Diversity and equal opportunities in broadcasting 2021

Methodology
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### Annex

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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 groups\(^1\) and disabled people\(^2\).

1.2 Ofcom broadcast licensees which employ more than 20 people in connection with the provision of their licensed service\(^3\) and are licensed to broadcast for more than 31 days a year are required\(^4\) to make arrangements for promoting, in relation to, 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 men and women, racial group and disability, Ofcom required licensees and the BBC to provide information about their arrangements and employees in terms of these three 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, and social mobility/socio-economic background.

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\(^1\) 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

2.1 This report describes the methodology used in carrying out the data collection for our 5 year review: Diversity and equal opportunities in UK broadcasting⁵. This year we served TV and radio broadcasters with two questionnaires, one of which had been partially completed by broadcasters in 2020 (last year we reduced the amount of data asked for due to the disruption caused by the Covid-19 pandemic)⁶. The changes outlined below apply to data collected for both periods (March 2019-April 2020, and March 2020-April 2021), and how this compares to previous reporting periods.

<table>
<thead>
<tr>
<th>What has stayed the same?</th>
<th>What has changed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Two-staged approach to data collection, including a preliminary online screener questionnaire to establish qualification, followed by a PDF form method of data collection for the full questionnaire.</td>
<td>Questionnaires made consistent across TV and radio in 2020, with the exception of job role categories.</td>
</tr>
<tr>
<td>TV and radio broadcasters with 20 or more employees were asked to complete the main questionnaire.</td>
<td></td>
</tr>
<tr>
<td>Legal framework.</td>
<td>Data period changed in 2020 from Jan-Dec to April-March for radio broadcasters.</td>
</tr>
<tr>
<td>Data period of the previous April to March for TV broadcasters.</td>
<td></td>
</tr>
<tr>
<td>Data security protections.</td>
<td></td>
</tr>
</tbody>
</table>

2.2 More detail on each of the points above can be found in this report, which explains the data collection process, the level of responses we received from broadcasters, the changes made to the questionnaire, and other important technicalities.

2.3 Sections 3 and 4 primarily focus on the 2021 questionnaire (covering March 2020 – April 2021). Alongside the 2021 questionnaire, broadcasters also received a copy of the 2020 questionnaire. For those with 100+ employees, this was partially completed with the reduced data they had provided last year, and they were asked to fill in the incomplete sections. Broadcasters with less than 100 employees were provided with a blank questionnaire⁷. The only difference in this version of the questionnaire was that it contained two qualitative questions at Section J (whereas the broadcasters who had submitted a reduced questionnaire in 2020 had already filled in a qualitative section, as outlined in section 5).

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⁵ All reports can be found on Ofcom’s online diversity hub at [https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/guidance/diversity](https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/guidance/diversity)

⁶ We told broadcasters that we would be asking for the rest of the 2019/20 data in the next reporting period alongside the 2020/21 data.

3. How did we collect the data?

3.1 As has been the case since we implemented the diversity in broadcasting monitoring programme in 2017, all elements of the survey including questionnaire design, fieldwork and analysis were conducted in-house by Ofcom’s market research/market intelligence team.

3.2 As a condition of their licences, broadcasters are required 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.\(^8\)

Stage 1: Screener questionnaire

3.3 At stage 1 we sent a short online screener questionnaire to assess the qualifying questions only (i.e. how many employees a broadcaster has and how many days per year they are licensed to broadcast). This was used to gather initial information from licensees to help us to understand which licensees were required to complete a full questionnaire. All new licensees and broadcasters who had fewer than 50 employees (or who didn’t provide a response) when we conducted the survey in 2019, were invited to complete the survey by 15 March 2021. All other broadcasters were automatically assumed to meet the threshold and sent a full questionnaire.

3.4 The screener questionnaire was sent to 691 broadcasters and Ofcom received 656 responses - of these 613 (covering 904 licences and 1923 employees) didn’t meet the qualification threshold of 20 or more employees.

3.5 All licensees that employed more than 20 people and were licensed to broadcast for more than 31 days per year in March 2021 were required to complete the full questionnaire (Stage 2).

Stage 2: Main questionnaire

3.6 The main questionnaires (for both 2021 and 2020) were provided to broadcasters as a PDF form\(^9\) (created in Adobe Acrobat DC), forming part of a formal information request. Those broadcasters who were required to complete partially completed 2020 questionnaires (i.e. those who had submitted a reduced questionnaire in 2020) were asked to access and submit both questionnaires using Ofcom’s secure managed file transfer (MFT) system. Those who did not need to complete a partially completed questionnaire (i.e. those who

\(^8\) 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.

\(^9\) The full questionnaire is available as a separate document on Ofcom’s online diversity hub at https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/guidance/diversity/diversity-equal-opportunities-tv-and-radio.
didn’t submit a reduced questionnaire in 2020) received both the 2020 and 2021 questionnaire via email and were asked to use MFT to securely submit their response. Fieldwork took place between April and June 2021.

3.7 All qualifying broadcasters identified from stage 1 received a standardised version of the questionnaire, except for BBC, S4C and MG ALBA who were sent their own bespoke versions.

3.8 The questionnaire was 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 made clear that failure to do so would result in a possible breach of their licence condition(s).

3.9 We required broadcasters to provide data on the three protected characteristics where we have powers to do so: sex i.e. men and women; 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. We also asked broadcasters to provide employee data relating to social mobility/social and economic background on a voluntary basis.

3.10 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 the licence(s) to which the data related.

3.11 For companies that provide services beyond broadcasting, we made clear that we only required information about those employed in connection with the provision of TV or radio broadcasting services. For example, Sky’s data only included information on the broadcasting side of its business, not telecoms and broadcast distribution.

3.12 Within the questionnaire, broadcasters were asked to provide the total number of people the organisation employs either full or part time in connection with the provision of licensed broadcasting services. They were then asked to specify how many of these were based in and outside of the UK. For employees based outside the UK, broadcasters were asked to provide only basic profiles for men and women, racial group and disability (the mandatory characteristics).

3.13 For UK-based employees, a more detailed breakdown was requested – specifically how many employees (for the period of 1 April 2020 to 31 March 2021) fell into 15 categories. These questions are what are referred to as the ‘profile grids’. We acknowledge that few

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10 We obtained consent from all relevant broadcasters to send this information request by email only.

11 Although the BBC, S4C and MG ALBA had their own specific versions of the questionnaire, the questions were largely the same. The BBC was required to complete the questionnaire under provisions of the BBC Charter and Agreement, while S4C and MG ALBA were asked to complete it on a voluntary basis.

12 Out of the 61 TV broadcasters included in the report, 28 of them did not have any employees based outside of the UK so were not required to fill in these profiles.

13 Out of the 61 broadcasters who provided data for the latest period, ten of them did not have any UK-based employees so were not required to fill in these profile grids.
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. For job roles (TV only), further help was provided to assist them to categorise by common job titles (See Annex: Job roles). This allows us to present like-for-like comparisons across the industry.

The categories were displayed as columns on the grids:

- Total number of UK-based employees
- Joined the organisation
- Left the organisation
- Received training (related to developing their role)\textsuperscript{14}
- Were promoted

Job level
- Senior managers
- Middle/junior managers
- Non-management

Job roles

\begin{itemize}
\item \textbf{Television}
  \begin{itemize}
  \item Broadcast management
  \item Business management and administrative
  \item Organisational - technical, engineering and data analytics
  \item Sales and marketing
  \item Creative and content production
  \item Journalism
  \item On-screen talent
  \end{itemize}
\item \textbf{Radio}
  \begin{itemize}
  \item Programmes / Programming
  \item Journalism / News
  \item Technical / Engineering
  \item Marketing / Press / PR
  \item Sales
  \item Support functions / Admin
  \end{itemize}
\end{itemize}

The questionnaire contained six ‘profile grids’, each for a different protected characteristic. 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 below\textsuperscript{15}). To help with this, at the header of each grid, the form automatically fed through the relevant total figure from

\textsuperscript{14} 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.

\textsuperscript{15} Data relating to gender ‘Other (e.g. Intersex, non-binary)’ was requested on a voluntary basis.
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’.  

Where broadcasters supplied employee numbers that didn’t add up to those specified at Section A, they were contacted and asked to review them and (if possible) correct the data. This was also the case if any data fields for the mandatory questions were left blank. 

For any unresolved queries where the figures didn’t add up correctly a rule was applied on processing the data. 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. 

More simplified gender, ethnicity and disability profiles (similar to non UK-based employees) were also requested on a voluntary basis for freelancers. 

16 For the voluntary sections we also included a field for ‘Data collected but no consent to disclose to Ofcom’.
4. Stage two responses

4.1 The main stage two 2021 questionnaire was completed by 61 qualifying TV broadcasters (covering 46,366 employees). Of these, 28 were based solely in the UK, 23 had employees inside and outside the UK, and ten only had employees based outside the UK (displayed in the table below).

<table>
<thead>
<tr>
<th>Broadcasters with 100% of employees based outside of the UK</th>
<th>Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Channels Incorporated Limited</td>
<td>101-499</td>
</tr>
<tr>
<td>English Club TV Ltd</td>
<td>21-100</td>
</tr>
<tr>
<td>JSC Channel One Russia Worldwide</td>
<td>500+</td>
</tr>
<tr>
<td>Lancaster LLC/SonLife Broadcasting Network</td>
<td>21-100</td>
</tr>
<tr>
<td>Lifestyle &amp; Media Broadcasting Ltd</td>
<td>21-100</td>
</tr>
<tr>
<td>New Delhi Television Limited</td>
<td>101-499</td>
</tr>
<tr>
<td>New Tang Dynasty Television</td>
<td>21-100</td>
</tr>
<tr>
<td>Paul E Commerce Private Limited</td>
<td>21-100</td>
</tr>
<tr>
<td>PTV-Global</td>
<td>21-100</td>
</tr>
<tr>
<td>Scripps Media, inc.</td>
<td>500+</td>
</tr>
</tbody>
</table>

4.2 Across the TV industry, this amounted to 35,427 (76%) employees based in the UK and 10,909 (24%) based outside of the UK. The former (which naturally exclude the broadcasters in the table above) provides the basis for our reporting and is what we refer to as the ‘UK-based TV industry.’

4.3 Fifteen radio broadcasters completed the stage two questionnaire. Of these 7,881 employees were based in the UK and they provide the basis for our ‘UK-based radio industry’ figures.

4.4 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 there were 633 broadcasters (1,923 employees) who didn’t meet the qualification threshold for our report. So, with the caveat that we do not know any details for the 37 broadcasters for which we were unable to get employee numbers, we estimate that our industry total of 54,218 employees represents around 95% of the industry.

4.5 Response rates for each of the employee profile sections are shown in the following tables. The first column ‘any data’ shows the number of broadcasters who provided data for any of their employees. This is then expressed, in the second column, as a proportion of the broadcasters who have at least one UK-based employee (% broadcasters), and, in the third column, as a proportion of the UK-based employees with data17 (% employees).

17 Employees who were asked the questions but chose not to disclose their data, or didn’t provide consent to provide the data to Ofcom (in the case of voluntary characteristics), are counted within these percentages.
Television

<table>
<thead>
<tr>
<th>MANDATORY PROFILE SECTIONS</th>
<th>Any data</th>
<th>% broadcasters</th>
<th>% employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>SECTION C: GENDER</td>
<td>51</td>
<td>100%</td>
<td>&gt;99%</td>
</tr>
<tr>
<td>SECTION D: RACIAL GROUP</td>
<td>48</td>
<td>94%</td>
<td>90%</td>
</tr>
<tr>
<td>SECTION E: DISABILITY</td>
<td>46</td>
<td>90%</td>
<td>81%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>VOLUNTARY PROFILE SECTIONS</th>
<th>Any data</th>
<th>% broadcasters</th>
<th>% employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>SECTION C: GENDER</td>
<td>51</td>
<td>100%</td>
<td>&gt;99%</td>
</tr>
<tr>
<td>SECTION D: RACIAL GROUP</td>
<td>48</td>
<td>94%</td>
<td>90%</td>
</tr>
<tr>
<td>SECTION E: DISABILITY</td>
<td>46</td>
<td>90%</td>
<td>81%</td>
</tr>
</tbody>
</table>

| SECTION F: AGE            | 23       | 45%            | 91%        |
| SECTION G: SEXUAL ORIENTATION | 19 | 37%            | 73%        |
| SECTION H: RELIGION OR BELIEF | 19 | 37%            | 73%        |
| SECTION I: SOCIAL MOBILITY Parent occupation when aged 14 | 10 | 20%            | 48%        |
| SECTION I: SOCIAL MOBILITY School type attended between aged 11 and 16 | 12 | 24%            | 47%        |
| SECTION I: SOCIAL MOBILITY Highest level of education achieved by parents | 9 | 18%            | 10%        |
| SECTION I: SOCIAL MOBILITY Eligibility for school meals | 7 | 11%            | 29%        |

Radio

<table>
<thead>
<tr>
<th>MANDATORY PROFILE SECTIONS</th>
<th>Any data</th>
<th>% broadcasters</th>
<th>% employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>SECTION C: GENDER</td>
<td>15</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>SECTION D: RACIAL GROUP</td>
<td>14</td>
<td>93%</td>
<td>97%</td>
</tr>
<tr>
<td>SECTION E: DISABILITY</td>
<td>13</td>
<td>87%</td>
<td>90%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>VOLUNTARY PROFILE SECTIONS</th>
<th>Any data</th>
<th>% broadcasters</th>
<th>% employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>SECTION C: GENDER</td>
<td>15</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>SECTION D: RACIAL GROUP</td>
<td>14</td>
<td>93%</td>
<td>97%</td>
</tr>
<tr>
<td>SECTION E: DISABILITY</td>
<td>13</td>
<td>87%</td>
<td>90%</td>
</tr>
<tr>
<td>SECTION F: AGE</td>
<td>10</td>
<td>67%</td>
<td>96%</td>
</tr>
<tr>
<td>SECTION G: SEXUAL ORIENTATION</td>
<td>8</td>
<td>53%</td>
<td>81%</td>
</tr>
<tr>
<td>SECTION H: RELIGION OR BELIEF</td>
<td>8</td>
<td>53%</td>
<td>86%</td>
</tr>
<tr>
<td>SECTION I: SOCIAL MOBILITY Parent occupation when aged 14</td>
<td>3</td>
<td>20%</td>
<td>40%</td>
</tr>
<tr>
<td>SECTION I: SOCIAL MOBILITY School type attended between aged 11 and 16</td>
<td>3</td>
<td>20%</td>
<td>41%</td>
</tr>
<tr>
<td>SECTION I: SOCIAL MOBILITY Highest level of education achieved by parents</td>
<td>2</td>
<td>13%</td>
<td>4%</td>
</tr>
<tr>
<td>SECTION I: SOCIAL MOBILITY Eligibility for school meals</td>
<td>2</td>
<td>13%</td>
<td>32%</td>
</tr>
</tbody>
</table>

4.6 In addition to the above, the questionnaire contained several qualitative questions in the form of open-ended/write-in responses (Section J, as described in 5.3).

Data protection and personal data

4.7 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
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 identifiable.

4.8 Regardless of whether a broadcaster marked such numbers with a ‘P’ we treated any fields pertaining to a specific characteristic (such as female, minority ethnic group, or disabled), with fewer than ten employees for an individual broadcaster, as potentially personally identifiable data. Therefore, in reporting the findings, we have been careful not to include any percentages relating to a single 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.

4.9 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.
5. Changes to survey

Specific question amendments

5.1 In our 2019 TV questionnaire we introduced a series of questions that were recommended to measure social mobility progress by the Bridge Group. These questions were not included in the equivalent 2019 radio questionnaire. As a result of harmonising the two questionnaires, radio broadcasters were asked alongside TV broadcasters (in both 2020 and 2021) to provide employee numbers based on the following:

1. Occupation of main household earner when employee was aged 14.
2. Type of school employee attended for the most time between the ages of 11 – 16.
3. Highest level of qualification achieved by either of parent(s) or guardian(s) by the time employee was 18.
4. Eligibility for school meals during their school years.

5.2 In addition to the above we replaced previous qualitative questions at Section J with the following topic areas for 2021:

1. Activity from Apr 20-Mar 21 - Diversity of your workforce
2. Activity from Apr 20-Mar 21 – Anti-bullying and discrimination
3. Activity from Apr 20-Mar 21 – Inclusion in your workforce
4. Activity from Apr 20-Mar 21 – Freelancers
5. Activity from Apr 20-Mar 21 – Commissioning
6. Looking forward and other matters – Coronavirus
7. Looking forward and other matters – Priorities & collaboration

Changes to broadcaster makeup

5.3 Compared to 2019 (covering April 2018-March 2019), there were seven fewer TV broadcasters (61 vs. 68), and one fewer radio broadcasters (15 vs. 16) included in our 2021 data.

5.4 Nine TV broadcasters are included in our data this year, but didn’t submit a response in 2019:

18 For those broadcasters who didn’t complete a reduced questionnaire last year, the new 2020 questionnaire only included the first item on this list (covering their most and least successful diversity initiative during the reporting period). For those broadcasters who did complete a reduced questionnaire last year, the section was not included. For details of the qualitative questions covered on the 2020 reduced questionnaire please see the methodology document from our 2020 report at https://www.ofcom.org.uk/__data/assets/pdf_file/0020/207920/2019-20-methodology-diversity-equal-opportunities-tv-and-radio.pdf

19 Ordinarily we would make this comparison with the previous year, so in this case 2020. However, in this section we are comparing 2021 with 2019 since the 2020 questionnaire was completed at different times by different broadcasters i.e. those with 100+ employees completed a reduced version last year, with additional questions answered this year; those with fewer than 100 employees completed the full questionnaire this year.
Sixteen TV broadcasters were included in our 2019 report, but no longer qualified (or didn’t respond):

- Abu Dhabi Media PJSC (no longer hold any licences)
- Box Plus Network Ltd (licences transferred to Channel Four Television Corporation)
- Channel I UK Limited
- Fox Networks Group UK Ltd (no longer hold any licences)
- Ginx TV Ltd (no response)
- IMG Media Ltd
- Immediate Media TV Ltd (licences now transferred to Gemporia Craft Limited)
- Made Television Ltd (now Local TV Ltd)
- NBC Universal International
- Nordic Entertainment Group (no longer hold any licences)
- Perform Investment Ltd (no longer hold any licences)
- SNI/SI Networks LLC
- Sports Information Service Ltd
- The Walt Disney Company Ltd (no longer hold any licences)
- TV Today Network
- Txt Me TV Limited (now Visional Media Limited)

Five radio broadcasters are included in our 2021 data, but didn’t submit a response in 2019:

- DC Thomson
- Jack Radio Group
- Mearns FM Community Radio
- Total Sense Media Limited (previously Media Sound Holdings Limited)
- Warwickshire County Cricket Club

Three radio broadcasters were included in our 2019 report, but no longer qualified:

- Quidem Midlands Ltd
- New Wave Media
- Media Sound Holdings Limited (now Total Sense Media Limited)

Celador, Lincs FM and UKRD were included in 2019 but were since purchased by Bauer.
**6. Terminology and reporting**

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

6.2 **Voluntary characteristics** - We have requested data on other ‘protected characteristics’ in the Equality Act 2010: age; sexual orientation; and religion or belief. We have termed these voluntary characteristics.

6.3 **Workforce** - This term is used to refer to employees and contracted freelancers combined.

6.4 **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’.

6.5 **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.

6.6 **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’.

6.7 **Visible and invisible data** - The latter term is used throughout this report to refer to the combined ‘not disclosed’ and ‘no consent’ data. This signifies data that has been collected but we (and the broadcaster in the case of not disclosed) are unable to determine the effect it has on the profile for that characteristic. While this is also the case for data that are not collected/recorded in the first place, ‘visible data’ (the remainder) is what helps us to create an accurate picture of the industry. However, 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.

6.8 Although our 2020 questionnaire retained the terminology ‘Black, Asian and Minority Ethnic’ (BAME), when we report on this group we refer to it as ‘Minority Ethnic Groups’ (MEG), as we have done in previous reports. For those specified as ‘White,’ or within the sub-groups under this heading, we refer to them as ‘White Ethnic Groups’ (WEG).

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20 We asked for information relating to gender ‘other (e.g. intersex, non-binary)’ on a voluntary basis.
6.9 When reporting on age we primarily focus on two age groups – ‘under 50’ and ‘50+’. Despite collecting data for several age ranges, this provides a more focused means for benchmarking across age.
7. UK Benchmarking data

7.1 The following table outlines the UK wide benchmark figures we have used in reporting, when looking at the UK-based TV industry overall as well as individual broadcasters.

## MANDATORY CHARACTERISTICS

<table>
<thead>
<tr>
<th>Category</th>
<th>Characteristics</th>
<th>Source</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GENDER</strong></td>
<td>53% Male, 47% Female</td>
<td>ONS Labour market statistics <a href="https://www.ons.gov.uk">A09: Labour market status by ethnic group</a> (Average of Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20). All employed males and females (employees and self-employed).</td>
<td></td>
</tr>
<tr>
<td><strong>RACIAL GROUP</strong></td>
<td>12% MEG, 88% WEG</td>
<td>ONS Labour market statistics <a href="https://www.ons.gov.uk">A09: Labour market status by ethnic group</a> (Average of Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20). ONS Annual Population Survey Apr 19 – Mar 20 – <a href="https://nomisweb.esomrs.com">NomisWeb</a>. Proportion in employment, aged 16-64 in London.</td>
<td>For London (35% MEG, 65% WEG) we use ONS Annual Population Survey Apr 19 – Mar 20 –  <a href="https://nomisweb.esomrs.com">NomisWeb</a>. Proportion in employment, aged 16-64 in Manchester. For Glasgow (12% WEG, 88% MEG) we use Scotland’s Census 2011 - National Records of Scotland Table KS2015C - Ethnic group. Proportion of all people in Glasgow. Note: this differs to the UK or London benchmarks which are among the working population (as opposed to the general population).</td>
</tr>
<tr>
<td><strong>DISABILITY</strong></td>
<td>19% disabled, 81% not disabled</td>
<td>ONS Labour market statistics <a href="https://www.ons.gov.uk">A08: Labour market status of disabled people</a> (Apr-Jun19, Jul-Sep19, Oct-Dec19, Jan-Mar20).</td>
<td>Proportion of all 16-64 who are ‘Harmonised Standard Definition Disabled’</td>
</tr>
</tbody>
</table>

## VOLUNTARY CHARACTERISTICS

<table>
<thead>
<tr>
<th>Category</th>
<th>Characteristics</th>
<th>Source</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AGE</strong></td>
<td>68% under 50, 32% 50+</td>
<td>ONS Labour market statistics <a href="https://www.ons.gov.uk">A05: Labour market by age group: People by economic activity and age (seasonally adjusted)</a> (Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20).</td>
<td>Note: these proportions are the same among both men and women.</td>
</tr>
<tr>
<td><strong>SEXUAL ORIENTATION</strong></td>
<td>2% LGB, 93% Heterosexual, 4% not disclosed</td>
<td>ONS Sexual identity, UK: 2019 - Percentage of UK adult population who identify themselves as Heterosexual, Gay, Bi-Sexual or Other (Note: Stonewall suggest 5-7% is a reasonable estimate)</td>
<td></td>
</tr>
<tr>
<td><strong>RELIGION</strong></td>
<td>48% religious, 52% non-religious</td>
<td>NatCen Social Attitudes Survey 36 - Percentage of British population who identify themselves as belonging to a particular religion.</td>
<td></td>
</tr>
</tbody>
</table>

21 For gender, racial group, disability and age we used the same benchmarks used in 2020 as the ONS has not yet updated these for the periods covered in our 2021 survey.
A1. 2021 Questionnaires

A1.1 The full questionnaires for the reporting period 2020-21 have been published as separate documents.