Diversity and equal opportunities in radio 2019

In-focus report on the main three broadcasters

Contents

Section

1. Overview

Ofcom's main report has focused on the overall initiatives, policies, schemes and data of the 16[1] UK-based radio broadcasters who met the threshold for submitting information about their diversity and equal opportunities arrangements. It has compared diversity statistics of the three largest broadcasters (Bauer, BBC Radio and Global) and benchmarked them against the wider UK-industry.

In this annex, where possible, we report on the individual data and information provided by the three largest broadcasters. The employees referenced below are UK-based, unless otherwise indicated. In some cases the numbers involved for certain characteristics and job roles/levels are too small to report on[2]. However, where we can report on the data provided by these companies, we have done so, and we also include the information they provided on their individual diversity policies and initiatives.

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[1] In addition to the 16 UK-based broadcasters, The Word Network also met the threshold for submitting information, but all its employees are based overseas. It is therefore reported below separately under 'Other submissions'.
[2] Due to small numbers and the make-up of some organisations, we have not published certain figures to avoid the potential identification of individuals.

1. How diverse is BBC Radio?

BBC RADIO

Key conclusions

Of the organisations in this report, the BBC stands alone in having set clear targets for a more diverse workforce. As the largest organisation in this report, and given its public service remit, we are pleased to see the BBC setting an example for the industry. We welcome the fact that it has carried out research and published recommendations to address barriers to career progression for its employees from minority groups and to make its culture more inclusive for them. The greatest challenge to BBC Radio may be meeting the BBC's group wide targets to increase the representation of minority ethnic groups across its workforce and in senior management, and to increase the representation of women at the highest levels.

BBC Radio broadcasts to the whole of the UK through a portfolio of network stations providing a range of speech and music output serving different types of audiences. In addition, it also provides programming covering all English regions as well as specific stations for each of the devolved nations including some language services within the nations.

Each week over 34 million adults listen to BBC radio, over three fifths, or (63%) of the population. The profile of the total weekly audience is: 51% male and 49% female; 91% white and 9% from a minority ethnic background. 40% of those listeners are aged under 46 and 10% consider themselves to have a disability.[3]
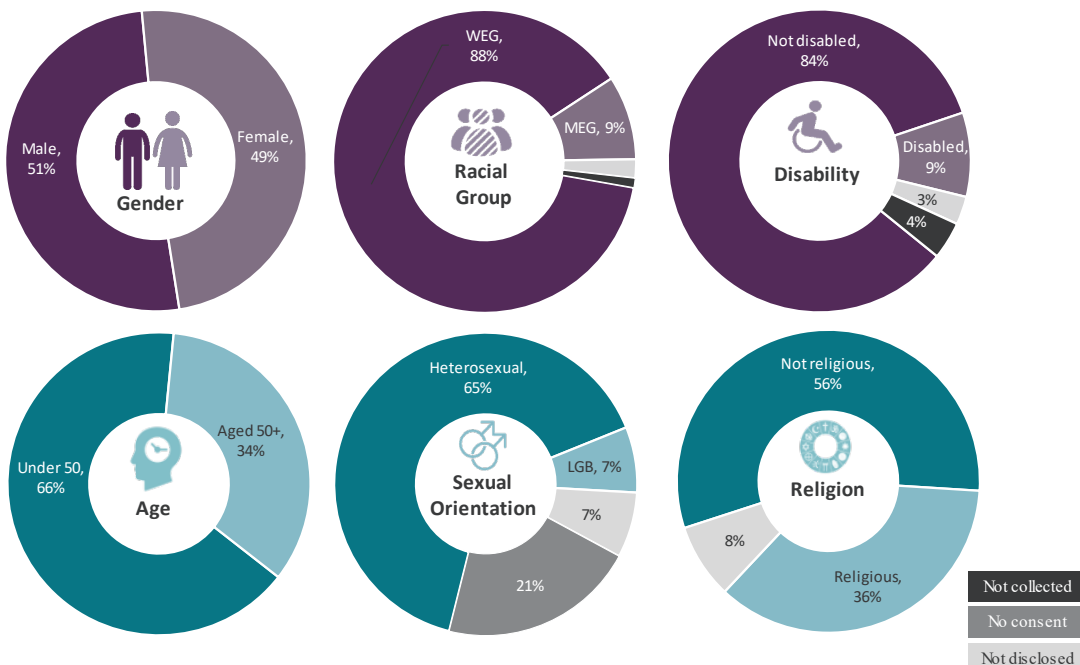
The BBC has 4,635 employees working directly across its radio services. The data provided in the BBC's submission is for all staff who are connected with the provision of UK radio content only. The BBC submitted data for all six characteristics, with very little data gap (racial group and disability data was not collected for 1% and 4% of employees, respectively)[4]. For sexual orientation, the data of 93% of employees is visible to the BBC[5], but only 72% to Ofcom[6]. For the other characteristics, data visibility to Ofcom and the BBC ranged from 92% to 100%.

In our first radio report we referenced several BBC schemes aimed at promoting equal opportunities and the BBC informed us that it plans to continue progressing against its Diversity and Inclusion Strategy, published in 2016. The BBC also publishes an annual Equality Information Report and other diversity information as part of its Annual Report.

The BBC's strategy has workforce, leadership and on-air targets under the headings **gender, ethnicity, disability, sexual orientation and socio-economic,** which the BBC aims to achieve by 2020. The BBC's strategy and targets run across all its services, on and off-air. Our report focuses on the diversity and inclusion work that has supported those BBC employees working on, or in relation to, public service radio in the UK over the 2018 calendar year and excludes employees working in television and the BBC's commercial services.

The BBC's targets demonstrate its resolve in this area. The figures indicate they are already being delivered or are close to being delivered for the BBC Radio workforce, and for half the characteristics at senior management[7] level. The exceptions are its targets of 15% minority ethnic group representation and for 50% of its senior management to be women:

	% Ethnic minority (target 15%)	% Female (target 50%)	% Disabled (target 8%)	% LGB (target 8%)
BBC Radio	9%	49%	9%	7%
Senior management	8%	40%	11%	9%

In 2018, the BBC undertook several internal reviews to improve its understanding of the culture of the BBC and what more can be done internally to progress the careers of certain groups. Reports were published on five diversity workstreams[8] with over 100 recommendations emerging from the

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[4] Ofcom's online diversity hub provides further information on the methodology behind this report, including the terminology it uses. We refer to 'not collected', 'data gap' and 'no data' where an 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.

[5] Seven percent of the data is 'invisible' to the BBC and Ofcom, i.e. it is 'Not disclosed' data. 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'.
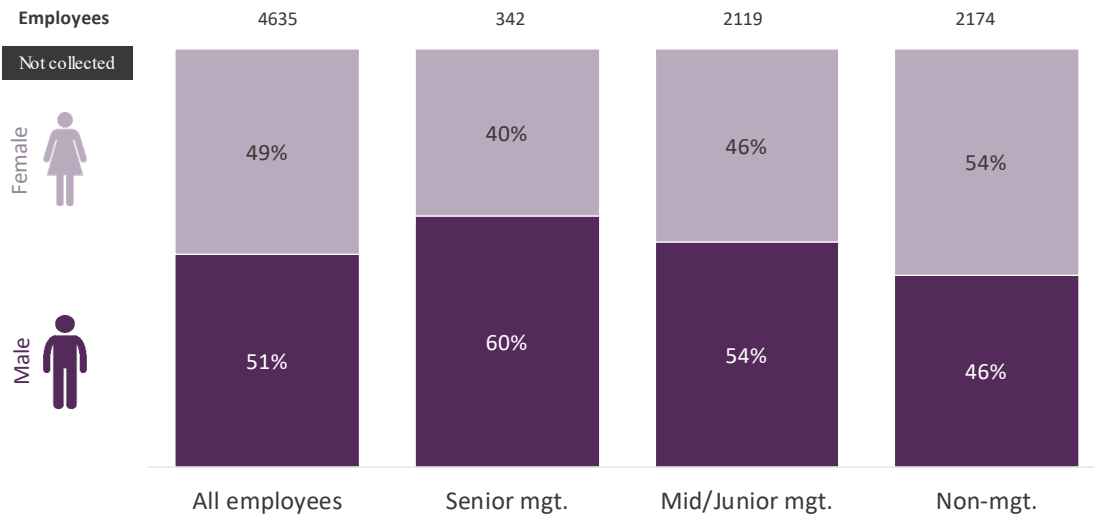
[6] A further 21% of the data is invisible to Ofcom, i.e. it is 'No consent' data. Even when employees disclosed their individual information to the broadcaster, they (or the employer) may not have consented to that information being shared with Ofcom. In these cases the broadcaster was asked to include 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'.

[7] Senior management in this report covers BBC employees at grade ten or above.

[8] Women, employees with disabilities, lesbian, gay, bisexual or transgender (LGBT) employees and those from ethnic minorities and lower socio-economic backgrounds.

findings. The BBC is currently implementing these recommendations. These are important steps towards promoting better inclusion and we look forward to seeing the new strategies taking effect.

Gender

	All employees	Senior mgt.	Mid/Junior mgt.	Non-mgt.
Employees	4635	342	2119	2174
Female	49%	40%	46%	54%
Male	51%	60%	54%	46%

Overall in 2018, 51% of BBC Radio employees were men, and they are increasingly likely to be men the more senior their position. 60% of senior management employees are men. At mid-level management, 54% are men. This contrasts with non-management positions, 54% of which are filled by women. There were no significant differences to 2017.

Half of roles at BBC Radio are defined as being within journalism/news and 35% within programming. At 54%, BBC Radio employees in journalism are more likely to be men, as are those in technical and engineering roles, at 81%. In contrast, 85% (80% in 2017) of those in support/admin, 76% (79% in 2017) of those in marketing/PR and 55% of those in programming are women.

The proportion of women promoted in 2018, was higher than the proportion of women in the organisation (55% vs. 49%) (with both at 49% in 2017). This was also the case for those who joined BBC Radio (54%) (55% in 2017), but the proportion of women leaving BBC Radio was slightly higher, at 56% (55% in 2017). The proportion of women who completed training was in line with the company profile, at 49% (51% in 2017).

Last year BBC Radio told us that it recognised the need to increase the number of women in more senior positions. It said it had a cross-BBC programme that looked at progressing women into senior roles (Hilda Matheson Women into Leadership). This year it told us that Radio Scotland has members of staff participating in the programme. Another initiative was the Sandy Chalmers Radio Development Programme. This one-year mentoring programme was radio-specific and focused on creative roles and the progression of women into senior positions, including using mentors from outside the BBC. It is now in its second year of operation across BBC Radio, including in the nations and regions.
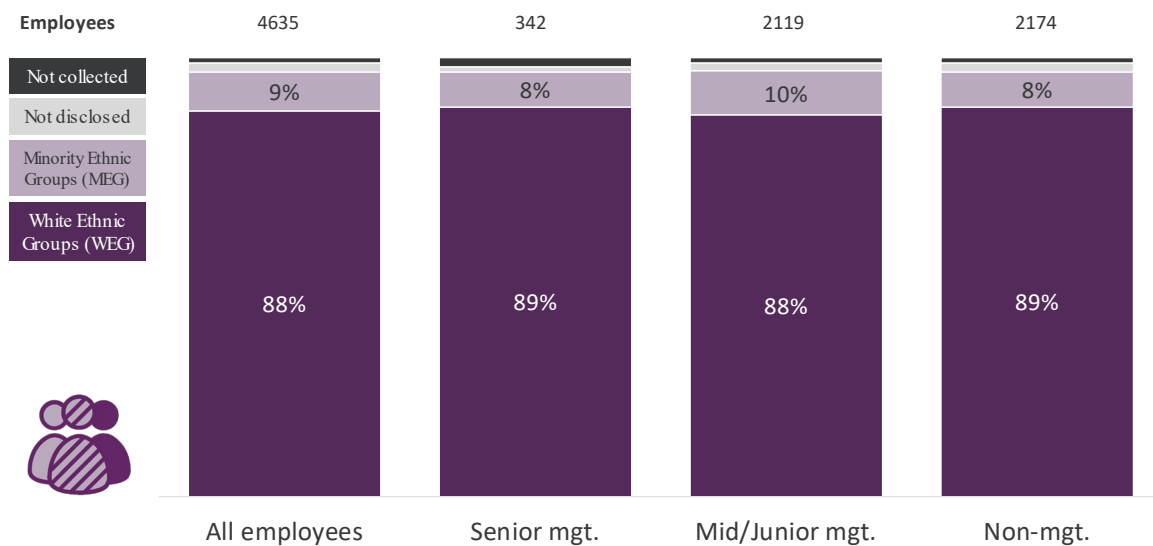
This year BBC Radio told us about internal research, initiated in March 2018 into career progression and culture for gender equality at the BBC. The BBC published recommendations to address the barriers it had identified in "Making the BBC a great workplace for women". The report makes a

number of recommendations around working practices and the BBC's approach to recruitment[9]. It forms part of the BBC's wider drive to have women in half of senior management and on-air roles by 2020 and to make the BBC an exemplar for other organisations. There has been no change in the representation of women in senior management roles from 2017 to 2018. It may be a challenge for BBC Radio to bring about a 10 pp increase in representation within the short time remaining to 2020, but it is a positive goal and we look forward to seeing progress on it in future reports.

For the in-focus report that accompanied our second Diversity and equal opportunities in television report, the BBC told us about a number of initiatives across the BBC[10]. For the present report and specific to radio, BBC Radio told us about a one-day workshop held for women in technical production roles, which explored what Radio Production Operations could do to improve its culture and how to develop an agenda beyond the BBC and inspire the next generation. A number of outreach projects resulted, including a two-day introductory workshop for students on technical production, a gender diversity seminar at academic institutions and an outreach project at Trinity Laban Conservatoire of Music and Dance in which a female crew covered a lunchtime concert on International Women's Day.

The BBC reported to the Gender Pay Gap Service an 8.4% mean and 7.6% median gender pay gap across the entire organisation in March 2018. For March 2017 these figures were 10.7% and 9.3% respectively. It has pledged to close the gap by 2020. In 2018, the BBC was listed as one of the Times Top 50 Employers for Women for the first time.

Racial group

Employees — 4635 / 342 / 2119 / 2174

Legend:
- Not collected
- Not disclosed
- Minority Ethnic Groups (MEG)
- White Ethnic Groups (WEG)

	All employees	Senior mgt.	Mid/Junior mgt.	Non-mgt.
MEG	9%	8%	10%	8%
WEG	88%	89%	88%	89%

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[9] The recommendations included "mixed gender shortlists with a new expectation for balanced shortlists in the final round of our most senior roles", advertising short term roles as "location flexible" where possible, a greater emphasis on hiring for potential and behaviours, gender neutral adverts and female representation on all interview panels.

[10] For example, the Clore Leadership programme which has the same goal as the RISE mentoring scheme but instead of mentoring offers a 12-month programme of short courses, fellowships and placements, to the relatively small number of six employees a year.

Employees from minority ethnic groups make-up 9% of employees (which is below the BBC 2020 target of 15% and below the UK workforce average of 12%).[11] This figure is similar across job levels (8% at both non-management and senior management levels, and 10% at mid-management level), and there has been little change year-on-year in this respect.[12] In comparison, minority ethnic group representation in the workforce is much higher in many of the major cities in which the BBC has a presence. For example, in its provision of information to Ofcom for this report the BBC referred to cities such as Birmingham (40%), London (36%), Nottingham (27%) and Salford (40%).[13] The proportions of the workforce in these cities from minority ethnic backgrounds in 2018 are given in brackets and are much higher than the national percentage (12%) and the BBC's 15% target.

Employees from minority ethnic groups are under-represented across all job roles within BBC Radio with representation ranging from 7 to 10%. The proportion of joiners (14%) and leavers (15%) from minority ethnic backgrounds are each above the BBC Radio and UK averages (these figures were 10% and 11% respectively in 2017). The proportion of those promoted is 11% and of those who completed training is 8% (these figures were 13% and 7% respectively in 2017).

The BBC has conducted an internal review and focus groups with employees from minority ethnic backgrounds, resulting in a published plan on 'BAME career progression and culture'. The report[14] makes nine recommendations that the BBC has accepted, including: a BBC commitment to having at least two members from a minority ethnic background on the Executive Committee and Divisional Senior Leadership Teams by 2020; for shortlists to include at least one person from an ethnic minority background; and for better representation of people from minority ethnic backgrounds across interview panels and on development and leadership programmes. The report also commits to develop action plans for all divisions with less than 10% minority ethnic group representation or with "below par" employee survey results. We support this targeted approach and look forward to seeing progress across all divisions as a result.

The BBC Annual Report says the places on its RISE development programme[15] recently doubled. In their third year, Creative Access Internships are also offered to graduates from minority ethnic backgrounds across BBC production areas.

BBC Radio said it supports colleagues from minority ethnic groups to develop and progress their careers and referred to the training and opportunities it provides:

- The Felix Dexter bursary offers two six-month traineeships and bursaries for two high potential comedy writers from minority ethnic backgrounds. Radio 4's *Newsjack* has contributed to the

[11] 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. Although low, BBC is still more diverse than the UK-based commercial radio sector: excluding the BBC, the aggregated data provided for this report shows that minority ethnic groups make up just 5% of all employees.

[12] This compares to 83% who identify as being from white ethnic backgrounds, 3% not disclosed and 2% not collected.

[13] ONS Annual Population Survey (January to December 2018) – NomisWeb. Aged 16- 64 in employment. The figures for Cardiff and Glasgow are percentages of the population rather than the workforce based on the 2011 Census and taken from a Local Area Report for areas in England and Wales and the Scottish Council Areas 2001 to 2011 Census Profile Comparator Tool.

[14] REFLECTING THE ETHNIC DIVERSITY OF THE UK WITHIN THE BBC WORKFORCE; A report on Career Progression and Culture for BAME staff at the BBC

[15] RISE mentoring and development programme (now in its third year) offers support to people from minority ethnic backgrounds in middle grades to support career progression. The programme has 48 places and is a 12-month programme.

scheme and, through it, has identified and developed individuals from within the BBC and externally.

- The Broadcast Operator Apprenticeship scheme, starting in September 2019, is an entry level initiative aimed at school leavers from diverse backgrounds. The scheme provides apprentices the opportunity to work alongside journalists and programme makers in radio, as well as in TV and digital, to gain training in broadcasting and production.
- Radio Cymru and Radio Wales will take one new apprentice each from underrepresented groups (particularly socio-economic and minority ethnic groups) under their new Digital Journalism Apprenticeship scheme starting in September. They have also been running a First Steps initiative (see under Recruitment Partnership and Training) to help with this scheme.

Nations and regions

The Hilda Matheson scheme (see under Gender) is aimed at women's career development in the nations and regions. The Broadcast Operator Apprenticeship scheme (see above) has places in Birmingham, Cardiff, Glasgow, London, Nottingham, Plymouth and Salford. Other apprenticeships are also offered in many of these cities, as well as in Bristol and Belfast.

Disability
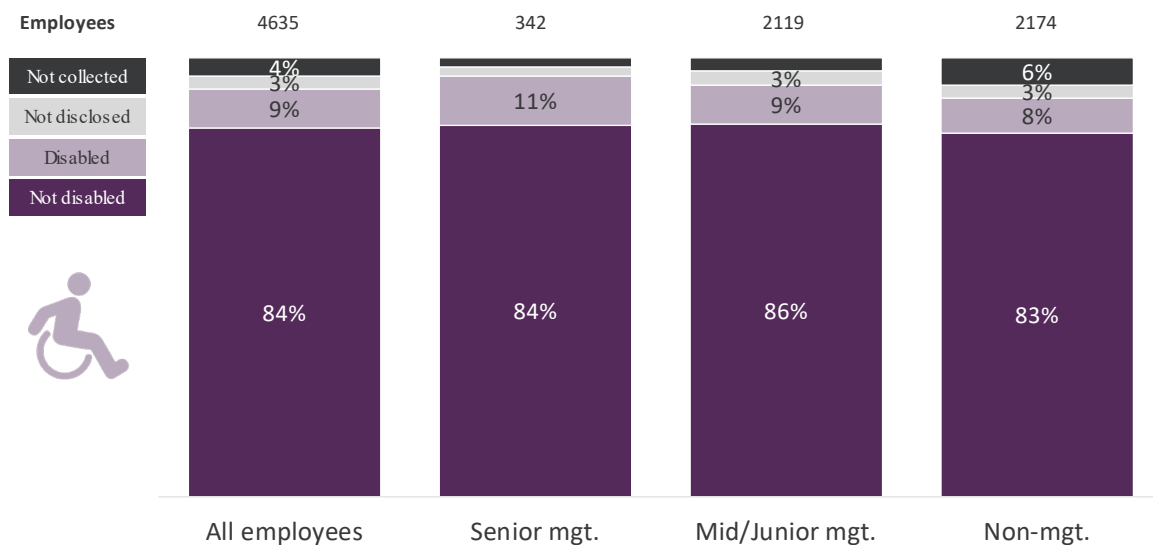
Representation of disabled people at BBC Radio is 9%, which is higher than the BBC's 2020 target of 8%. As both figures are lower than the UK average across the UK population aged 16-64 (18%), there is room for BBC Radio to push further in exceeding the 2020 target. [16]

Eleven percent of those at senior management level identify as being disabled, compared to 9% at middle/junior management level and 8% in non-management positions. By job role, one of the

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[16] ONS Labour market statistics A08: Labour market status of disabled people (Average of Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec 2018). Proportion of all 16-64 who are 'Harmonised Standard Definition Disabled'

highest proportions of disabled employees is in support/admin roles at 12%, whereas for most other job roles representation is 8 or 9%.

The proportion of those who completed training who identify as being disabled (9%) is in line with the profile of all employees. Of promoted employees, 10% said they were disabled (7% in 2017).

Since 2017 there has been little change in terms of the overall proportion of employees for which data is not collected (4%). However, there have been some improvements in reporting by category – the 'not collected' figure has fallen from 12% to 1% for joiners, and 9% to 5% for promoted.

In addition to continuing Elev8 [17], the BBC will ring-fence 10% of places on all its training schemes for disabled people. It has introduced compulsory Disability Confident training for all its employees and in 2018 it received "Disability Confident Employer" accreditation. [18] It also has a comprehensive Access Service, which arranges reasonable adjustments for disabled candidates and employees.

The BBC launched a workstream looking at its culture and barriers to career progression, which focused on the experience of its disabled employees. It published a report on career progression and culture for disabled staff at the BBC, "Reflecting the disability in the UK within the BBC workforce". BBC Radio said the report aimed to identify gaps and best practice and make recommendations to the Executive Committee for significant change. It said it had taken steps to remove the barriers identified in the report.

Sexual orientation
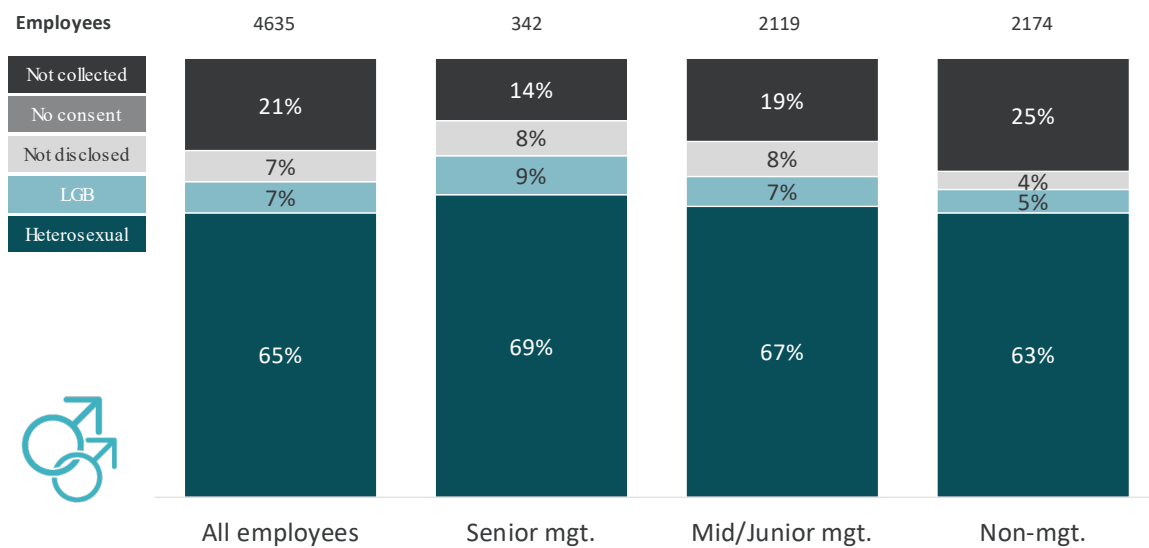
Against the BBC's internal 2020 target of 8%, BBC Radio employees who identify as being lesbian, gay or bisexual (LGB) make up 7% of BBC employees, 9% of BBC senior management, 11% of joiners

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[17] In last year's report we referred to the Elev8Development Programme, now in its fourth year, which provides disabled staff in middle grades with a senior level mentor and formal career development training. The programme offers 50 places to colleagues and runs for 12 months.

[18] The Department for Work & Pensions Disability Confident scheme helps employers to recruit and retain disabled people and those with health conditions. There are three levels of accreditation. Disability Confident Employer is level 2.

and 10% of leavers. Over half of BBC employees who identify as being LGB were gay men. The proportion of those promoted is 8% and of those who completed training is 7%.
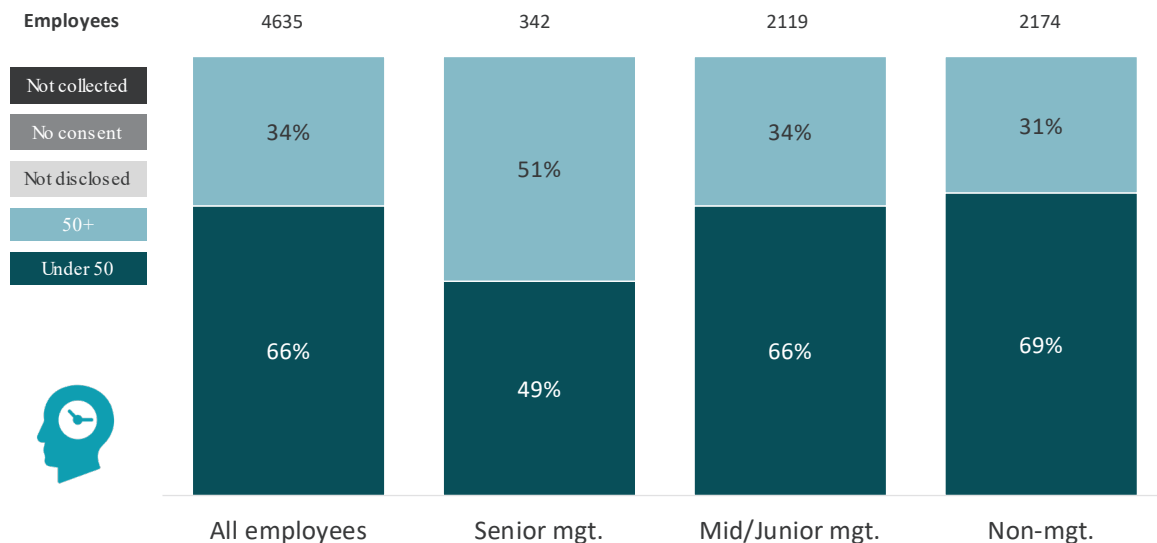
The BBC has been exploring internally, through its culture and progression workstream, how any barriers to LGBT colleagues progressing can be addressed. It has published its report on career progression and culture at the BBC, "LGBT Culture and Progression".

Gender Reassignment

The BBC said it is committed to supporting employees who do not identify as being of a fixed gender or are transitioning between genders. Initiatives include providing paid time off for appointments and setting up individual action plans for employees transitioning between genders, looking at issues such as confidentiality and personal support.
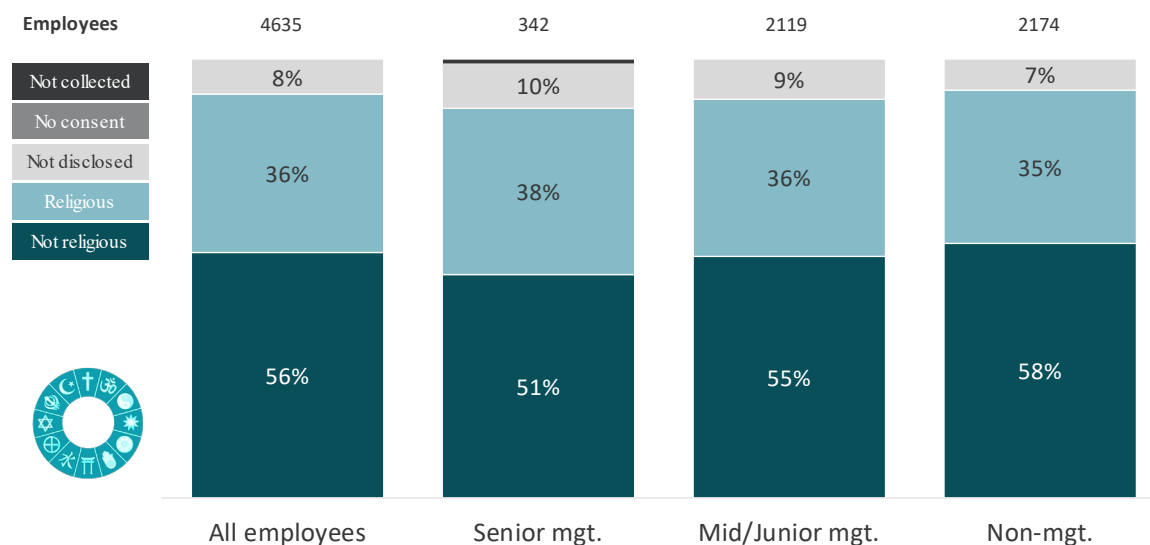
All advisers at the BBC Employee Assistance Programme have had Stonewall training and offer advice to managers. This information is contained in the BBC's Diversity and Inclusion Policy and the BBC is developing specific guidance on gender reassignment for employees and managers. The BBC does not operate an official dress code and considers that the purposeful use of an incorrect pronoun amounts to bullying or harassment, in contravention of BBC policy.

Age

Employees	4635	342	2119	2174
Legend: Not collected, No consent, Not disclosed, 50+, Under 50	50+: 34%	50+: 51%	50+: 34%	50+: 31%
	Under 50: 66%	Under 50: 49%	Under 50: 66%	Under 50: 69%
	All employees	Senior mgt.	Mid/Junior mgt.	Non-mgt.

More than a third (34%) of BBC Radio employees are aged 50 or over and it employs more men than women in this age bracket, an 8pp difference. BBC Radio has introduced reverse mentoring and a network for employees aged under 35 supporting career development.

Religion or Belief

Employees	4635	342	2119	2174
Not collected				
No consent				
Not disclosed	8%	10%	9%	7%
Religious	36%	38%	36%	35%
Not religious	56%	51%	55%	58%
	All employees	Senior mgt.	Mid/Junior mgt.	Non-mgt.

Over half (56%) of BBC Radio employees identify as not being religious, compared to 36% as religious - most of the latter identified as being Christian (20% of all employees). Eight percent of employees did not disclose their religion or belief.[19]

Social Mobility

The BBC monitors and publishes the social and economic diversity of all its employees, asking about the type of school they attended, their parents' occupation and the highest level of education of their parents. This data was reported on in the BBC's Equality Information report. The BBC then carried out a deep dive analysis of this data to understand progression rates better. One of its workstreams on career progression and culture at the BBC intended to understand better the experiences of employees from low-income backgrounds, to ensure that its culture is inclusive. From there, the BBC developed a series of recommendations on how to increase the social diversity of the organisation and ensure an inclusive culture with progression opportunities. It published these in its report, "Reflecting the socio-economic diversity of the UK within the BBC workforce".

Since 2014, the BBC's work to widen access to the BBC has included apprenticeships and pre-employment opportunities aimed at non-graduates. Apprenticeships are offered across the BBC, including in radio, and in different locations across the UK. Some have inbuilt degrees that appeal to those who might otherwise be put off by university tuition fees. Across all schemes, there are currently 350 apprentices and graduate trainees in the BBC. Other initiatives, such as anonymous CVs and creative assessment techniques, are helping the BBC to increase the social diversity of the organisation. The BBC removes names and degrees from applications for internships, traineeships, development programmes and some other positions.

In February 2018 the BBC announced two new initiatives to help young people from low-

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[19] We acknowledge that employee data disclosure rates are not entirely within broadcasters' control, as employees are entitled to not disclose their data to employers.

income backgrounds compete for future apprenticeships at the BBC. The first programme, based in London and Salford, is a training course designed to level the playing field for 50 school students from socially diverse backgrounds. The programme, being developed with advice from The Sutton Trust[20], will help prepare 16 to 18-year olds from less privileged backgrounds to apply for highly sought-after apprenticeships. The second programme, based in Cardiff, will offer ten full time, paid, pre-employment traineeships to candidates wanting to apply for BBC Wales Journalism Apprenticeships.

Recent initiatives at Radio Cymru and Radio Wales have included Discovery Days, with almost 300 opportunities being given to young people across Wales, with a focus on targeting under-represented groups. They also regularly offer work placements, with a focus in 2019 on targeting more diverse applicants.

Radio 1 and 1Xtra's "Where It Begins" offers eight-week, paid placements designed to attract a range of people. Another example is the Make It Digital trainee scheme for 16-24 year olds.

The BBC has been recognised by the Social Mobility Employer Index[21] for two consecutive years, the only broadcaster in the list. It is ranked in the top 30 of UK companies working to be socially inclusive, using recruitment and employment policies and practices to broaden the socio-economic background of its future workforce.

Recruitment, Partnerships and Training

In terms of progressing through the organisation, the proportions of LGB employees (7%), employees who were women (49%), from a minority ethnic background (8%) and who identify as being disabled (10%) were largely in line with the average across the organisation:

	% Ethnic minority	% Female	% Disabled	% LGB
BBC Radio	9%	49%	9%	7%
Trained	8%	49%	9%	7%
Promoted	11%	55%	10%	8%

The BBC has a range of compulsory training for employees and managers, including unconscious bias training, disability confidence training, Stonewall training and diverse recruitment training. The BBC has also developed a new disability awareness training package for managers and staff which will be rolled out in 2018/19. Some schemes mentioned above, such as RISE and Elev8, aim to encourage in-role development for under-represented groups.

The BBC "First Steps" pre-employment scheme runs two talent pools of 40 places, with the aim to increase the diversity of BBC applicants, and the BBC has begun working with the Job Centre to offer ring-fenced work experience placements to young unemployed people.

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[20] Research from the Sutton Trust last year suggested that, across the UK generally, a disproportionate number of the country's most prestigious apprenticeship places are going to teenagers from higher-income-backgrounds and older people, leaving less privileged youngsters behind.
[21] Social Mobility Employer Index

The BBC monitors all stages of its recruitment processes to assess their impact on diversity. For all schemes, applications and CVs are anonymised. All interviews are conducted by at least two people, and recruitment panels must have as diverse a mix of levels of seniority, gender and background as possible. Reasonable adjustments and access services and communication support for deaf or hard of hearing candidates are also arranged.

The BBC also partners with a range of external organisations to promote diversity and inclusion, including the Creative Diversity Network (CDN) and Creative Access.

Flexible working, parents and carers

The BBC has a flexible working policy which is communicated to all employees and available on the BBC intranet site. It is also looking to set up a staff network for parents and carers.

On-air and wider focus

This section refers to some of the schemes designed to improve diversity on-air but, given the production sector is not covered by this report, it provides only a snap-shot of this work.[22]

The BBC has set on-air targets for women and people from minority ethnic backgrounds[23]. At the end of March 2018, the BBC published its first Diversity Commissioning Code of Practice as part of its commitment to increase diversity on- and off-air. It puts diversity at the heart of the BBC's commissioning processes and reporting framework across all its services, including radio, standardising the approach across its output so action on diversity is agreed and progress checked.

Serving a wide range of communities in different ways are Radio 1 and 1Xtra's output for young people, while the BBC Academy's Expert Women programme provides media training and networking to broaden the base of female contributor voices on-air across the industry.[24] This comes as the BBC announced it is seeking to ensure that there is a 50:50 gender split of expert voices across its airwaves in news, current affairs and a range of topical programmes by April 2019. BBC Radio said that it fully supports the 50:50 programme and a large percentage of its radio outputs achieve 50% female representation. It said that a Local Radio Mentoring Scheme saw female presenters in local radio mentored by high profile BBC broadcasters. It said that "two women on [the scheme] have secured new high profile shows". It added that a further project to find new female presenters ("Women in Radio") "saw two women secure long-term contracts at the BBC, with a number of other participants having since appeared on local radio as contributors or presenters". Radio 3 has increased the number of female record reviewers to over 50% on its weekly show. Other initiatives are:

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[22] Our data on the BBC does not include on-air employees, except those in journalism, as we understand that, beyond journalism, all on-air talent is either employed by the commercial division BBC Studios, not by BBC Radio, or are freelancers.

[23] The on-air targets are part of a wider set of primarily on-screen portrayal targets for 2020:
- Women on screen, on air and in lead roles 50%
- Disability on screen and in some lead roles 8%
- Black, Asian and ethnic minorities on screen, on air and in lead roles 15%
- LGBT on screen and in some lead roles 8%

[24] BBC Academy's Expert Women database

- The Class Act: Nationwide Search and Skill Factory, an intensive skills training programme for 32 disabled actors, all of whom secured an audition with BBC Studios.
- The Make It Digital Virtual Traineeship, run exclusively on social media and offering digital skills such as website building to help young people with limited work experience.
- The new Centre for Excellence for the commissioning and development of diverse programmes and programme makers in Birmingham, which aims to improve all types of diversity in content.
- A £2.1 million Diversity Development Fund, which continues to be used to accelerate projects with diverse content or talent, and a £2 million Portrayal Fund to support ideas programmes, which represent lives, stories and communities from all areas of the UK.

Leading from the top and accountability

The Director General and the Group Director of Human Resources are sponsoring the BBC's overall project to review the culture and career progression of diverse and minority groups in the BBC. In addition, the Executive Committee and the Board take an active role in leading diversity and inclusion programmes within the organisation. Each divisional director is accountable for their area's progress and each of the five diversity workstreams is sponsored by an Executive Committee member or senior manager.

Executive Committee: The BBC referred to its recent publication of a series of measures to address the lack of representation of employees from minority ethnic backgrounds[25] in its leadership teams. This includes adopting a policy of diverse short lists for senior appointments and target of two Executive Committee members from minority ethnic backgrounds by 2020.

Diversity and Inclusion Advisory Group: the BBC has a refreshed Diversity and Inclusion Advisory Group, who advise and support its work. According to its media centre webpage the group has internal and external members and will "provide a fresh perspective" on the BBC's ambitions to "represent the widest range of stories, faces and voices on screen [and] on air".

"Having a creative, diverse workforce is key to our success. It's so vital for us to consider how well we are doing and it's equally important to focus on what we can do better to increase diversity, both across the BBC, as well as within the radio industry." **James Purnell, Director BBC Radio & Education**

[25] Report on Career Progression and Culture for BAME staff at the BBC

2. How diverse is Global?

Key conclusions

Global has collected more data for 2018 than it did in 2017. However, significant amounts of its data are not disclosed[26], including data for disability (61%), which is a mandatory characteristic, sexual orientation (63%) and religion and belief (66%). It had success in its established initiatives such as the Global Academy, has focused on promoting the development, growth and retention of women in technology and it has a new apprenticeship scheme. However, it has yet to develop comprehensive and targeted new initiatives to promote diversity and inclusion. Of the three main broadcasters, Global has more to do and we look forward to clear improvements over the coming year.

Global Media & Entertainment Ltd is primarily a UK radio broadcaster with brands including LBC, Heart, Capital, Classic FM and Smooth. It broadcasts to the whole of the UK through a portfolio of network stations providing a range of speech and music output serving different types of audiences.

Almost 24 million adults listen to Global radio stations – over two fifths, or 43%, of the population. 46% of their listenership are men and 54% are women; 86% are white and 14% from minority ethnic backgrounds; 49% are aged over 45; and 10% consider themselves to have a disability.[27]

Global's data collection

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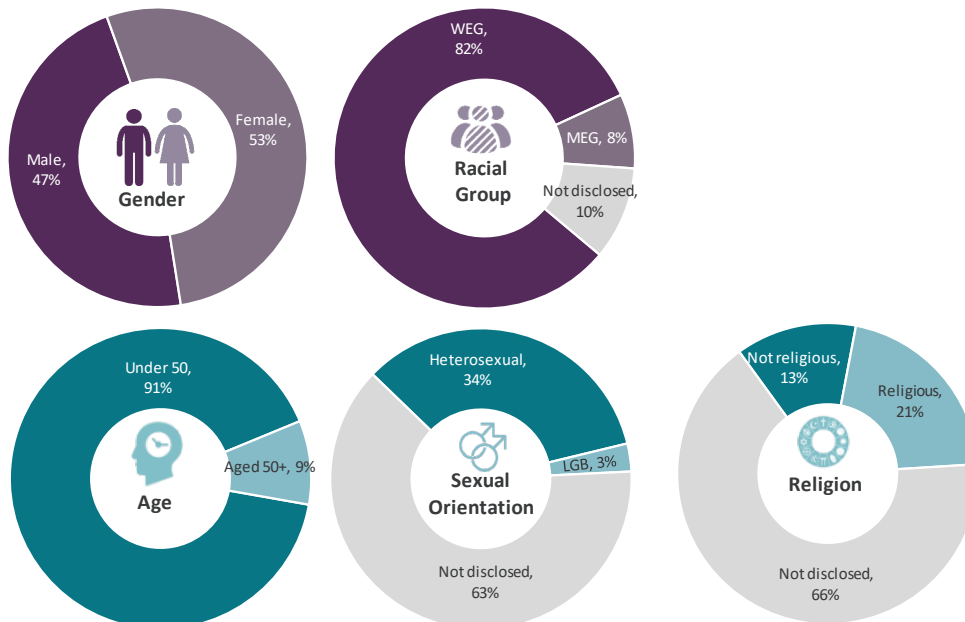
[26] See footnote 3 and the Diversity and equal opportunities in radio 2019 methodology for an explanation of this and other terminology. We acknowledge that employee data disclosure rates are not entirely within broadcasters' control, as employees are entitled to not disclose their data to employers.
[27] RAJAR Q4 2018; 12 month weight.

Global Radio has 1,585 employees and collected data from all its employees across all six characteristics for 2018.[28] This is an improvement on the data it had previously collected for 2017, which was only on 'gender' and 'racial group'. It follows the implementation of a people management system, 'Workday' (Global had previously relied on manual processes). However, over 60% of its data on disability, sexual orientation and religion or belief is 'not disclosed'. This is where its employees opted not to share their age, sexual orientation and religion or belief with it. In effect, this data is invisible to Global and Ofcom. It is therefore not possible for Ofcom to report meaningfully how well represented these characteristics are among Global's employees. For sexual orientation and religion or belief, Global shared data for all its employees at an all-employee level, but it did not collect any data for these characteristics by subcategory.

Understanding the makeup of a workforce is central to effectively addressing gaps in diversity and Global told us last year that it was to underpin its diversity strategy with improved data. While Global's data collection has got better, there is still much room for improvement. We would like to see Global work with its employees to create a culture which encourages greater disclosure and therefore greater data visibility for our next report.[29]
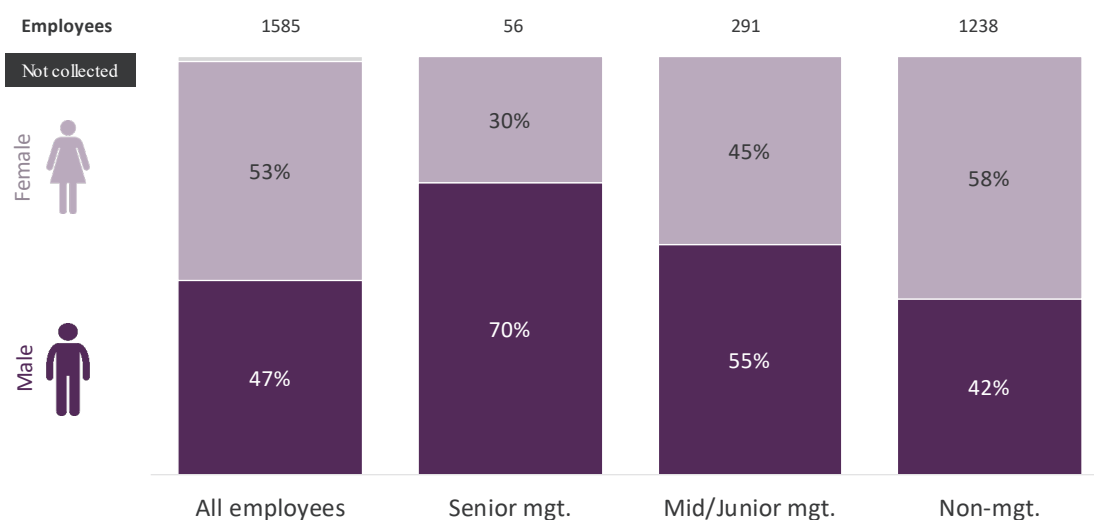
Global's diversity and diversity work in 2018

In our first radio report we referenced Global's diversity strategy 'Different - Will Set You Apart', launched in May 2018. We also referred to Global's cultural change programme, which was to include a detailed review of its policies, processes and practices and then make recommendations for change. For this (our second) report, Global said that its change programme had resulted in an apprenticeship scheme, improved data collection and process, a recruitment and attraction strategy and a number of unnamed actions and initiatives. However, Global provided little detail as to the unnamed initiatives (apart from that they will be launched sometime in 2019) and provided little information to demonstrate its planning in this reporting period for a more diverse workforce. We will engage with Global to discuss its arrangements in the coming months.

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[28] To avoid the possibility of identifying individuals, we have not included a chart for disability.
[29] See footnote 24.

Gender

Employees	1585	56	291	1238
Female	53%	30%	45%	58%
Male	47%	70%	55%	42%
	All employees	Senior mgt.	Mid/Junior mgt.	Non-mgt.

(chart note: "Not collected")

Women represent 53% of Global's employees (57% in 2017). As seniority increases, the representation of women decreases from 58% in non-management roles to 45% in middle-management roles and just 30% in senior management roles.

There continue to be significant differences in gender profiles depending on the job role. Technical and engineering roles are more likely to be filled by men, 86% men v 14% women (78% v 21% in 2017), as are programming roles, 68% v 32% (67% v 32% in 2017). Women, however, dominate marketing/PR roles, 73% women v 27% men (77% v 22% in 2017) and sales roles, 61% v 39%.

More women joined Global (58%) in 2018, but the proportion of leavers who were women was higher still, at 63%.

The proportion of women promoted in 2018 was higher than men, 57% v 43%.

In accordance with a commitment it made last year, Global provided data this year on the gender split at middle and non-management (see above) and additionally the gender split of freelancers (65% male, 35% female).

Global told us that it continues to participate in the Tech Talent Charter, of which it said it was a founding member. This is an external industry charter set up to promote the development, growth and retention of women in technology. It said that "one of Global's diversity objectives is to increase the ratio of women within technology" and that "the number of women in Global's technology team has risen from 6% to more than 20% in less than three years". It added that it had tied women's networking and mentoring activities to its technology team collaborative learning experiences, to ensure that new female employees had a network of support while integrating into the team. Ofcom welcomes the work that Global has done to increase the representation of women in its technology team and to make it an inclusive place of work. Having led the field in 2017, the representation of women in technology at Global has fallen back from 21% to 14% in 2018 and is now behind BBC Radio (19%). We encourage Global to continue its efforts in this area, to regain lost ground.

Global said that it is also working with partners such as Work180 and Code First Girls (see under Recruitment, Partnerships and Training). From the information that Global had provided to Work180 (as published on Work180's website), we understand that it has implemented measures such as

discussing flexible working arrangements during recruitment processes and having internal women's networking groups.

In September 2018, Global launched a new, six-month leadership development programme of group workshops and one-to-one coaching, which culminates with a presentation from each participant to the Executive team. The first alumni are 20 female middle managers.

Over 50% of the intake to the first Global Apprenticeship scheme (see Recruitment, Partnerships and Training, below) were female and over 50% from minority ethnic backgrounds.

Global reported to the Gender Pay Gap Service a 32.7% mean and 19.4% median gender pay gap in March 2018. For March 2017 these figures were 34.5% and 20.5% respectively.

Racial group
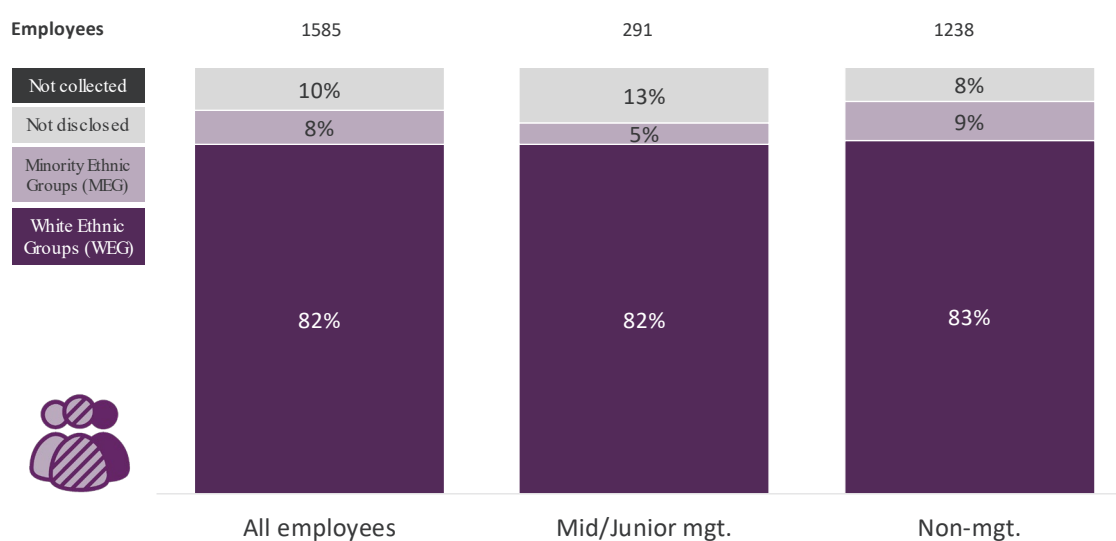
Due to the small numbers and the make-up of the organisation, we have not included figures for Global employees at Senior Management level to avoid potential identification of individuals.

In 2018, employees from minority ethnic backgrounds made up 8% of employees (6% in 2017), with a non-disclosure rate of 10% (13% in 2017). This is approaching the UK workforce average of 12%[30], but compares less favourably with the averages of large cities such as London, where many of Global's radio brands are based (e.g. LBC, Smooth and Classic FM). In London, 36% of the workforce is made up of employees from minority ethnic groups.

The non-disclosure rate for senior managers was 36%, compared to 13% of middle managers and 8% of non-managers. Other subcategories with high non-disclosure rates are leavers (17%) and support/admin (22%).

People from minority ethnic backgrounds make-up 9% of non-managers and just 5% of middle-managers. Eleven percent of those promoted are from minority ethnic backgrounds.

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[30] 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.

Over 50% percent of the intake to the first Global Apprenticeship scheme (see Recruitment, Partnerships and Training below) were female and over 50% from minority ethnic backgrounds.

In the absence of further information from Global, we consulted the information that Global has given to Work180, as published on Work180's website. This states that Global accommodates cultural and religious events, although it was not clear whether these events are celebrated, which is the case with many other broadcasters.

Disability

Global provided data on all its employees, but 61% of them had chosen not to disclose to Global whether they were disabled. At the subcategory level, the non-disclosure rate ranged from 31% of joiners to 92% of leavers. As a result, it was not possible for Ofcom to report meaningfully how representative Global's workforce is of disabled people.

Global said that it encourages all disabled employees to tell them about their disability so that it can meet their requirements at work through, for example, special equipment, accessibility in its buildings and training colleagues in issues such as mental health awareness.

Sexual orientation[31]

Global shared that 3% of its employees are LGB. Given that it also reported that 63% of its employees had chosen not to disclose their sexual orientation to it, it is likely that representation of lesbian, gay and bi-sexual people is actually higher at Global than 3%.
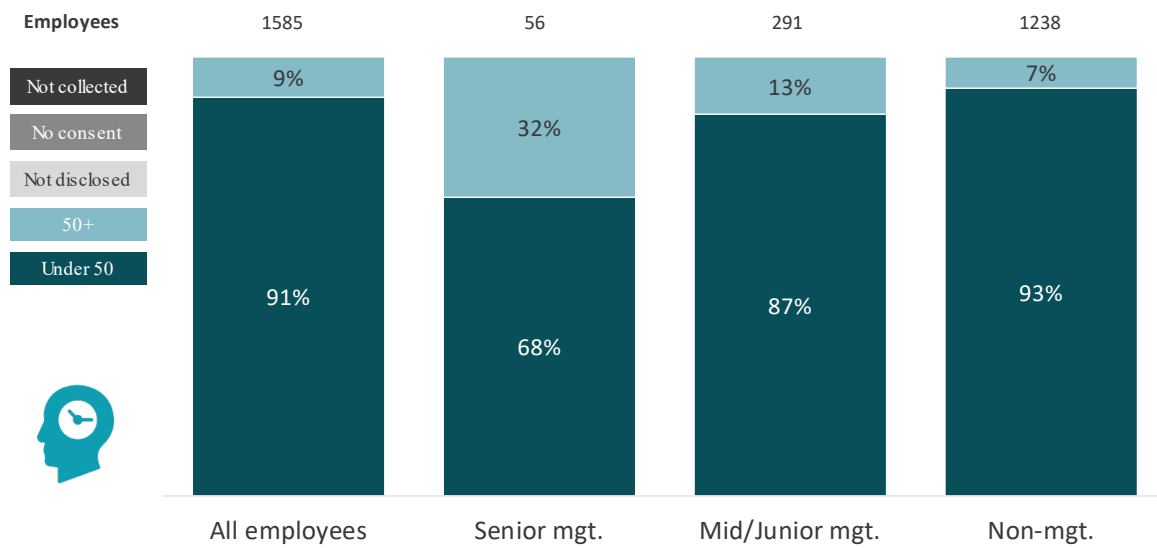
We gave Global the opportunity to provide details of any arrangements to support LGB employees, but it did not provide any information.

Gender reassignment

We asked Global to tell us, on a voluntary basis, about any arrangements it has in place to promote equality of opportunity for transgender people. Global referred to its Fairness Policy. This states that Global will be supportive of employees who tell it they are to undergo gender reassignment. It asks employees to contact its People and Culture team to agree a plan for managing the process "to make sure that the transition goes as smoothly as possible". It states that time off for medical or other associated treatment will be treated just as time off for other types of medical appointments.

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[31] Global did not provide subcategory data and therefore we have not been able to include a chart for this characteristic.

Age

Employees	1585	56	291	1238

Legend:
- Not collected
- No consent
- Not disclosed
- 50+
- Under 50

Chart values:
- All employees: 9% (50+), 91% (Under 50)
- Senior mgt.: 32% (50+), 68% (Under 50)
- Mid/Junior mgt.: 13% (50+), 87% (Under 50)
- Non-mgt.: 7% (50+), 93% (Under 50)

Global provided complete data for 2018 at an all-employee level and by all subcategories except 'trained'. It had not collected any age data in 2017.

Of Global employees in middle and non-management roles, 87% and 93% respectively are aged under 50 compared to 68% of those in senior management. Overall the number of employees aged under 50 is 91%.

Religion[32]

Global provided data on all its employees. While 21% identified as following a religion or belief and 13% following no religion or belief-system, 66% of employees chose not to disclose this information. As a result, it was not possible for Ofcom to report meaningfully the diversity of religious and other beliefs at Global.

As above, according to the information Global has given to Work180, it accommodates cultural and religious events. It said it will "always do [its] best to accommodate employee's requirements as they relate to religion or belief" but did not explain how it does this or give examples.

Flexible working, parents and carers

Global said it continues to support working parents and carers, with an enhanced maternity pay policy and more flexibility in the workplace, including hours of work, part time contracts and different working patterns. It has also enhanced its shared parental leave and pay policy to match the changes to its maternity and adoption policies. Further, it has enhanced its paternity leave and pay policy, increasing leave to three weeks at full pay.

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[32] Global did not provide subcategory data and therefore we have not been able to include a chart for this characteristic.

According to the information Global has given to Work180, it uses gender-neutral parental language and for shared parental pay it matches the maternity offer with regards to enhancing pay for 12 weeks.

Social mobility

In December 2018, Global agreed a partnership with Debut, an early talent recruitment platform that actively targets and tracks candidates from different social groups/backgrounds.

Recruitment, partnerships and training

Like last year, Global did not provide any data about the number of employees who received training at an organisational level or by characteristic. It said that it will be launching a new learning and development system in 2019 to capture data on the people it trains.

For all senior recruitment and appointments, Global insists on a diverse talent pool being shortlisted which includes a balanced gender representation. Under its inclusivity strategy 'Different Will Set Us Apart', it has launched an apprentice scheme and a recruitment and attraction strategy.

Global said that it is actively working with other partners, including Work180, a careers website that pre-screens employers to see how well they support women's careers, and Code First Girls, a multi-award-winning social enterprise that aims to increase diversity in the Technology sector. In so doing, Global hopes to attract female talent at all levels, and particularly into traditionally male dominated functions like digital and technology. Its new leadership development programme began in September 2018 with 20 female middle managers as its first intake.

Global said that in 2018 it had focused on where and how it attracts talent, particularly at entry level, into the organisation. It said this includes building a strong relationship with Global Academy, its school for 14-19-year olds specialising in broadcast and digital media, and an entry path from education into the work place. Global offers up to two weeks unpaid work experience and up to three months paid internships. It has partnered with Debut and it continues to develop managers in fair recruitment skills training and in managing diverse teams. In September 2018 Global's first apprenticeship scheme began, welcoming a number of apprentices and graduate apprentices into roles in its programming, digital, video, marketing, technology and commercial teams. It partnered with the Global Academy to support the transition from education into employment.

Global is also piloting a new learning management system, which includes content for managers on the importance of diversity and Unconscious Bias training.

On-air and wider focus

Global did not provide voluntary data for its freelancers, except for their gender split (see above).

Leading from the top and accountability

Global told us that its senior management has led the cultural change programme, and are responsible for reviewing, assessing and recommending new initiatives to promote a fair and

inclusive culture. It said that, at the launch of 'Different Will Set Us Apart' in May 2018, Ashley Tabor (Founder and Executive President), Stephen Miron (Group CEO) and Sarah Homer (its People and Culture Director) had presented at a companywide meeting the message that Global welcomes and celebrates the difference in people, whatever their background and was seeking diversity data to understand its diverse makeup and put in place effective initiatives to be more diverse in the future. It said that its "apprenticeship scheme, improved data collection and process and recruitment and attraction strategy" were all initiatives that had resulted from its change programme. In 2017, Global told us that its Technology Director had been instrumental in defining and participating in the Tech Talent Charter (see above).

Global's initial data submission was within Ofcom's deadline for responses but required substantive revisions as it had misunderstood how to characterise the data it held. Global resubmitted its data on 17 May 2019, 10 weeks after the deadline. It was important for Ofcom to receive this more accurate data, particularly as Global Radio employees represent about a fifth (18%) of the sample of UK radio industry employees covered in this report. Global's final submission also included more qualitative information. The delay in providing data inevitably held up the publication of our report. Global has said that it is currently making arrangements for improved monitoring in preparation for our next report.

> "Diversity and inclusion are very important to Global. It is a constantly evolving process and we are committed to making improvements year-on-year. We are already investing in future generations through our Global Academy and Global Apprentice scheme. There has also been a particular focus at Global on improving diversity in our growing technology team. This said, we recognise there is still a lot of work to do however, Global has always been committed to recruiting the highest level of expertise and experience relevant to our business at any given moment in time, regardless of gender, origin, sexual orientation or disability." **Global spokesperson**

3. How diverse is Bauer?
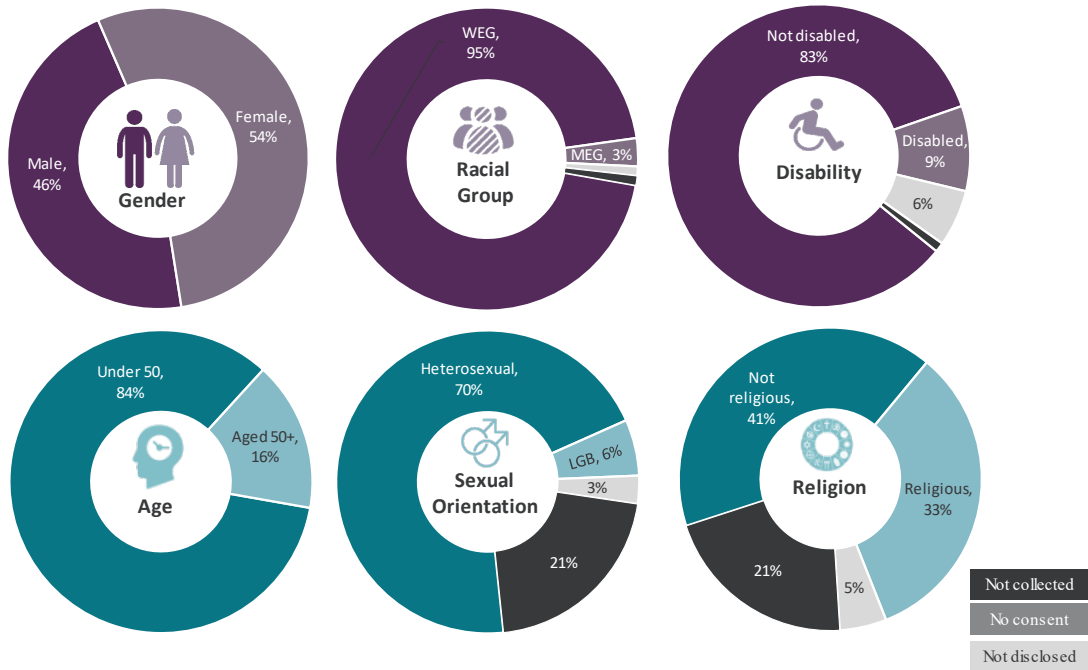
BAUER
MEDIA GROUP

Key conclusions

Bauer monitors all six characteristics, but there is a 21% data gap for sexual orientation and religion or belief. It should work to collect complete data for these characteristics. Women are still under-represented in senior management (36%). Bauer has a low proportion of employees from minority ethnic backgrounds (3%) particularly within its senior and middle management. It should urgently address this lack of diversity. In contrast, disabled people now make-up 9% of Bauer's employees (up 6pp on 2017). While there is still room to raise this figure, this increase in representation is welcome. Bauer continues to have several initiatives in place to promote equal opportunities and has also launched "Belonging at Bauer", a company-wide programme on diversity and inclusion, supported by set objectives, project plans, internal reporting and commitments by Bauer's senior management. Ofcom fully supports the commitment to diversity and inclusion shown through these initiatives and senior management sponsorship.

Bauer Media Group is a digital broadcasting business reaching over twenty-five million listeners daily across parts of Europe. We report here exclusively on its UK arm, Bauer Radio Ltd, whose UK national radio brands include Magic, KISS, Scala Radio, Planet Rock and Jazz FM. Its regional brands include Radio City, Metro Radio, Wave 105, Radio Clyde and Free Radio, all part of the Hits Radio Brand Network.

18 million adults listen to Bauer's radio stations in the UK, which is around a third of the UK adult population. Forty-eight percent of their listenership is male with 52% female; 87% are white and 13% from a minority ethnic groups; 40% are aged over 45; and 10% consider themselves to have a disability. [33]

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[33] RAJAR Q4 2018; 12-month weight.

Gender
Male, 46%
Female, 54%

Racial Group
WEG, 95%
MEG, 3%

Disability
Not disabled, 83%
Disabled, 9%
6%

Age
Under 50, 84%
Aged 50+, 16%

Sexual Orientation
Heterosexual, 70%
LGB, 6%
3%
21%

Religion
Not religious, 41%
Religious, 33%
5%
21%

Not collected
No consent
Not disclosed

Bauer radio has 788 employees and collected data across all six characteristics. For the mandatory characteristics and age, Bauer collected data from almost all its employees with 3% to 6% of them not disclosing[34] to Bauer if they identified as disabled or their ethnicity. Having not collected any data for sexual orientation and religion and belief last year, this year it collected data from 79% of its employees for these characteristics at an organisational level. Three to five percent of employees chose not to disclose to Bauer their sexual orientation or whether they are religious.

Last year Bauer told us that it was forming a Diversity and Inclusion Forum made up of representatives from all areas and levels within the business and to report quarterly to the Executive Board. This year, Bauer said it has since partnered with a specialist diversity and inclusion strategist to help accelerate its progress on achieving an inclusive culture in the business. These initiatives have resulted in the launch of "Belonging at Bauer", a company-wide programme on diversity and inclusion within Bauer in the UK. The programme has five key objectives for 2019, including to have embedded Belonging at Bauer in the UK business and shifting its demographic make-up closer to being truly representative of its audiences. The other objectives are to have:
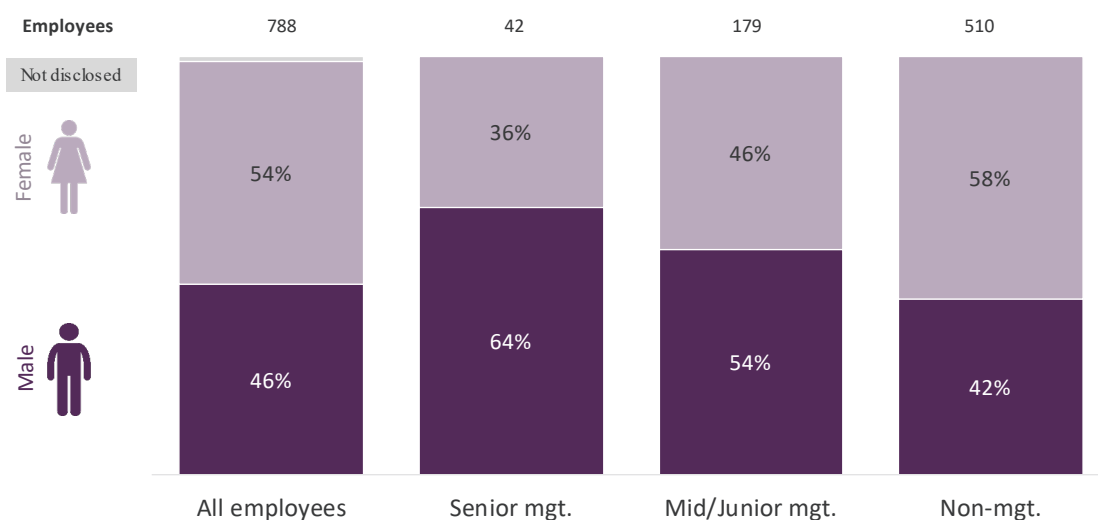
- made a shift in the experience of its under-represented groups (including "BAME, Social Mobility, Disability and Women in Programming LGBT+[35] and Carers");
- taken action to 'change the system' and ensure that there is a mechanism for people where they see something that doesn't fit with Bauer's diversity and inclusion culture to 'call it out'; and
- change the conversation around flexibility at work, to improve things for everyone.

For each of these objectives, Bauer said it has a programme of work in place, which will be measured throughout the year. We will be seeking updates from Bauer on these initiatives in the coming months.

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[34] We acknowledge that employee data disclosure rates are not entirely within broadcasters' control, as employees are entitled to not disclose their data to employers.
[35] LGBT+ is short for 'Lesbian, Gay, Bisexual, Transgender/Transsexual plus'. The 'plus' is inclusive of other groups, such as asexual, intersex, queer, and questioning.

Gender

| Employees | 788 | 42 | 179 | 510 |

Bar chart showing gender split by role category:

	All employees	Senior mgt.	Mid/Junior mgt.	Non-mgt.
Female	54%	36%	46%	58%
Male	46%	64%	54%	42%

As last year, the gender split at Bauer is 54% female, 46% male and promotions were broadly in line with this split (52% female, 48% male). Gender profiles are more likely to be male as the seniority of the role increases: 42% of those in non-management roles are male (40% in 2017) compared to 64% of those in senior management roles (61% in 2017). These are not statistically significant compared to last year, but in middle management the proportion of females has increased by 5pp to 46%.

There continue to be significant differences in gender profiles depending on the job role. Roles in programming are more likely to be filled by men, with the same split in 2018 as in 2017 (81% v 19%). In contrast, support/admin, sales and marketing roles are more likely to filled by women (69%, 66% and 62% women v 31%, 34% and 38% men, respectively). In the case of marketing the proportion of women has increased by 6pp since 2017.

2019 saw the completion of Bauer's European Social Funded project Making Creativity Work. It trained 1,275 individuals (65% from minority ethnic backgrounds and 60% women). Bauer said that, as at May 2019, 500 of the trainees had entered employment within the wider creative industries, with about a dozen starting at Bauer.

Bauer Academy continues to deliver Accelerator, its wide-ranging apprenticeship programme, including new entry positions within the organisation for women who want to get into radio programming.

Bauer also sits on the Government's Apprenticeship Diversity Champions Network, which promotes apprenticeships and diversity amongst employers and encourages more people from underrepresented groups, including those with disabilities, women and people from minority ethnic groups, to consider apprenticeships.

Bauer Media UK's gender pay gap report 2018 states that it has a 12% mean and 16% median pay gap against a national average in April 2018 of 14% and 12% respectively [36].

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[36] Bauer's report states that its 2017 data is not comparable with 2018 due to structural changes.

Racial group
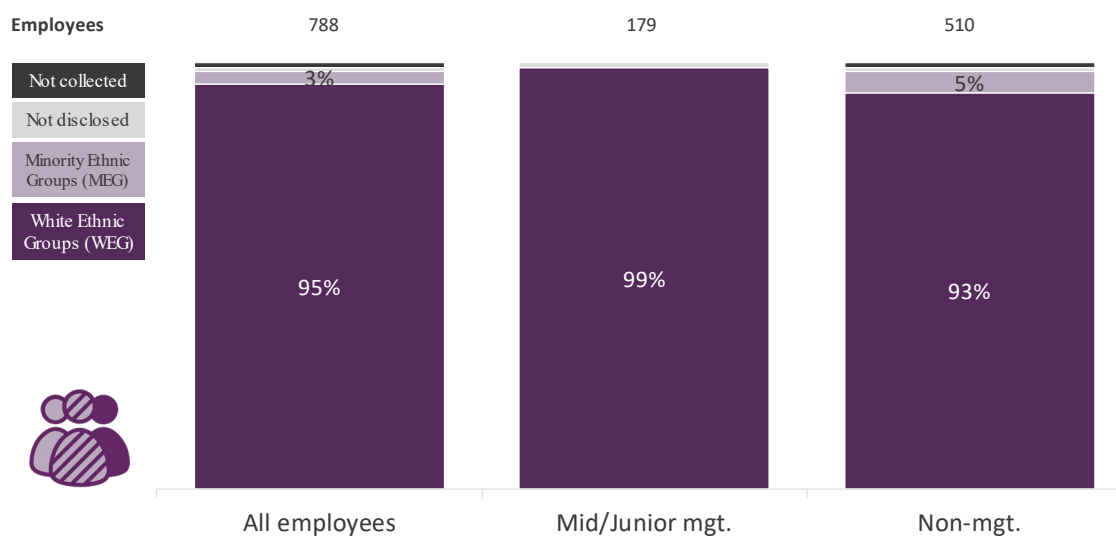
Ninety-five percent of employees at Bauer are white and just 3% are from a minority ethnic group, which does not compare favourably with the UK workforce average of 12%[37], and even less favourably with the averages of large cities such as London where many of Bauer's radio brands are based (e.g. Magic, Kiss, Heat, Planet Rock and Absolute). In London, 36% of the workforce is made up of employees from minority ethnic groups. The 3% figure across all of Bauer's radio brands is closer to the make-up of the local labour market of smaller cities. For example, 4% of Kingston upon Hull's labour market, where Bauer's Viking FM is based, are from minority ethnic backgrounds. In Sheffield, where Bauer's Hallam FM is based, 14% of the labour market is made up of employees from minority ethnic groups. In Preston, where Bauer's Rock FM is based, 22% of the labour market is made up of employees from minority ethnic groups[38]. Recruitment and retention of employees from minority ethnic groups is one of Bauer's objectives for 2019. We will be monitoring Bauer's progress over the coming year.

Bauer continues to partner with Creative Access, a not-for-profit social enterprise that helps young people from minority ethnic groups to secure paid training opportunities in creative companies and supports them to move into full-time employment.

As above, 2019 saw the completion of Making Creativity Work, in which 65% of the trainees were from minority ethnic groups.

As above, Bauer sits on the Apprenticeship Diversity Champions Network, which supports the Government's commitment to increase the proportion of apprenticeship starts by people from minority ethnic groups by 20% by 2020.
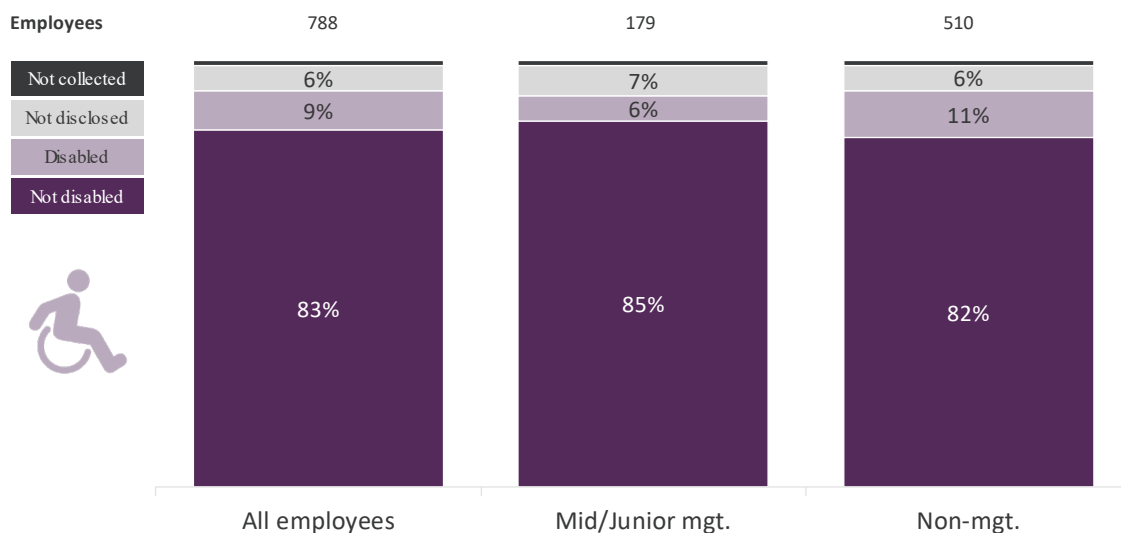
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[37] ONS Labour market statistics A09: Labour market status by ethnic group (Average of Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec 2018). All in employment.

[38] ONS Annual Population Survey (January to December 2018) – NomisWeb. London, aged 16- 64 in employment. Other cities also have large percentages of people from minority ethnic groups in their workforces, for example: Birmingham (40%), Bristol (10%), and Nottingham (27%). See ONS Annual Population Survey (January to December 2018) – NomisWeb.

Under the oversight of its CEO, every person in Bauer's leadership team has made a commitment on Diversity and Inclusion, such as volunteering to sponsor an employee network group. It has a working group within its Diversity and Inclusion Forum, driving projects specific to this area, to try to move the dial in terms of levels of representation and the internal culture within the organisation. It is also looking to increase the visibility of employee role models from minority ethnic backgrounds, to make a "shift" in the way it works. Bauer is working on its talent management process and sees this as being critical to its Diversity and Inclusion work, particularly for its employees from minority ethnic backgrounds. In explanation of its lack of representation in this area Bauer said that in 2018 more employees from a minority ethnic background (9%) left it than joined, meaning that its representation in this area is not where it would like it to be. Bauer told Ofcom it is "absolutely determined to make a positive impact on this in the next twelve months".

Last year we highlighted that Bauer may benefit from the development of existing initiatives to ensure effective and fair recruitment and progression practices, in particular to improve representation for those with disabilities and those from minority ethnic groups. Bauer still has significant progress to make if the makeup of its workforce is to truly reflect the diversity of UK society, 12%[39] of whom are from a minority ethnic group. It has very low ethnic minority representation within its senior and middle management teams. However, it is beginning to understand better the composition of its workforce and to embed various initiatives to increase its diversity. It should set defined targets with clear delivery dates to improve representation in this area.

Disability

Employees	788	179	510
Not collected	6%	7%	6%
Not disclosed	9%	6%	11%
Not disabled	83%	85%	82%
	All employees	Mid/Junior mgt.	Non-mgt.

Bauer collected data from 99% of its employees at total employee level (97% in 2017) and all its leavers (in 2017 it collected no data for leavers). At subcategory level however, data was not collected from about a quarter of employees in Technology and Engineering and in Marketing. 9% of employees at Bauer identified as disabled, which represented a significant increase from 2017

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[39] See footnote 35.

(3%).[40] In 2018, 9% of joiners also identified as disabled. Approximately 11% of employees in non-management roles, and 6% of employees in middle management, identified as having a disability.

Bauer's data findings are supported by its work in this area. Last year, Bauer said it was engaging with MyPlus, which describes itself as "a membership forum aimed at building disability confidence in graduate recruitment". Bauer has begun a comprehensive audit of its website and intranet to ensure it is accessible to everyone and is re-designing job advertisements to ensure they include a proactive statement about reasonable adjustments. It also has a recruitment best practice guide so that managers are clear on their responsibilities, and where they can go for support in making adjustments for candidates.

In addition, Bauer has engaged with the Business Disability Forum, to understand more about 'non-visible' disabilities, including learning difficulties. It said it would focus on employee wellbeing, with resilience and wellbeing training available to everyone. It added that it would provide mental health awareness training for its HR department who would then help its managers in identifying and supporting people in the right way. This year, Bauer said it continues to campaign for mental health first aiders through its 'Where's your head at?' campaign, which has run in-house, across the industry and beyond. During 2019, Bauer will complete the rollout of mental health first aiders across all its locations.
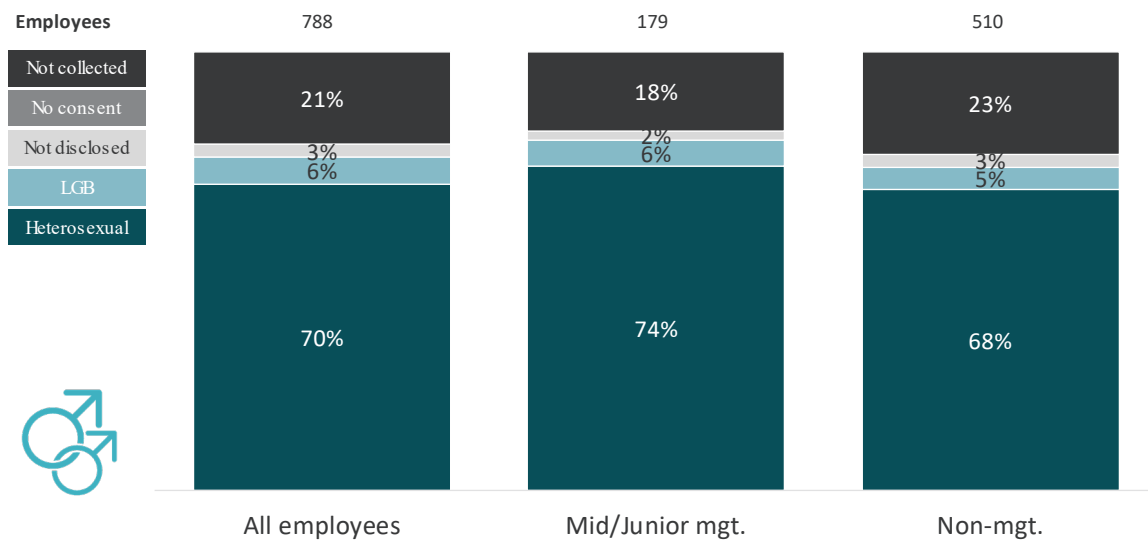
As set out above, Bauer sits on the Apprenticeship Diversity Champions Network.

Last year we highlighted that Bauer may benefit from the development of existing initiatives to ensure effective and fair recruitment and progression practices, in particular to improve representation for those with disabilities. Ofcom supports the measures Bauer has taken to build its confidence in recruiting disabled people and make itself more inclusive, and the increase in representation of employees and joiners who identify as being disabled. We encourage Bauer to continue to consider and plan how it can increase the representation of disabled people across different job roles and levels.

We will be seeking updates from Bauer on its initiatives in the coming months.

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[40] It is unclear if it is an actual increase or a product of improved data collection.

Sexual orientation

Employees

Not collected	
No consent	
Not disclosed	
LGB	
Heterosexual	

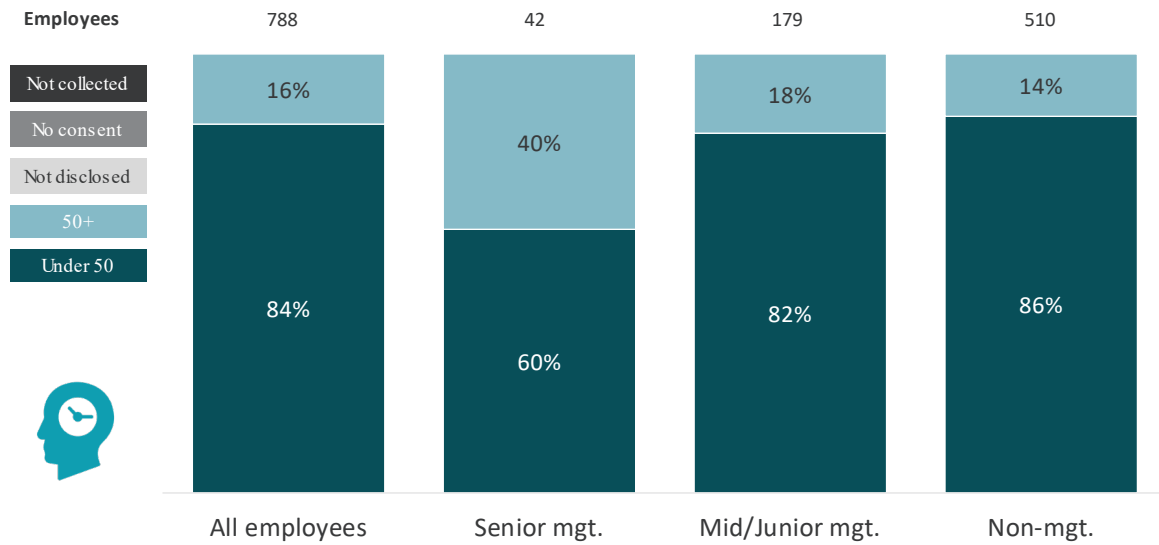|	All employees (788)	Mid/Junior mgt. (179)	Non-mgt. (510)
Not collected	21%	18%	23%
No consent		2%	
Not disclosed	3%	6%	3%
LGB	6%		5%
Heterosexual	70%	74%	68%

Some of the above data may not add to exactly 100% due to rounding.

Last year Bauer did not submit data on the sexual orientation of its employees. In 2018 it submitted visible data for 76% of its employees, with 21% not collected and 3% not disclosed to them. Seventy percent of Bauer's employees identified as heterosexual and 6% as LGB. Eight percent of joiners identified as LGB. No data was collected for leavers or those who had received training. While the overall data gap has reduced from 100% to 21%, it still accounts for over a fifth of Bauer's UK employees. We would like to see Bauer reduce this gap for future reports and to consider how it can capture data for leavers and those trained.
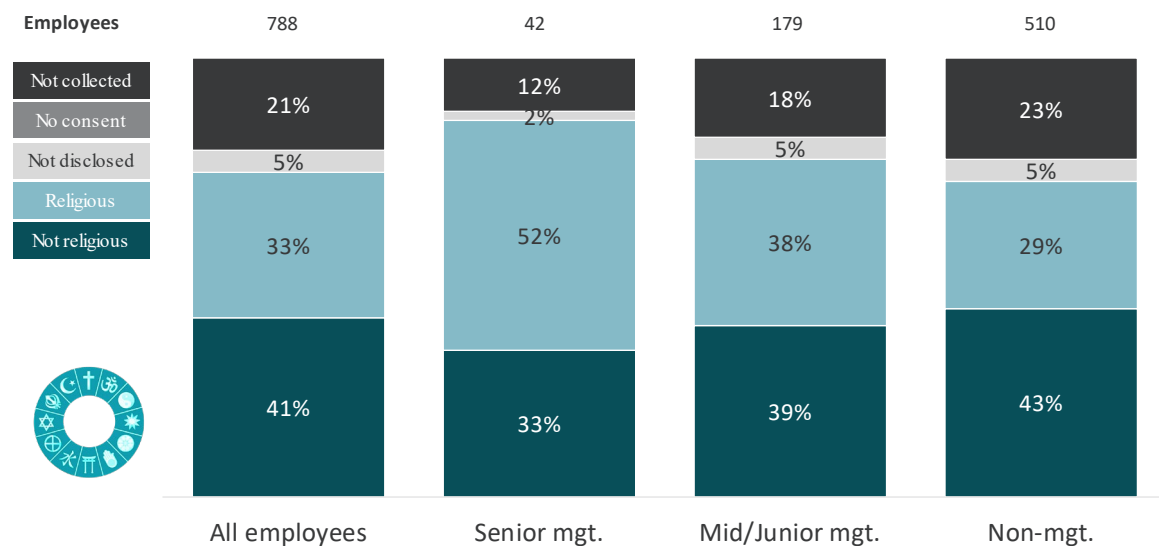
Gender reassignment

Bauer said that a member of its leadership team has volunteered to launch an LGBT+ network. It added that it is using two key ways to create a safe and supportive environment for trans employees: its internal ally-ship work; and, the interest its employees have shown in Stonewall training.

Age

Employees	788	42	179	510
Not collected				
No consent				
Not disclosed				
50+	16%	40%	18%	14%
Under 50	84%	60%	82%	86%
	All employees	Senior mgt.	Mid/Junior mgt.	Non-mgt.

In 2018, 82% and 86% of Bauer's employees in middle and non-management roles respectively were aged under 50 compared to 60% of those in senior management. Overall the number of employees aged under 50 is 84%. These figures are similar to those of 2017.

Religion

Employees	788	42	179	510
Not collected	21%	12%	18%	23%
No consent				
Not disclosed	5%	2%	5%	5%
Religious	33%	52%	38%	29%
Not religious	41%	33%	39%	43%
	All employees	Senior mgt.	Mid/Junior mgt.	Non-mgt.

Some of the above data may not add to exactly 100% due to rounding.

In 2017, Bauer did not collect any employee data related to religion or belief, but this year it collected visible data from 74% of its employees, with 21% not collected and 5% not disclosed to them. 41% of Bauer employees identified as being not religious, while 33% identified as being religious. Data was collected at an organisational level and also by job role, seniority and for joiners and those promoted. No data was collected for leavers and those trained. While the overall data gap

has reduced from 100% to 21%, it still accounts for over a fifth of Bauer's UK employees. We hope to see Bauer reduce this gap for future reports and consider how it can capture data for leavers and those trained.

Social mobility

Bauer has a working group in its Diversity and Inclusion Forum dedicated to socio-economic mobility. It has equalised its work experience programme by banning unpaid internships, to increase accessibility of opportunity. It continues to run the Bauer Academy, which designs and delivers training programmes to progress underrepresented groups and promote diversity across creative industries.

Bauer said its Diversity and Inclusion survey sought to check if there were socio-economic barriers to progression for its employees. Although none were identified, Bauer said it will continue to monitor individual's progression through the company.

'Get In', Bauer's recent project in Liverpool targeting NEETS[41] trains young, unemployed people from the Liverpool City Region, placing them into employment within the local area.

Bauer has also launched This is Me: Creative London, which will see 200 unemployed 16-30-year-old Londoners benefit from fully funded, industry led training and work experience opportunities within Bauer and the wider creative industries. Bauer aims to progress at least 75% of its participants into employment and further education.

Bauer said that one of its executive team has committed to sponsoring activity around socio-economic mobility, with support also committed by members of its leadership team.

We are encouraged by Bauer's initiatives to improve socio-economic diversity within its organisation and look forward to them reporting on progress in the coming year.

Recruitment, partnerships and training

Bauer is supporting its objective to make a shift in its demographic make-up with a plan of action. This includes a thorough review of both its recruitment and talent management recruitment practices at all levels of the company.

As a part of a recruitment audit, Bauer will be re-designing job advertisements to ensure they include a proactive statement about reasonable adjustments.

In 2018 Bauer launched a virtual induction programme for all employees ('100 Days at Bauer') to ensure that the high standards of behaviour it expects are communicated from the outset.

Bauer previously ran a campaign called 'Is It OK', aimed at starting conversations for its colleagues around equal opportunities and behaviour at work. In 2019, it intends to continue using this, and develop it further into a full framework to allow individuals to report experiences formally.

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[41] People who are 'Not in Education, Employment or Training'.

Flexible working, parents and carers

As above, Bauer told us that one of its five objectives in 2019 is to change the conversation around flexibility at work.

On-air and wider focus

For last year's report, Bauer said that it had piloted the Mental Health Media Charter at its stations Heat, Kerrang and Planet Rock, training on-air presenters on language and tone. Now, Radio City Talk is also a signatory.

Bauer has a Diversity and Inclusion Forum working party on disability which is about to do a comprehensive audit of Bauer's website to ensure that it is accessible to everyone.

Bauer has signed up to the Radiocentre diversity statement, a commitment to diversity and inclusion across the industry.

Bauer did not provide any data for its freelancers, which we asked for on a voluntary basis. Having conducted a Diversity and Inclusion survey of its employees in December 2018 (see below), it has committed to seeking the feedback of its freelancers on inclusion at Bauer in 2019, after considering logistical and data privacy challenges.

Leading from the top and accountability

In December 2018, Bauer conducted a Diversity and Inclusion survey across all permanent employees, to understand more both its demographics and the experiences of its people. It plans a series of roadshows to publish the results and to ensure that all its employees feel engaged with the topic of inclusion and their responsibilities to act in a way which supports an inclusive culture and equal opportunities.

Bauer's senior management team has formally committed to, and supported, the Belonging at Bauer programme. This has included: internal and external leadership training on diversity and inclusion (e.g. unconscious bias training); formal appraisal objectives reflecting a particular commitment on diversity and inclusion (e.g. sponsoring an employee network, attending Stonewall ally training); and project plans to measure if and how those commitments are contributing to an inclusive culture.

> "We work hard to ensure Bauer is a great place to do great work for all – creating a culture where our people are appreciated and supported. During 2018, we launched 'Belonging at Bauer' - a programme to advance our Diversity and Inclusion strategy with both our people and our products and we remain committed to attracting the most talented people from all backgrounds in each territory we operate in." **Paul Keenan, President of Audio Bauer Media Group**