 17%, which is an increase 8pp, and the proportion coming from all non-professional backgrounds has increased from 34% to 39%.

3.51 The broadcaster has also found the data from its recruitment system to be encouraging: 25% of candidates who applied for roles in 2018 defined themselves as ‘working class’ (9% opted to not answer); 27% of candidates who attended interviews for roles in 2018 defined themselves as ‘working class (9% opted not to answer); and 32% of candidates who were offered a role in 2018 defined themselves as ‘working class (2% opted not to answer).

3.52 This is a positive set of results in the first year of reporting. We hope to see the remaining data gap close in the next few years but are encouraged by the high rate of data collection.

3.53 The broadcaster told us that, in the last year 20, after its 2016 research into the social and economic background of people working at Channel 4, it had introduced a number of initiatives to improve the socio-economic diversity of its workforce:

- The 2018 youth outreach programme (C4 Pop-Ups) focused on the six UK cities with the highest areas of youth unemployment and deprivation providing free training and workshops to young people.
- All of Channel 4’s early career programmes are aimed at non-degree holders.
- Channel 4 covers all costs for candidates to attend its work experience programmes in London and Manchester.
- Channel 4 does not allow current employees to bring in family or friends for work experience.
- Channel 4 offers relocation support for any apprentices who need to move cities to undertake an apprenticeship.
- Channel 4 has provided unconscious bias training to all hiring managers - helping ensure people think about not recruiting in their own image.
- Employees who join Channel 4 on its Graduate Programme for Data Science complete a fully-funded Master’s degree and are paid a full-time salary.
- In 2019, Channel 4 has welcomed 12 new apprentices to the channel, from a pool of 780 applicants.

3.54 Looking forward, Channel 4 has committed to expanding its programme in 2020 to welcome 26 new apprentices, working across its offices in Leeds, London, Glasgow, Bristol and Manchester. Also, Beyond Brontës is a diverse talent initiative funded through the

---

19 These questions concerned: type of school attended between 11-16; highest level of education achieved by parents when 18; and eligibility for free school meals.
20 Channel 4 has told us that, due to the way its initiatives have been captured, not all fall within the 2018/19 reporting period.
Leeds City Region, which will support 100 young people from across West Yorkshire into careers in TV and film.

**Recruitment, Partnerships and Training**

3.55 Channel 4’s ‘Inclusive Hiring’ training programme continues and all hiring managers are also actively encouraged to attend a half-day ‘Inclusive recruitment’ workshop to upskill and build awareness of the importance of an inclusive approach to recruitment. External role vacancies are advertised on diverse platforms such as ‘Evenbreak’ and ‘Vercida’ to widen access to available opportunities.

3.56 Channel 4’s 4Talent Pop Ups (see broadcasters’ evaluation under Nations and Regions) have reached beyond the narrow pool of talent to target communities across the UK. In 2018, this initiative delivered two employability sessions, aimed at younger audiences recognised as facing the greatest employment challenges. A total of 683 young people attended Pop Ups across the country, which was the highest number to date. Of these, 55% were from backgrounds on which social mobility focusses. In addition, 19% of attendees identified as from a minority ethnic background, 19% as LGBT and 13% as disabled.

3.57 Channel 4 is also making progress on partnering with University College London, to develop two data-scientist schemes; a three-year Masters MRes in Machine Learning and Data Science, and a five-year PhD in Statistical Sciences. Of the scheme’s 12 students, three are full time employees and two of these are in senior positions.

**Evaluation of broadcaster initiatives**

3.58 Channel 4 provided evaluation reports on four of its key initiatives\(^2\), three of which are continuing activities from last year (such as 4Talent Pop Ups) and one of which was started in the last year (Channel 4’s Women’s Development Programme, RISE). Information on these evaluations has been included under the (most) relevant characteristics, above. These evaluations have been conducted on the basis of formal research in the form of HR data, surveys (providing feedback from participants, line managers, HoDs), independent consultants’ findings and talent tracking.

3.59 Channel 4’s evaluations appear thorough and robust, and ongoing assessment appears to feature heavily, which we would recommend to all broadcasters as appropriate.

---

\(^2\) The initiatives were: Spotlight on Directors; 4Talent Pop Ups; RISE; and 4Stories.
Key conclusions

Channel 4 has been going through a period of considerable change in the last year, particularly with the regional relocation of its National HQ and the adoption of a new multi-site operation. We recognise that during this period, it will have faced a unique challenge in continuing its workforce diversity programme without interruption.

We welcome the finding that Channel 4 is still leading on representation of disabled people in its workforce and hope that the initiatives on disability and mental health that Channel 4 has told us about will improve recruitment and progression of disabled people, as well as create an inclusive culture. We are fully supportive of the announcement that it will publish its first disability pay gap this year.

Although Channel 4 has not seen any significant change in its representation of employees from a minority ethnic background, there has been a positive increase in people from minority ethnic backgrounds joining Channel 4 in the last year (19% to 30%), which surpasses those leaving it. This is an encouraging sign and we support Channel 4 in its target to ensure 20% of its top 100 earners come from a minority ethnic background by 2023.

There has been a slight increase in women in senior management positions, as well as a small rise in women being promoted in the last year, despite there being slightly fewer opportunities for progression overall.

We support Channel 4’s RISE initiative, aimed at boosting the career prospects of women at the organisation and fully support its ongoing evaluation in order to create greater impact. We look forward to engaging with Channel 4 over its continuing work to achieve its target of 50:50 gender representation amongst its top 100 earners by 2023.

We also hope to see the positive impact of Channel 4’s relocation in terms of increasing the diversity of its talent pool and workforce, particularly when it comes to minority ethnic groups and representing people across a wide range of social and economic backgrounds.
4. How diverse is ITV?

Figure 15: Job level and role employee profiles for ITV

4.1 This year ITV has set itself 2022 diversity targets on gender, people from minority ethnic backgrounds, disabled people and LGBT+ people. ITV has set itself a target of 30% women on its PLC board, 50% women in its senior leadership team and 50% across ITV. For ethnicity, ITV has set a target of 10% on its PLC board, 15% of ITV’s managers and 15% across all ITV staff. ITV has also set itself a target on disability of 8% of ITV managers and all staff. There is also a target for 6.5% of all ITV staff to be represented by those identifying as LGBT+.

4.2 ITV has told us that it continues to support four employee networks that promote diversity and inclusion. These are ITV Pride, The Women’s Network, ITV Embrace (its ethnicity network) and the work-life balance network, ITV Balance.

4.3 ITV says that its senior leaders are integral to driving ITV’s diversity and inclusion commitments at the organisation and CEO Carolyn McCall continues to be its overall diversity and inclusion sponsor. With an eye on its targets, ITV plans to focus on diversity at senior levels (in particular around people from a minority ethnic background and, to a lesser extent, gender). It is acknowledged by ITV that work is still to be done in specific areas of under-representation. Last year we recommended that ITV review the under-representation of people from a minority ethnic backgrounds and, as mentioned, the broadcaster continues to seek to improve in this area in particular, especially at senior levels.

4.4 ITV is continuing to embed diversity and inclusion in its leadership and management development training. It says this will be further reinforced in the next six months with the launch of ‘Leading the ITV Way’ - a training programme which is being rolled out to all leaders and managers.

4.5 ITV has evaluated it What’s It Got to Do with You Data Campaign, which was launched in 2018 as an ongoing initiative designed to promote greater transparency around the use of colleague diversity data and therefore encourage greater levels of engagement. Disclosure
rates across ITV diversity data are reviewed on an on-going basis and the initiative has seen an increase in disclosure levels. We are encouraged by the apparent early success of ITV’s initiative and encourage all broadcasters to promote data disclosure within their organisations, which is central to tracking the success of diversity initiatives and meeting set targets.

**Disability**

Figure 16: Disability profile of ITV employees

4.6 With an increase from 2% last year, 4% of ITV’s employees self-identified as disabled (this is still the joint lowest proportion across the main five broadcasters), compared to 18% across the UK population (aged 16-64)\(^22\). As was the case last year, disabled employees remain under-represented across all job levels and job roles. The proportion of disabled employees is still highest in broadcast management at 5% (4% last year), and lowest in creative roles at 3% (1% last year).

4.7 This year the proportion of disabled people who joined the organisation is 4% (5% last year) and this figure is slightly higher than the same amount who left the organisation (3%).

4.8 The proportion of those who completed training who are disabled (4%) is slightly higher than the profile of all employees.

4.9 In the last year ITV has run a range of internal awareness events designed with a specific focus on non-visible disabilities, including ‘Lunch & Learn’ events on Dyslexia and Autism. In 2018 ITV also partnered with the BBC to deliver a pan-broadcaster event ‘A Visible Me’ - to mark the International Day of Persons with Disabilities. This has led to further cross-broadcaster collaboration to host similar events in the coming year. Last year, having reached Disability Confident status, ITV introduced measures such as guaranteed

\(^{22}\) ONS Labour market statistics [A08: Labour market status of disabled people](https://www.ons.gov.uk/peoplepopulationandcommunity/lifeevents/disability) (Average of Apr-Jun18, Jul-Sep18, Oct-Dec18, Jan-Mar19). Proportion of all 16-64 who are ‘Harmonised Standard Definition Disabled’
interviews for disabled applicants who meet the minimum job criteria. ITV has also continued to engage with Microlink around ensuring a fully supported approach to workplace adjustment. Given ITV’s ongoing commitment towards both positive action and reasonable adjustments during both recruitment and employment, it has now achieved accreditation as a Disability Confident Leader.

4.10 It is encouraging to see that ITV has set itself a range of priorities, with targets that include promotion of wellbeing and improved mental health. Its ‘Better Health’ strategy includes a goal for 10 million people to take action to improve mental or physical health by 2023. Further to this goal, ITV will be partnering with mental health organisations to launch an ITV Campaign for Mental Wellness. Although this is an audience-targeted campaign there is an internal element aimed at improving the health of its employees, so we welcome the initiative as a positive step.

4.11 ITV’s Disability Working Group continues to grow and attract the support of its employees. In 2019 the Group intends to widen its engagement by launching key aims to further attract and hear from employees who identify as disabled, to better understand what change and focus is needed at ITV and the barriers experienced.

4.12 As flagged in last year’s report ITV had signed the Time to Change Employer Pledge and has since run an internal campaign that saw employees sharing their personal Time to Change pledges. Chief Executive Carolyn McCall also signed a Time to Change pledge on World Mental Health Day 2018. ITV’s Time to Change mental health awareness initiative aims to consolidate the broadcaster’s commitment to eliminating the stigma in the workplace associated with mental health and to support better understanding of it.

4.13 No evaluation of this initiative has yet been undertaken and ITV is in discussion with MIND, with a view to it carrying out a mental health audit, which will allow the broadcaster to evaluate its policies, tools and training, and understand what additional support/tools are needed, to continue its drive for improved mental health awareness.

4.14 In addition, ITV’s internal Wellbeing Programme, Feel Good, offers a variety of activities and resources to support employees’ physical and mental health, from yoga classes and mindfulness workshops to gym sessions. Although this programme has been running for nearly two years, it has recently changed to include new provisions such as health checks and further support around resilience.

4.15 Mental health first aid training has been rolled out at ITV with a particular focus on production and news areas. ITV engaged its employees to support its agenda to tackle stigma around mental health by establishing a team of mental health champions, whose task it is to promote awareness and engagement on issues of mental health.

4.16 ITV has been working with the other main broadcasters to support the Doubling Disability initiative, the target of which is to double the amount of disabled people both on and off screen in the television industry23. There is further detail on this in our freelancer report.

23 See: Creative Diversity Network and UK Broadcasters commit to “doubling disability”.
Racial group

Figure 17: Racial group profile of ITV employees

4.17 Last year, employees from minority ethnic backgrounds were significantly under-represented at ITV at 9%. This year, the figure is 10%\(^{24}\). It is still both below the UK workforce average of 12%\(^{25}\) and for the third year running, the lowest figure amongst all the main broadcasters. Employees from a minority ethnic background are more likely to be non-management (10%, same as last year) than at a more senior level (8% across senior/middle/junior management, 7% last year).\(^{26}\)

4.18 Employees from minority ethnic backgrounds remain under-represented in all job roles except for technical, engineering and data analytics at 19% (18% last year), and in broadcast management, as well as in business management/administration, where in both areas the proportion is in line with the UK workforce average at 13%. Despite the relatively large size of the creative and content production and journalism cohort at ITV, these are still the job roles with the lowest representation of people from minority ethnic background, both still at 7% (the same as last year).

4.19 This year among those who joined the organisation, a higher proportion were from minority ethnic backgrounds (17%) than the company average (11%), but this was also the case among leavers at 12%. The figure for those who completed training this year was 15% (last year it was 12%).

4.20 The proportion of data not collected by ITV fell from 20% last year to 16% this year which is a positive move in the right direction, but there remains some distance to go.

4.21 ITV engaged the external consultancy Caerus to find out what helps and hinders colleagues from a minority ethnic background at ITV. This exercise included face-to-face focus groups

---

\(^{24}\) 16% of ITV’s workforce remains undefined so this figure could be either higher or lower.


\(^{26}\) This combines senior management with mid/junior management figures for consistency with the 2018 report.
and confidential conversations with both white and minority ethnic background employees. The focus groups and research took place over 6 months and following this research Caerus identified a number of core recommendations for ITV to consider including to:

- develop opportunities for employees from ethnic minorities;
- tackle the lack of Senior BAME role models within the business; and
- help employees always feel they can be authentic to their heritage at work.

4.22 The feedback, along with these recommendations, has been shared with the Management board and the co-chairs of ITV Embrace, and ITV is working directly with the network to implement positive actions to address the key areas identified by the research.

4.23 ITV Embrace meets monthly and its focus for 2019 is on career development. The network has organised events such as Speaking your Truth, Ronke Phillips in conversation with Scottish supermodel, actor and art curator Eunice Olumide MBE and Black History Month, which included a range of events including career-focused talks by onscreen talent including actor Sanjeev Bhasker and journalist Nina Nannar.

4.24 ITV has told us that, for the first time, it has published its ethnicity pay gap with a median gap of 7.8% and a mean gap of 9.6%. The broadcaster has also added that, although companies aren’t currently required to publish this information, it has voluntarily chosen to do this.

Nations and regions

4.25 ITV has, across its networks, regional co-chairs for key sites in Manchester and Leeds, all of whom are invited to the quarterly ITV Network Chair Meeting. ITV also states that, wherever possible, it aims to live stream employee network events for regional teams to engage with the sessions and have a conversation around the relevant topics in their location.

4.26 Through the ITV Ambassador Forum ITV colleagues are also able to discuss equal opportunities and employee engagement across the regions.
Gender

Figure 18: Gender profile of ITV employees, by job level

<table>
<thead>
<tr>
<th>Employees</th>
<th>4,208</th>
<th>160</th>
<th>732</th>
<th>3,316</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>46%</td>
<td>56%</td>
<td>49%</td>
<td>45%</td>
</tr>
<tr>
<td>Female</td>
<td>54%</td>
<td>44%</td>
<td>51%</td>
<td>55%</td>
</tr>
</tbody>
</table>

4.27 ITV’s employees continue to be more likely to be female overall (54% vs 53% last year) and across non-management (55% vs. 54% last year), and they are now more likely to be so at middle/junior management level (51%). However, countering this at senior management level is a male skew of 56%. Nevertheless, of the five main broadcasters, ITV still has the joint highest proportion of women in senior management, at 44%.

4.28 ITV defines 46% of its roles as being within creative and content production, compared to 8% within technical, engineering and data analytics. While female employees still hold just over half of these roles in creative and content production (53% vs. 51% last year), employees in technical roles remain more likely to be male (at 65%). Women are still over-represented in all the other job roles: broadcast management (60%); business management/administration (61%), sales/marketing (56%) and journalism (55%).

In the 2018 Hampton-Alexander Review, FTSE Women Leaders - Improving gender balance in FTSE Leadership, ITV is ranked sixth in the top 10 for performing companies, in terms of percentage of women on the board and in direct report roles. It is the only company from the Media and Entertainment sector to appear in the top 10.

4.29 ITV has put in place a number of initiatives to support the development of its senior female leaders, which has included providing help in building their external visibility, nominating a number of them for the WeQual Awards (created to identify and recognise female executives one level down from the management board of UK FTSE businesses) and the HERoes Awards (designed to commend those who are working to ensure the inclusion and success of women in business).

4.30 As part of its #WhatWomenWant programme, ITV hosted an event in Autumn 2018 to which its Women’s Network members were invited. This initiative celebrated brands that have empowered women through their marketing over the last 100 years and included a
programme of inspirational speakers, an exhibition on the campaigns, films and workshops that celebrated diversity and women’s empowerment.

4.31 The ITV Women’s Network continues to play a pivotal role in building confidence and capability for women across all levels of the organisation. Examples of activities it has undertaken in the last year include: a development event, ‘Shine SHOW workshop’, aimed to increase confidence; a ‘Menopause Myth Busters’ event, which was hosted by a Loose Women panel; and an event called ‘Barking Tales and Me’, which featured Harriet Dyer, who visited ITV’s Manchester offices to share her quest to tackle mental health issues through comedy.

4.32 ITV reported an 14.9% mean and 11% median gender pay gap (as at 5 April 2018), reflecting its submissions for the Gender Pay Gap Service’s 2018/19 report. This shows a welcome decrease on its 2017/18 figures, which were 16.4% and 11.9% respectively.

Religion or belief

4.33 ITV is the only one of the five main broadcasters that continues to provide no data on religion or belief. It reported last year that it was planning to start monitoring in this area. As a result of its ‘What’s It Got to Do with You Data Campaign’ to promote greater transparency around the use of colleague diversity data and to encourage greater levels of disclosure, discussed above, ITV is now collecting relevant data, but this was insufficient to share as part of its submission. Ofcom therefore looks forward to including ITV’s initial data on religion or belief in our next report.

4.34 ITV continues to raise awareness of religious festivals and religions by publishing information and guidance documents via its Manager Bulletins and the ITV Embrace Network.

27 ITV is required to submit to the gender pay gap service separate information for four different ITV companies (ITV Studios Limited, ITV Breakfast Limited, ITV Broadcasting Limited and ITV Services Limited) and its reported pay gap figures therefore reflect analysis of their combined employee figures, as published in the ITV 2018 Gender and Ethnicity Pay Gap Report.
Sexual orientation

Figure 19: Sexual orientation profile of ITV employees

4.35 Five percent of ITV’s employees self-define as lesbian, gay or bisexual (LGB). Of those leaving and joining the organisation over the period, 3% and 7% respectively, self-define as LGB. It is also positive that the proportion of employees from whom data was not collected has fallen by 4pp, to 22%.

4.36 This year, ITV Pride launched its monthly ‘Pridecasts’. On average, each of these monthly podcasts for LGBT+ employees and allies is streamed 200 times and focuses on key LGBT+ events and initiatives. It has already featured people from within the industry and elsewhere, allowing the ITV Pride Chairs to continue raising awareness of current LGBT+ issues and news.

4.37 ITV continues to participate in Pride events across London, Manchester, Leeds and Belfast, helping to raise its profile as an inclusive organisation. In 2018, ITV took part in Stonewall’s Workplace Equality Index, to measure its progress on LGBT inclusion in the workplace. In its application, ITV demonstrated work in 10 areas of employment policy and practices, and employees from across the organization completed an anonymous survey about their experiences of diversity and inclusion at work. As a result, ITV moved up 50 places in the index from its ranking 3 years ago to sit at 129 out of a total of 450 organisations that entered, in recognition of its continued internal and external engagement across LGBT+ issues and its specific focus on trans inclusion over recent years.

Gender reassignment

4.38 ITV Pride’s ‘Pridecasts’, discussed above, raise awareness of, among other things, trans issues and news. In addition, last year, following a consultation with employees and building on workshops facilitated by All About Trans, ITV introduced its Transitioning at Work Policy.
Age

Figure 20: Age profile of ITV employees

- Under 50, 82%
- Aged 50+, 18%

4.39 Eighteen percent of ITV’s employees are aged 50 or over. This is the second highest figure amongst the main five broadcasters and the BBC is the only broadcaster amongst the five to have a higher proportion of employees in this age bracket than ITV.

4.40 ITV continues with a number of initiatives it has in place to attract new young talent to ITV, such as its apprenticeship programme, which is open to applicants of any age, over two thirds of which gain permanent jobs with the broadcaster. ITV’s continued partnership with the Ideas Foundation has involved working in schools across London, Leeds and Manchester, and has supported diverse groups of students to come up with a campaign to promote ITV’s entry careers opportunities and attract entry level candidates, which also made them aware of its apprenticeship opportunities.

Flexible working, parents and carers

4.41 To understand work/life balance challenges that affect parents, grandparents and carers alike, ITV’s Balance Network Group, which was launched in 2017, has shifted its focus to ensure it encapsulates the widest possible definition of the family unit. Its focus for 2019 is flexible working and how colleagues work at ITV. Delivered in partnership with its Women’s Network, over 350 employees recently attended ITV’s ‘Let’s talk about flexible working’ event and they’re now going to produce a detailed set of Q&As to answer key questions on the subject. ITV Balance will also be running focus groups to understand feedback of experiences of flexible working across ITV.

4.42 Partnered with Women Returners, ITV recently launched the ITV Career Returners Programme, which received over 220 applications for opportunities in Technology, News and Studios Production. Sponsored by Carolyn McCall, the programme aims to strengthen management talent across the organisation, improving ITV’s diversity of experience and
removing barriers by offering experienced and talented professionals the opportunity to return to their careers from extended breaks of at least 18 months.

4.43 ITV continues to offer workshops that provide support to employees who return to work following long-term sickness, sabbatical, shared parental leave or maternity leave. Facilitated by its external partners, Talent Keepers, the sessions are designed to ensure that employees experience a smooth transition back to work, with support and confidence.

4.44 Following these sessions, ITV provides additional support to individuals on the basis of need, to ensure effective integration. ITV has also reviewed its flexible working policies and is formulating a communications and engagement plan to help all employees view such working as both possible and positive and encourage a more flexible working culture.

Social mobility

4.45 ITV has not been able to collect any meaningful data on the social and economic background of its workforce. Although it piloted Social Mobility questions successfully to its Senior Leadership Team, it has only recently rolled this out to all staff. However, the broadcaster has told us that it hopes to have a clearer picture of its socio-economic data by the end of 2019, after which it will look at how it can track social mobility rather than just its social demographics. ITV describes this a longitudinal piece of work which it aims to do over a five-year period.

4.46 ITV also participated in the 2019 Social Mobility Employer Index, to understand better its performance and to help shape its future approach and priorities to social mobility. We look forward to engaging with the broadcaster to see how it progresses in this area in the future.

4.47 ITV continues to participate actively in the Social Mobility Business Partnership (SMBP). This is a volunteer-led charity that brings together over 130 professional services firms, commercial organisations and professional sports teams that are all committed to supporting students from low-income backgrounds in their pursuit of a career – in particular, as a legal or finance professional. Led by ITV, the SMBP provides a work insight programme for students. Beyond the scheme itself, alumni can continue to access career guidance through virtual coaching. Delegates are drawn from schools selected by the partners, working closely with organisations such as PRIME, Social Mobility Foundation, Manchester Access Programme and Pathways to Law.

4.48 ITV also continues as a signatory of the SMBP and the Social Mobility Pledge which enables people of all backgrounds to reach their full potential in the workplace.

4.49 ITV’s Technology Graduate Programme aims to improve the diversity of talent entering Technology at ITV. The scheme was promoted at careers fairs and on social media etc, with an additional focus on Social Mobility, and presentations at various universities. The programme covers placements across ITV’s cyber, software engineering and digital teams, to offer candidates a breadth of experience in all areas of Broadcast Technology and the broadcaster has tracked the diversity of applications and candidates throughout its
selection and hire process. Last year, the diversity of ITV's technology graduate hires increased as a result of this initiative.

Recruitment, Partnerships and Training

4.50 ITV has told us that its recruiting practices are strongly aligned to its Diversity and Inclusion strategy. In addition to its ongoing activity, ITV has put in place the following specific measures:

- ITV has launched an Interviewing Skills Masterclass for hiring managers and leaders, to ensure its recruitment practices are as robust, consistent and inclusive as possible. As a half-day externally-facilitated workshop, it focuses on building skills and confidence, as well as compliance with ITV’s equal opportunities policy as part of its selection process.
- ITV works with an external insights & research agency to understand where people are looking for jobs and to ensure it is advertising opportunities to the broadest demographic possible, in the most appropriate way for each protected characteristic. In particular, ITV targets such advertising to specific LinkedIn groups.
- ITV has recently gained Disability Confident Leaders status, which it has told us demonstrates on-going commitment and work around removing barriers for disabled candidates.
- ITV has told us that regular review of the ITV Jobs website and sharing updates of its internal activity and engagement on its social media platforms, where it has reached over 100,000 followers on Twitter, continues to demonstrate the broadcaster’s inclusive and diverse culture and workforce.
- Having worked with ITV Signpost to hire an On Screen British Sign Language presenter, where most of the candidates that came to first stage interviews were deaf, ITV has told us that it continues to offer a number of schemes that support increasing the diversity of its employees and opening up opportunities to individuals who may not have considered it as a potential employer.
- ITV’s apprenticeship scheme and the broadcaster’s continued partnership with the Ideas Foundation are detailed under Age, above.

4.51 Following feedback from various employee events and the ITV Employee Networks, the broadcaster has told us that it will be launching its ITV Networks sponsored ‘Managing your Career at ITV’ workshops, which will be designed to support employees with the information, tools and confidence to own and drive their development across the organisation.

4.52 ITV has also launched an Aspiring Manager Masterclass. This programme is aimed at supporting employees to think about the expectations of being a manager and to prepare them for their first management level roles. Sponsored by the ITV Embrace network, ITV has told us that it aims to encourage participation from its BAME employees to address under-representation at manager level.

4.53 Mentoring opportunities are offered to all employees with training provided for mentors and mentees.
By promoting the above programmes via ITV Networks, the broadcaster has seen higher levels of engagement from under-represented groups across its organisation. In addition, ITV Backstage offers opportunities for employees to understand more about different parts of the organisation, by giving them the chance to spend up to a day work-shadowing in a different area of ITV. Sponsored by the ITV Embrace network, ITV has encouraged participation from its minority ethnic employees to address under-representation at manager level, as a result of its Caerus research, which is detailed under ‘Racial Group’, above.

Plus 1 – this ongoing initiative (launched in 2017) aimed at promoting greater accountability across leaders and managers, to promote greater diversity and inclusion across recruitment practices, succession planning and team development, has led to an increase in both attraction and workforce diversity data and the revision and reframing of ITV’s D&I strategy, communications plan and roadmap. Overall feedback on the initiative, from focus groups across ITV, has been positive, although it revealed that employees wanted additional clarity on the practical application of the initiative. The broadcaster is now being clearer in the language it uses about this, emphasising that it concerns recruitment and succession planning and development, to help build a more inclusive environment and culture, where everyone can thrive.

High Potential programme – this programme launched in late 2018 and aims to strengthen the diversity of ITV’s talent pipeline across the business, offering a tailored development programme to identify and accelerate the development of high potential managers, to prepare them for leadership positions. The programme achieved its aim and built visibility of those concerned to the management board. In terms of representation, the programme has 20% with a minority ethnic group background, 5% with a disclosed disability and 53% of the group are women, which is higher than ITV’s overall levels.

Aimed at making ITV an employer of choice for anyone seeking a career in media, the Employer of Choice initiative is intended to garner more applications from across all protected characteristics, to help increase the diversity of ITV’s workforce. Evaluating this initiative involved reviewing the diversity of applications on a quarterly basis which has shown an increase in applications from across the different characteristics. However, evaluation has shown that this has not translated into offers. To prevent unconscious bias in its selection process ITV has therefore introduced hiring manager training as well as inclusive leader / manager workshops that look at unconscious bias and help ensure an inclusive culture. The broadcaster intends to review its attraction data each quarter and make further adjustments, as required.
Evaluation of broadcaster initiatives

4.58 ITV provided evaluation reports on six of its initiatives, some of which are continuing activities from last year, such as Plus 1, and others that were started in the last year, such as the High Potential programme. It also provided an update on its Time to Change mental health awareness initiative, which is yet to be evaluated. Information on the evaluations has been included under the relevant characteristics, above. The evaluations mentioned all provided clear status updates but many lacked detail. However, ITV’s evaluation of its ongoing Plus 1 initiative provided a fuller picture, and we would recommend that the broadcaster models its approach to evaluation on this going forward. Evaluations conducted on the basis of formal qualitative and quantitative research, such as focus groups and statistical analysis, are more likely to provide effective monitoring and outcomes.

28 The six initiatives are: Plus 1; High Potential programme; What’s It Got to Do with You Data Campaign; Social Mobility Monitoring; Technology Graduate Programme; and Building ITV’s external brand as an employer of choice, for anyone seeking a career in media.
**Key conclusions**

ITV has set itself targets for achieving greater workforce diversity by 2022 and has introduced a range of initiatives to bring about change. We fully support these targets and the activities that ITV plans to carry out in order meet its diversity objectives.

Currently at ITV, disabled people are still under-represented in its workforce, despite a slight improvement since last year (2% to 4%). As this is significantly below the UK disabled working population (18%), ITV will need to accelerate its rate of progress to become an organisation that is truly diverse and inclusive in this area. We would like to see whether the initiatives and Disability Working Group actions that ITV has told us about are sufficient to meet the challenge ahead.

There has been a slight improvement at ITV in the representation of people from a minority ethnic background in the last year. However, at 10%, ITV is behind all the other main broadcasters and below the UK workforce population (12%). We also note that, given the high number of positions in creative and content production at ITV, there is particularly low representation of minority ethnic talent in these areas (only 7%). Last year ITV told us that it would develop targeted strategies to improve opportunities for minority ethnic groups in particular, and whilst it is positive that the broadcaster has been taking steps to learn more about the barriers faced by its minority ethnic employees, we would like to see these actions result in improved representation, so that ITV can be in line with the UK workforce.

ITV is the only one of the main broadcasters to have still not collected any data on the religion or belief of its employees. This was the same last year and the broadcaster told us it would begin to collect this data, so we expected the broadcaster to have done this. We will discuss with ITV whether its What’s It Got to Do with You campaign around improving staff disclosure will change this situation in the future and whether there is an ongoing evaluation of this campaign as well.

On a positive note, we are pleased to see that ITV is jointly leading the industry when it comes to the number of women in senior management. This is a strong indicator of where ITV continues to effect positive change in specific areas across its organisation. We are also encouraged to see the impact of schemes such as the returners programme for women and also the healthy representation of women in creative and content roles.

We will be discussing with ITV how it will improve its diversity and inclusion strategy in areas where the rate of progress might be insufficient in order to meet its own future targets.
5. How diverse is Sky?

Figure 21: Job level and role employee profiles for Sky

5.1 As one of the leading television broadcasters in the UK and Europe, Sky has reaffirmed its commitment to equality and inclusion saying that decisions about anyone’s employment at Sky is to be based only on their qualifications, ability, performance, skills and potential. Sky has told us that this applies to all elements of employment and work and is particularly relevant when the broadcaster makes decisions about recruitment selection, career development, career progression and pay and benefits.

5.2 Sky has two specific areas in which it has set itself objectives to achieve. Its employee data shows that Sky should prioritise efforts to increase female representation and representation of people from a minority ethnic background. To this end, Sky has set diversity targets to become an employer of choice for women with a 50:50 leadership team and further targets to increase minority ethnic representation and progression in the organisation.

5.3 Beyond setting targets and measuring progress in these areas, Sky has also refreshed its diversity and inclusion in policy in June 2018, as well as its flexible working policy in September 2018. Sky’s family and special leave policy has also been upgraded with improvements in the last year.

5.4 Sky has six employee networks and each one includes executive sponsorship from its senior leadership. The Executive Steering Group reviews progress throughout the year to agree strategy across UK & Ireland and is led by Stephen van Rooyen, UK & Ireland CEO.
Disability

Figure 22: Disability profile of Sky employees

5.5 Last year, disabled employees made up just 3% of employees compared to 18% across the UK population (aged 16-64). While Sky has reduced by 7pp the proportion of employees from whom it has not collected disability data (from 45% last year to 38% this year), it remains difficult to get an accurate picture of disability representation across Sky. Due to a continued low declaration rate of its employees, Sky remains unable to set representation targets for disability as it does for gender and racial group, as they could be unrealistic.

5.6 Sky has told us that it is evolving its entire recruitment model and hopes that it will be a significant step towards achieving Disability Confident status.

5.7 Launched in 2018, Body&Mind@Sky is an employee-led community, with chairs in London, Scotland and Sheffield. They aim to raise awareness and break down stigma, their initial focus having been on mental health. So far, 70% of the organisation (Sky News, Sky Sports, Sky Media, Sky Production Studios and Sky’s Customer Service Group) has signed up to the Mind Time to Change pledge, as a public commitment to supporting people with mental health, with local mental health first aiders and ambassadors guiding their teams to keep the pledge commitments alive. Access to a mental health data dashboard provides each area with a way to track the impact of the commitments made in its pledge in relation to mental health related absence (and associated cost) and its Wellbeing score, aggregated from questions in Sky’s people survey concerning Empowerment, Role, Growth, Manager, Workplace & Balance. Sky believes this organic approach is creating sustainable actions that are authentic to each individual team.

---

29 ONS Labour market statistics A08: Labour market status of disabled people (Average of Apr-Jun18, Jul-Sep18, Oct-Dec18, Jan-Mar19). Proportion of all aged 16-64 who are/are not ‘Harmonised Standard Definition Disabled’.
and it anticipates that, during 2020, a sufficient number of departments will have signed the TTC pledge for it to sign up as an entire organisation.

5.8 Sky continues to highlight and communicate all the benefits and support it offers employees to aid their health and physical, mental and financial wellbeing.

5.9 On 3 December 2018, Sky marked International Day of Persons with Disabilities with a purple take over, influenced by champions from its Body & Mind network.

**Racial group**

**Figure 23: Racial group profile of Sky employees**

- South Asian / South Asian British: 7%
- East Asian / East Asian British: 1%
- Black / African / Caribbean / Black British: 3%
- Mixed: 2%
- Other: 1%
- Not specified: 2%
- MEG, 16%
- WEG, 69%
- Not disclosed
- Not collected

5.10 The proportion of employees from minority ethnic backgrounds who make up Sky’s workforce is 16% (compared to 15% last year), which is not a significant increase. However, data wasn’t collected from 14% of the workforce, which represents a data gap increase of 8pp from last year. Sky has explained that this is due to the introduction of a new HR system and should not prove problematic going forward.

5.11 The proportion of employees from minority ethnic backgrounds at senior management level and middle/junior management level are 8% and 15% respectively, the latter still exceeding the UK workforce average of 12%.

5.12 Employees from minority ethnic backgrounds remain under-represented in journalism (11%) and creative roles (10%), but broadcast management has increased by 7pp, to 16%. Technical, engineering and data analytics (27%) and sales and marketing (16%) have stayed the same year-on-year. Minority ethnic employees in business management/administration are represented in line with the UK average workforce figure (12%).

---

30 ONS Labour market statistics [A09: Labour market status by ethnic group](https://www.ons.gov.uk/releases/labourmarketstatusbyethnicgroup) (Average of Apr-Jun18, Jul-Sep18, Oct-Dec18, Jan-Mar19). All employed people.
5.13 Sky has launched ‘Let’s Talk About Race’ sessions, to help employees get more comfortable talking about the subject, which it designed in collaboration with employees from BAME backgrounds. The sessions are facilitated by Sky BAME employees and are based on their own experiences, exploring the history of race, microaggressions, hidden workplace tensions and focus on developing confidence around language. These employees also share their own life experiences and discuss current topics in the media, such as Stacey Dooley being criticized for white savior complex and Raheem Sterling’s experience of racism in football.

5.14 Results from the sessions have indicated significant impact, with scores for comfort in talking about race shifting before and after sessions as follows:

- Not so confident, from 18% to 0%;
- Somewhat confident, from 50% to 35%;
- Very confident, from 26% to 47%; and
- Extremely confident from 6% to 18%

5.15 Sky has also launched a programme to connect people with different life experience across the organisation, bring fresh perspectives to thinking and provide a broader understanding of leadership in the organisation. Initially, BAME Heads of teams are invited on five occasions to spend time with one of Sky’s senior leaders, when they are asked to contribute in meetings or discussions and share feedback. As the relationship develops, the leaders speak up for their colleague and introduce them to people in their network who may also be able to support the colleague’s development.

5.16 Sky is a signatory of the Business in the Community Race at Work Charter. This comprises five calls to action, which are: Appoint an Executive Sponsor for race; Capture ethnicity data and publicise progress; Commit at Board level to zero tolerance of harassment and bullying; Make clear that supporting equality in the workplace is the responsibility of all leaders and managers; and Take action that supports ethnic minority career progression. Sky shares the progress it has made against each.

5.17 In 2018, with the aim of increasing both minority ethnic group representation in its Content, Corporate, Commercial and Operational Teams, and minority ethnic group progression in some of its Customer Service teams, Sky set targets for minority ethnic group representation. Having tracked progress every quarter, the following shows these targets (with the progress made so far against each):

- On screen:
  - Sky Sports 20% (13%)
  - Sky News 20% (15%)
  - Entertainment (as part of Project Diamond\textsuperscript{31}, these are for people commissioned for Sky original productions and are not Sky employees):
    - 7% / at least one, senior off-screen role (13%)

\textsuperscript{31} Run by Creative Diversity Network, Diamond is a single online system used by the BBC, ITV, Channel 4, Channel 5 and Sky, to obtain consistent diversity data on programmes they commission.
Diversity and equal opportunities in television: In-focus report on ten major broadcasters

- 20% on screen (28%)
- 20% writers (16%)

• Behind the scenes:
  ▪ Sky News, Sky Sports, Entertainment, Studios 15% (11%)
  ▪ Corporate, commercial, customer service, non-volume 25% (15%)
  ▪ Contact Centres / Retail 1st line managers 15% (9%)
  ▪ Contact Centres / Retail 2nd line managers 15% (9%)

Sky has also developed an inclusive guide to recruitment, which provides its leaders with a collective understanding of the organisation’s approach to achieving these targets.

5.18 We welcome the fact that Sky has recognised that people from minority ethnic backgrounds are under-represented at the organisation and has set targets for representation in key areas of the organisation, with progress being measured quarterly through Sky’s joiners and leavers.

Nations and regions

5.19 As highlighted in last year’s report, beyond Sky’s headquarters in Osterley, it has set up a technology hub in Leeds, employed people in customer contact centres in Glasgow, Uddingston, Dunfermline, Livingston, Newcastle, Leeds, Stockport and Sheffield, and employed retail and home service staff across the UK, although many of these employees are not specifically dedicated to Sky’s broadcasting business.

5.20 Sky employs people of more than 80 different nationalities in the UK and, as part of the wider Sky Group, provides opportunities for employees to share ideas and talent in Europe, through on-going working groups and relationships with colleagues in Sky Italia and Sky Deutschland and formal secondments.
Gender

Figure 24: Gender profile of Sky employees

<table>
<thead>
<tr>
<th>Employees</th>
<th>Not collected</th>
<th>Male</th>
<th>Female</th>
<th>All UK-based employees</th>
<th>Senior mgt.</th>
<th>Mid/Junior mgt.</th>
<th>Non-mgt.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>61%</td>
<td>39%</td>
<td>7425</td>
<td>479</td>
<td>1098</td>
<td>5848</td>
</tr>
<tr>
<td></td>
<td></td>
<td>61%</td>
<td>39%</td>
<td>479</td>
<td>61%</td>
<td>62%</td>
<td>61%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>62%</td>
<td>38%</td>
<td>1098</td>
<td>39%</td>
<td>39%</td>
<td>39%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>61%</td>
<td>39%</td>
<td>5848</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

5.21 As was the case last year, Sky employees are more likely to be male across the whole organisation (61%) and across each job level – senior management at 61%, middle/junior management at 62% and non-management at 61%. While clearly male-skewed, Sky, unlike other organisations, shows no skew between its overall profile and its senior management profile. However, this means the proportion of women in senior management also remains the same as the average across the organisation (39%), and this is still the lowest across all the main five UK broadcasters. Nevertheless, for the last four years, Sky has featured in the Times Top 50 Employers for Women list, which recognises organisations that are leading the way on workplace gender equality.

5.22 Reflecting little change across job roles, Creative and Content remains the largest job role group in Sky, where almost two-thirds of roles are held by men, and women are still under-represented in all job roles except for business management/administration (52%), and sales/marketing (47%), the latter of which matches the UK workforce average.32

5.23 Sky has told us that gender diversity is a core part of Sky’s approach to people planning, with teams across the organisation committed to this agenda, and regular reporting to track its progress. The last year has also seen the growth of Sky’s ‘Women in’ groups, from Product and TV Engineering to Sky Business, created by women in these areas to change the perception of traditionally male-dominated functions and to support development and progression.

32 ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Jun18, Jul-Sep18, Oct-Dec18, Jan-Mar19). All employed males and females (employees and self-employed).
5.24 Sky has identified specific group/area targets for gender diversity and provided us with its targets (and progress figures up to the end of 2018):

- Technology - 30% target (23% so far)
- Group Product Design & Supply - 30% target (23% so far)
- Digital – 40% (36% so far)
- Ireland - 40% target (36% so far)

5.25 Sky’s Women into leadership programme is an apprenticeship programme for women at Sky’s middle management level. It provides future female leaders, to help the organisation achieve its aim of having a leadership team with an even gender balance and being an employer of choice for women. The programme runs for 24 months and participants gain a diploma level equivalent leadership qualification. There are currently 93 women across four cohorts on the programme and 17% of participants are from a BAME background. Since the programme started, in 2018, a fifth of participants have had changes to their roles/careers, which has included: increased responsibility; a lateral move; a move to a completely different business area within the organisation; and promotion into a ‘Head of’ roles (6%). Feedback from trainers/managers and participants has indicated that the programme addresses the challenges women face in career progression: improving confidence to ask more from mentors and be more active in networking; supporting participants to develop skills in dealing with challenging situations more effectively; and impacting on participants growth of self-confidence and self-awareness. However, the programme requires significant time commitment and, to date, 12% of participants have therefore dropped out of the programme.

5.26 Sky’s Women in Home Service programme is a six-month trainee programme for women working in its Home Service function. This initiative commenced in 2017 and aims to open up the possibilities of women working in what is perceived as male-dominated jobs. It was anticipated that participants would be more likely to apply for a permanent role as vacancies arose. Having filled four trainee programme cohorts so far 70% have converted into full time permanent roles. By the end of 2018, the proportion of Sky’s Home Service who were women had increased from 2% to 9%.

5.27 Sky reported a 5.3% mean and 7.8% median gender pay gap (as at 5 April 2018) in its submission for the Gender Pay Gap Service’s 2018/19 report. These are similar to its 2017/18 figures, which were 5.2% and 8% respectively.

5.28 We recognise the progress shown by Sky in the above initiatives, but would like to see further progress for women at Sky, especially as representation across the organisation remains lower than the other broadcasters and the UK working population.

---

33 Home Service is not part of Sky’s broadcasting function and not therefore part of the broadcaster’s core submission. It is been included for illustration.
Religion or belief

5.29 An apparent even split in terms of religious vs non-religious employees continues at Sky, but even with a 6pp reduction in data not collected (to 39%), these proportions could still change.

5.30 Sky’s multiculture@sky network raised the profile of Ramadan this year, with Muslim colleagues sharing their experiences of the ninth and holiest month of the Islamic calendar. The increased awareness encouraged iftar tables to breakfast together after sunset in contact centres and non-Muslim colleagues to take part in fasting. Eid (the end of the fast) was also celebrated across Sky’s regional sites, with colleagues, friends and family enjoying various activities, ranging from a presentation on the timeline history of British Muslims to children’s artistic Islamic displays and performers, and live music, competitions and comedians.

5.31 Following the success of its Home Service implementing shift swaps for Ramadan in the last year, more teams across Sky have empowered people to swap specific bank holidays to better accommodate their own cultural or other personal commitments. More than 50% of teams have implemented these and they are locally-owned, to allow for flexibility in approach and business continuity for each team.
5.32 Sky’s employees who self-define as lesbian, gay or bisexual (LGB) make up 2% of the organisation’s employees across the whole organisation and at senior management level, in line with the UK population.34

5.33 LGBT+@Sky has partnered with LGBT radio station Gaydio to explore what it now means to be LGBT+ and Sky’s Proud to Be Me campaign is empowering its employees to share their stories, focus on the fringes of the LGBT+ community and engage with local organisations and charities. On-air specials will be aired on Gaydio in primetime, comprising interviews with representatives from key organisations. Digitally, Gaydio.co.uk and LGBT+@Sky host bespoke landing pages that include information on LGBT+ community projects across the UK, interview clips, videos and access to all on-air content.

5.34 Make Sky and beyond more LGBT+ inclusive is LGBT+@sky’s vision and it has run activities and events to this end since 2016. 87% of lesbian, gay and bisexual (LGB) and 84% of Transgender colleagues took part in Sky’s most recent employee survey and they report a consistently high and positive experience of working for the organisation when compared with the 85% of heterosexual colleagues who took part. Sky has told us that its LGBT+ network is one of its most mature networks, having many allies, as it provides a constant source of inspiration for the organisation’s newer networks.

5.35 The Proud to Be Me campaign focuses on intersectional issues such as LGBT and mental health, in partnership with Body&Mind@Sky; LGBT and BAME, in partnership with Multiculture@Sky; and Identity, in partnership with Parents@Sky and Women@Sky.

5.36 Sky has told us that this year it is seeing its biggest ever celebration of Pride, with employees, friends, family and partners coming together and interacting with others, to show support for diversity and inclusion. Celebrating where Sky colleagues are based, it is

34 ONS: Sexual identity – Sexual orientation, UK: 2017 – Percentage of UK population who identify themselves as LGB.
participating in events across Great Britain and in the Republic of Ireland, including Edinburgh, Dublin, Newcastle, London and Cardiff.

5.37 Stonewall has recently named Sky the UK’s #1 Media Company for LGBT inclusion after the broadcaster took part in its Workplace Equality Index, which celebrates organisations committed to LGBT+ inclusion in the workplace.

**Gender reassignment**

5.38 Sky has recently worked with members of its network LGBT+@Sky, with guidance from Stonewall, to increase trans visibility. In a panel event hosted by Sky News presenter Stephen Dixon talking to transgender guests and allies from Credit Suisse, Kier Group, Sainsbury’s and Sky, the discussion tackled the exclusion and isolation trans people can feel in society and the significance of support from family, friends and employers to be accepted for who you are. Open to external guests and Sky employees and being both live streamed to all Sky’s sites across the UK and made available for later viewing, the event provided Sky with the opportunity to highlight its transgender policy and guidance for managers.

**Age**

Figure 27: Age profile of Sky employees

5.39 Fifteen percent of Sky’s workforce is now aged 50 or over (which is also the case in its largest job group, creative & content). This is a 2pp increase on last year and is almost in line with the UK industry average of 17%. However, these results compare with a UK workforce average of 31%.\(^{35}\) Further, Sky has a higher proportion of men over 50 than of women over 50 (18% vs. 10%).

---

\(^{35}\) ONS Labour market statistics [Table A05: Labour market by age group: People by economic activity and age (seasonally adjusted)](Average of Apr-Jun18, Jul-Sep18, Oct-Dec18, Jan-Mar19). All employed people.
5.40 Sky describes itself as a flexible and family-friendly employer that, with support from its parents@sky network, recognises that caring responsibilities are life changing and multi-generational. It therefore offers six free emergency family care sessions to support the families of all employees, which provide emergency access to pre-approved professional support for when regular family care arrangements fall down. This includes emergency childcare, backup adult and eldercare, and school holiday cover offering last minute places at holiday clubs and camps.

5.41 Sky also views itself as thoughtful about the broad implications of Britain’s aging population and is committed to supporting its changing workforce, to ensure that colleagues of any age can be themselves and give their best.

**Flexible working, parents and carers**

5.42 Sky has enhanced its paternity/secondary carer leave provision. A previous two weeks paid leave entitlement has been increased to six weeks paid leave, with an optional additional six weeks unpaid leave. Further flexibility is offered, with families able to decide how they wish to spread paternity/secondary carer leave across the year. Sky says these changes were made because it is not only committed to making sure both men and women can succeed in their careers, but it also recognises that achieving gender equality in the workplace relies on both parents being able to take an active role in domestic work and raising a family. Also, 65% of Sky UK & Ireland are male and around 600 people take paternity/secondary carer leave each year, compared with around 400 people taking maternity/primary carer leave, and around 40 taking shared parental leave. To support the cultural transition of more men taking more time off work, Sky has updated its flexible working information on its intranet and built an interactive resource for flexible and fluid working.

5.43 Sky has also formalised its support to foster carers. Having asked existing foster parents what would help them, Sky now offer paid time off on up to five occasions in a 12-month period, to attend review appointments and training. Sky’s Family and Special Leave policy has been updated accordingly, the policy also encourages people to have a conversation with their line manager if they need additional time off for something more specific.

5.44 Sky’s Returners programme is designed to attract people with senior experience and a career gap of two or more years onto a six-month paid placement. Sky believed that, at the end of the placement, participants would be more likely to apply for a full-time role as vacancies arose and, in the last year hired seven returners, four going into technology. Five are now in permanent roles, with one as a director, and two remain on fixed term contracts. The women on the programme were provided with coaching support and mentors. They also found good support within the group and appreciated Sky’s focus on valuing transferable experience and skills, and not looking purely at career history.

**Social mobility**

5.45 Although Sky does not yet collect data to aid social mobility, as it has not yet established appropriate measures (see below), the broadcaster has told us that it considers that an
individual’s socio-economic starting point should have no bearing on their ability to join or thrive at the organisation. The broadcaster is confident that its initiatives for targeting under-represented groups, such as its work experience programme, Sky News Diversity Work Experience Programme and its Sky Production Services Early Careers Programme, together with its approach to inclusive recruitment, support social mobility.

5.46 Currently, Sky is also refreshing its approach to Early Careers, with a focus on building future skills, developing agility and leadership potential, and diversifying the workforce. It believes it has the opportunity to bring more diverse talent into its business by targeting under-represented groups and providing support to help people succeed when joining a large organisation. Sky therefore aims to:

- scale up its intake;
- develop a new assessment solution, to assess strengths over previous experience;
- offer more rotations across its organisation;
- offer more development and support; and
- expand its insight day programme, to attract more people from under-represented groups.

5.47 Sky also continues to invest in paid placement programmes across Sky UK & Ireland, to give particular groups of young people their first job. With the aim of monitoring social mobility and ensuring opportunities for everyone interested in starting their career with Sky, the broadcaster currently asks the following questions in its dedicated Early Careers application tracking system:

- What type of school did you attend for the majority of your schooling (between the ages of 11-18)?
- If you attended school in the UK, were you eligible for Free School Meals and/or an Educational Maintenance Allowance (EMA) at any time during your studies?
- Are you the first generation of your immediate family to attend university?
- What type of higher education institute did you predominantly attend?

5.48 Beyond early careers, Sky has not yet established measures to aid social mobility, as it is keen to establish a consistent approach with the other four main broadcasters to create effective benchmarking across the industry. While delivering what it considers a less perfect but simple assessment, Sky favours a simple and pragmatic approach, using one question (concerning parental occupation at age 14), rather than using the complete set of questions recommended by the Cabinet Office and Ofcom, as it believes this will deliver more benefit than would a stronger but more complicated measure.

5.49 As we hoped to see the main broadcasters begin to collect data in this area this year, we would certainly encourage an organisation of the size of Sky to take a step further in its efforts and begin to collect data on the social and economic background/social mobility of its workforce.

Recruitment, Partnerships and Training

5.50 Sky’s job vacancies are promoted widely with:

36 See: Measuring Socio-economic Background in your Workforce: recommended measures for use by employers.
Diversity and equal opportunities in television: In-focus report on ten major broadcasters

- job descriptions and job advertisements written to appeal to a broad audience;
- the best attraction channels used to attract the cultural contribution the broadcaster seeks;
- all employees being reflected in its job advertising; and
- advertisements placed where they will attract more diverse candidates.

5.51 Sky has told us that it also encourages its leaders to diversify their LinkedIn connections, mentor under-represented students in local schools and colleges, host inspirational career visits to Sky for such students, and attend student recruitment events.

5.52 Sky has told us that vacancies for permanent roles at Sky are open for applications from everyone. As highlighted in last year’s report, all its vacancies are listed on workforsky.com and are posted on the world’s leading diversity and inclusion employer brand platform, VERDICA (Values, Equality, Respect, Culture, Inclusion, Diversity, Accessibility).

5.53 Sky has also said that its hiring managers are reminded of their departmental diversity objectives and targets and are guided through unconscious bias training when they start recruiting for a role. This is to ensure they are aware of any biases they may have before shortlisting or selecting candidates. Further, as Sky develops new initiatives, it captures them in an inclusive recruitment guide to influence the recruitment industry and support its hiring managers each time they have vacancies.

5.54 Sky also operates a ‘try before you apply’ initiative for under-represented groups, which, on their conclusion, have shown that participants are more likely to apply for and successfully secure a permanent role when a vacancy arises. Further to this, all the learning and development Sky offers is made convenient for its employees, managers and leaders, every employee being able to request a LinkedIn Learning license and choose to learn at work or at home on any topic they choose.

5.55 To accelerate awareness and help trigger any need for action, Sky has developed local reverse mentoring programmes for its business areas with minority ethnic group targets. Leaders meet with a colleague from a minority ethnic background to learn about life both in and outside work. The broadcaster has also launched a programme across the organisation, to connect people with different life experiences, bringing fresh perspectives to thinking and provide a broader understanding of leadership at Sky (see under ‘Racial Group’, above).

Evaluation of broadcaster initiatives

5.56 Sky provided evaluation reports on eight37 of its key initiatives, three of which are continuing activities from last year (such as Early Careers) and five of which started in the last year (such as Returners). Information on seven of these evaluations has been included under the relevant characteristics, above.

5.57 Sky uses its people survey to help leaders evaluate whether their business areas of the organisation are equally inclusive for everyone, providing data and practical tools to help

---

37 The eight initiatives concern: Sky’s people survey; Women into leadership; Returners; Women in Home Service; targets for minority ethnic group representation; Body&Mind@Sky; LGBT+ inclusivity; and Early Careers.
leadership teams tackle identified gaps. This is a continuing initiative that started in 2018 and runs twice a year, so each business area can see the difference or similarity in engagement. Data is gathered and reviewed at an organisational level, for all directorates, covering employees at all levels. Sky has found that the simplicity of this initiative has worked well and has led to a clear understanding of the differences in experiences of employees, based on their demographic diversity, creating a compelling need to take action, where required. An example is the organisation’s *Let’s talk about race* sessions, discussed above, which was designed to facilitate a conversation with leadership teams to help build confidence and gain a shared understanding of hidden workplace tensions. Sky has found that its approach has also empowered local leadership teams to take full ownership of the broad D&I agenda.

Sky’s evaluations appear to have been conducted on the basis of formal research, in the form of data and feedback from relevant parties. Given the great detail provided by Sky, its evaluations appear thorough and robust.
Key conclusions

Sky has the second largest workforce of any broadcaster in the UK and is therefore a major contributor to the industry’s track record on workforce diversity.

There has been no improvement in the representation of disability at Sky with the broadcaster’s workforce at 3% (the same as last year). This is the lowest out of all the other main broadcasters and is far below the UK disabled working population (18%). Sky has slightly improved its data collection on disability, but the gap is still high enough (38%) to make it hard to gain an accurate picture of its workforce. We are concerned about the lack of momentum in this area and would like to see the setting of disability workforce targets, improved data collection and a targeted strategy which may go beyond the existing initiatives that Sky has told us about.

We are pleased that Sky remains above the UK workforce population when it comes to the representation of people from a minority ethnic background (16%); this is notwithstanding its temporarily increased data gap in the last year due to the introduction of a new HR system. We would like to see greater progress for minority ethnic talent in journalism and creative and content roles at Sky, key areas where there is under-representation.

The representation of women both at senior levels and across Sky remains the lowest across the main broadcasters at 39%. There is also under-representation of women being promoted and in creative and content roles at Sky. Though there has been an increase in the number of on-screen talent roles at Sky, women are more under-represented in this area than they were last year. We would like to discuss with Sky how it is going to make greater progress for women across its organisation, particularly given the prominence of its initiatives aimed at getting women into leadership and the wide organisation. We are pleased that Sky has evaluated its women-focused initiatives but we would like to see what changes can be made to realistically achieve Sky’s own 50/50 gender balanced leadership target.

We would also like to see the effect of Sky’s positive colleague engagement with LGBT staff around inclusion. Currently, Sky collects the least amount of data amongst the main broadcasters on LGB employees and, whether due to this or not, is also the lowest in terms of workforce representation (2%).

On a positive note, we appreciate that Sky is evaluating the progress of its initiatives with more thoroughness and detail than most of the other main broadcasters.

Given that Sky has several areas where workforce diversity is lacking when compared to other broadcasters, especially in its representation of women and people with a disability, we would like Sky to assess how it might be able to enhance its existing strategies to make better progress. We are confident that if the broadcaster builds upon its strong approach to the ongoing evaluation of its initiatives, it will help greatly in addressing key areas of under-representation.
6. How diverse is Viacom?

Figure 28: Job level and role employee profiles for Viacom

6.1 Viacom’s Office of Global Inclusion continues to report directly to Viacom’s NYC-based President and CEO ensuring that diversity and inclusion is always on the agenda and woven into the fabric of the organisation. It has continued several of its arrangements mentioned last year, nine of which have been evaluated and has begun several additional initiatives.

6.2 Viacom’s five employee resource groups (ERGs) – HERE (women), Fusion (cultural diversity), Emerge (LGBT), Parenthood (working parents), and Thursday Think (junior employees) – were launched in its London offices in 2012 and continue to play a key role in its diversity and inclusion work, and give minority and marginalised employee groups a voice, championed by members of Viacom’s Senior Management Team.

6.3 As mentioned in last year’s report, the ERGs continue to partner with HR to deliver policy ‘lunch and learns’, allowing employees to provide feedback and ask any questions. Viacom also told us that, following its successful New York summit in 2016, it hosted a European Summit last year, at which all ERG chairs attended training to upskill in leadership and promoting the benefits of diversity and inclusion. This event was evaluated by Viacom against its aims to understand the membership of each ERG, to promote the value of ERGs across Viacom and to help develop best practices, foster collaboration and share learning. Viacom’s evaluation of this activity included gathering feedback via a survey which found that the content had been well received and that ERG’s felt more valued in the organisation as a result. We hope that Viacom will extend this evaluation of how valued and impactful its ERG’s feel within Viacom so they are able to track progress on this over time and ensure consistency of support across all employee groups.

6.4 A Status Report on Employee Resource Groups is produced annually, outlining how each group is functioning against its Strategic Plan and to establish individual budgets for the coming year. Depending on its focus and activities, each group’s success/effectiveness is evaluated using one or more of the following criteria:

- supporting the company’s diversity and inclusion initiatives;
• helping members be as productive and creative as possible;
• enhancing professional development of members; and/or
• assisting Viacom in achieving its business and/or diversity and inclusion objectives.

6.5 Viacom provided no clear and definable targets in key areas of under-representation but reiterated that it was business-critical for it to reflect the society in which it operates and the communities to whom it broadcasts.

Disability

Figure 29: Disability profile of Viacom employees

6.1 Viacom’s disclosure for this year shows that disabled employees continue to make up 8% of its employees\(^3\)\(^8\).

6.2 Viacom has continued its work with an external disability consultant, to review existing processes, run feedback sessions and to create a more generally inclusive environment for disabled employees. Viacom has told us that over the last year this has led to improvements in its processes and development of its disability policy and it is also now looking for employees to champion its proposed disability ERG. In January this year, Viacom London reached the goal mentioned in last year’s report to become an accredited Level 2 Disability Confident employer. Viacom evaluated the impact of the work that enabled it to progress in this scheme and has found that its employees are now confident it has good practices in place and can provide additional support as required. The external review and the feedback sessions are a positive way to consider the impact of the scheme, though given there is still room for improvement in terms of representation of disabled people at Viacom, we hope this improved inclusion will be evaluated in relation to the overall make-up of Viacom’s employees.

---

\(^3\)\(^8\) 77% of employees remain undefined, so this figure could be higher.
6.3 Viacom is also continuing mental health first aid, in which its "Approach Team" members and HR group are trained to be the first port of call and provide next step information for employees struggling with mental health issues.

Racial group

Figure 30: Racial group profile of Viacom employees

<table>
<thead>
<tr>
<th>Racial Group</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Asian / South Asian British</td>
<td>6%</td>
</tr>
<tr>
<td>East Asian / East Asian British</td>
<td>1%</td>
</tr>
<tr>
<td>Black / African / Caribbean / Black British</td>
<td>6%</td>
</tr>
<tr>
<td>Mixed</td>
<td>6%</td>
</tr>
<tr>
<td>Other</td>
<td>1%</td>
</tr>
<tr>
<td>WEG, 73%</td>
<td></td>
</tr>
<tr>
<td>MEG, 20%</td>
<td></td>
</tr>
<tr>
<td>Not collected</td>
<td></td>
</tr>
<tr>
<td>Not disclosed</td>
<td></td>
</tr>
</tbody>
</table>

6.4 Employees from minority ethnic backgrounds now make up a fifth of Viacom's workforce, which is closer to the London proportion\(^{39}\) than any of the other main five broadcasters. Employees from minority ethnic backgrounds remain more likely to hold non-management positions (24%) than management positions (16%)\(^{40}\).

6.5 Those in technical, engineering and data analytics (24%) and business management (29%) roles remain above the average across the organisation (20%). However, significantly, the proportion of employees from minority ethnic backgrounds in creative roles has fallen by 10pp (to 16%).

6.6 Of the main five broadcasters, Viacom has the joint highest proportion of employees who are either Black, African, Caribbean or Black British (together with Channel 4\(^{41}\)), at a very positive 6%.

6.7 As one of Viacom’s Employee Resource Groups (ERGs), Fusion continues to encourage diversity of thought and to celebrate, promote and change how colleagues view cultural diversity, by recognising it within the workplace and across the organisation. The group

---

\(^{39}\) In London the UK labour market figure is 36%. ONS: Annual Population Survey Apr 2018-Mar 2019 [from Nomis on 2 August 2019].

\(^{40}\) This combines senior management with middle/junior management figures, as the senior management figure alone was less than ten people.

\(^{41}\) The full breakdown of minority ethnic group employees at Channel 4 has been provided but cannot be reported due to some data being personally identifiable.
envisages an environment where employees can benefit Viacom’s business culture and productivity, sharing a vision for diversity, where employees can #beyoubelong. Fusion has had an active year in which it has championed the introduction of transparent plasters in all First Aid Boxes across the office as part of a campaign entitled ‘Nude-Nude for Who?’.

Viacom’s Director of the Office of Global Inclusion is also on the steering group of the cross-industry ethnicity network, the Creative Industries Alliance.

6.8 For Black History Month, Fusion created a video and poster campaign, “It’s ok to call me black” and the rapper, journalist, author, vegan activist, poet, political activist and public intellectual (awarded an honorary doctorate by the University of Brighton), Akala, gave a presentation in which he spoke openly about black British history and experience. Viacom evaluated the educational impact of this activity and found that it had encouraged conversation across the organisation and received positive feedback from a Fusion questionnaire. This initiative also helped drive content for Black History Month and has shaped the way Viacom considers offensive words within its programming.

6.9 Viacom holds regular guest speaker sessions, which have included June Sarpong running a workshop with its senior management team, focusing on intersectionality and an interactive session with ERG leaders, as well as Lenny Henry rounding off National Inclusion Week in conversation with historian David Olusoga.

6.10 Other recent Viacom initiatives have included: the featuring of key dates in Black British history as a timeline up the vinyl steps of its main Hawley Crescent office staircase, which is aimed at educating employees on Black history; and the Caerus Executive listening group, which gives employees from minority ethnic backgrounds the opportunity to discuss their experiences at work. In late 2018 Viacom held a series of separate and confidential group conversations in London with the organisation’s employees from minority ethnic backgrounds, white female employees and white male employees. It comprised seven, 90-minute sessions that sought to gather information on: what helps inclusion; what prevents inclusion and the lived experience in Viacom. As a result, Caerus Executive produced a report and Viacom’s Senior Management Team is working to implement its recommendations consistently across all areas of the organisation.

6.11 As a result of the Caerus Executive report, Viacom launched an initiative aimed at increasing the profiles of senior leaders from minority ethnic backgrounds, so employees can see individuals like themselves at the top of the organisation. Viacom’s evaluation of the scheme found that SMT members from minority ethnic backgrounds became more visible, attending more ERG events, which made for richer debate and feedback from Caerus Executive focus groups was positive.

6.12 Viacom has signed up to the Business in the Community’s Race at Work Charter.

---

42 As featured in Ofcom’s main report.
Diversity and equal opportunities in television: In-focus report on ten major broadcasters

Nations and regions

6.13 As reported last year, Viacom is the only broadcaster to monitor the regional origins of its employees. This reporting period, more than 75% of its employees provided data. Of those, 79% grew up in the UK, with 12% from elsewhere in Europe and 8% international. As before, the three local authorities most commonly selected were Essex (7%), Surrey (5%) and Kent (5%).

6.14 It has said it continues to analyse the regional diversity at each stage of its internship programme Viacom Breaks, to evaluate whether the scheme is attracting and increasing take-up from different demographics. The broadcaster has reported that the scheme has been found this year to increase the diversity of the candidates it has both attracted and hired. More detail on this scheme and its evaluation can be found under social mobility.

6.15 Viacom has also now launched a Deposit Loan Scheme, which is open to all Interns, with repayments split across 12 months. The scheme is designed to remove a potential financial barrier and both attract and support candidates from all regions of the UK, by ensuring that, regardless of location, Interns can afford their initial housing deposits.

Gender

Figure 31: Gender profile of Viacom employees, by job level

<table>
<thead>
<tr>
<th>Employees</th>
<th>1144</th>
<th>91</th>
<th>435</th>
<th>618</th>
</tr>
</thead>
<tbody>
<tr>
<td>All UK-based employees</td>
<td>53%</td>
<td>42%</td>
<td>55%</td>
<td>54%</td>
</tr>
<tr>
<td>Senior mgt.</td>
<td>47%</td>
<td>58%</td>
<td>45%</td>
<td>46%</td>
</tr>
<tr>
<td>Mid/junior mgt.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-mgt.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

6.16 Viacom’s employees remain more likely to be female overall (53%) and across middle/junior management (55%) and non-management roles (54%). However, at senior level, they are more likely to be male (58%), and Viacom therefore no longer has the highest proportion of women in senior management across the main five broadcasters.

6.17 29% of the roles at Viacom are defined as being within broadcast management, with 26% in business management/administration and 10% in technical, engineering and data analytics. The proportion of women in broadcast management are almost evenly split between male and female employees (49% and 51% respectively). However, female
employees still hold most roles within business management (61%), with technical engineering and data analytics being more male skewed (66%).

6.18 Viacom’s ERG group, HERE, aims to cultivate a strong sense of community amongst female employees by promoting professional and personal development for women at every level of the organisation. It pledges to achieve gender parity and parity in pay, position and opportunity. In 2018, HERE worked with HR to develop policies that held Viacom to account and this partnership has led to new and improved polices, including gender balanced candidate pools and interview panels, and shared parental leave. Gender balanced interview panels in particular were promoted to all Viacom hiring managers and the broadcaster is looking forward to this initiative becoming embedded, when it will be in a position to evaluate its impact.

6.19 Laura Bates, author and founder of Everyday Sexism, ran a workshop for Viacom employees, which looked into the data behind everyday sexism and urged colleagues to consider the way debates are framed and tackle the normalisation of established policies, procedures and practices that can prevent challenging the stereotypes of women and everyday sexism.

6.20 Other interactive activities and guest speaker sessions Viacom has held throughout the year at its London offices included:

- empowerment workshops, such as Mary Portas’ ‘Work Like a Woman’, in which, following the publication of her latest book, she took part in an ‘in conversation’ style discussion with Guardian journalist, Jane Martinson, and employees could ask questions;
- ‘Funny and Female’, in association with Comedy Central, in which female talent for HERE’s 2019 International Women’s Day celebrations was championed in a night of stand-up comedy; and
- ‘Slay in Your Lane’, in association with Fusion, in which the authors of ‘Slay in your Lane: The Black Girl Bible’, Yomi Adegoke and Elizabeth Uviebinené, offered an inspirational, honest and provocative take on navigating the map of life as a black woman. ‘Slay in Your Lane’ recognises and celebrates the strides black women have already made, while providing practical advice and inspiration for those who want to do the same and forge a better, visible future.

6.21 Disappointingly, Viacom reported a 13.8% mean and 13.9% median gender pay gap (as at 5 April 2018) in its submission for the Gender Pay Gap Service’s 2018/19 report. This shows an increase on its 2017/18 figures, which were 11.8% and 13.7% respectively, which is disappointing. Prior to external publication of its latest Gender Pay Gap Report, Viacom held a Gender Pay Forum with its CEO and SVP, which comprised three sessions. Open to all employees, plans to reduce the gap were discussed and one of the recommendations was to work more closely with HERE.
6.22 Although it is still the case this year that a larger proportion of employees self-define as not religious (39%) compared to religious (31%), the data gap has almost doubled, from 17% to 30% and any year on year comparisons would be unreliable, as this increase is reasonably spread across all job roles and types.

6.23 Viacom's ERGs continue to celebrate cultural difference by marking religious festivals and important cultural dates, to help foster inclusivity. These have included such diverse events as HERE ERG inviting the ethno-historian Amrit Kaur Lohia to speak to employees and Fusion ERG celebrating cultural diversity by marking religious festivals and cultural dates in various ways, ranging from providing baklava at all tea points in celebration of the end of Ramadan to holding a talking heads session with the Holocaust Educational Trust on International Holocaust Memorial Day, when employees were given the rare opportunity to meet and question a holocaust survivor.
Sexual orientation

Figure 33: Sexual orientation profile of Viacom employees

- Heterosexual, 72%
- LGB, 9%
- 5%
- 14%
- Not disclosed
- Not collected

6.24 The proportion of Viacom employees who self-define as lesbian, gay or bisexual (LGB) is 9%, which remains the highest LGB representation of the main five broadcasters. This proportion is spread quite evenly across job types and is only slightly more variable for job roles, ranging from 6% in business management and administration to 10% in broadcast management, creative and technical roles.

6.25 Viacom’s Emerge ERG for LGBT+ employees and allies continues to sponsor the LGBT awards, one of its co-chairs participating on the judging panel. It also partners Mosaic, offering work experience opportunities to the young LGBT community across London, and supports the Terrence Higgins Trust, the MTV Staying Alive Foundation and Intermedia, which is an LGBT+ network group for people working across the media and creative industries. Emerge continues to hold a number of speaker sessions, activities and workshops throughout the year, aimed at engaging and educating employees, as well as fostering an overall sense of inclusion. These have included:

- an LGBT Representation Project in Collaboration with Research Team via Global Attitudes Survey;
- a talk by the entertainment news presenter, freelance stylist and former fashion editor of Gay times, Darkwah Kyei-Darkwah, and Jatinder Grewal, a makeup artist within the Asian bridal Industry;
- continued support for the annual Pride in London festival, with Viacom UK contributing to the InterMedia Pride Float;
- a talk by journalist and Editor-in-chief/Founder of Burnt Roti mag, Sharan Dhaliwal; and
- leading a programming and poster campaign to celebrate LGBT History Month.

Gender reassignment

6.26 As Stonewall Global Champions, Viacom utilises its membership to inform and support employees. Members of its HR team and Emerge ERG attended a Stonewall transgender
Diversity and equal opportunities in television: In-focus report on ten major broadcasters

training day and are currently creating a workplace transitioning policy. Emerge also ran ‘talking heads’ sessions for Trans Visibility Day, with guests such as Munroe Bergdorf.

Age

Figure 34: Age profile of Viacom employees

![Age profile of Viacom employees](image)

6.27 Although the proportion of Viacom’s employees aged 50 or over has increased slightly (by 1pp), the broadcaster still has the youngest workforce of the main five, with 91% of employees aged under 50. This compares with the UK-based industry average of 68% and the UK workforce average of 69%. Viacom continues to employ fewer women aged 50 or over than the UK industry average (6% vs 14%), and the difference between the proportion of male and female employees aged 50 or over remains equal to the difference across the UK industry (5pp).

6.28 Viacom continues to offer work experience to candidates from Community TIME Camden, the local organisation aimed at creating a time and skills 'exchange' that offers employment support to people over 50 years of age.

Flexible working, parents and carers

6.29 Viacom aims to create a climate where both men and women have the opportunity to provide childcare. Its policy allows parents to share parental leave, matching the shared parental pay it provides with its maternity pay. More generally, flexible working is encouraged at Viacom and any declined flexible working pattern requests are escalated to its SVP, HR and CEO. Viacom’s job advertisements now include “happy to talk flexibly”, to ensure external candidates are aware of its support of flexible working.

6.30 As part of Viacom’s maternity/adoption policy, it partners with Talking Talent, to provide a service that is split into three parts: pre-leave, during leave and upon return to work. Employees are able to use Talking Talent to discuss anything related to their upcoming
time away or return to work, such as searching for a local nursery or discussing potential flexible work patterns.

6.31 Parenthood is Viacom’s employee resource group dedicated to help its working parents navigate the challenges of balancing work and professional development, while managing a busy family life. The group also celebrates key dates, such as Mother’s Day and Father’s Day, to increase parental engagement, and offers family fun days, such as cinema film screenings.

6.32 During the last year initiatives have included: Youth Mental Health training day; The Good Schools Guide session on choosing primary and secondary schools; knowledge and tips around sustainable and low impact parenting from MamaLina’s Emma Ross; and a First Aid for life workshop to support parents and careers.

6.33 Parenthood ERG also conducts internal surveys from which a large proportion of its activity is driven, and these generally highlight first aid and child safety as the most common parental concerns.

**Social mobility**

6.34 Viacom was able to collect data on the social and economic background of 65% of its workforce. Given this is the first time that we have asked for data in this area, it is encouraging to see Viacom collect information on a large share of its employees.

6.35 From the visible data provided by Viacom, 18% of employees had parents who were in modern professional occupations when the employee was aged 14, compared to only 4% who had parents in routine manual and service occupations.

6.36 We can also see from the visible data that 54% of the Viacom’s employees attended non-selective state-run or state-funded schools between the age of 11-16, compared to 14% attending schools that were selective on academic, faith or other grounds, and 16% who attended independent or fee-paying schools.

6.37 For the question we asked about the highest level of education achieved by parents of employees when they were aged 18, 84% of Viacom’s employees said that their parents had qualifications that were of degree level or equivalent or above, and 16% said that their parents held qualifications below degree level.

6.38 Last year Viacom said it aimed to make the intake of its Viacom Breaks internship scheme as regionally diverse as possible. The scheme has provided 47 opportunities across all brands and departments within the organisation for people wanting to ‘break’ into the media industry. It is designed to attract the best talent and provide opportunities to people starting out who do not have the relevant qualifications or education, but are able to demonstrate relevant skills, passion and enthusiasm for the role. The application process for the scheme is therefore focused on talent potential, rather than education or experience and, to avoid any focus on educational background, CVs are not requested, which, in turn, also enables hiring managers to support Viacom’s social mobility agenda more easily.
6.39 This year the broadcaster evaluated the impact of the internship scheme and following various internal reviews of data at each stage of the scheme’s application process, found that the scheme has been successful in increasing the diversity of candidates Viacom has attracted and hired, with an Intern retention rate of 32% in 2018. Following the evaluation, Viacom has partnered with social mobility charities, such as Even Break, to target socially disadvantaged areas and implemented a new rental deposit loan scheme to ensure it is removing barriers to individuals accepting internship opportunities.

6.40 In addition, Viacom highlighted the following measures to promote social mobility:

- its HR team having attended a number of external sessions on the importance and impact of social mobility and having shared their learnings more widely in the organisation; and
- new initiatives such as its Viacommunity Day, A World of Good Workshop and a ‘Be the change you want to see’ panel discussion about speaking up on equality.

**Recruitment, Partnerships and Training**

6.41 Viacom has a number of equal opportunities measures in place concerning recruitment practices, some of which are new this year and others that have continued. These include:

- its careers site having a diversity and inclusion section, which highlights the organisation’s diversity and inclusion activity, ensuring everyone can see someone like themselves in the organisation;
- all its recruitment documentation (job descriptions, templates etc.) including its talent diversity statement;
- ensuring all of Viacom’s hiring managers have good recruitment practices, by making it mandatory that they attend both unconscious bias training and a people manager roadshow, which includes training that highlights the importance of diversity and inclusion in their teams;
- a focus on Viacom’s attraction strategy, which is made-up of partnerships with job boards, social networks, charities and organisations, and focuses on minority ethnic groups, LGBT and social mobility in disadvantaged areas, and non-university educated talent;
- all the recruitment agencies Viacom UK uses having diversity and inclusion requirements for shortlists; and
- supporting its hiring managers in ensuring their candidate shortlists and interview panels are gender balanced.

6.42 Over the reporting period Viacom offered its employees instructor led coaching and mentoring, and virtual sessions covering 29 different topics, which attracted 1995 employee enrolments. In addition, employees accessed 368 online courses. Due to system restrictions, Viacom has not collected any information on the make-up of employees who have been trained.43

---

43 This is not something that can be extracted from Viacom’s existing systems.
6.43 Viacom also has a number of training schemes in place to promote a diverse and inclusive workforce. These include:

- inclusive leadership training for Viacom’s Senior Management Team, to help its members demonstrate and create inclusive cultures within their teams. The broadcaster evaluated this initiative via feedback from the trainer, stating that this initiative produced valuable discussion about shared and individual experiences, with feedback from participants being positive. As they roll out what they have learned, employee feedback will be sought from follow-up focus groups with Caerus Executive and we recommend tracking progress on some key objectives from the training over time;
- unconscious bias and inclusive leadership training, which is undertaken by all senior leaders, hiring managers, HR, Commissioners and Employee Resource Group leaders;
- disability workshops, in which Viacom’s disability consultant has run educational workshops designed to remove stigma and alter attitudes and perceptions towards disability;
- celebratory and educational programming around Pride, Black History Month, Inclusion Week, Mental Health Week and International Women’s Day;
- Viacom’s global mentoring scheme, which is available to employees at all offices and all levels around the world, including the UK and, among other things, supports diversity & inclusion, as mentors / mentees can request to be matched with an individual from a diverse group; and
- two employees from minority ethnic backgrounds attending an “Investing in race and ethnicity” workshop as part of strengthening the pipeline of minority ethnic talent.

**Evaluation of broadcaster initiatives**

6.44 Viacom provided evaluation reports on seven of its initiatives, some of which are continuing activities from last year, such as Viacom Breaks, while others started in the last year, such as the Caerus Executive Report. Information on these evaluations has been included under the relevant characteristics, above. The evaluations mentioned have generally been conducted in quite general terms, having resulted from ad hoc feedback and a few questionnaires/surveys. We consider that, where possible, appropriate qualitative and quantitative research, such as focus groups and statistical analysis, provides for a more robust assessment of the initiatives and therefore encourage Viacom to evaluate its initiatives as it has done in relation its Breaks internship scheme, where interview and exit interviews were conducted and a range of feedback sources used.

---

44 The seven initiatives are: Viacom Breaks; Caerus Report; Inclusive Leadership; Black History Month; the European ERG Summit; Disability Confident Scheme; BAME Leaders; and Inclusion Week.
Key conclusions

Viacom has added more employees to its workforce in the last year than any of the other main broadcasters, this despite it being a relatively small organisation in comparison to some of the others. We note that this was not seized on by Viacom as an opportunity to have increased its workforce diversity during the last reporting period.

We are, of course, pleased to see that Viacom now leads the industry in its workforce representation of people from a minority ethnic backgrounds – representing around a fifth of the whole organisation. We hope this figure will increase further as Viacom embeds its culture of inclusion and representation across its brands and continues operating out its multicultural London-based HQ. As a note of caution, we would highlight the dip in talent from minority ethnic backgrounds in creative and content roles (down from 26% to 16%), though Viacom still leads in this area against the other main broadcasters.

The gender balance remains stable at a representative 53% for women across the organisation. There is a positive outlook for women in mid/junior management positions, as 55% of these roles have been taken up by women and this is the joint highest across the main broadcasters.

Viacom is also doing well when it comes to the representation of LGB employees (9%), though the more the 14% data gap can be closed in this area, the more inclusive the organisation will become for Viacom’s LGB workforce.

Viacom is the youngest broadcaster amongst the main five broadcasters, with only 9% of its employees being over the age of 50. We feel that for Viacom to be a truly diverse and inclusive environment, it may look at areas where it can reflect the working population better, particular through its recruitment, training and skills strategies.

Contrary to the broadly diverse outlook in the areas described above, the broadcaster has shown a significant lacking in its ability to gather information on how many people who define themselves as disabled work at Viacom. 77% of Viacom’s workforce is not accounted for and therefore no clear picture can be gained on the promotion of equal opportunities in this area. We are concerned by this finding, particularly as disability is a mandatory protected characteristic for which licensed broadcasters should have adequate arrangements in place. Given the various disability inclusion activities Viacom is undertaking, as well as its status as a Disability Confident employer, we would expect it to use every opportunity to encourage the value of reporting disability data to its employees.

We will discuss with Viacom how it plans to increase the disclosure of data on disability within its workforce and urgently bring its strategy and practices in this area in line with the rest of its positive achievements in diversity and inclusion.
7. How diverse are the other five major broadcasters?

7.1 This Section focuses on each of the remaining five broadcasters that have over 500 employees – STV, Turner, Discovery, Perform Investment Ltd and QVC. While less comprehensive than our focus on the main five broadcasters, above, we report on the following five major broadcasters in order of the amount of employee data they monitor, highlighting some of the initiatives each has in place to tackle under-representation.

7.2 All figures throughout this Section, as in the rest of this report, refer to UK-based employees.

How diverse is STV Group Limited?

7.3 STV is a Scottish digital media brand providing content on air, online and on demand. Its TV channel reaches 3.4m people each month and digital platform, STV Player, is the most popular commercial Broadcaster Video on Demand player in Scotland. STV has its headquarters in Glasgow and has four other offices throughout Scotland and an office in London.

Figure 36: Job level and role employee profiles for STV

Equal opportunities arrangements

7.4 STV has an Equal Opportunities policy statement and it is “committed to valuing and promoting equality, diversity and inclusion”. To this end, it has an ‘Open Access Charter’ which sets out its strategy to achieve its equality, diversity and inclusion objectives. From this flow a number of divisional action plans, which are regularly reviewed and updated, and communicated to all staff, with updates on STV’s progress against the charter.

7.5 STV’s Diversity and Inclusion steering committee is chaired by its Managing Director of Broadcasting. It meets regularly, with updates communicated to all staff. It has also formed
working groups to progress specific diversity and inclusion actions for their respective business divisions.

7.6 STV’s managers undertook unconscious bias training in 2018 and it has plans for further training of its managers and similar training for all its employees by the end of 2019. Preceding this its CEO and Managing Directors have planned presentations on diversity and inclusion to all staff. We look forward to hearing more about the progress of this training in the coming year.

7.7 Mindful of its role as a Public Service Broadcaster (PSB), STV has set a number of internally communicated targets designed to support representation of the communities it serves both on and off screen, and to create an inclusive culture that fosters equality of opportunity for all. Ofcom supports STV’s targeted and all-inclusive approach.

7.8 STV said it has “given full regard to Ofcom’s published guidance on Diversity in Broadcasting and the wider cultural shift towards accelerating the pace of change, in reviewing its equal opportunities arrangements and shaping its diversity and inclusion strategy”. In particular, it has:

- Actively engaged with colleagues across the business to ensure different views and voices are accounted for;
- Further developed its ability to capture equal opportunities data to monitor the demographic make-up of colleagues;
- Taken active steps to ensure a fair recruitment process; and
- Established diversity targets to represent population demographics.

Further information on these initiatives is given below.

Monitoring

7.9 For last year’s report, STV collected data on three mandatory characteristics (gender, racial group and disability) and one voluntary characteristic (age), however due to the level of undisclosed disability data it was not possible to report on this. For this year’s report it collected data on all six characteristics, including subcategory data. This is a positive development and we support STV’s efforts to gain a more comprehensive understanding of the make-up of its workforce. It also monitors marriage or civil partnership status and pay rates and grading to ensure equality and fairness and has plans to begin monitoring socio-economic background.

7.10 Much of the data STV collected for this report is ‘not disclosed’ data. As a result, we can only report meaningfully on the make-up of its employees for gender and age. Nevertheless, in collecting data on all six characteristics STV has shown its commitment to understanding the make-up of its employees to inform its diversity and inclusion planning.

---

45 For example, job level (senior, middle and non-management) and job role data.
46 Ofcom acknowledges that employee response rates to surveys and employee data disclosure rates are not entirely within broadcasters’ control, as some employees may not respond to a survey and employees are entitled not to disclose their data to employers. However, without visible data, it is impossible to understand fully the levels of diversity in a given organisation and across the industry, and to compare them accurately to benchmarks.
It also has a communication plan to fully inform its employees of the purpose and importance of its monitoring and how their data is processed, which it hopes will encourage greater disclosure and increase the integrity of its equality data.

7.11 STV is currently at an advanced stage in procuring a new online recruitment portal and applicant tracking system which aims to collect equality and diversity data in respect of freelancers. It will also be used to support all areas of its business in “engaging freelancers aligned to its equality and diversity objectives to represent the communities it serves both on and off screen”. Our series of diversity reports this year includes, for the first time, a look at the current diversity of freelancers in UK television broadcasting. It concludes that data gaps are limiting the industry’s access to complete and up-to-date information on their freelance workforce, so Ofcom strongly supports STV’s plans.

Disability

7.12 Nearly half of STV’s employees (49%) did not disclose to it whether they are disabled. STV is seeking to encourage greater disclosure from colleagues.

7.13 STV has a new recruitment system which has been designed to have accessible job description layouts, text to speech functionality and an interactive dictionary and software to support applicants with dyslexia, visual impairments and other communications needs.

7.14 As part of its newly launched ‘Open Access’ paid training programme, STV will provide work experience and insight across a range of areas including its broadcast operations team who, in partnership with Inclusion Scotland, will provide a three-month training programme to a disabled candidate. See also under ‘Recruitment, Partnership and Training’.

7.15 STV continues to support International Day of People With Disabilities. An employee peer group to represent the interests of disabled employees is planned for the second half of 2019.

7.16 STV has retained its status as a Disability Confident employer. It continues to provide an on-site occupational health advisor and a comprehensive wellbeing programme. A new feature of this programme is employee access to nine fully trained Mental Health First Aiders.

Racial group

7.17 For last year’s report, STV only collected racial group data from 71% of its employees. This year it collected this data from all its employees. However, since 37% of its employees did not disclose their information to STV, it is not possible to report meaningfully on their make-up.

---

47 For more information on the freelance sector, see our freelancer report.
48 Inclusion Scotland is a ‘Disabled People’s Organisation’ (DPO) – led by disabled people. Its mission is to achieve positive changes to policy and practice, so that disabled people are fully included throughout all Scottish society as equal citizens.
7.18 STV has set an internal target to achieve BAME\(^{49}\) representation in an average of 4% of roles based across its five office locations in Scotland, and in 20% of roles based in London. Its focus is that the makeup of its workforce should reflect the makeup of the demographic profile of the regional population in which colleagues are employed or engaged. Ofcom supports this focused, targeted approach.

7.19 STV continues to support Black History Month. Beyond this reporting period, an employee peer group to represent the interests of BAME employees is planned for the second half of 2019.

**Gender**

7.20 There are more men than women at STV (52% v 48%, respectively). At non-management level the gender split is even (50:50) (from 51% men v 49% women in the previous reporting period). In middle-management, the gender split is 49% men v 51% women (last year it was 48% men v 52% women). Some job roles have fewer women this year and others have slightly more:

*Figure 38: Comparison of the percentage of women in various job roles in this and the previous reporting period*

<table>
<thead>
<tr>
<th></th>
<th>This reporting period</th>
<th>Previous reporting period</th>
<th>PP change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Business Management/Admin</td>
<td>70%</td>
<td>74%</td>
<td>-4</td>
</tr>
<tr>
<td>Sales &amp; Marketing</td>
<td>59%</td>
<td>66%</td>
<td>-7</td>
</tr>
<tr>
<td>Journalism</td>
<td>56%</td>
<td>61%</td>
<td>-5</td>
</tr>
<tr>
<td>Creative &amp; Content</td>
<td>42%</td>
<td>39%</td>
<td>+3</td>
</tr>
<tr>
<td>Tech/engineering</td>
<td>25%</td>
<td>24%</td>
<td>+1</td>
</tr>
</tbody>
</table>

7.21 STV reported to the Gender Pay Gap Service an **18.5% mean and 20.5% median gender pay gap** (as at 5 April 2018).

7.22 STV has publicly stated its aim to achieve an even gender split in the top 25% of roles by earnings by 2023. Ofcom supports the commitment shown by this targeted approach. To support its aim, STV is reviewing its succession plans with a view to building its internal

---

\(^{49}\) Used to refer to members of non-white communities in the UK, BAME is short for ‘Black, Asian, and minority ethnic’.
talent pipelines for as many senior roles as possible. It has expanded its bespoke career development programme so that it is now also available to its Digital team as well as its News team. The programme develops internal talent for senior roles through personal development, role specific development and partnering with a relevant coach or mentor. Each programme strives to comprise a 50:50 gender balance. STV is also reviewing its flexible working culture to further help colleagues in balancing their work and family lives. It continues to have balanced gender panels for all recruitment and has further broadened its recruitment advertising. It continues to support the International Women’s Day equality campaign.

Religion or belief

7.23 STV said it is committed to providing support to its colleagues in the practice of their religion or belief wherever it is reasonably practical to do so. It said that colleagues who have requested an adjustment related to religion or belief, such as the requirement for time to pray, a private prayer area, or to have their hours adjusted to avoid for example Sunday working at specific points in the year, have been fully accommodated.

Sexual Orientation & Gender Reassignment

7.24 This is our first report for which STV has collected sexual orientation data from its employees. However, we cannot report meaningfully on the makeup of its employees because 95% of them chose not to disclose their information to STV.50

7.25 In this reporting period, STV sought the assistance of Stonewall Scotland to explore the creation of a peer group for LGBT+ colleagues. Stonewall Scotland facilitated a meeting to support the establishment of the group and discuss the needs of prospective members. STV detailed a number of proposals for further discussions and ways to support LGBT+ colleagues which emerged from the discussion and which are to be considered further. We look forward to reporting any proposals that STV adopts in the next diversity report. STV is currently developing a Transitioning at Work policy. The newly formed peer group is to have a key role in creating engagement and promoting equality of opportunity for those with this protected characteristic. STV continues to support the Pride equality campaign.

Age

7.26 Most of STV’s employees are aged under 50 (80%), with 20% of employees aged 50 or over. For the previous reporting period, these figures were 82% and 18% respectively.

7.27 The latest age split figures are almost the same among men and women employees and close to STV’s overall age split. 21% of male employees, and 19% of female employees, are 50 or over. For the previous reporting period, these figures were 21% and 15% respectively.

50 See footnote 46.
Diversity and equal opportunities in television: In-focus report on ten major broadcasters

7.28 STV said it will consider the gender balance in colleagues aged over 40 and over 50 as part of its monitoring of equality data, with a view to identifying and developing plans to address any material imbalance.

Flexible working, parents and carers

7.29 STV has established a Parents and Carers peer group and a ‘Returners Programme’ to support those returning from a period of extended leave to care for a dependent. This aims to support colleagues in feeling quickly reintegrated to their role and the wider business through reorientation meetings, access to a Parents and Carers peer group and the support of a coach/mentor.

7.30 STV also reviews the pay of parents or carers returning from a period of maternity or shared parental leave to ensure they have not “fallen behind”.

Social mobility

7.31 In March 2019 STV announced a significant multi-year investment to create the STV Bursary Scheme. Working in partnership with the Royal Television Society, STV will provide ten bursaries each year to students of Scottish universities and from lower income backgrounds. In addition to annual bursary funding for each year of their degree course, the scheme will provide a wider range of opportunities, including work placements and mentoring, to support access to the industry. The scheme is also aimed at supporting increased diversity in STV’s talent pipeline across protected characteristics.

7.32 Following this, and shortly after the period covered in this report, STV announced a pilot ‘Open Access’ training programme designed to increase diversity and widen access to the creative industries in Scotland. The programme will be delivered in conjunction with organisations committed to diversity on and off the screen: Equate Scotland51; Inclusion Scotland52; and the Social Mobility Foundation53. The paid training programme will provide work experience and insight across a range of areas including digital product development, broadcast operations, sales and STV News. STV also take part in The Pact Indie Diversity Training Scheme54, aimed at encouraging new entrants to the creative industries who reflect the diversity of the UK. The programme is underway and is being delivered by STV Productions. It will provide exposure to factual, daytime and entertainment genres, both in development and production. Further training programmes, targeted at candidates from lower social economic backgrounds, BAME and disabled candidates, and women pursuing careers in technology, will be delivered in the second half of 2019.

51 Equate Scotland promotes gender equality throughout the science, technology, engineering and mathematics (STEM) sectors.
52 See footnote 48.
53 Social Mobility Foundation is a charity which aims to make a practical improvement in social mobility for young people from low-income backgrounds.
54 Pact is the trade association representing the commercial interests of UK independent television, film, digital, children’s and animation media companies. It runs the Pact Indie Diversity Training Scheme, which is aimed specifically at entry-level diverse talent (both graduates and non-graduates).
Recruitment, Partnerships and Training

7.33 STV has a range of fair recruitment and performance and development policies and it communicates its equality and diversity policy to employment agencies. For example, all its training materials must reflect the diversity of its employees and the specific needs of disabled employees should be accommodated insofar as is reasonably practicable. To ensure that all employees have equal access to training irrespective of location or hours of work, its policy is to offer a range of training options, such as online learning resources.

7.34 STV has broadened its recruitment advertising network and identified opportunities to work with a range of relevant organisations.\(^{55}\)

7.35 In 2018, hiring managers received unconscious bias training which focused on situations where this could arise in the employment cycle including during recruitment shortlisting, interviewing, hiring decision making and future progression. Beyond this reporting period, by early 2020, to accompany the launch of a new recruitment process and system, managers will receive further training focused on inclusive hiring.

7.36 STV is procuring a new online recruitment portal and applicant tracking system. This is due to launch after the reporting period and is to provide increased accessibility support for candidates. It will also allow for blind recruitment\(^{56}\) and the capture of equalities data.

On air and wider focus

7.37 This section refers to some of the schemes designed to improve diversity on-air but, given the production sector is not covered by this report, it provides only a snap-shot of this work.\(^{57}\) Ofcom welcomes the information that STV provided and supports its initiatives.

7.38 STV said that a longstanding priority for STV Productions has been to ensure the ideas they pitch to commissioners reflect a diverse range of voices, subjects and talents. It also said that it is focused on building diversity into the heart of its business and its supply chain relationships. It said for example that STV’s Broadcast division is developing commissioning guidelines, and its Creative team is engaging with advertisers, to ensure regional programmes and advertising campaigns connect and represent the diversity of STV’s audience. It added that the Creative team is also reviewing the process, and STV Productions is developing guidelines, for engaging/casting talent.

7.39 STV said that its news team has joined the BBC and others in rolling out the 50:50 Project with the ambition of achieving an even gender balance among contributors. Scotland

\(^{55}\) The organisations include: Pact; Equate Scotland, \textit{Coalition for Racial Equality and Rights} (CRER), which is a Scottish strategic racial equality charity, based in Glasgow; Social Mobility Foundation; \textit{Mama Youth Project}, a charity which trains young people from under-represented backgrounds to succeed in the media industry; and \textit{Creative Access}, which aims to fill a gap in the current creative landscape by helping young people from BAME backgrounds, as well as those with a lower socioeconomic status, to secure both jobs and paid training opportunities in creative companies.

\(^{56}\) Blind recruitment is the practice of removing identifiers from applications and CVs to encourage the assessment of people on their skills and experience and to mitigate against unconscious and conscious bias.

\(^{57}\) This report relates to television broadcasters’ monitoring and diversity and inclusion initiatives for their direct employees.
Tonight committed to this in August 2018. At the start, it was achieving an average of only 25% of contributors being women, but by May 2019 this had increased to 43%. The production team achieved this by, for example, extending its network of contacts, supporting media development of more women contributors and working very flexibly (for example, through pre-recording discussions since Scotland Tonight airs late in the evening). STV said that it will continue to seek further improvement and that “having a gender balanced discussion on the programme resonates with our guests and viewers”. It is now planning to extend the 50:50 Project to further news programming.

7.40 STV’s Digital business aims to create an ‘STV for everyone’ and is working to increase the proportion of on-demand content available with subtitling, audio description and signing.

How diverse is Turner?

7.41 Turner operates versions of core Turner brands, including CNN, TNT, Cartoon Network, Boomerang and TCM Turner Classic Movies. It manages the business of pay- and Free- TV channels, as well as Internet-based services, and oversees commercial partnerships with various third-party media ventures. Turner has its headquarters in the US with offices around the world, and London is the EMEA headquarters. Following the 2019 merger of AT&T and Time Warner, Turner is now part of WarnerMedia which is in the process of aligning its HR and diversity policies.

Figure 39: Job level and role employee profiles for Turner

Equal opportunities arrangements

7.42 Turner Broadcasting System Inc.’s President, together with the VP of Diversity and Inclusion, have responsibility for fostering a diverse workforce that reflects the communities Turner serves, globally.

7.43 Turner has an Equal Opportunities policy statement and is “firmly committed to a policy and practice of non-discrimination in all areas of employment...to fostering a diverse workforce that reflects the communities [it] serve[s] [and to] a culture of inclusivity”. It said that it has taken motivation from Ofcom’s diversity reports to formulate new strategies.
and has discussed with several other companies, topics such as: data collection; staff engagement; and the progression of women employees, with Channel 4 and Sky having provided particularly helpful advice. It has kept a focus on diversity and inclusion at ‘Town Hall’ events and departmental meetings. In May 2018 Turner held employee focus groups, from which it developed seven actionable projects. These projects are led by a cross-divisional Steering Committee and managed by senior executives responsible for their success. Under the banner of ‘Opportunity for All’ the projects include:

- greater visibility in respect of available jobs across the company, and new job description templates that are more accessible and attractive to a more diverse pool of applicants;
- a mentoring scheme;
- a more transparent approach to the promotions process in general, with a particular focus on senior promotions; and
- an ongoing employee resource group, including regular meetings for feedback, networking and idea generation.

7.44 Turner’s other projects focus on gender balance and working parents and are set out below.

**Monitoring**

7.45 For last year’s report, Turner provided data for two of the three mandatory characteristics only (gender and racial group). All its employees disclosed their information for these characteristics. For this year’s report, Turner provided data for all three mandatory characteristics and also for two voluntary characteristics (age and sexual orientation). This is a positive development and we support Turner’s efforts to provide a more comprehensive understanding of the make-up of its workforce. However, Turner said that, while it had surveyed all its UK employees, not all had responded. This is reflected in a 50% data gap\(^\text{58}\) for disability, racial group and sexual orientation.

7.46 Turner uses a range of means to inform its employees of the survey to collect data and its results. It also presents the results to the executive team to highlight the areas that need attention and inform Turner’s diversity.

**Disability**

7.47 We are glad to see that Turner’s provision of data to Ofcom has increased from 0% to 50%. Three percent of its employees of its employees self-defined as disabled\(^\text{59}\).

7.48 Turner is a [Disability Confident Employer]\(^\text{60}\). It works with Leonard Cheshire Disability’s [Change 100 scheme] which gives three month paid internships to disabled people straight out of college and has had “six highly successful placements to date”, making all necessary

---

\(^{58}\) See footnote 46.

\(^{59}\) As there is a 50% data gap, this figure could be higher.

\(^{60}\) The Government’s Disability Confident scheme helps employers make the most of the opportunities provided by employing disabled people. It is voluntary and has been developed by employers and representatives of disabled people.
adjustments to enable the internships. Turner also sponsors disabled people to attend the Edinburgh TV Festival Talent scheme ‘The Network’ and invites them to job shadow and get career advice from its employees. Turner’s ‘Adult Swim’ channel is a long-term sponsor of the Oska Bright learning disability film festival and its senior producer presents at the festival and works with participants with the aim of getting their work on air.

Racial group

7.49 Turner’s data collection has increased from 0% to 50%. This is a positive development. Nine percent of its employees are from a minority ethnic group.61

7.50 Turner said it recognised that people from minority ethnic backgrounds are under-represented at board level and that it is working to change that. It said that its ‘Opportunities For All’ initiative is designed to enable everyone to be able to reach the most senior positions. Turner also has numerous Social Mobility initiatives, which are also relevant to Racial Group and are reported below.

Gender

7.51 Turner’s gender split varies by job level and across job roles:

Figure 41: Turner’s gender split by job level

<table>
<thead>
<tr>
<th>Job level</th>
<th>Men</th>
<th>Women</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-management</td>
<td>49%</td>
<td>51%</td>
</tr>
<tr>
<td>Middle-management</td>
<td>50%</td>
<td>50%</td>
</tr>
<tr>
<td>Senior-management</td>
<td>69%</td>
<td>31%</td>
</tr>
</tbody>
</table>

Figure 42: Comparison of the percentage of women in various job roles in this reporting period and the previous reporting period

<table>
<thead>
<tr>
<th>Job role</th>
<th>This reporting period</th>
<th>Previous reporting period</th>
<th>PP change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tech/engineering</td>
<td>70%</td>
<td>41%</td>
<td>+29</td>
</tr>
<tr>
<td>Broadcast management</td>
<td>67%</td>
<td>57%</td>
<td>+10</td>
</tr>
</tbody>
</table>

61 As there is a 50% data gap, this figure could be higher.
7.52 Turner reported to the Gender Pay Gap Service a 26.4% mean and 23.5% median gender pay gap (as at 5 April 2018), reflecting its submissions for the Gender Pay Gap Service’s 2018/19 report.

7.53 Gender diversity is an integral part of Turner’s annual and ongoing talent management and succession planning. Turner said it has “a large number of high potential women at the middle-management level that [it is] committed to providing with development opportunities and progression”. We are pleased to see that 50% of Turner’s middle-management are women and that it is committed to their career development.

7.54 Turner’s new ‘Opportunity for All’ initiative aims:
- to give “greater access to female leaders across the business to share career guidance, through panels, one-on-one conversations and general networking opportunities”; and
- to give “enhanced attention to its pipeline of female talent, using insights from its senior female managers and including staff surveys to validate the approach”.

7.55 It has also expanded its membership and involvement in women-focused industry initiatives and forums.

7.56 Turner said its major focus currently is on increasing the number of women in senior roles from director and above with an overall aim to see significant progress throughout the organisation.

7.57 See also Recruitment, Partnership and Training.

---

62 Turner is required to submit to the gender pay gap service separate information for two different companies (Turner Broadcasting System Europe Limited and Cable News International Limited) and its reported pay gap figures therefore reflect analysis of their combined employee figures, as published in the Turner UK gender pay gap report April 2018.
Religion or belief

7.58 Turner did not collect religion or belief data. It supports staff to celebrate religious holidays and, if they want, to include others. For example, in 2018 a group celebrated Hanukkah in an open event, which was well attended by people of all faiths and beliefs.

Sexual orientation and gender reassignment

7.59 We are glad to see that Turner’s data collection has increased from 0% to 50%. Four percent of its employees self-identified as LGB.

7.60 OUT is Turner’s LGBT+ ally network run by employees and is dedicated to providing an inclusive, respectful, supportive and diverse work environment at all levels of the company. It runs regular events, such as screenings, drinks events, game expos and networking events, takes part in London Pride and also raises funds for a number of charities each year.

7.61 Turner said that it is aligning its policies on gender reassignment with Warner Media.

Age

7.62 As in the previous reporting period, most of Turner’s employees are aged under 50 (90%), with 10% of employees aged 50 or over.

7.63 The age split figures for this reporting period among men and women employees are close to Turner’s overall age split, but with more men aged 50 or over than women. 12% of male employees, and 8% of female employees, are 50 or over. For the previous reporting period, these figures were 14% and 7% respectively.

Flexible working, parents and carers

7.64 In 2018 Turner reviewed its flexible working practices with the support of an external consultancy to advise on industry best practice. Its employee survey included ‘Carer’ questions this year and highlighted that many employees have caring responsibilities for children or related to those with long-term disabilities or problems related to age. It increased promotion to all its staff of its flexible working and shared parental leave policies and established better support structures and mechanisms for working parents. Its ‘Opportunity For All’ initiative included a working group focused on working parents. It suggested the following initiatives which are now in place:

- a Working Parents support group for parents and parents-to-be, who meet to share support and guidance and who act as ‘buddies’ to parents newly returned to the workplace;
- plans for a dedicated breast-feeding room; and

---

63 As there is a 50% data gap, this figure could be higher.
• support and guidance for line managers so that expectant mothers are in turn supported in the workplace during pregnancy, whilst on leave, and as they return to the workplace.

Social mobility

7.1 Turner continues to:
• include questions on social mobility in its staff survey;
• participate in Media Trust’s mentoring scheme for young disadvantaged people; and,
• offer 32 paid internships in CNN every year and to run job shadowing and the CNN Open Newsroom days.

7.65 The job shadowing scheme is specifically for people from disadvantaged backgrounds and is now part of an ‘early careers programme’ which includes summer internships and 12-month internships to help diversify its overall pool of talent from entry level onwards.

Turner continues to seek applications from disadvantaged groups by advertising and promoting its careers programme and holding open events with various colleges, charities and organisations, such as: Creative Access; Social Mobility Foundation; Media Trust; and Renaissance Foundation.

Recruitment, Partnerships and Training

7.66 Turner closely monitors the wording of its job adverts to ensure that it is inclusive and uses gender-neutral wording. Shortlists are not put forward to the hiring manager until there is a minimum of 30% gender diversity in the list. Its compulsory orientation training for new staff includes items on its diversity and inclusion policy.

How diverse is Discovery?

7.67 Discovery is a global media company focusing on real-life entertainment, producing content for audiences around the world. It hosts a portfolio of diverse brands with a global reach and is available in 220 countries and territories and 50 languages. More than half of Discovery’s 2,000 employees who work on the Ofcom licensed channels are based outside the UK. It first launched a channel in the UK in 1989 and today is a UK business consisting of consisting of 18 channel brands, including pay-tv brands Discovery Channel, Eurosport, TLC, Animal Planet and free to air channels Quest, DMAX, Quest Red and Really.
Diversity and equal opportunities in television: In-focus report on ten major broadcasters

Figure 43: Job level and role employee profiles for Discovery

Equal opportunities arrangements

7.68 Discovery has an annually reviewed Equal Opportunities policy statement and it aims to “ensure equal opportunities for all, not only at the recruitment stage but also in [its] approach to promotion, transfers, training, benefits, facilities and underlying process and procedures”.

7.69 Discovery continues to provide unconscious bias training for its global CEO and Management Team, which includes representatives from across the UK and Europe. Its Chief Diversity Officer oversees its LifeWorks and Inclusion department. This department arranges cultural awareness training and a culture exchange programme, among other initiatives. Discovery’s Head of Broadcast Technology & Operations has sponsored a new global inclusion initiative called ‘Be More Tech-i’ (further information below) and we are pleased to see that this is being led from the very top of Discovery.

7.70 All of Discovery’s employees must complete training on its Code of Ethics, which includes diversity and equality. Discovery also regularly provides unconscious bias training to its employees.

7.71 Discovery uses the online platforms of EmployAbility and Stonewall for targeted job advertisements and draws on their expertise, and that of Aperian Global, to give guidance to its managers and provide awareness events and sensitivity training to its employees. Discovery also has employee-driven resource groups, many of which are active in the UK, and which run regular speaker sessions, discussion groups and social events.

7.72 Further information on Discovery’s arrangements, its memberships and on specific employee resource groups is given below.
Monitoring

7.73 For this and last year’s report Discovery only collected data from employees for two of the three mandatory characteristics (gender and racial group) and one of the three voluntary characteristics (Age), including subcategory data.

7.74 For the period covered in this report, Discovery collected data from its UK new joiners on a voluntary basis. In June 2019, just outside this reporting period, it launched a UK initiative to capture employee personal data in a more comprehensive and robust way, ahead of planned improvements to its monitoring of the diversity of its employees globally. We look forward to hearing more about this next year.

Disability

7.75 Ofcom was glad to learn that though Discovery has not yet collected its employees’ disability data, this will be collected in the UK from June 2019. This is a positive development and we support Discovery’s plan to use this data to set key performance indicators regarding diversity.

7.76 Discovery’s continued membership of EmployAbility helps it to ensure that its disabled people can access not just the physical environment, but also “navigate themselves in the workplace”. Discovery also continues to train its managers in mental health first aid.

7.77 As mentioned in last year’s report, the ableD employee resource group is for disabled people and their carers. It aims to provide a network of support and mutual understanding.

Racial group

7.78 Discovery’s data collection for this year’s report is down 10pp with ‘not collected’ data increasing from 16% to 26%. The percentage of UK-based employees from a minority ethnic groups (22%) has stayed almost the same year-on-year and we are encouraged to see that it continues to exceed the working population and UK based industry average. For last year’s and this year’s reporting periods, 20% and 25% of Discovery’s middle and non-management respectively were from minority ethnic groups.

7.79 Discovery maintains its engagement with Aperian Global to train its employees to understand cross cultural differences and to work more effectively together across borders.

7.80 As we reported last year, there are two employee resource groups relevant to Racial Group, the Asian Cultural Alliance and the Black Cultural Alliance which Discovery continues to develop. Both groups seek to promote cultural exposure and education, provide networking, leadership and career development opportunities and to give members the opportunity to develop impactful initiatives that will influence the business.
Gender

7.81 There are slightly more women than men in Discovery’s non-management (52% v 48%, respectively). In middle-management there are more women than this (54%), but less in its senior management (45%), as was the case last year. Over the reporting period more promotions went to women (56%).

7.82 The job roles with the greatest proportion of women (over 60%) are broadcast management, business management/admin and sales and marketing. The roles with the least proportion of women are creative and content (43% women) and tech/engineering (36% women).

7.83 Discovery reported to the Gender Pay Gap Service a 12.7% mean and 4.6% median gender pay gap (as at 5 April 2018).

7.84 Discovery launched the ‘Be More Tech-i’ action group, supporting inclusion and diversity within its Technology and Operations department with a primary focus on gender. The group is raising awareness of the need and benefits of a more even gender split in this department. It is developing a four-part plan of action around monitoring, recruitment, retention and career development for women in technology.

7.85 ‘The Discovery Women’s’ Network’ employee resource group continues to deliver programs and events that support, coach, and empower women to discover and leverage their full leadership potential in and out of work. Throughout the year, the group hosts inspiring women speakers from across all industries, runs workshops and networking events, and promotes and host a range of events around International Women’s Day. The reach of the network has expanded to Discovery’s Asia Pacific offices.

7.86 For its monitoring of the gender profile of its employees, Discovery will be expanding its gender categories to include both intersex and transgender options for employees who wish to share this information.

Religion or belief

7.87 Ofcom was glad to learn that though Discovery has not yet collected data on its employees’ religious beliefs, this will be collected in the UK from June 2019.

7.88 Discovery has a Wellness Room available to employees as a quiet place for contemplation and prayers. It continues to celebrate cultural events across the organisation such as Lunar New Year, Eid, Diwali and Christmas to foster a sense of community and awareness of other cultures. With each celebration it puts up posters to promote and celebrate Discovery’s diversity and to educate its employees on the history and cultural heritage of these celebrations.

Sexual orientation and gender reassignment

7.89 Ofcom was glad to learn that though Discovery has not yet collected data on its employee’s sexual orientation, this will be collected in the UK from June 2019. Ofcom also supports
Discovery’s plan to expand its gender categories to include both intersex and transgender options for employees who wish to share this information. As mentioned in last year’s report, Discovery’s employee resource group for LGBTQ+ Allies is called ‘priDe’. It continues to grow internationally, with Discovery France and Poland launching their own groups in 2019. The network aims to foster an inclusive working environment. It promotes understanding and inclusion through fun activities such as celebrating Pride Month and International Day Against Homophobia, Transphobia and Biphobia. It continues to encourage attendance of seminars and talks hosted by InterTech & Intermedia UK (an LGBT network for the Tech and Media industry). Such events educate employees on topics such as LGBT parents, legal rights of same-sex marriages and the challenges faced by LGBT people in other countries with non-inclusive legislation.

Through its membership of Stonewall, Discovery continues to promote campaigns and targeted recruitment and to provide educational infographics to its teams. These are used to promote awareness and steps to cultivate an inclusive environment. For Pride Week, it promoted educational events for employees around LGBTQ+ topics. In December 2018 Discovery participated in Stonewall’s Trans Allies Programme, a training program aiming to increase awareness of Trans issues.

Beyond the reporting period, Discovery has made plans to host its first Trans Panel discussion in London in summer 2019, which we look forward to hearing more about for the next diversity report.

Most of Discovery’s employees are aged under 50 (90%), with 10% of employees aged 50 or over. A similar pattern is found across most job roles. However, 30% of senior management is aged over 50 compared to just 6% of non-management. There are a lower proportion of women aged 50 or over than there are men (8% and 12% respectively) which remains similar to last year.

Generation Discovery (genD) is an employee resource group that focuses on people who want to improve innovation, as well as network and learn the different aspects of the business. This group “fosters intergenerational synergy” and is for employees across different generations to learn from one another.

Discovery UK offers “generous enhanced maternity, shared parental leave and adoption pay”. It also offers three weeks fully paid paternity leave. Employees may also take up to 20 fully paid keeping in touch days whilst on extended leave. As flagged in last year’s report, Discovery’s flexible working policy is open to all employees, not just those who are parents or carers. Its London office has a flexible working model for all applicable departments which involves core hours and the option to work from home for two days a week. Discovery also offers 15 fully paid days per annum of backup emergency child or dependent/elder care (such as a day of an emergency nanny, holiday camp or carer). It also
has an internal online group called The Maternity League that connects Discovery parents
before/during maternity/other leave to enable them to share tips and support each other.
Employees may also buy up to five days of extra leave each year.

7.95 The Discovery Family Forum (DFF) aims to create an inclusive network promoting support
and understanding to enhance the lives of Discovery’s working parents and carers,
including carers of older parents and dependents. The DFF hosts events and
workshops/training sessions for employees giving them opportunities to exchange ideas,
resources and life experiences, empower each other and to encourage recognition
(internal and external).

Social mobility

7.96 Just outside of this year’s reporting period, in April 2019 Discovery launched its global
‘Talent Unlimited’ initiative, which aims to inspire, motivate and attract talent from
untapped communities to pursue opportunities and careers within Discovery, which will
feature in next year’s report.

7.97 Discovery continues to hold a day of community volunteering across Discovery’s regional
offices (‘Impact Day’), part of which has included its UK office conducting workshops on
writing CVs for students in underprivileged areas.

How diverse is Perform Investment Limited?

7.98 The Perform Group is a global sports media company
whose UK subsidiary Perform Investment Limited operates a multi-territory, pure-sport,
live and on-demand streaming service called “DAZN”.

Figure 47: Job level and role employee profiles for Perform Investment Ltd

<table>
<thead>
<tr>
<th>Job level</th>
<th>988 UK-based employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior Mgt.</td>
<td>12%</td>
</tr>
<tr>
<td>Mid/Junior Mgt.</td>
<td>21%</td>
</tr>
<tr>
<td>Non-mgt.</td>
<td>26%</td>
</tr>
<tr>
<td>No data</td>
<td>67%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Job role</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Broadcast Mgt.</td>
<td>9%</td>
</tr>
<tr>
<td>Business Mgt.</td>
<td>23%</td>
</tr>
<tr>
<td>Tech / Engineering</td>
<td>26%</td>
</tr>
<tr>
<td>Sales &amp; Marketing</td>
<td>17%</td>
</tr>
<tr>
<td>Creative &amp; Content</td>
<td>6%</td>
</tr>
<tr>
<td>Journalism</td>
<td>6%</td>
</tr>
<tr>
<td>On-screen</td>
<td>23%</td>
</tr>
<tr>
<td>Other / No data</td>
<td>23%</td>
</tr>
</tbody>
</table>

Equal opportunities arrangements

7.99 Perform Investment has an Equal Opportunities policy statement. It has established a
Diversity & Inclusion project team and is committed to making “full use of the talents and
resources of all employees and to provide a healthy environment, which will encourage good and productive working relations within the organisation”.

7.100 The group’s executive committee receives a twice-yearly update on its diversity and inclusion progress across the group. Its board has decided to add five specific questions around diversity and inclusion to its annual people survey to get more insight into its employees’ views on this topic.

7.101 Their senior management are trained and expected to encourage an inclusive workforce, foster fairness, lead by example and flag any concerns. Diversity is covered in inductions, its internal training programmes and its training for hiring managers. The latter also covers unconscious bias and recruiting for skills. Its e-learning platform has resource on workplace equality.

Monitoring

7.102 For this and last year’s report, Perform Investment collected data from its UK-based employees for the three mandatory characteristics (gender, racial group and disability), including subcategory data. In 2018, it started to issue a Diversity and Monitoring questionnaire to all new starters along with their contract documents to supplement diversity monitoring it conducts through an annual people survey and a half yearly pulse survey. It has a new Learning Management System which will allow it to capture and report the ethnicity and gender of those who have received training.

Disability

7.103 Perform Investment reported that all its employees self-identified as not disabled. It aims to provide those who have physical or mental disabilities with specific assistance and arrangements, to enable them to work for the organisation wherever and whenever this is reasonably practicable.

Racial group

7.104 Sixty-eight percent of its UK-based employees chose not to disclose their Racial Group information to it. Twenty-six percent of its UK-based employees are from a white ethnic group and 6% are from a minority ethnic group.

7.105 Perform Investment runs an ‘International Management’ training programme that covers culture and diversity and managing remote teams. It has also launched a Learning Management System which will have various training and awareness materials around unconscious bias, international team management and inclusion.

Gender

7.106 There are nearly four men for every woman among their UK-based employees (79% v 21%) and there are four men for every woman in its non-management and in its tech/engineering job roles (20% are women). The percentages of women in senior
Diversity and equal opportunities in television: In-focus report on ten major broadcasters

management roles and of those promoted are over double this (41% and 43%, respectively), but the percentage in middle-management roles is just 11%.

7.107 Annual succession planning by the board includes identifying gender balance in the talent pipeline. Its Learning and Development team has led focus groups globally to understand challenges around gender balance.

7.108 It has a mentorship programme designed for senior female members of the team to have networking and coaching opportunities with members of the board. It also runs Women in Technology events.

7.109 Perform reported to the Gender Pay Gap Service a 0.6 mean and negative 19.5% median gender pay gap (as at 5 April 2018) (i.e. that its women’s median hourly wage is 19.5% higher than that of its men).

7.110 Perform Investment holds regular internal and external events related to the Women in Sport initiative, a programme “with the goal of giving every woman and girl in the UK the opportunity to experience the transformational rewards of sport”. The events aim to “give an opportunity for people to share experiences and build confidence within the industry”.

How diverse is QVC?

7.111 QVC is a multi-media retailer and part of the large global company, Qurate Retail Group. It is retail combined with live TV and an online presence on web and mobile. QVC’s UK teleshopping channels include the main QVC channel and others such as QVC Beauty and QVC Style.

Figure 45: Job level and role employee profiles for QVC

Equal opportunities arrangements

7.112 QVC has an Equal Opportunities policy statement which applies to recruitment and all aspects of employment. QVC recognises that “[its] ability to meet [its] business needs is improved by having a diverse workforce” and “the importance of providing training in
Diversity and Equal Opportunities to employees at all levels of the organisation at regular intervals throughout their employment”. All employees receive training about QVC’s Diversity Policy as part of their induction, and there is mandatory compliance training for employees on the importance of equal opportunities. It also has a ‘Culture Wizard’ program for leaders managing remotely to team members from other countries.

7.113 QVC has diversity and inclusion goals for 2019 and a 5-year aspirational statement. These include:

- establishing a ‘Diversity & Inclusion Council’;
- launching more team member resource groups in 2019;
- developing and implementing a diversity & inclusion leadership engagement and communications plan;
- exploring and deploying further team member training opportunities; and
- starting unconscious bias training.

**Monitoring**

7.114 For this and last year’s report, QVC only collected data for two of the three mandatory characteristics (gender and racial Group), including subcategory data. Of the three voluntary characteristics, QVC said that it collects data on Age, but it chose not to provide this information to Ofcom. QVC’s monitoring arrangements are not in line with our requirement that it should report to us the make-up of its employees across disability, gender and racial group. We will engage with QVC to discuss its arrangements in the coming months.

7.115 QVC said that it is currently developing a dashboard on internal and external metrics, both quantitative and qualitative to inform its overall direction, programmes and initiatives for diversity and inclusion. It has also developed an ‘inclusion index’ for implementation in an upcoming employee engagement survey.

**Disability**

7.116 QVC has started an internal support community for mental wellbeing, investing in training for Mental Health First Aiders ("MHFAs"). Its current wellbeing strategy is to continue to grow this community with more MHFAs and champions, and to build understanding and awareness in all team members and its leaders. This is to create a more open environment where team members can talk about any issues and find support to “take control of their own overall wellbeing”.

**Racial group**

7.117 The percentage of employees from minority ethnic groups (7%) is 1pp up on last year. The proportion of employees from minority ethnic groups at senior management is 8%. The proportion at mid-management level increased 1pp to 14%. At non-management level the proportion remains at 5%. The job roles with the greatest representation of people from minority ethnic groups are tech/engineering (19%) and creative & content (16%).
Gender

7.118 QVC has more women working for it than men (58% v 42%). The gender split varies with job role and seniority. The gender split of QVC’s senior management is even (50% v 50%). It has more women in middle-management (53% v 47%) and non-management (63% v 37%) than men. These proportions are similar to last year. Some job roles have less women than men, for example tech/engineering (20% women v 79% men)\(^{64}\). Others have more women than men, for example creative & content (62% v 38%).

7.119 QVC has “various initiatives aimed at reinforcing [its] inclusive culture”, including the celebration of International Women’s Day.

7.120 QVC UK reported to the Gender Pay Gap Service a 13.1% mean and 15.1% median gender pay gap (as at 5 April 2018).

7.121 QVC has established a ‘UK Gender Pay Gap working group’. It has identified opportunities to remove any barriers that may exist within its internal/external talent flow and it is informing its evolving diversity & inclusion plan for the UK.

Social mobility

7.122 In affiliation with a local school from a deprived socio-economic area, QVC is providing insight to working environments and to skills through development covering topics such as emotional intelligence, and through mentoring and coaching. It offers work experience and it has a paid graduate scheme.

\(^{64}\) 1% of employees did not disclose their gender.