
Diversity and equal opportunities in radio 2019

Methodology

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1. Legal background

- 1.1 Ofcom has a duty under section 27 of the Communications Act 2003 (the 'Act') to take all such steps as we consider appropriate for promoting equality of opportunity in relation to employment by those providing television and radio services, and the training and retraining of people for such employment, between men and women, people of different racial groups¹ and disabled people.²
- 1.2 Ofcom broadcast licensees which employ more than 20 people in connection with the provision of their licensed service³ and are licensed to broadcast for more than 31 days a year are required⁴ to make arrangements for promoting, in relation to employment, equality of opportunity between men and women, people of different racial groups and for disabled people. They are also required to make arrangements for training people employed in, or in connection with, the provision of the licensed service or the making of programmes to be included in the service. They are required to take appropriate steps to make those affected by the arrangements aware of them, to review them, and to publish observations on their operation and effectiveness at least annually.
- 1.3 The BBC is subject to similar requirements under paragraph 12 of Schedule 3 to the BBC Agreement.
- 1.4 In order to review broadcasters' arrangements, and to take appropriate steps to promote equal employment and training opportunities in relation to gender, racial group and disability, Ofcom required licensees and the BBC to provide information about their arrangements and employees in terms of these three protected characteristics.
- 1.5 In addition, given the importance of equality of opportunity and diversity in the broadcasting industry in terms of the wider protected characteristics under the Equality Act 2010, we also asked broadcasters to provide, on a voluntary basis, information on their equal opportunities arrangements and employee make-up in terms of age, sexual orientation, religion or belief, gender reassignment, and pregnancy and maternity.
- 1.6 Ofcom continues to hold discussions with the Department of Digital, Culture, Media and Sport on whether an extension of our powers to require broadcasters to provide data on the broader range of characteristics covered by the Equality Act 2010 would be appropriate, rather than relying on them to provide some of this data voluntarily. Ofcom will also continue to work constructively with industry to drive change and ensure effective reporting on diversity.

¹ Under the Equality Act 2010, and therefore for the purposes of section 27 and 337 of the Act, a racial group is a group of people defined by reference to race. Race includes colour; nationality; ethnic or national origins

² Under the Equality Act 2010, and therefore for the purposes of section 27 and 337 of the Act, a person has a disability if he or she has a physical or mental impairment, and the impairment has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.

³ Or where the licensee and any group companies together employ more than 20 people in connection with the provision of licensed broadcasting services.

⁴ Pursuant to section 337 of the Act.

2. Overview – 2018 vs 2019

2.1 This report outlines the methodology used in carrying out the data collection for the *Diversity and equal opportunities in radio 2019* report.⁵ Following a review of the 2018 survey and collection process we have improved the methodology for the data collection to get better quality and more detailed information. The following two tables summarise what has remained the same as the methodology used in the first report⁶, and what changes have been made. The latter are discussed in more detail in Section 4.

What has stayed the same?	What has changed?
<ul style="list-style-type: none"> • PDF method of data collection and layout • Data security protections • Legal framework • The qualification threshold (which broadcasters are required to complete the full questionnaire) 	<ul style="list-style-type: none"> • Introducing a preliminary online questionnaire to establish qualification and refine data collection • Specific question amendments and additions • Terminology and reporting • Make-up of the broadcasters who are reported on (in terms of who completed the main survey this year compared to last year, and the number of employees covered) • UK benchmarking figures

2.2 More detail on each of the points above can be found in this report, which explains the data collection process, the changes made to the questionnaire in 2019⁷, reasoning for these changes, and the legal framework.

⁵ The main report can be found on Ofcom’s online diversity hub at www.ofcom.org.uk/diversity

⁶ The 2018 methodology is available on Ofcom’s online diversity hub or directly at https://www.ofcom.org.uk/data/assets/pdf_file/0021/114861/Diversity-in-Radio-2018-Methodology.pdf

⁷ Covering data for January to December 2017

3. How did we collect the data?

- 3.1 As was the case last year, all elements of the survey including questionnaire design, fieldwork and analysis were conducted in-house by Ofcom's market research team.
- 3.2 As a condition of their licences, Ofcom requires broadcasters to promote equality of opportunity in employment between men and women, people of different racial groups and for disabled people, and to make arrangements for training and retraining people for such employment.⁸
- 3.3 This year, to reduce the administration required by broadcasters and Ofcom, we introduced a short online questionnaire to assess the qualifying questions only. This was used to gather initial information from radio licensees to help us to understand which licensees were required to complete a full questionnaire.
- 3.4 All new licensees and broadcasters who had fewer than 50 employees (or who didn't provide a response) when we conducted the survey for the first time in 2018, were invited to complete an online 'screener' questionnaire (Annex 1) by 14 December 2018. This was designed to establish whether they currently met the qualification threshold, and thus whether they should receive a full questionnaire. All other broadcasters were automatically assumed to meet the threshold and sent a full questionnaire.
- 3.5 The screener questionnaire was sent to 437 licensees and Ofcom received responses from 415 - of these 385 (covering 467 licences and 662 employees) didn't meet the qualification threshold so were not required to complete the full questionnaire. The remaining 30 licensees who qualified equated to nine radio groups and one independent radio station who were required to complete stage 2.
- 3.6 All licensees who employed more than 20 people and were licensed to broadcast for more than 31 days per year in 2018, were required to complete stage 2, which involved a full questionnaire (Annex 2). Including those who were not sent the screener questionnaire, this applied to 17 broadcasters⁹ (including the BBC¹⁰). In total we calculate this to cover around 93% of the UK radio industry.

⁸ This obligation only applies to broadcasters (or groups of companies) who employ more than 20 people in connection with the provision of licensed broadcasting services and are authorised to broadcast for more than 31 days a year.

⁹ This differs from the 16 organisations we include within our UK industry figures. Although Word Network met the qualification threshold, they indicated they had no employees in the UK and so are not included.

¹⁰ The BBC had their own specific version of the questionnaire, though the content was largely the same.

Stage two data collection and the questionnaire

- 3.7 The full questionnaire was provided to broadcasters via a PDF form (created in Adobe Acrobat Professional) as it was in 2018, as part of a formal information request. Each broadcaster was sent the questionnaire by email and asked to use the managed file transfer (MFT) system to securely submit their response. Fieldwork took place from January to March 2019.
- 3.8 The questionnaire had a similar structure to the 2018 questionnaire, having been designed so it was clear which questions were mandatory to fill in, and which were voluntary. Purple and blue colour-coding was used to distinguish these. All licensees were required to respond to the mandatory questions, and it was stated that failure to do so would result in a possible breach of their licence condition(s).
- 3.9 Like last year, we required broadcasters to provide data on the three protected characteristics where we have powers to do so: gender; racial group; and disability (these were mandatory). In addition, we requested information on other protected characteristics outlined in the Equality Act 2010: age; sexual orientation; religion or belief; pregnancy and maternity; and gender reassignment (these were voluntary). This year we also asked broadcasters to tell us about the work they have been doing around social mobility/social and economic diversity (this was voluntary).
- 3.10 Where it wasn't possible for broadcasters to provide the required information, we asked licensees to provide reasons for this and state if alternative information could be provided.
- 3.11 For broadcasters with multiple licences, we accepted information on either a licence-by-licence or aggregated (combined across licences) basis, depending on how data had been collected internally by the broadcaster. Broadcasters were asked to specify at the top of the questionnaire to which licence(s) the data related.
- 3.12 For companies that provide services beyond broadcasting, we made clear that we only required information about those employed in connection with the provision of radio broadcasting services.
- 3.13 Within Section A of the questionnaire, broadcasters were asked to provide the total number of employees the organisation employs, either full or part time, in connection with the provision of licensed broadcasting services. They were then asked to provide numbers of employees (for the period of January to December 2018) within a further 13 categories. These questions are what are referred to as the 'profile grids'. We acknowledge that few organisations categorise employees in exactly these ways (particularly job level and job role), and so we asked broadcasters to input their information in the categories they considered most closely matched those used by their organisation. This allows us to make like-for-like comparisons across the industry.

The categories were displayed as columns on the profile grids:

1. Total number of employees
2. Joined the organisation
3. Left the organisation
4. Received training (related to developing their role)¹¹
5. Were promoted

Job level

6. Senior managers
7. Middle/junior managers
8. Non-management

Job role

9. Programmes/Programming
10. Journalism/News
11. Technical and engineering
12. Sales
13. Marketing/Press/PR
14. Support/admin

3.14 The questionnaire contained six ‘profile grids’, each for a different protected characteristic. For each characteristic, broadcasters were asked to provide breakdowns among each of the 14 categories above. Broadcasters were required to type employee numbers into each profile field on the matrix (e.g. male and female, as shown in the gender example below¹²). To help with this, at the header of each grid, the form automatically fed through the relevant total figure from Section A. At the bottom of each grid there was also a running total which would automatically recalculate each time a number was entered. The licensees were instructed to ensure that these two figures matched. A ‘Data not collected’ field was provided for any employees whose data was not captured, as well as a field for ‘Employee preferred not to disclose’.¹³

SECTION C: GENDER

For each column please ensure that the sum of boxes a to e equals the total specified in the top row (as already specified in Section A). Completion of row c is voluntary. Only provide information in row c if you have the explicit consent of the relevant individuals.

		1	2	3	4	5	6	7	8	9	10	11	12	13	14
		Total	Joiners	Leavers	Trained	Promoted	Senior	Junior	Non-mgt	Prog	Journ	Tech	Sales	Market	Support
TOTAL SPECIFIED AT:		A2	A4a	A4b	A4c	A4d	A5a	A5b	A5c	A6a	A6b	A6c	A6d	A6e	A6f
		0	0	0	0	0	0	0	0	0	0	0	0	0	0
a	Male														
b	Female														
c	Other (e.g. Intersex, non-binary)														
d	Employee preferred not to disclose														
e	Data not collected														
Current total		0	0	0	0	0	0	0	0	0	0	0	0	0	0
Still to allocate		0	0	0	0	0	0	0	0	0	0	0	0	0	0

¹¹ We note that several broadcasters indicated that they collected training data on a session-by-session basis, so the data we collected may have included multiple instances of the same employee in some cases.

¹² Data relating to gender ‘Other (e.g. Intersex, non-binary)’ was requested on a voluntary basis.

¹³ For the voluntary sections we also included a field for ‘Data collected but no consent to disclose to Ofcom’ – see 4.1.

- 3.15 A rule was also applied on processing the data to ensure that the breakdowns added up to each category total. If the summed total of a column was less than the category total, the remaining number of employees was added to the ‘not collected’ variable. If the summed total was higher, the licensees were contacted and asked to review the questionnaire.
- 3.16 A slightly simplified version of the gender, ethnicity and disability profiles were also requested on a voluntary basis for freelancers.

Stage two responses

- 3.17 The full stage two questionnaire was completed by 18 broadcasters including the BBC¹⁴. Of these, one broadcaster responded but no longer qualified due to having fewer than 21 employees (so were excluded from the reporting), and one broadcaster indicated that all their employees were based outside of the UK. The remaining 16 qualifying broadcasters (covering 8,916 employees) who completed the full questionnaire (with at least the mandatory sections filled in) within the designated time-frame, form the basis for our reporting. Of these 8,916 employees, 8,887 were identified as being based in the UK which equates to over 99% of all employees reported on.
- 3.18 Due to non-responses at stage 1, the qualification threshold, and the fact that some sections received only partial responses (i.e. data for <100% of the workforce) the research cannot provide a full picture of the industry. In total we calculate that there were 387 broadcasters (672 employees) who were not included within our industry profile figures, which we calculate to be around 7% of the industry. Conversely, the 16 broadcasters included account for around 93%.
- 3.19 Response rates to each of these employee profile sections are shown below. The first column ‘Any data’ shows the number of broadcasters who provided employee data for any of their employees, i.e. if ‘not collected’ was lower than 100%. This is then expressed as a proportion of the 16 broadcasters (% broadcasters), and as a proportion of the 8,916 employees (% employees).

MANDATORY PROFILE SECTIONS	Any data	% broadcasters	% employees
SECTION C: GENDER	16	100%	100%
SECTION D: RACIAL GROUP	13	81%	90%
SECTION E: DISABILITY	13	81%	87%
VOLUNTARY PROFILE SECTIONS	Any data	% broadcasters	% employees
SECTION F: AGE	11	69%	95%
SECTION G: SEXUAL ORIENTATION	10	63%	85%
SECTION H: RELIGION OR BELIEF	10	63%	85%

- 3.20 In addition to the above, the questionnaire contained the following additional sections which were primarily in the form of open-ended/write-in responses. This included

¹⁴ The BBC was required to complete the questionnaire under provisions of the BBC Charter and Agreement.

questions reflecting Ofcom’s diversity and equal opportunities guidance (published in November 2017) and the new area of social mobility and social and economic background.

MANDATORY SECTIONS
SECTION A: ABOUT YOU AND YOUR ORGANISATION
SECTION B: EQUAL OPPORTUNITIES ARRANGEMENTS
VOLUNTARY SECTIONS
SECTION I: SOCIAL, GEOGRAPHIC & ECONOMIC BACKGROUND
SECTION J: OTHER

Data protection and personal data

- 3.21 When completing the questionnaire broadcasters were asked to ensure they identified any personal data by adding the letter ‘P’ before such information. We explained that personal data was data which, due to the small numbers and the make-up of the organisation, could potentially lead to an individual being identified. This type of data cannot be published in our report unless it is aggregated with other data so that individuals are not potentially identifiable.
- 3.22 As was the case last year, we asked that broadcasters use Ofcom’s managed file transfer (MFT) to submit their data securely via individual password-locked accounts on the secure system. Broadcasters were also instructed to provide certain information to any individuals whose personal data they would provide in the mandatory sections of the questionnaire, and to obtain consent from any individuals whose personal data they proposed to provide on a voluntary basis.
- 3.23 In reporting the findings, we have been careful not to include any percentages relating to a particular broadcaster which equate to fewer than ten employees. This means that even when reporting on the larger (500+ employee) broadcasters, we are sometimes unable to report on specific subgroups where the base sizes are relatively low.

4. Changes made to the survey in 2019

Specific questionnaire amendments and additions

- 4.1 In 2018 we were unable to identify the number of employees where data for the voluntary characteristics had been disclosed to the broadcaster by the employee, but they had not given the necessary consent to provide the data to Ofcom. Therefore, this year, for each of the three voluntary categories (age, sexual orientation and religion or belief) we added an additional field for 'Data collected but no consent to disclose to Ofcom'.
- 4.2 We removed 'Board/non-execs' from the job level categories. This was because the base sizes were generally too low to provide robust quantitative data to report on. However, as this is a crucial area for us to understand, we included an open question asking broadcasters whether they have any equal opportunities arrangements related to board members.
- 4.3 This year we removed some questions where we asked broadcasters to provide quantitative data for employees, as we didn't feel that they provided sufficient information for meaningful reporting – these included national identity, maternity leavers, and maternity returners. Instead we included an open question asking broadcasters whether they have in place any equal opportunities arrangements specifically related to maternity and pregnancy (and nations and regions in the case of the BBC¹⁵).
- 4.4 We increased the number of open-response questions. This included significant changes to the section on equal opportunities arrangements and the ability to specify additional arrangements concerning each characteristic.
- 4.5 Previously asked broadcasters (on a voluntary basis) if they had any arrangements in place to promote equality of opportunity relating to social, geographic and/or educational make-up. This year we expanded on this question to ask if this included monitoring, schemes or initiatives, research carried out with third parties, or the start of any internal conversations.

Terminology and reporting

- 4.6 **Mandatory characteristics** We have required broadcasters to provide data on the three characteristics where we have powers to do so: gender (male or female);¹⁶ ethnicity; and disability. In this report we term these as mandatory characteristics.

¹⁵ The BBC were asked an additional question - 'Do you have any specific initiatives in place to promote equal opportunities in the nations and regions and/or amongst employees of different national origins?'

¹⁶ We asked for information relating to gender 'other (e.g. intersex, non-binary)' on a voluntary basis.

- 4.7 **Voluntary characteristics** We have requested data on other ‘protected characteristics’ in the Equality Act 2010: age; sexual orientation; religion or belief; pregnancy and maternity; and gender reassignment. We have termed these voluntary characteristics.
- 4.8 **Description of job roles** Broadcasters were asked to provide the number of employees who fall into six job role categories: programmes/programming, journalism/news, technical/engineering, sales, marketing/press/PR, and support functions/admin. We acknowledge that few broadcasters group their employees in exactly these ways, and so we asked them to input their information in the categories they considered most closely matched. This allows us to present like-for-like comparisons across the industry.
- 4.9 **Workforce** This term is used throughout this report to refer to employees and contracted freelancers combined.
- 4.10 **Not disclosed** Even when broadcasters captured data about their workforce, individuals may have preferred not to disclose their individual information to the broadcaster. In these cases the broadcaster was asked to include these individuals as ‘Employee preferred not to disclose’. These individuals are therefore included in the totals but are not identifiable by category and their data are referred to as ‘not disclosed’.

Terminology and reporting amendments

- 4.11 **Not collected** This term is used throughout this report to refer a lack of data because the employer has not requested data or the employee has not responded at all to the request or the employer left a section of our questionnaire blank without explanation.
- 4.12 **No consent** Even when employees disclosed their individual information to the broadcaster, they (or the employer) may not have consented to that information being shared with Ofcom. In these cases the broadcaster was asked to include these individuals as ‘Data collected but no consent to provide to Ofcom’. They are therefore included in the totals but are not identifiable by category and their data are referred to as ‘no consent’.
- 4.13 **Invisible data** This term is used throughout this report to refer to ‘not disclosed’ and ‘no consent’ data, combined. We acknowledge the visibility of data is not entirely within broadcasters’ control, as employees are entitled to not disclose their data to employers or to withhold consent for it to be shared with Ofcom.
- 4.14 Although our 2019 questionnaire retained the terminology ‘Black, Asian and Minority Ethnic (BAME)’, when we report on this group we now refer to it as ‘Minority Ethnic Groups’ (MEG). For those specified as ‘White,’ or within the sub-groups under this heading, we refer to them as ‘White Ethnic Groups’ (WEG).
- 4.15 When reporting on age we now primarily focus on two age groups – ‘under 50’ and ‘50+’. This differs to the 2018 report where we charted and compared against several age groups. This provides a more focused means for benchmarking across age.

Changes to broadcaster makeup

- 4.16 This year our data comprises of 8,916 employees from 16 radio broadcasters, compared to 8,879 employees from 16 broadcasters in 2018. The differences are as follows:
- Two broadcasters who are included in our data this year were not included in 2018. These are:
 - 1) *Media Sound Holdings Ltd* (43 employees)
 - 2) *New Wave Media* (24 employees)¹⁷
 - Two broadcasters who submitted a response in 2018, did not submit a response this year:
 - 1) *Tindle Radio* (21 employees for Jan-Dec 2017, 19 employees for Jan-Dec 2018)
 - 2) *INRIX Media Ltd*¹⁸ (110 employees for Jan-Dec 2017)
 - In addition, *Quidem Midlands Ltd* (30 employees) now replaces *Touch Broadcasting Ltd* (29 employees)

¹⁷ Ofcom did not ask these broadcasters to complete stage 2 questionnaires for last year's report.

¹⁸ Inrix Media Ltd provides traffic and travel information for in car satellite navigation systems, and therefore are not included in our report which focusses on the make-up of the UK radio industry.

Changes to UK benchmarking figures

4.17 The following table outlines the UK-wide benchmark figures we have used in reporting, when looking at the UK-based radio industry overall as well as individual broadcasters. In the final column of the table we provide reasons for changing the source that was used in 2018, as well as any other relevant items to note.

MANDATORY CHARACTERISTICS

	2018	2017	Reason for change
GENDER	<p>53% Male, 47% Female</p> <p>ONS Labour market statistics A09: Labour market status by ethnic group (Average of Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec 2018). All employed males and females (employees and self-employed).</p>	<p>49% Male, 51% Female</p> <p>ONS Annual Population Survey 2017 – NomisWeb</p>	<p>Changed to ‘Labour market statistics’ to better reflect the make-up of the UK workforce across the exact period measured.</p>
RACIAL GROUP	<p>12% MEG, 88% WEG</p> <p>ONS Labour market statistics A09: Labour market status by ethnic group (Average of Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec 2018). All in employment.</p>	<p>14% MEG, 86% WEG</p> <p>ONS Annual Population Survey 2017 – NomisWeb</p>	<p>Changed to ‘Labour market statistics’ to better reflect the make-up of the UK workforce across the exact period measured. Also included additional regional variations where relevant.</p>
DISABILITY	<p>18% disabled, 82% not disabled</p> <p>ONS Labour market statistics A08: Labour market status of disabled people (Average of Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec 2018)</p> <p>Proportion of all 16-64 who are ‘Harmonised Standard Definition Disabled’</p>	<p>18% disabled, 82% not disabled</p> <p>Census 2011 - Activity limiting health problem or disability (limited a lot or limited a little). GB only.</p>	<p>Changed to ‘Labour market statistics’ to better reflect the proportion of all disabled people who are able to work, across the exact period measured. Also reflects the UK, rather than GB.</p>

VOLUNTARY CHARACTERISTICS

	2018 report	2017 report	Reason for change
AGE	<p>68% under 50, 32% 50+</p> <p>Note: these proportions are the same among both men and women.</p> <p>ONS Labour market statistics Table A05: Labour market by age group: People by economic activity and age (seasonally adjusted) (Average of Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec 2018). All employed people/women/men</p>	<p>51% under 40, 49% 40+</p> <p>ONS Annual Population Survey 2017 – NomisWeb</p>	<p>Changed to ‘Labour market statistics’ to better reflect the make-up of the UK workforce across the exact period measured.</p>
SEXUAL ORIENTATION	<p>2% LGB, 93% Heterosexual, 4% not disclosed</p> <p>ONS Sexual identity, UK: 2016 - Percentage of UK population who identify themselves as LGB</p>		<p>No benchmark data in 2018.</p>
RELIGION	<p>67% religious, 26% non-religious, 4% not disclosed</p> <p>Religion = Census 2011</p>		<p>No benchmark data in 2018. * Note that we are aware of other studies which contradict the Census figures we use. For example, NatCen British Social Attitudes survey 2017 suggest that ‘non-religious’ is 53% (thus surpassing ‘religious’).</p>