



# Diversity Report

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2015

# About this document

This document is a report on the diversity profile of Ofcom colleagues. It provides analysis and further information on the diversity of the Ofcom workforce and where possible also evaluates diversity across:

- Each stage of recruitment
- Job levels
- Completion of training and development programmes
- Performance ratings and promotions
- Leavers
- Grievances

This report fulfils part of Ofcom's duties under the Equality Act 2010. It also informs our Single Equality Scheme and our ongoing work to promote equality and diversity at Ofcom.

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## Section 1

# Executive summary

## 1.1 Introduction

As the UK's communications regulator, Ofcom's responsibility is to make decisions that have a significant impact on consumers and citizens, to make communications work for everyone. To do this effectively, we need people from diverse backgrounds to help us represent the different perspectives within society.

Ofcom is committed to treating all colleagues with dignity and respect in an inclusive and fair working environment, promoting equality of opportunity for all. In order to achieve this we have a Single Equality Scheme that sets out specific actions and objectives that encourage and promote diversity (found [here](#)).

To help direct this work, we monitor, and carry out analysis of, the diversity profile of our colleagues. This helps us to understand the composition of our organisation, and how diversity and equality is operating within its key functions.

This is Ofcom's fourth report on the diversity profile of colleagues. It fulfils part of Ofcom's public sector equality duty under the Equality Act 2010, helps inform our Single Equality Scheme and our ongoing work to promote equality and diversity at Ofcom.

## 1.2 Summary of findings on the diversity of Ofcom colleagues

**Age:** Colleagues' ages range from 17 to 69 years old. The largest age group is made up of Ofcom colleagues aged between 30 and 39 years old.

**Disability:** 2% of colleagues have a disability, with 8% preferring not to say or with no data recorded.

**Gender:** 59% of colleagues are male and 41% are female.

**Gender reassignment:** We do not have the data necessary to report on this characteristic.

**Ethnicity:** 67% of colleagues are from a White background, 16% of colleagues are from a BAME (Black, Asian, and Minority Ethnic) background and 16% preferred not to say or the data is not recorded.

**Marriage and civil partnership:** We do not collect this data.

**Pregnancy and maternity:** 4% of female colleagues took maternity leave between 1 April 2014 and 31 March 2015. Of those that took maternity leave, 21% were from a BAME background, 50% were from a White background, and 29% preferred not to say or the data was not recorded. None were disabled.

**Religion or belief:** 47% of colleagues do not have a religion or belief and 8% preferred not to say or the data is not recorded. At least seven religions or beliefs are represented at Ofcom and the largest group are Christians at 23%.

**Sexual orientation:** 48% of colleagues describe themselves as heterosexual / straight, 2% as LGB (lesbian, gay or bisexual), and 50% preferred not to say or the data is not recorded.

## 1.3 The purpose of this report

We collect our colleague diversity data and report on it annually so we can analyse our colleague profile and facilitate an informed approach to equality and diversity at Ofcom.

We monitor and report on the diversity of our workforce to form a part of our public sector duty under the Equality Act 2010 and to help guide our Single Equality Scheme. It helps us to direct the areas of work we should be focussing on in order to help us represent consumers and citizens, to make sound decisions and be an effective regulator.

This is fundamental to Ofcom achieving its organisational purpose of making communications work for everyone. To help us with our work in promoting choice, securing standards and preventing harm, we need to make the best decisions for all UK consumers and citizens. To do this, it is essential that all levels of our organisation are diverse and foster an inclusive culture. We will achieve this by adopting our recently updated values of:

- Excellence
- Collaboration
- Agility
- Empowerment

We will incorporate these values into how we conduct our daily business to underpin all of our work and how we behave whilst carrying out our work.

## **1.4 How we will use this report and its findings**

- We will communicate the findings of the report with Ofcom colleagues and publically on our website.
- We will use the findings of the report to identify where we have gaps in our current approach to diversity and to develop our strategy.
- We will benchmark our performance with other stakeholders and corporate employers.

## Section 2

# About this report

## 2.1 What data is used

This report provides an overview of the diversity monitoring data held on Ofcom colleagues. The data used is either a snapshot of colleagues taken in June 2015, or covers the period from 1 April 2014 to 31 March 2015.

At the time of reporting, in June 2015, there were 803 colleagues at Ofcom (52 Administrators; 249 Associates; 298 Senior Associates; 150 Principals; and 54 Senior Managers and Specialists).

## 2.2 How we collect the data

We ask colleagues to complete a diversity monitoring form when joining Ofcom and we ask colleagues to review their data annually. We also ask candidates to complete a voluntary diversity monitoring form when applying for positions at Ofcom.

## 2.3 Areas of reporting

The Equality Act 2010 replaced three previous reporting duties on ethnicity, disability and gender, bringing them together as a single duty which was extended to cover nine protected characteristics. The protected characteristics covered by the Equality Act are:

- Age
- Disability
- Ethnicity
- Gender
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Religion or belief
- Sexual orientation

See Annex 1 for definitions of these terms and our usage of them.

This report provides information on all of the protected characteristics except for gender reassignment and marriage and civil partnership, which we do not intend to publish data on.

## 2.4 Understanding the charts in this report

We wanted to understand whether or not particular groups of colleagues were participating or represented within different areas at Ofcom, e.g. within each job level or within each performance rating.

To do this, on many of the charts featured in this report we have included a bar chart like the one featured in the worked example below.

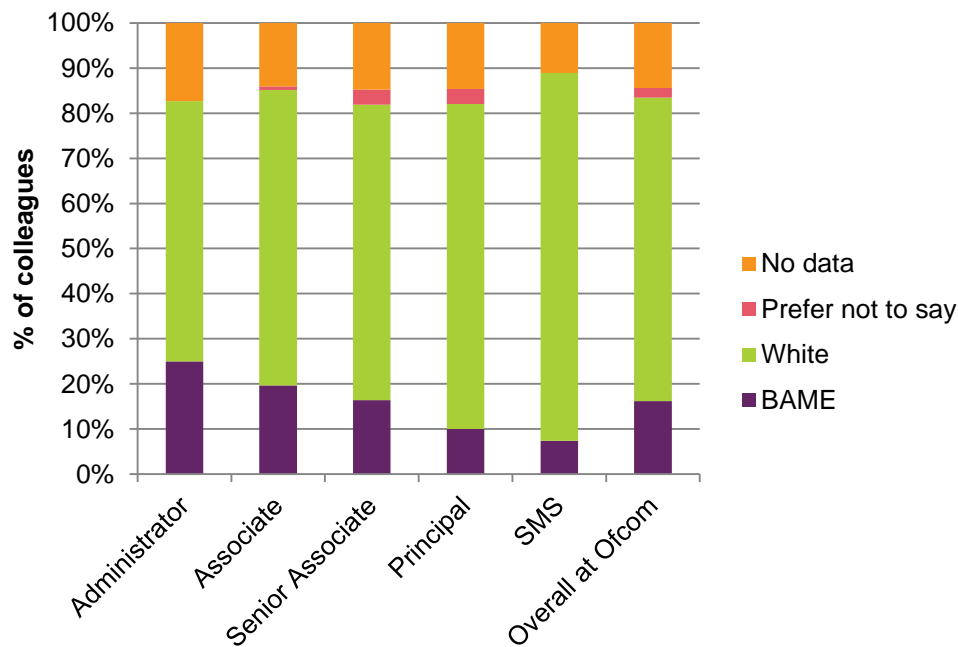
This graph allows us to compare the actual representation or participation of diversity groups with what we would expect this level to be, given the overall distribution of the diversity group or area at Ofcom.

By doing this we are able to identify instances where a particular diversity group appears to be overrepresented or underrepresented within different areas of Ofcom.

### Worked example – ethnicity within each job level

- a) In the example chart below, we are examining the total population of colleagues within Ofcom by job level.
- b) For each of the job levels we have reported the distribution of the diversity groups, in this case by ethnicity.
- c) Each bar represents 100% of the population at each job level.
- d) The proportion of each ethnic category at every job level is reflected on each bar.
- e) The final bar; Overall at Ofcom, represents the overall average proportion for each ethnicity group at Ofcom as a whole.

### Ethnicity within each job level



## Section 3

# Next steps

This report has been reviewed by our Corporate Responsibility Steering Group, and reported to the Policy Management Board and the Ofcom Board. We will publish this report on our website and communicate our findings to all Ofcom colleagues.

We will use the findings of this report to identify gaps in our current approach to diversity and feed this into our Single Equality Scheme action plan. Following the analysis there are some key priority areas of work that we have identified:

- Although we have achieved considerable progress in diversity since our first Diversity Report in 2012, the trends in our colleague profile have not significantly improved. We have therefore decided to set ourselves the following gender and ethnicity targets to be reached by 2020:
  1. 50% female to male gender balance across Ofcom
  2. 60:40 male to female balance at a senior level
  3. 13% of colleagues at a senior level to be from a BAME background

We are clear these targets are not quotas; we will always hire the strongest candidates and value our highest performing colleagues. Whilst we are starting with gender and ethnicity targets, we are equally committed to ensuring progress for all under-represented groups.

- This was the first year we have been able to monitor and report on our recruitment diversity data and we are concerned about what the data tells us about the process for BAME candidates. We are therefore going to review our recruitment process and deliver more extensive unconscious bias training for all our colleagues making people decisions.
- We will work to collect more complete data by continuing to encourage our colleagues to complete their diversity data, and by working with recruitment agencies to submit candidate data for our recruitment analysis.
- We are concerned about the trend in our data that demonstrates a disproportionately high number of BAME colleagues receive lower performance ratings than white colleagues. We have committed to updating our appraisal process in time for a new approach to be in place for the 2015/16 performance year.
- The data shows that no BAME colleagues were promoted to senior levels during our 2014/15 promotions process. We are therefore going to review our process to mitigate any potential bias and to help ensure that colleagues from all ethnic backgrounds have the opportunity to be promoted at all levels.

Following an organisational review, we have a number of changes planned which will help to promote our organisational agility, collaboration, and development. All of these improvements will incorporate our wider diversity strategy and help towards our work in encouraging diversity and promoting equality. This is demonstrated clearly by our recent focus on *how* we conduct our business and the change to our values, led by our colleagues.

Ofcom has a clear statement of purpose: a shared understanding of why we exist, what we do and how we should work together. Ofcom's purpose is to make communications work for everyone. We do this by promoting choice; securing standards and preventing harm. How we work together to achieve this is through excellence, collaboration, agility and empowerment. To deliver against these objectives it is critical we continue to improve our diversity monitoring and corresponding strategy, to promote diversity across our colleague profile and throughout our processes, so we can make communications work for everyone.



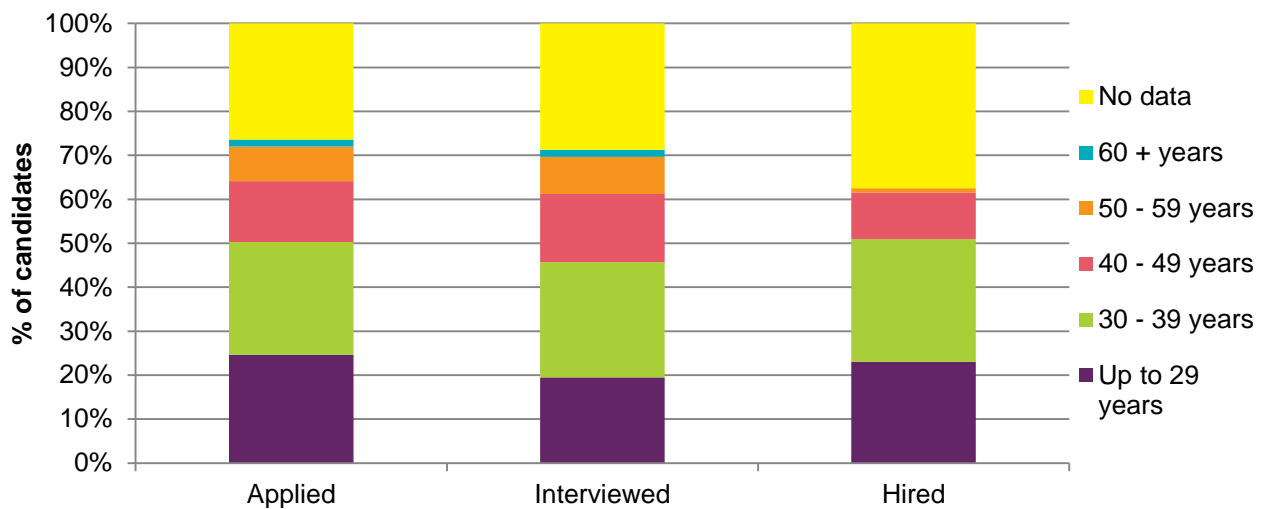
## Section 4

# Recruitment

In March 2014 Ofcom installed an applicant tracking system so we can manage our recruitment process. This new system allows us to regularly collate and analyse the diversity data at each stage of the recruitment process. The diversity data that we collect during recruitment includes age, disability, gender, ethnicity and sexual orientation.

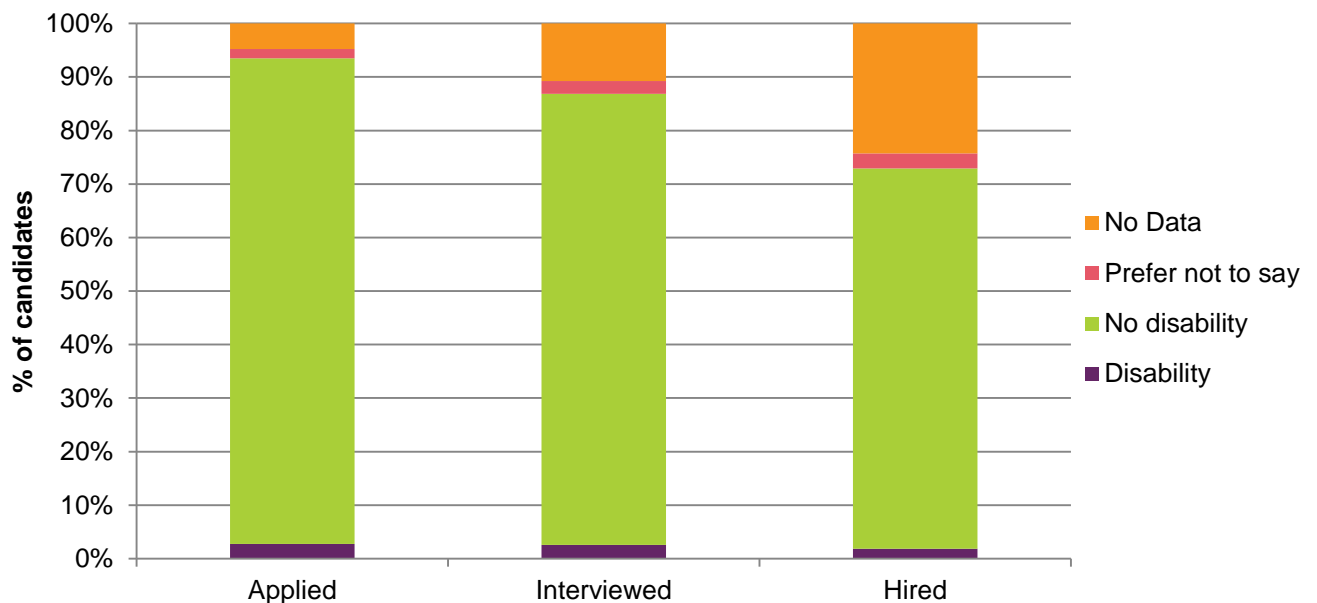
This section of the report provides the diversity information about candidates who applied for positions at Ofcom from the 1 April 2014 to the 31 March 2015. To help our analysis we have broken the data down into three parts: applied; interviewed; and, hired. Between 1 April 2014 and 31 March 2015, 3248 candidates applied for a position at Ofcom, 554 were interviewed; and 99 hired. The graphs show the diversity of candidates at each of these three stages.

### 4.1 Recruitment by age



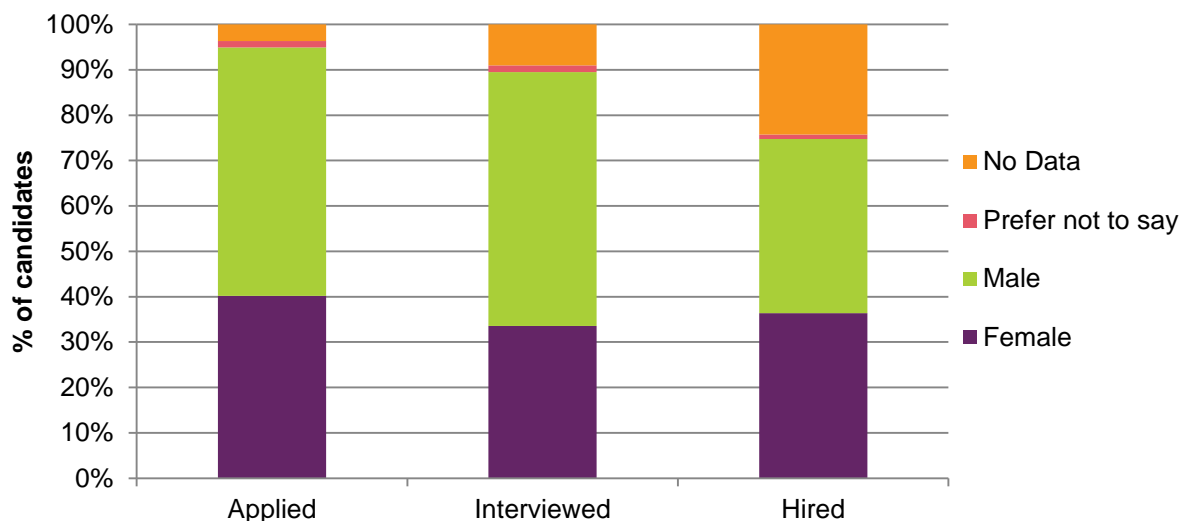
Base: All candidates who applied for a position at Ofcom between 1 April 2014 and 31 March 2015 (n=3248); who were interviewed by Ofcom (n=554); and, who were hired by Ofcom (n=99)

### 4.2 Recruitment by disability



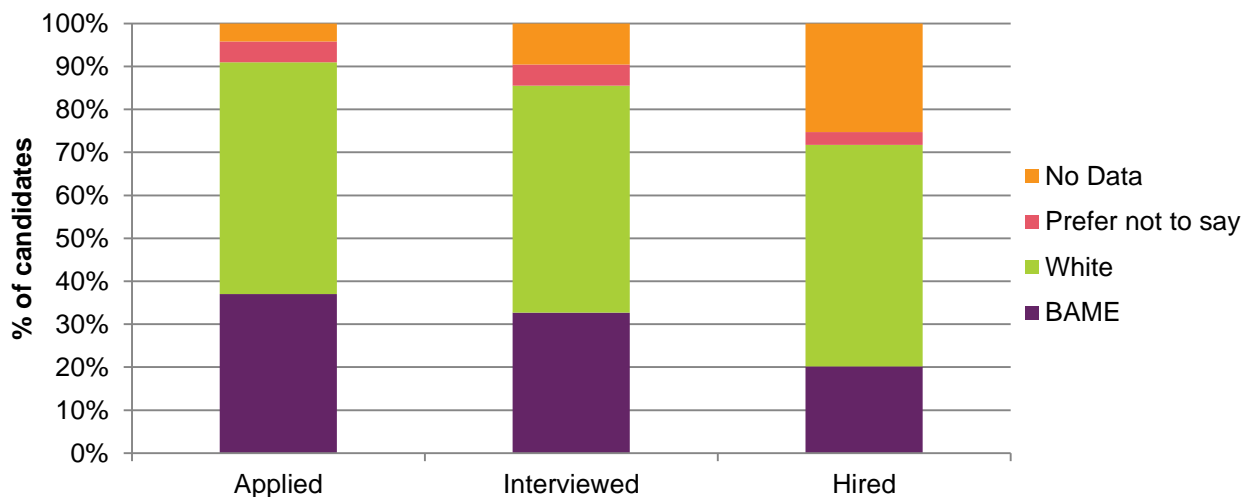
Base: All candidates who applied for a position at Ofcom between 1 April 2014 and 31 March 2015 (n=3248); who were interviewed by Ofcom (n=554); and, who were hired by Ofcom (n=99)

### 4.3 Recruitment by gender



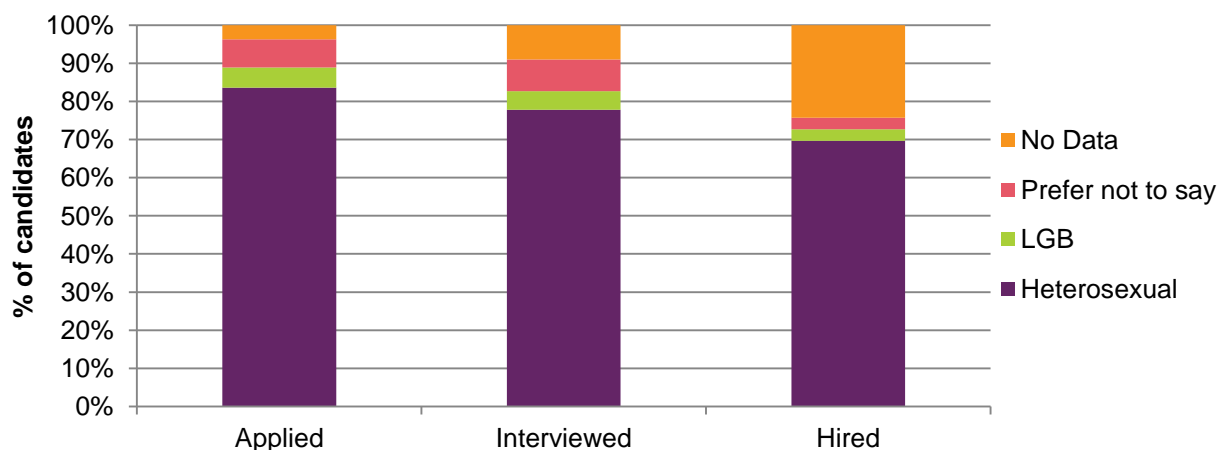
Base: All candidates who applied for a position at Ofcom between 1 April 2014 and 31 March 2015 (n=3248); who were interviewed by Ofcom (n=554); and, who were hired by Ofcom (n=99)

### 4.4 Recruitment by ethnicity



Base: All candidates who applied for a position at Ofcom between 1 April 2014 and 31 March 2015 (n=3248); who were interviewed by Ofcom (n=554); and, who were hired by Ofcom (n=99)

### 4.5 Recruitment by sexual orientation



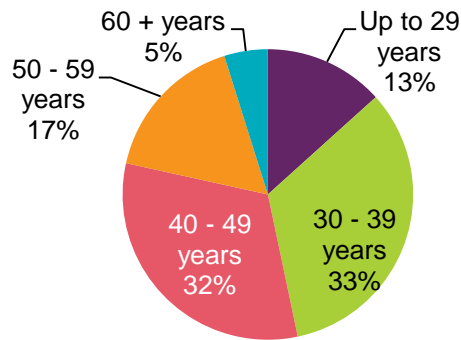
Base: All candidates who applied for a position at Ofcom between 1 April 2014 and 31 March 2015 (n=3248); who were interviewed by Ofcom (n=554); and, who were hired by Ofcom (n=99)

## Section 5

# Colleague profile

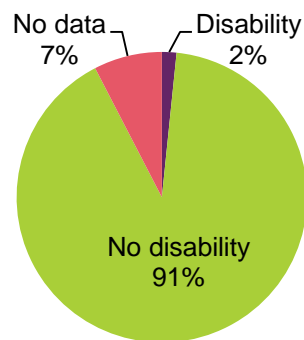
This section of the report provides diversity information about Ofcom colleagues for each of the protected characteristics we report on (this excludes gender reassignment and marriage and civil partnership). The diversity data represents a snapshot of Ofcom's workforce taken in June 2015; there were 803 colleagues at this time.

### 5.1 Age of Ofcom colleagues



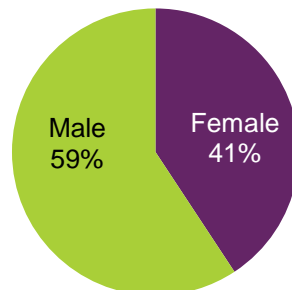
Base: All colleagues as of June 2015 (n=803)

### 5.2 Disability of Ofcom colleagues



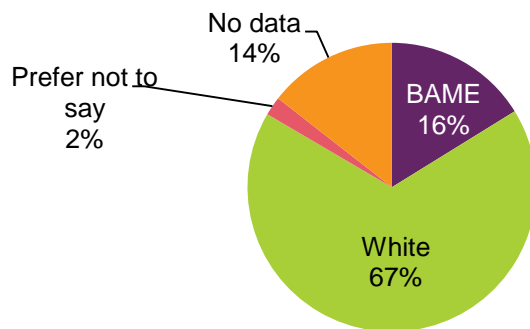
Base: All colleagues as of June 2015 (n=803)

### 5.3 Gender of Ofcom colleagues



Base: All colleagues as of June 2015 (n=803)

## 5.4 Ethnicity of Ofcom colleagues



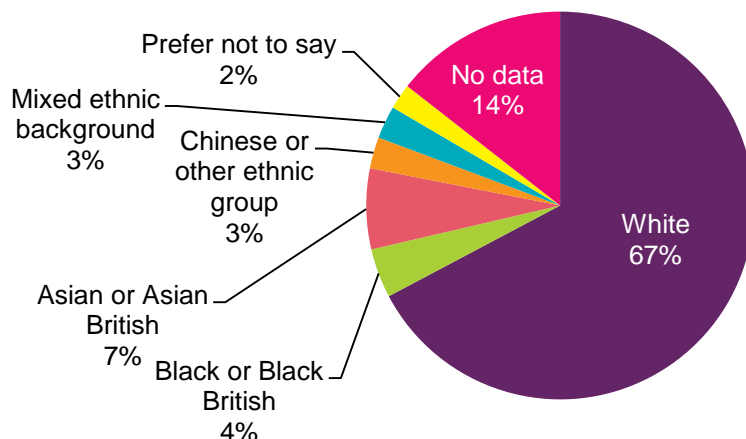
Base: All colleagues as of June 2015 (n=803)

For reporting purposes, we have grouped the classifications as follows:

- BAME (Black, Asian and Minority Ethnic)
- White

Please see Annex 2 for a full list of classifications and how they are grouped.

Where possible we also analyse the ethnicity data by each ethnicity classification and when we are able to maintain colleague confidentiality we have reported on our findings.



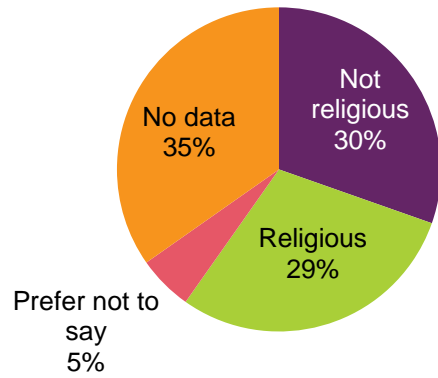
Base: All colleagues as of June 2015 (n=803)

## 5.5 Pregnancy and maternity leave of Ofcom colleagues

### Key information

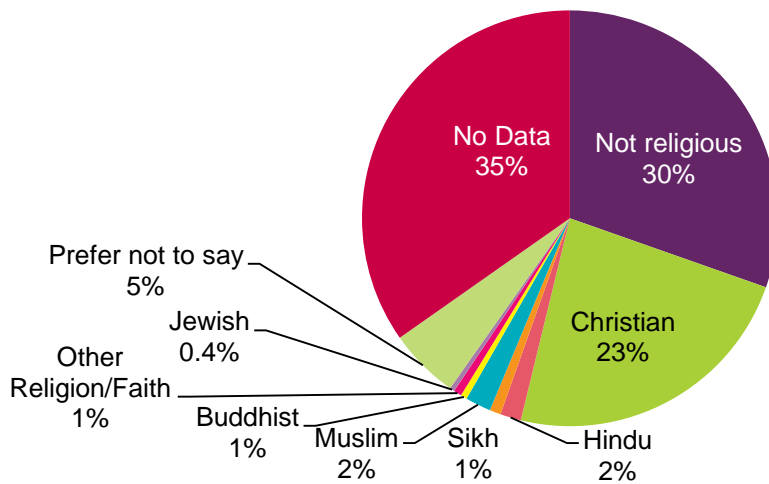
- During the last financial year, from 1 April 2014 to 31 March 2015, 4% of our female colleagues took maternity leave.
- Of those who took maternity leave, 86% were employed full time and 14% part time, 64% returned to work with the same hours and 21% returned on reduced hours.
- Of those who took maternity leave, 21% were from a BAME background, 50% were from a White background and 29% preferred not to say or no data was not recorded.
- No disabled colleagues took maternity leave during this period.

## 5.6 Religion or belief of Ofcom colleagues



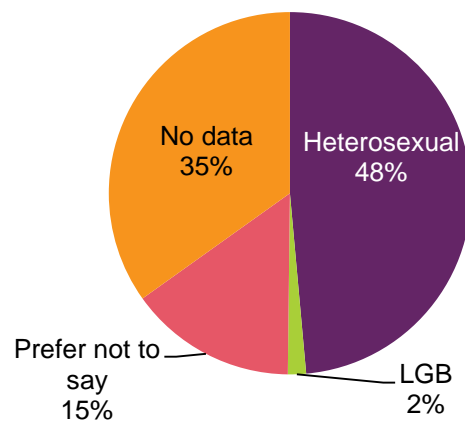
Base: All colleagues as of June 2015 (n=803)

The different types of religions and how they are represented at Ofcom is broken down in the graph below:



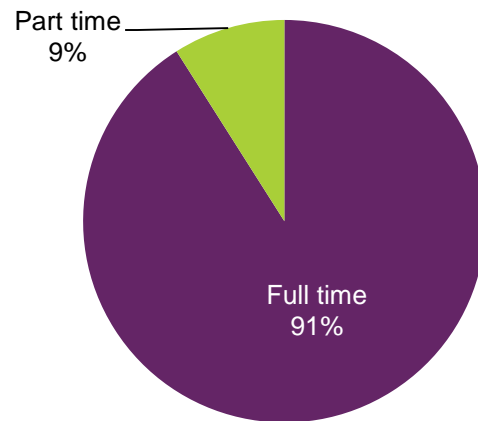
Base: All colleagues as of June 2015 (n=803)

## 5.7 Sexual orientation of Ofcom colleagues



Base: All colleagues as of June 2015 (n=803)

## 5.8 Working pattern of Ofcom colleagues



*Base: All colleagues as of June 2015 (n=803)*

## Section 6

# Job level

## Introduction

This section of the report provides diversity information about Ofcom colleagues at each level of seniority. In June 2015, there were 54 Senior Managers and Specialists; 150 Principals; 298 Senior Associates; 249 Associates; and 52 Administrators. There are five job levels within Ofcom, people managers sit across these levels, in descending seniority the technical capabilities are:

### Senior Manager and Specialist (SMS)

SMS lead Ofcom's thinking, direction and handle highly complex issues, exercising clear and incisive judgement. SMS colleagues take responsibility for the set-up, direction and delivery to time, quality and cost of strategically significant projects, programmes or objectives.

### Principal

Principals are recognised experts or acclaimed specialists in their own field, typically taking responsibility for delivering objectives with minimal direction. Colleagues at Principal level will have a depth and breadth of knowledge and skills and apply these to complex problems.

### Senior Associate

Senior Associates will have developed a specialist knowledge or expertise and apply knowledge and skills to a range of standard and moderately complex activities. Colleagues at Senior Associate level will act as a source of experience and technical expertise to others within Ofcom.

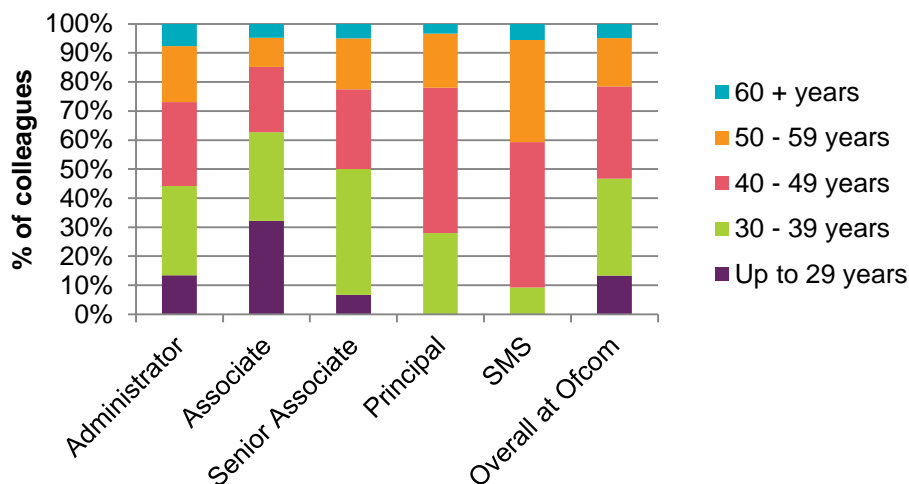
### Associate

Associates demonstrate competence in their own field and will be broadening their ability over a variety of areas. Colleagues at Associate level will apply knowledge and skills to a variety of standard day-to-day activities.

### Administrator

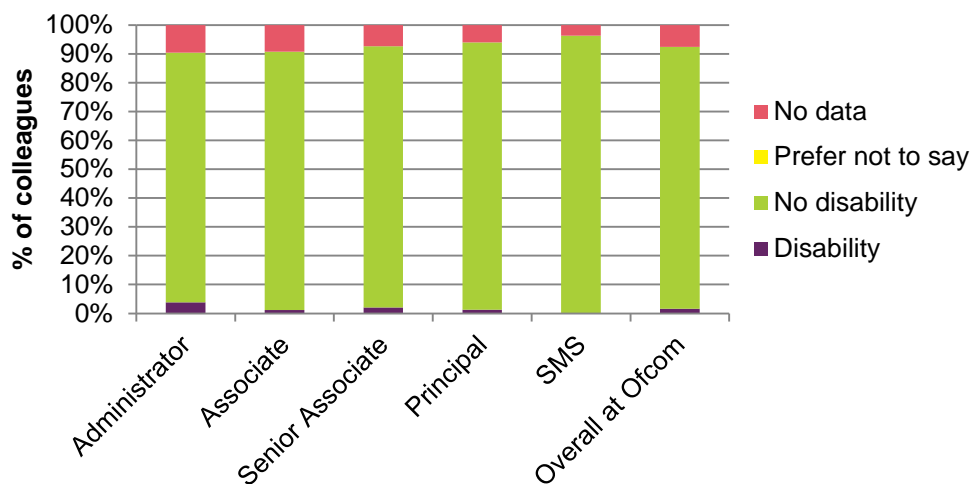
Administrators apply skills and knowledge to a variety of standard day-to-day tasks and procedures. Colleagues at Administrator level will apply basic technical skills, together with business knowledge to their own work area.

## 6.1 Age within each job level



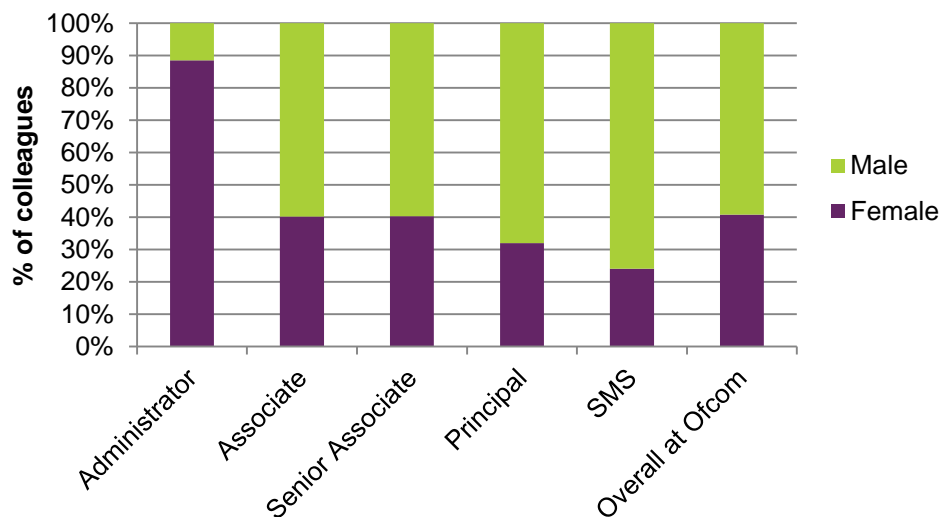
Base: All colleagues as of June 2015 (n=803)

## 6.2 Disability within each job level



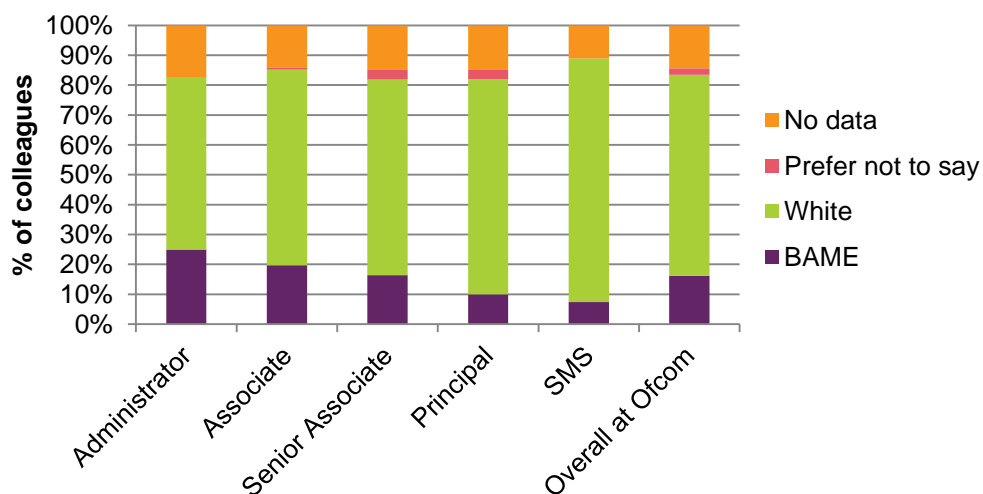
Base: All colleagues as of June 2015 (n=803)

## 6.3 Gender within each job level



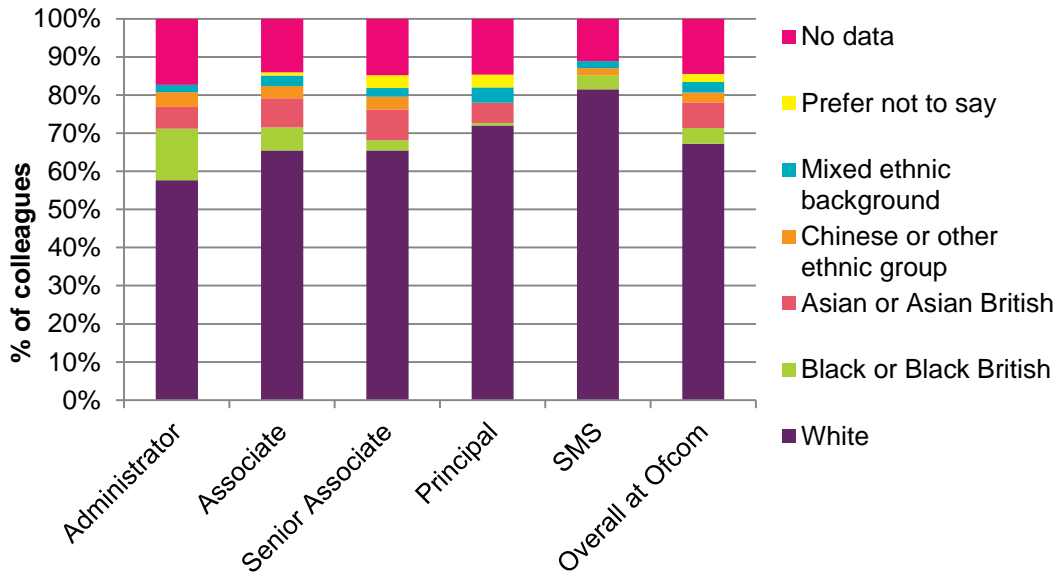
Base: All colleagues as of June 2015 (n=803)

## 6.4 Ethnicity within each job level



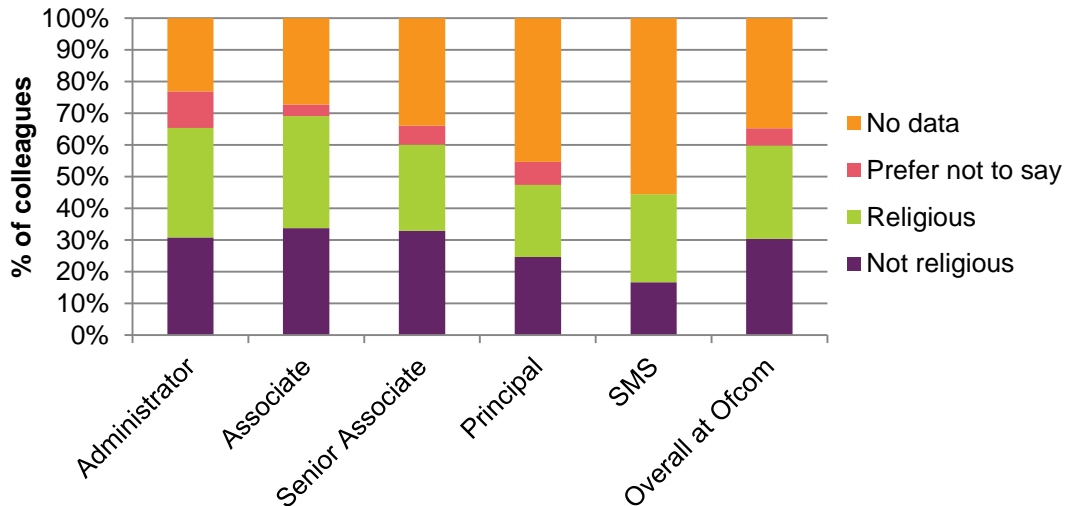
Base: All colleagues as of June 2015 (n=803)





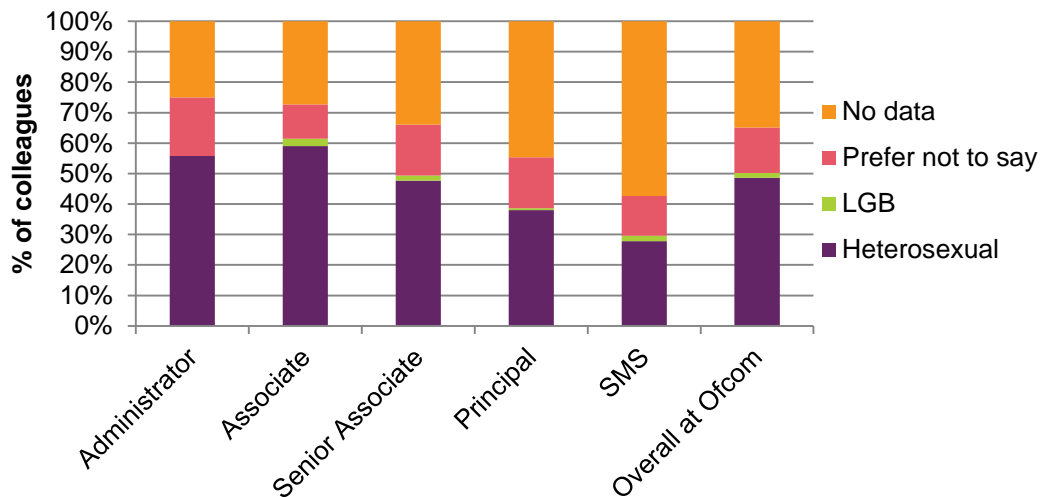
Base: All colleagues as of June 2015 (n=803)

## 6.5 Religion or belief within each job level



Base: All colleagues as of June 2015 (n=803)

## 6.6 Sexual orientation within each job level



Base: All colleagues as of June 2015 (n=803)

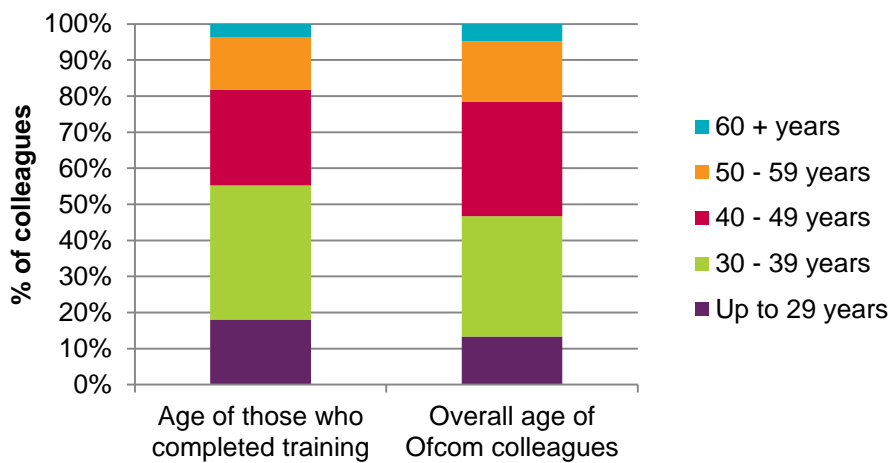
## Section 7

# Training and development

This section of the report provides diversity information about Ofcom colleagues who have received training and development between 1 April 2014 and 31 March 2015. This data only includes colleagues who have attended specific training and development courses which are recorded on our database, and does not include eLearning training. Ofcom colleagues also take part in broader training and development such as mentoring, project work and secondments; these are not always recorded on our database and so are not featured in this report.

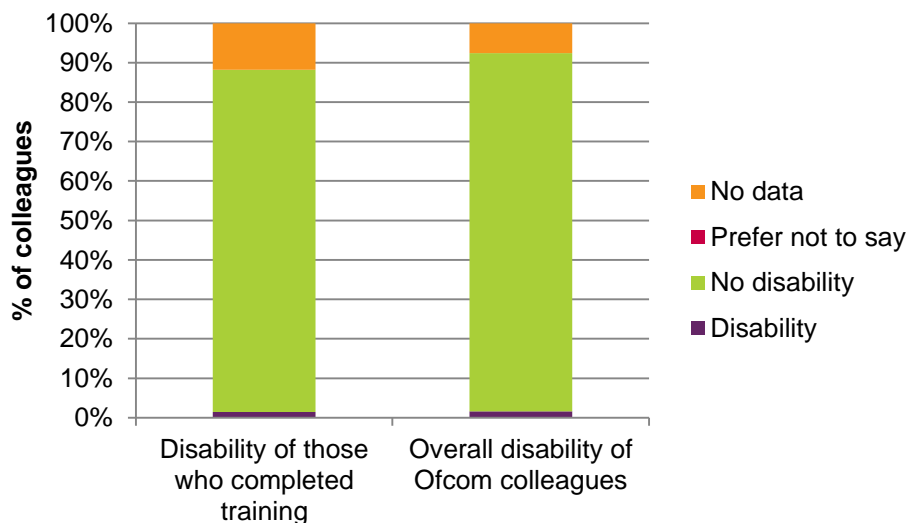
During the 2014/15 financial year, 70% of colleagues (n= 561) completed some form of training and development.

### 7.1 Training and development by age



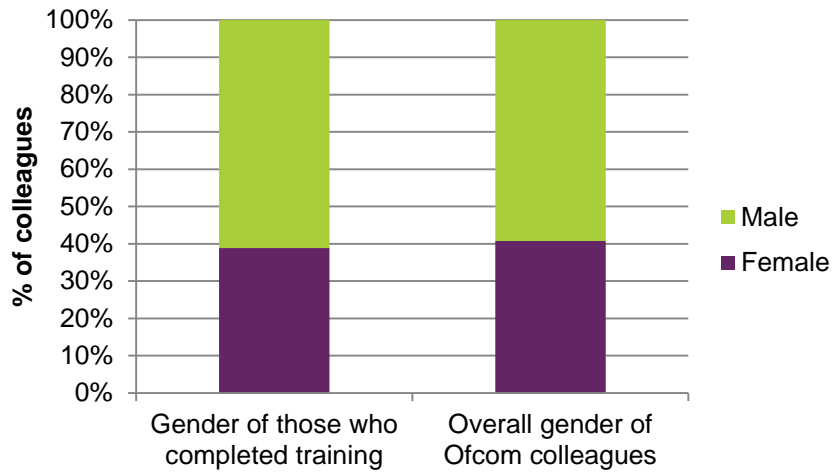
Base: All colleagues that completed a training and development activity (excluding eLearning) between 1 April 2014 and 31 March 2015 (n=561)

### 7.2 Training and development by disability



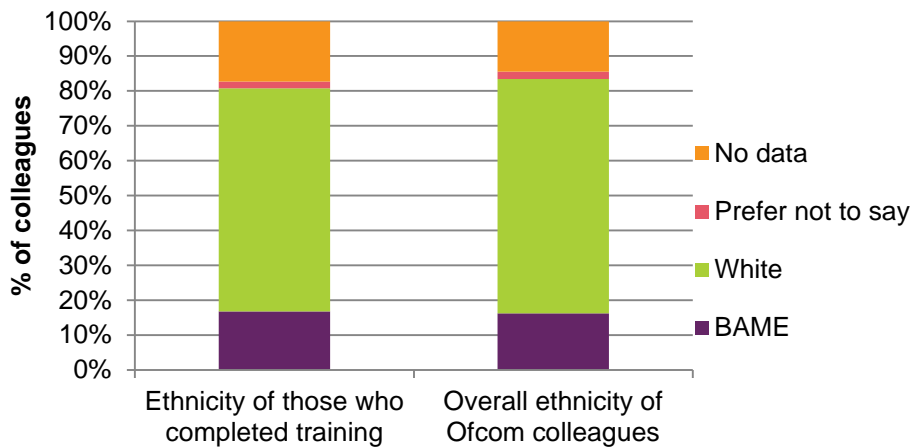
Base: All colleagues that completed a training and development activity (excluding eLearning) between 1 April 2014 and 31 March 2015 (n=561)

### 7.3 Training and development by gender



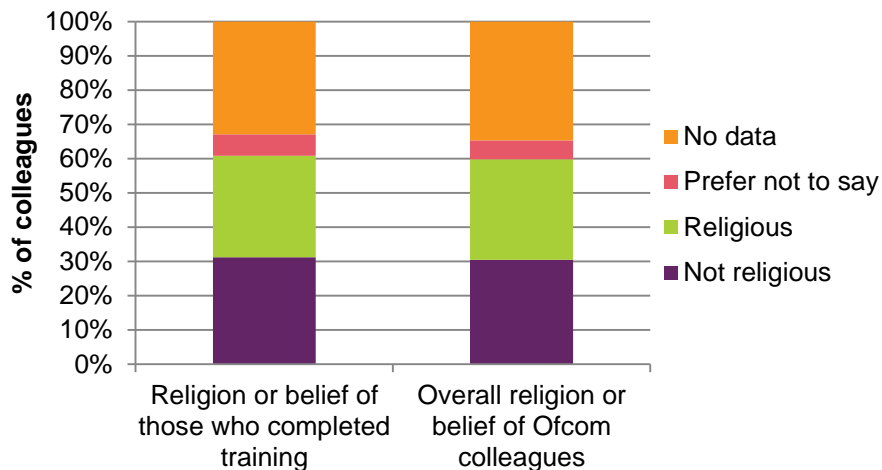
Base: All colleagues that completed a training and development activity (excluding eLearning) between 1 April 2014 and 31 March 2015 (n=561)

### 7.4 Training and development by ethnicity



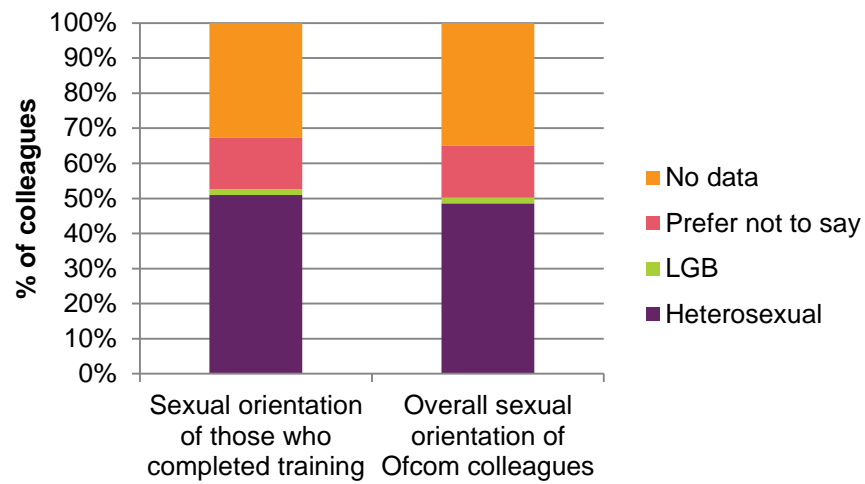
Base: All colleagues that completed a training and development activity (excluding eLearning) between 1 April 2014 and 31 March 2015 (n=561)

### 7.5 Training and development by religion



Base: All colleagues that completed a training and development activity (excluding eLearning) between 1 April 2014 and 31 March 2015 (n=561)

## 7.6 Training and development by sexual orientation



Base: All colleagues that completed a training and development activity (excluding eLearning) between 1 April 2014 and 31 March 2015 (n=561)

## Section 8

# Performance and promotion

This section of the report provides diversity data on Ofcom colleagues in relation to performance ratings and promotions in 2015. During this time 758 colleagues received a performance rating and 37 colleagues were promoted.

We are unable to report on the disability or sexual orientation of colleagues within performance ratings and promotions as the numbers are so low when broken down into these areas. This renders meaningful statistical analysis insignificant and reporting the statistics whilst maintaining colleague confidentiality would not be possible.

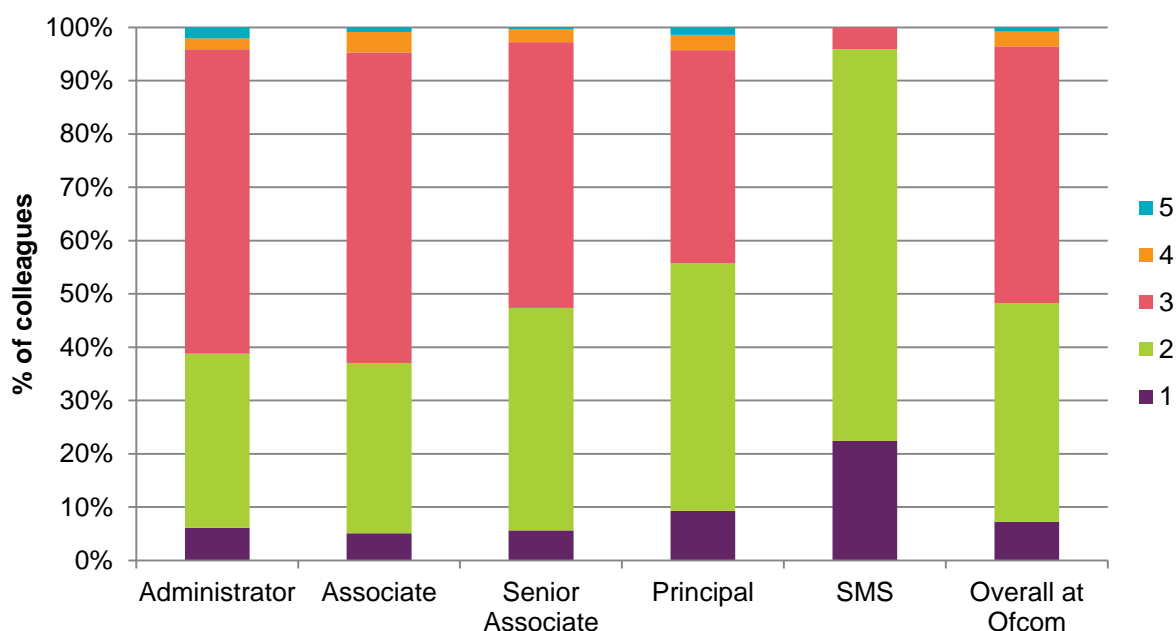
## 8.1 Performance ratings

The performance year reported runs from 1 April 2014 to 31 March 2015. The following data relates to colleagues that were eligible for the performance appraisal process.

Ofcom performance ratings are scored from one to five:

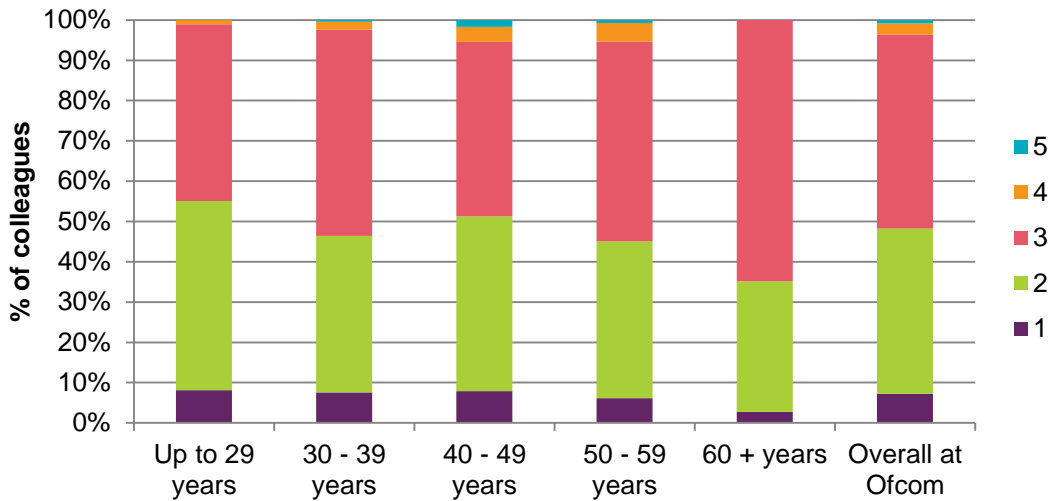
- 1: Has shown outstanding performance, consistently exceeding agreed expectations in both the delivery of objectives and the application of the skills / behaviours required.
- 2: Has shown very good performance, meeting and frequently exceeding agreed expectations in both the delivery of objectives and the application of the skills / behaviours required.
- 3: Has shown good performance, meeting agreed expectations for the delivery of objectives and application of the skills / behaviours required.
- 4: Has achieved some but not all of the agreed expectations for the delivery of key objectives and application of the skills / behaviours required.
- 5: Has shown unsatisfactory performance failing to deliver against key objectives and / or skills and behaviours.

## 8.2 Job level and performance ratings



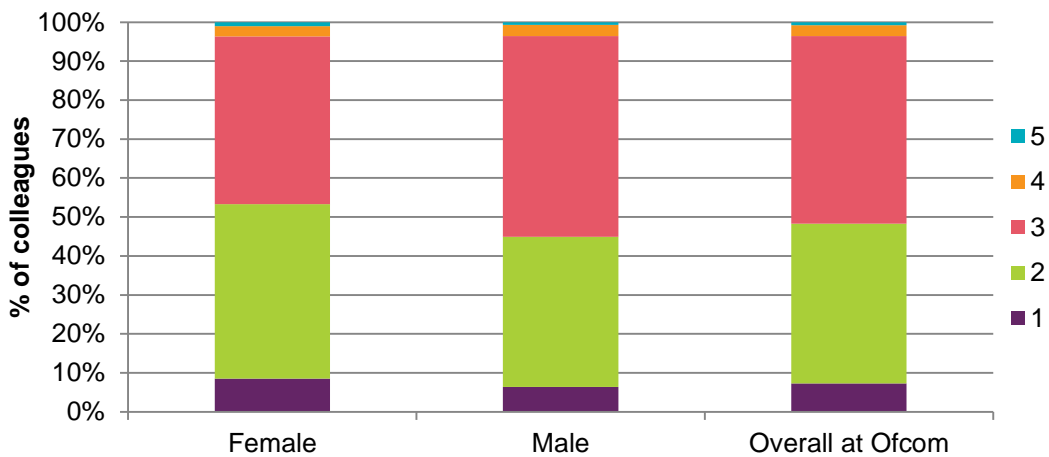
Base: All Ofcom colleagues eligible for the 2014/5 performance appraisal process excluding those who were too early to assess (n=758)

### 8.3 Performance ratings by age



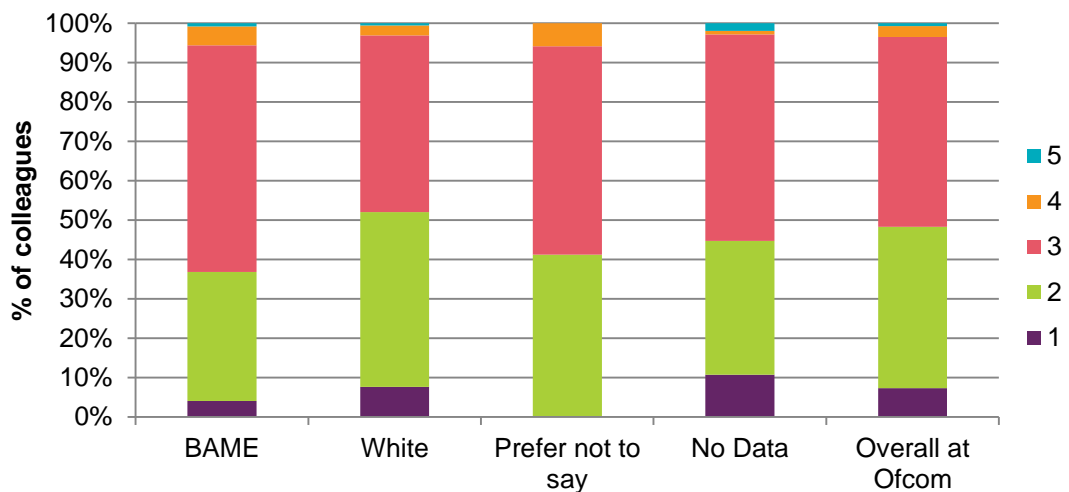
Base: All Ofcom colleagues eligible for the 2014/5 performance appraisal process excluding those who were too early to assess (n=758)

### 8.4 Performance ratings by gender



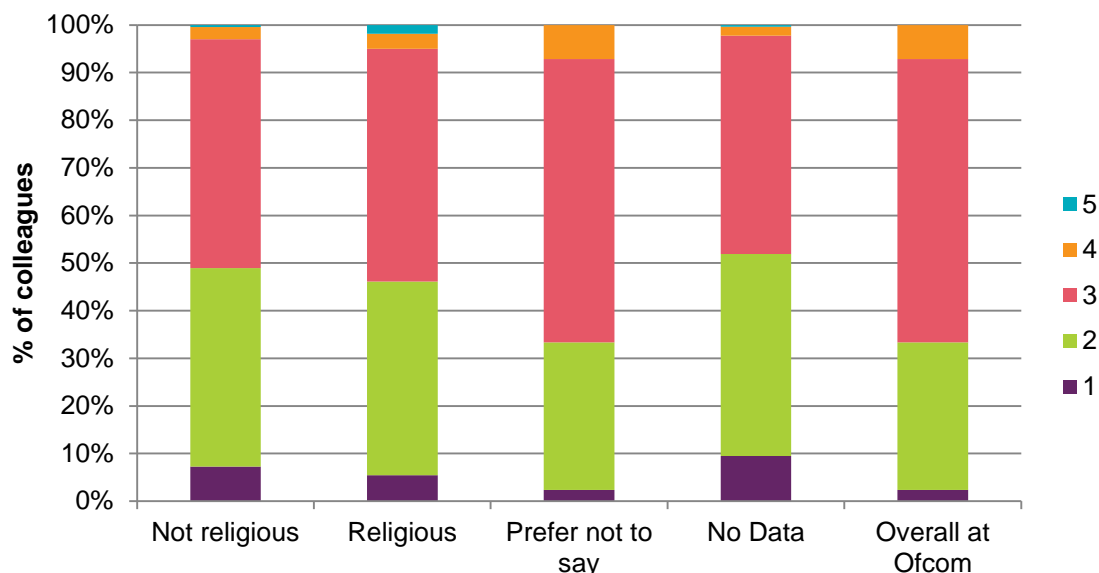
Base: All Ofcom colleagues eligible for the 2014/5 performance appraisal process excluding those who were too early to assess (n=758)

### 8.5 Performance ratings by ethnicity



Base: All Ofcom colleagues eligible for the 2014/5 performance appraisal process excluding those who were too early to assess (n=758)

## 8.6 Performance ratings by religion

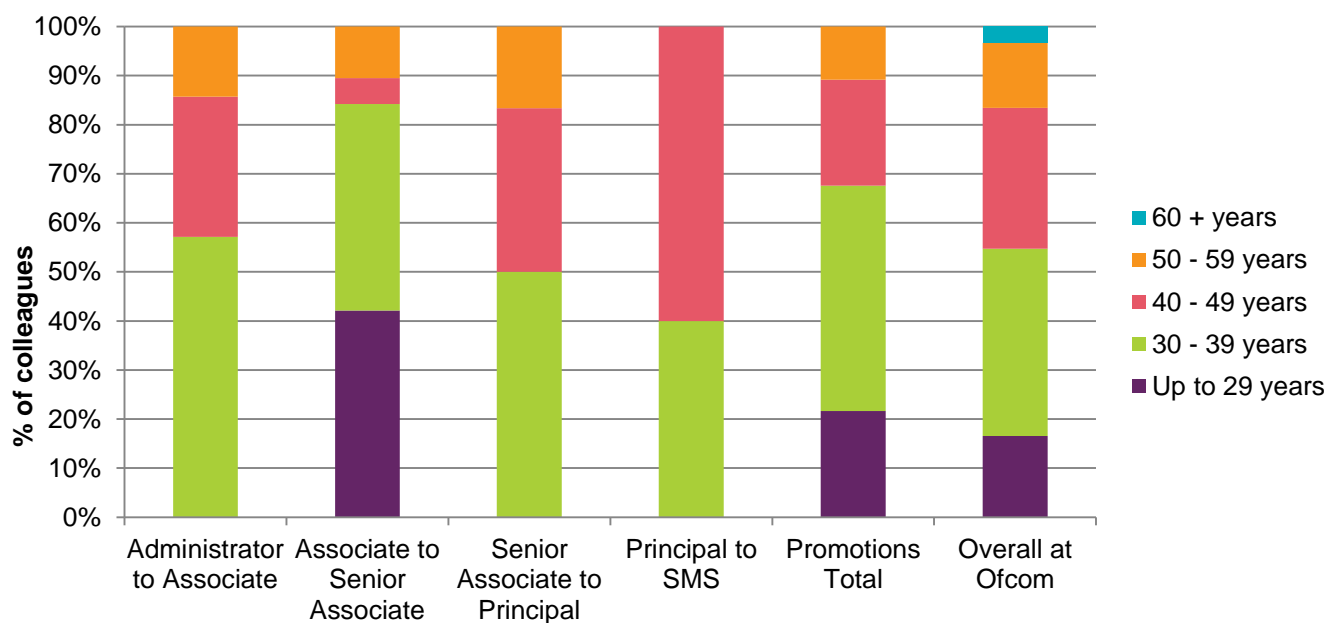


Base: All Ofcom colleagues eligible for the 2014/5 performance appraisal process excluding those who were too early to assess (n=758)

## 8.7 Promotions

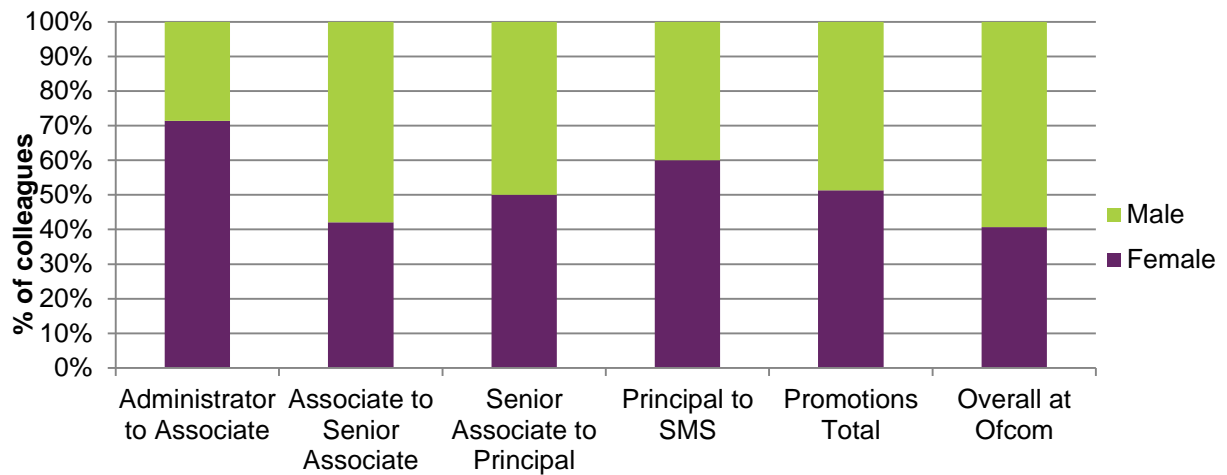
Ofcom operates an annual in-role promotions process and the following data relates to the 37 promotions made within the 2015 promotions round. It does not include colleagues who were promoted through internal job applications.

## 8.8 Promotions by age



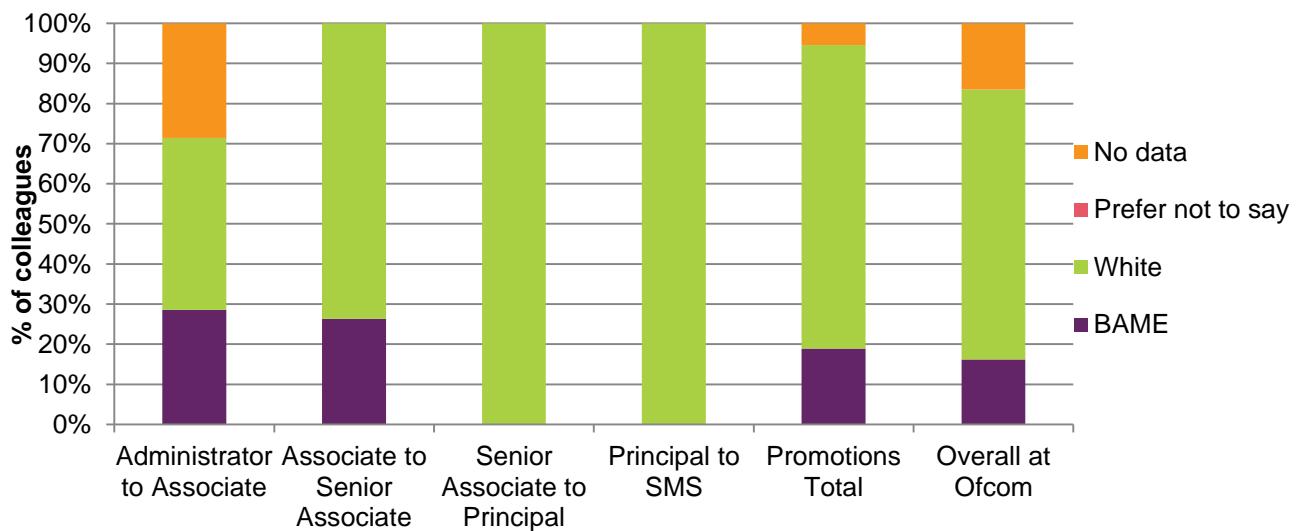
Base: All Ofcom colleagues that received a promotion in 2015 (n=37)

## 8.9 Promotions by gender



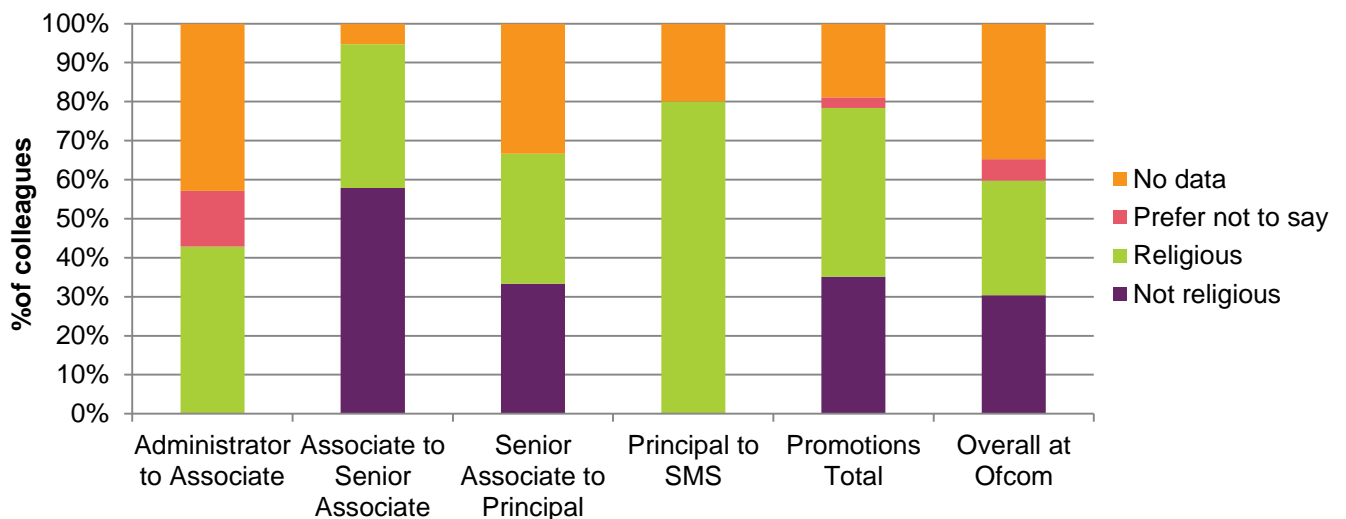
Base: All Ofcom colleagues that received a promotion in 2015 (n=37)

## 8.10 Promotions by ethnicity



Base: All Ofcom colleagues that received a promotion in 2015 (n=37)

## 8.11 Promotions by religion



Base: All Ofcom colleagues that received a promotion in 2015 (n=37)

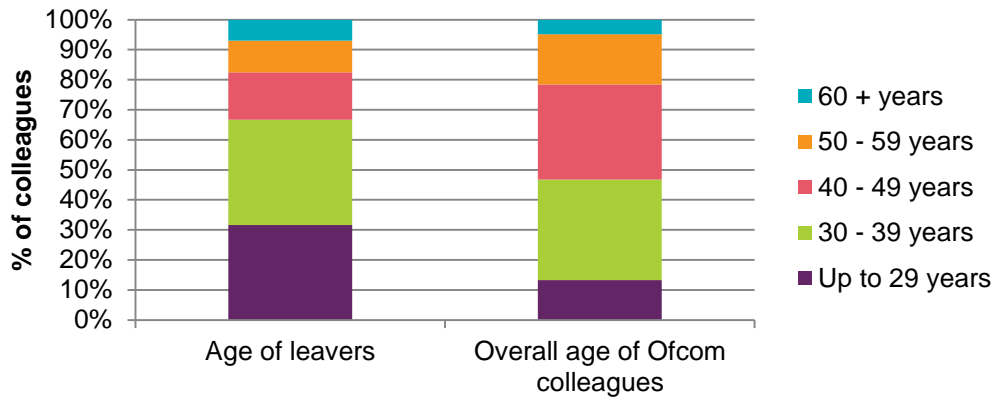


## Section 9

# Leavers

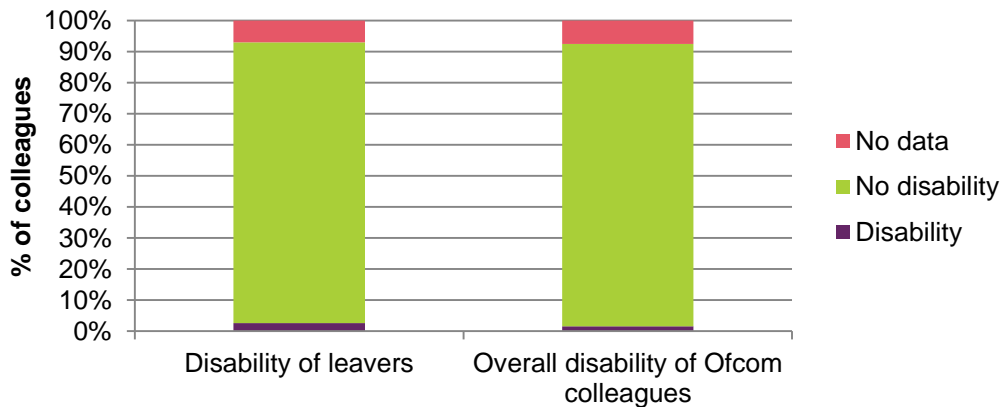
This section of the report provides diversity information in relation to the 114 colleagues who left Ofcom between 1 April 2014 and 31 March 2015.

### 9.1 Leavers by age



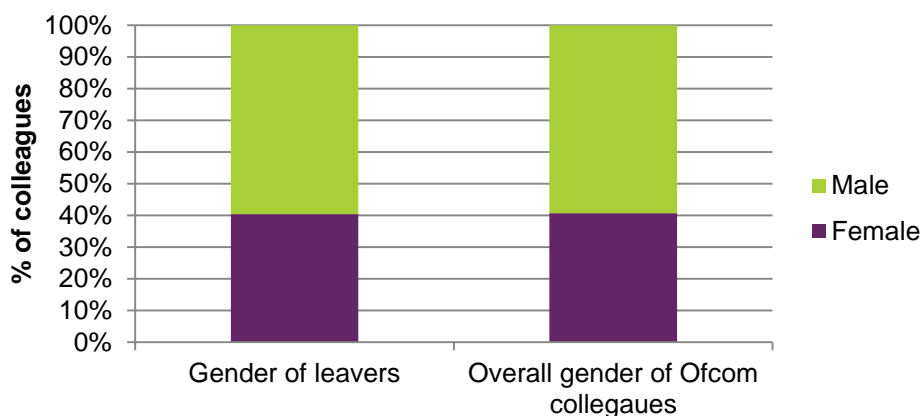
Base: All Ofcom leavers between 1 April 2014 and 31 March 2015 (n=114)

### 9.2 Leavers by disability



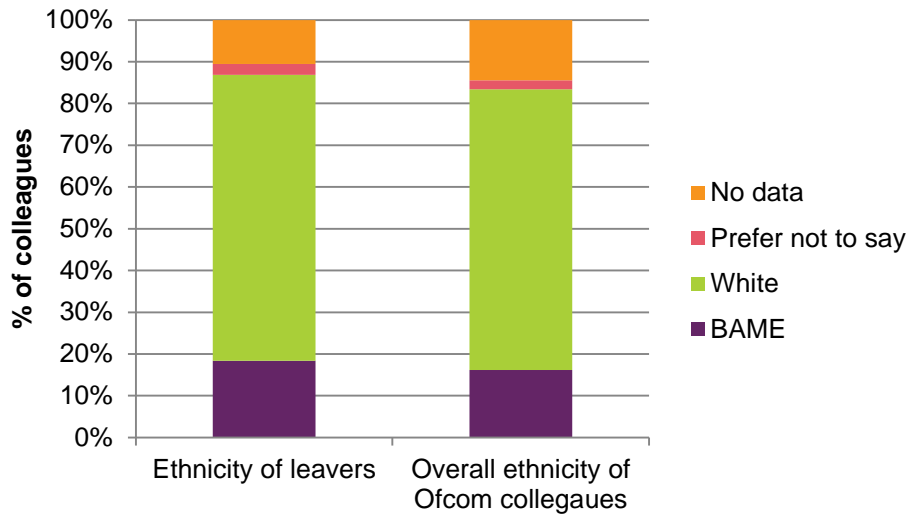
Base: All Ofcom leavers between 1 April 2014 and 31 March 2015 (n=114)

### 9.3 Leavers by gender



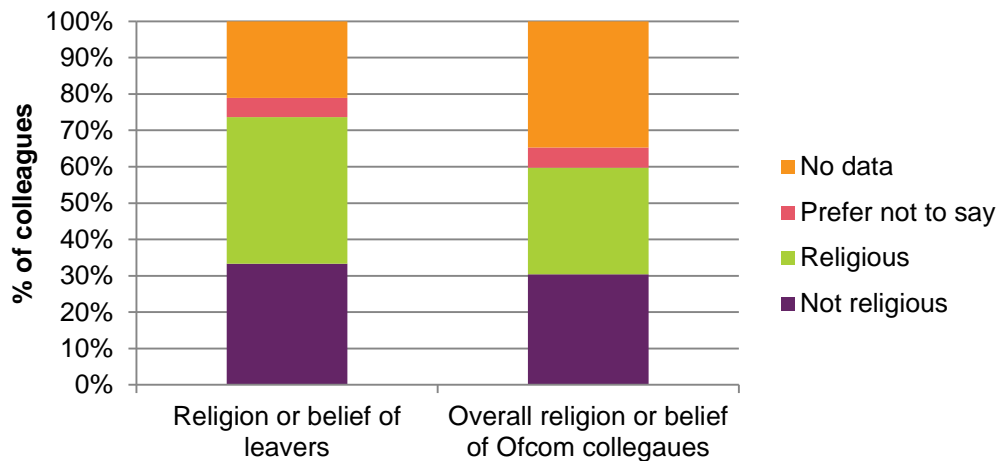
Base: All Ofcom leavers between 1 April 2014 and 31 March 2015 (n=114)

## 9.4 Leavers by ethnicity



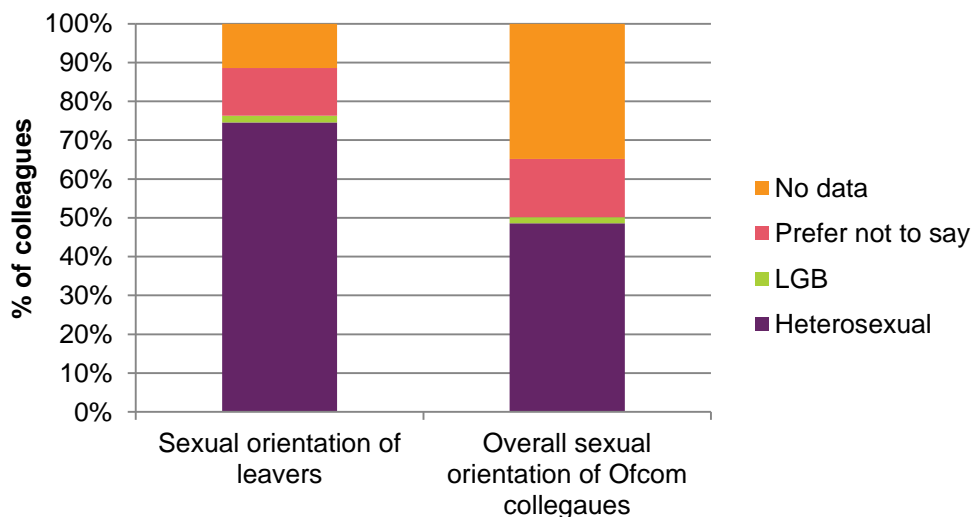
Base: All Ofcom leavers between 1 April 2014 and 31 March 2015 (n=114)

## 9.5 Leavers by religion



Base: All Ofcom leavers between 1 April 2014 and 31 March 2015 (n=114)

## 9.6 Leavers by sexual orientation



Base: All Ofcom leavers between 1 April 2014 and 31 March 2015 (n=114)

## Section 10

# Grievances

This section of the report provides information about grievances raised by colleagues related to bullying, harassment or discrimination.

### Key information

- Records of grievances raised in 2014/15 are complete.
- During 1 April 2014 to 31 March 2015, two grievances relating to bullying, harassment or discrimination were raised by Ofcom colleagues.
- These grievances were thoroughly investigated.
- Given the small number of grievances there can be no meaningful statistical analysis.

## Annex 1

# Protected characteristics

## Age

The Act protects people of all ages. However, different treatment because of age is not unlawful direct or indirect discrimination, if a firm can justify it. Age is the only protected characteristic that allows employers to justify direct discrimination.

## Disability

The Act has made it easier for a person to show that they are disabled and to be protected from disability discrimination. Under the Act, a person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. To collect this data, employees and candidates were asked whether they identified themselves as disabled under the definitions of the 2010 Act.

## Gender

Both men and women are protected under the Act. We record gender as male or female.

## Gender reassignment

The Act provides protection for transsexual people. A transsexual person is someone who proposes to, starts or has completed a process to change his or her gender. The Act no longer requires a person to be under medical supervision to be protected – so a woman who decides to live as a man but does not undergo any medical procedures would be covered. It is discrimination to treat transsexual people less favourably for being absent from work because they propose to undergo, are undergoing or have undergone gender reassignment than they would be treated if they were absent because they were ill or injured.

## Ethnicity

For the purposes of the Act 'ethnicity includes colour, nationality and ethnic or national origins. We define ethnicity data according to the criteria used in the 2001 UK Census. This complies with the code of practice on ethnic monitoring published in May 2002.

## Marriage and civil partnership

The Act protects employees who are married or in a civil partnership against discrimination. Single people are not protected.

## Pregnancy and maternity

A woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any statutory maternity leave to which she is entitled. During this period, pregnancy and maternity discrimination cannot be treated as sex discrimination. The Act forbids an employer from taking into account an employee's period of absence due to pregnancy-related illness when making a decision about her employment.

## Religion or belief

In the Act, religion includes any religion. It also includes a lack of religion, in other words employees are protected if they do not follow a certain religion or have no religion at all. Data on religion or belief is classified according to the criteria used in Census 2001.

## Sexual orientation

The Act protects bisexual, gay, heterosexual and lesbian people.

## Annex 2

# Ethnicity classifications

Ethnicity and ethnicity data collected by Ofcom is classified according to the criteria used in Census 2001 and is in accordance with the Code of Practice on Ethnic Monitoring (2002). The classifications used are:

- White – British
- White Irish
- White – Other
- Black / Black British – African
- Black / Black British – Caribbean
- Black / Black British – Other
- Asian / Asian British – Indian
- Asian / Asian British – Pakistani
- Asian / Asian British – Bangladeshi
- Asian / Asian British – Other
- Chinese
- Other ethnic background;
- Mixed – White and Asian;
- Mixed – White and Black African
- Mixed – White and Black Caribbean
- Mixed – Other

For reporting purposes, we have grouped the above classifications as follows:

- BAME (Black, Asian and Minority Ethnic)
- White



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or write to The Ofcom Consumer Contact Team, Riverside House, 2a Southwark Bridge Road, London SE1 9HA