Ofcom

Single Equality Scheme 2011 - 2014

October 2011

SINGLE EQUALITY SCHEME 2011-2014

FOREWORD

Colette Bowe
Chairman

At Ofcom, diversity and equality are central to our values and our approach to the work we do. To be effective as a regulator, we need to understand and reflect the society we serve; therefore, it is essential we promote diversity and equality within Ofcom.

The introduction of the Equality Act 2010 provides an opportunity to ensure we continue to embed diversity and equality in everything we do. Our Single Equality Scheme (SES) is designed to be a clear plan of the work we have done and what we hope to achieve in the future, both as an employer and as the UK's communications regulator.

This document is the product of discussions with our colleagues to ensure it is both realistic and ambitious. I am grateful to the many people in Ofcom who have contributed to it.

Do please take the time to read this document to see how we plan to build on the progress we have already made and develop our organisation even further.

SUMMARY

This is Ofcom's second Single Equality Scheme (SES) and it describes in one publication how diversity and equality are essential to the way we operate, both as an employer and as the UK's communications regulator. The SES is a fundamental part of our Corporate Responsibility strategy and values, both of which are driven by our vision to be the most creative communications regulator that delivers quality and excellence to consumers.

To achieve our vision we take steps to ensure we are a good employer that values and welcomes the different ideas, skills and behaviours of our colleagues. As a regulator, we have a duty to further the interests of citizens and consumers. We need people from diverse backgrounds to help ensure we make sound decisions that are representative of the different perspectives within society.

Under the Equality Act 2010, Ofcom has a legal duty as a public body to have due regard to the need to promote equality of opportunity, eliminate unlawful discrimination and foster good relations between key equality strands of age, disability, gender, race, religion or belief, sexual orientation gender reassignment, pregnancy and maternity.

We are determined to do more than just meet our statutory obligations. We promote equal opportunities and we respect and acknowledge the diversity of individuals who work both in the organisation, and in the wider community we work with. We act responsibility towards the environment and encourage our colleagues to interact with the different communities around us.

This document explains Ofcom's role as the UK's communications regulator and demonstrates the progress we have made on Corporate Responsibility which encompasses our approach to diversity and equality. We have ambitions for the future; our new SES objectives outline what we hope to achieve in the next three years and we have developed a series of actions to demonstrate how we will accomplish them. The SES objectives are to:

- have a diverse mix of people at all levels of our organisation

- consider the different needs and interests of all individuals and stakeholders when carrying out our work; and

- create a culture where everyone's contribution is valued on its merits.

Our SES is a working document that will be reviewed and updated on a regular basis to make sure it continues to be significant and valuable. A review of progress on the actions underpinning our objectives will be published annually.

INTRODUCTION

Christopher Woolard
Group Director,
Content, International and Regulatory Development

I am delighted to present the publication of Ofcom's second Single Equality Scheme. This important document outlines the steps we are taking to ensure that Ofcom is not only a successful regulator but a good employer and a great place to work for our colleagues.

As Ofcom's Corporate Responsibility Champion, it is my job to help ensure we make issues such as diversity a real part of everyday life at Ofcom rather than something we do as an afterthought. Our Corporate Responsibility Steering Group, which is made up of senior managers from across Ofcom, guides our work in this area, focusing on:

1. **Diversity and Equality**
2. **Footprint and Sustainability**
3. **Volunteering and Community**

We are responsible for ensuring that our SES is embedded into all areas of Ofcom. Since the publication of our first SES,

we have celebrated many achievements including being named as one of The Times Top 50 Employers for Women and climbing 65 places in the Stonewall Workplace Equality Index 2011. We have taken steps to provide more support to our disabled colleagues, and developments have been made to the accessibility of our website and publications. Support and awareness of our SES remains high from colleagues and it has been developed in a 'grass roots' way by Champions from all areas of Ofcom.

Whilst real progress has been made in recent years, there are still ways we can improve; we have a new set of SES objectives that encapsulate our aspirations and an Action Plan to demonstrate how we will attain them. This latest SES was created by colleagues in every part of Ofcom during testing times for us as an organisation and I want to thank everyone who has contributed to its development.

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ABOUT OFCOM

Ofcom is the regulator of the UK's communications industries.

We regulate the TV and radio sectors, fixed line telecoms and mobiles, and the airwaves over which wireless devices operate.

Ofcom exists to further the interests of consumers and citizens through a regulatory regime, which, where appropriate, encourages competition.

We make sure that people in the UK get the best from their communications services, while ensuring that competition can thrive.

The Communications Act 2003 and the Equality Act 2010

Ofcom operates under the Communications Act 2003. Our main duties are:

- to look after our consumers and citizens in relation to communications, and promote their interests; and

- to look after everyone's interest as consumers and citizens by promoting choice and competition where we think it is needed.

The Communications Act 2003 demands that Ofcom must, for example, look to the needs of elderly and disabled people, and people on low incomes.

As well as the duties under the Communications Act, as a public authority we have general duties to promote equal opportunities under the Equality Act 2010.

This legislation states that we have a responsibility to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation;

- advance equality of opportunity between different groups; and

- foster good relations between different groups,

in the following protected characteristics:

1. age;

2. disability;

3. gender reassignment;

4. pregnancy and maternity;

5. race;

6. religion or belief;

7. sex; and

8. sexual orientation

These responsibilities are known as the 'general duties' to promote equality.

The Equality Act 2010 impacts on a range of employment issues - from providing training opportunities; to giving everyone fair access to our facilities, to maternity and paternity leave and flexible working time. As an employer of approximately 700 people, we must promote equality in the way we recruit new colleagues, and in how we treat our colleagues on a day-to-day basis.

Ofcom's Corporate Responsibility programme, which encompasses our SES and Equality Impact Assessments (see page 8), addresses all of these duties and shapes the way we work, both as an employer and as a regulator.

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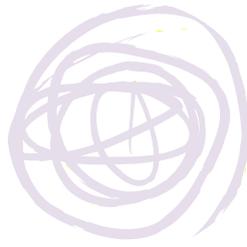
CORPORATE RESPONSIBILITY

At Ofcom, we take steps to ensure we are not only a responsible employer towards our colleagues; we also recognise and manage our impact on the wider community.

Our Corporate Responsibility programme brings together three key areas of activity that are embedded throughout the organisation:

1. Diversity and Equality

2. Footprint and Sustainability

3. Volunteering and Community

Our work is led by our strategic priorities to:

• treat all colleagues with dignity and respect in an inclusive and fair working environment, promoting equality of opportunity for all.

• reduce our carbon footprint, provide value for money and ensure ofcom's practices are environmentally sustainable.

• engage, inspire and develop colleagues while proactively seeking to support our local community.

The activities and support that make up our Corporate Responsibility programme are driven by the Corporate Responsibility Steering Group (CRSG).

Members hold senior management positions within the organisation and set the strategic direction of our work. They are responsible for delivering and implementing our SES and ensuring that it remains effective and relevant to our colleagues and stakeholders.

We believe that embedding Corporate Responsibility into our organisational approach is a fundamental part of our success as a regulator. Being socially and environmentally responsible reduces our operational costs. Valuing, encouraging and promoting diversity creates a more engaged and efficient workforce. Being inclusive of different communities and representative of the diversity of society allows us to make better decisions that help consumers. This is an essential part of our SES and the following sections outline our key areas of work in Diversity and Equality, Footprint and Sustainability and Volunteering and Community, and the progress we have made so far.

1. Diversity and Equality

Treat all colleagues with dignity and respect in an inclusive and fair working environment, promoting equality of opportunity for all

As an employer, Ofcom's goal is to recruit, motivate, develop and retain outstanding people, reflecting the diverse communities we serve, who work together to deliver our common aims and objectives. Part of our ethos is to be a place where people choose to work because it offers equal and inspiring opportunities to everyone.

We embrace the concept of flexible working, which includes alternative working practices such as working from home, term time working and job sharing.

We have a competitive maternity scheme, which supports female employees before, during and after their maternity leave.

We also have a clear set of Values which reflect our wish to work in an open, effective and people-driven way. Our Values guide what we do, the way in which we do it and encourage the right behaviour:

• communicating openly and honestly

• listening with an open mind

• making a difference

• empowering and prioritising

- investing and supporting our colleagues

- genuine collaboration

Our behavioural competencies, which set out the standards and expectations of the skills and behaviour required for working at Ofcom, link directly to our Values.

We also take steps to promote diversity and equality within Ofcom and we have a successful strategy to ensure that diversity is at the forefront of the organisation.

We have an enthusiastic and committed volunteer Diversity and Equality Working Group (DEWG), who are responsible for promoting diversity within the organisation. The DEWG hold regular internal 'Lunch and Learn' events which promote equality. For example, in celebration of International Day for People with Disabilities, the DEWG hosted an event with the charity Changing Faces[1]. The charity explained their work on promoting an accurate portrayal of people with a disfigurement in the media and society as a whole.

Volunteers from the DEWG wrote a special article for our intranet for Holocaust Memorial Day, looking back on the events of the past and highlighting the plight of those who suffer today from discrimination and persecution.

Our Lesbian, Gay, Bisexual and Transgender (LGBT) employee network group is called the Affinity Network and was created as a small forum for

LGBT colleagues to meet one another socially. In recent years, it has become more than just a social group, and has grown larger in membership with increasing responsibilities. The group coordinates our submission to the Stonewall Workplace Equality Index and plans our LGBT History Month celebrations. To commemorate a recent LGBT History Month, the Press Complaints Commission was invited to present at a session on how it handles complaints about editorial content of newspapers, magazines and websites and how this has particularly affected LGBT people.

1.1 Measuring our success

We rigorously monitor our internal policies and practices so that we can make improvements where necessary. Some of the tools we use include:

A. Colleague Survey

The Colleague Survey provides an opportunity for all colleagues to give their views, in confidence, on how the organisation is run and helps us identify areas for future improvement.

In 2010 we saw positive responses from colleagues in regards to diversity and equality and key achievements include:

- 87% of colleagues agreed that Ofcom is an equal opportunities employer

- 83 % of colleagues are aware of Ofcom's Single Equality Scheme

- 83% of colleagues would feel comfortable asking for an adjustment to the work environment if needed for a disability
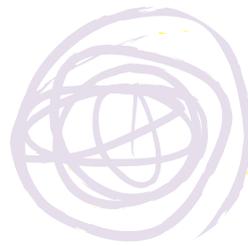
B. Benchmarking

We continue to benchmark ourselves with Stonewall, Race for Opportunity and Employers Forum on Disability. In 2011, we climbed 65 places in the Stonewall Workplace Equality survey ranking at 184. A copy of our latest submission can be found on our website[1].

In addition, we were delighted to be included in The Times Top 50 Employers for Women 2011.

C. Equal Pay Audits

We carried out our first equal pay audit in 2004, and our second in 2007 to investigate whether there were any disparities in the pay of men and women doing equal work. The findings of these reviews showed that there was no there was no significant disparity in the pay of men and women working at comparable levels within Ofcom.

We will continue to monitor pay and in 2011 will undertake another equal pay audit.

1.2 Diversity and Equality and the way we carry out our regulatory duties

A. Equality Impact Assessments

Ofcom carries out Equality Impact Assessments (EIAs) to make sure that we have due regard to any impacts that our proposed policies or projects will have on protected Equality groups.

An EIA is not just about fulfilling our statutory obligations; it is a best practice analytical tool that allows Ofcom projects and policies to thoroughly identify how they will impact all sections of our consumer and citizen stakeholders. By implementing EIAs, Ofcom can run projects and policies in a consistent and evidence based manner to produce good outcomes in furthering the interests of our stakeholders.

B. Equality in Broadcasting

A key part of our regulatory role is to make sure that broadcasting serves everyone, whether they work in the industry or listen to or watch television and radio services.

The Ofcom Broadcasting Code[2] sets out the rules for television and radio programmes that broadcasters must comply with to protect all viewers and listeners from harmful or offensive content. The Code has particular rules to protect people from diverse groups against discrimination.

Ofcom has duties that require broadcasters to make appropriate arrangements for promoting equal opportunities and training for those that they employ. Under co-regulatory arrangements agreed with broadcasters, they report annually on their arrangements to the Broadcast Equality and Training Regulator (BETR), which publishes an annual assessment. The next assessment is due to be published in June 2011[3]. We have also published guidance to broadcasters which is available on our website[4].

Our duties to further the interests of consumer and citizens include promoting the availability and take-up of digital communications services. For people with sensory impairments, access services are an important aid to understanding and enjoying television. Ofcom's Code on Television Access Service[5] currently requires more than 70 channels to provide these services. A review of this code in 2009:

1. http://www.ofcom.org.uk/files/2010/09/Workplace-Equality-Index-2011-document-doc.pdf
2 http://stakeholders.ofcom.org.uk/broadcasting/broadcast-codes/broadcast-code/

3 In the light of the Government's plans to remove these duties from Ofcom, we are planning to close BETR later this year, and we are considering how best to discharge the duties in the remaining period
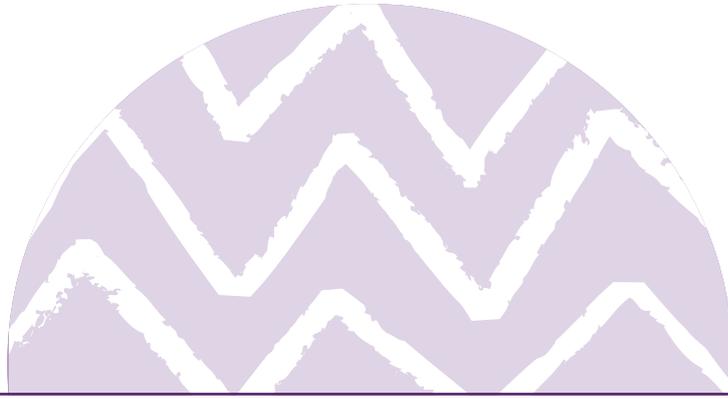
- confirmed that the existing framework for the provision of subtitling, sign language and audio description continues to deliver benefits to viewers with sensory impairments in a proportionate and effective manner;

- led to the BBC, ITV and Channel 4 voluntarily increasing the volume of audio described programming on their channels to at least 20%; and

- concluded that the British Sign Language Broadcasting Trust (BSLBT) arrangement for providing sign-presented programming was popular with sign-language users, and enjoyed the continuing support of participating broadcasters, and therefore should be allowed to continue.

2. Footprint and Sustainability

Reduce our carbon footprint, provide value for money and ensure Ofcom's practices are environmentally sustainable.

We carried out our first carbon audit in z007, and subsequently committed to a challenging 25% reduction in carbon emissions by 2013. Our most recent audit in 2009 showed that we have already made substantial progress against this target by achieving a 15% reduction in our overall footprint. We have developed a programme of work to meet the remaining 10% of the target and to ensure that our operations adhere to environmental best practice.

In 2009 our commitment to carbon reduction was recognised when we attained Carbon Trust Standard certification.

3. Volunteering and Community

Engage, inspire and develop colleagues while proactively seeking to support our local community.

To ensure that we make a positive impact, Ofcom has established a Colleague Volunteer Scheme which enables colleagues to make a difference to the community in which we work.

We run a reading mentoring scheme with a local primary school in Southwark, through which colleagues coach young children to improve their literacy skills.

We also support various community initiatives, such as our work with Careers Academies UK, a mentoring scheme for 16 to17 year old students. We have also hosted career days in Ofcom to engage young people in the world of business, and offered support to young people in interview skills and CV writing.

Ofcom supports Silver Surfers' Day. This is a national campaign promoting the use of digital technologies by older people. In 2010 volunteers from Ofcom met with Silver Surfers and provided introductory internet training sessions, and volunteered at local libraries to help set up email accounts.

At a UK level, our national offices support various ad hoc initiatives in their local regions, for example, speaking to students at schools and colleges about engineering careers. Colleagues in our Welsh office helped decorate a local primary school.

4 See: www.ofcom.org.uk/tv/ifi/guidance/guidance/ and www. ofcom.org.uk/tv/ifi/guidance/eo-toolkit/
5 http://stakeholders.ofcom.org.uk/broadcasting/broadcast-codes/code-tv-access-services/

Section 6

MAKING THE SES HAPPEN

We have been active in promoting Corporate Responsibility practices, and we have encouraged diversity and equality in our organisation but there is still more to do. We want to improve the way we operate and we have developed a set of aspirational objectives that outlines what we want to achieve over the next three years.

We have a clear mission statement that is intended to drive our SES forward:

Ofcom values a diversity of views from both inside and outside the organisation in order to ensure our decision-making is richly informed. To achieve this we are committed to:

- having a diverse mix of people at all levels of our organisation;

- considering the different needs and interests of all individuals and stakeholders when carrying out our work; and

- creating a culture where everyone's contribution is valued on its merits.

We have created a challenging framework that allocates a set of actions to each area of Ofcom. Group Directors are responsible for ensuring that their area meets these actions and they update the Corporate Responsibility Steering Group (CRSG) on progress quarterly. An SES Progress and Evaluation Report will be published annually.

The actions have been divided into two action plans: Action Plan 1 outlines new ways of working and tasks we have set ourselves, and Action Plan 2 'Business as Usual', builds on ongoing activities and progress underway.

The action plans are shown in Annex 1.

Annex 1

ACTION PLAN 1 – NEW ACTIVITIES

Objective 1: Having a diverse mix of people at all levels of our organisation

Objective	Activity	Outcome	Lead Department	Target Date 11/12	11/13	11/14
NA 1.1 Ensure that we represent the wider community we work with.	Understand the diverse mix of people in Ofcom by reviewing the diversity profile of the organisation, Use Ofcom's employment statistics to evaluate the representation of the various diversity strands in all Ofcom groups, and at all levels across the organisation. Compare the diversity make-up with historic data to establish trends. Improve our monitoring systems so that we can understand the range of disabilities within the organisation and how best to support our colleagues.	Use the data to review the impact of Ofcom's initiatives, and help to determine whether further action should be taken (e.g. in recruitment, with the communities we work with, and training and development). Seek to recruit from the widest possible candidate pool.	HR, CRSG and Executive Committee	●	●	●
NA 1.2 Understand the gender profile of engineering and technical roles.	Benchmark the proportion of women recruited into technical and engineering roles and compare against the UK industry sectors. Review the data on the mix of Policy versus Engineering roles in the Group. Changes to recruitment processes if necessary.	A better understanding of the diverse make up of technical and engineering roles across Ofcom and the UK industry sector. Potentially, a more representative mix of colleagues.	SPG	●	●	●
NA 1.3 Understand whether Ofcom is perceived as a good place to work for colleagues from ethnic backgrounds, who have a disability or are women	Review formal exit interview process to ensure that alongside other questions colleagues leaving us are encouraged to share their experiences of working for Ofcom and whether they view Ofcom as a diverse place to work and in which diversity is valued and encouraged	Identify any obstacles or specific problems to achieving a diverse mix of colleagues Potentially, a more representative mix of colleagues	HR, All Managers, Group Directors and CRSG	●		

Objective 2: Considering the different needs and interests of all individuals and stakeholders when carrying out our work

Objective	Activity	Outcome	Lead Department	Target Date 11/12	11/13	11/14
NA 2.1 External diversity groups are made aware of when a project or policy may particularly impact them.	Communicate directly with media outlets for diversity groups, where policies or projects have a specific impact on them. Take the lead in briefing specialist diversity media	A higher profile for Ofcom's projects and policies among diversity groups, which in turn encourages greater participation in our consultations. Ofcom's projects and policies are promoted amongst diversity groups.	External Communications Team, CIR	●	●	●
NA 2.2 As part of our responsibilities under the Communications Act, encourage broadcasters to create equal opportunities for everyone they employ, including freelancers, regardless of age, gender, ethnicity or disability by working with Ofcom's co-regulator, the Broadcast Equality Training Regulator (BETR).	Make sure that the BETR: produces a report in Summer 2011 on broadcasters' equal opportunities arrangements in 2010 assess the industry's progress; and provides guidance on how to improve.	Progress towards equal access to employment and training regardless of age, gender, ethnicity or disability A suitable legacy is left to the broadcasting industry when BETR closes in 2011.	Content Policy Team, CIR	●	●	
NA 2.3 Ensure that TV channels meeting the affordability and audience share criteria, laid out in the Access Services Code, provide access services (subtitling, signing and audio description) in line with their obligations.	Conduct annual assessments of audience share and revenue data to determine which channels are obliged to provide access services. Notify broadcasters of their obligations for the following year. Publish half yearly data on the broadcasters' delivery of access services.	Hearing impaired and visually impaired viewers are able to enjoy more television.	Content Policy Team, CIR			

Objective	Activity	Outcome	Lead Department	Target Date 11/12	11/13	11/14
NA 2.4 Ensure that Ofcom colleagues are well informed about the protected groups, as defined in equality legislation.	Build an online resource for consumer and market data relating to protected groups and make this data available to the public through the Ofcom website.	Policy development work is better informed across all Groups, and colleagues have an understanding of equality.	Consumer Group	●		
NA 2.5 Use our research to widen awareness and understanding of media literacy among ethnic minority groups, people with disabilities and older people.	Publish technology tracking study and media literacy tracker datasets showing media literacy among people from ethnic minority groups and among people with disabilities. Report on media literacy trends over time for older people in Media Literacy reports.	Diversity information is available for use across a wider audience which contributes to understanding of equality issues.	Consumer Group	●		
NA 2.6 Create an environment in Ofcom where colleagues feel able to ask for a reasonable adjustment.	Capture Ofcom's commitment towards reasonable adjustments in a formal statement and raise awareness with managers and colleagues. Track the number of colleagues requesting a reasonable adjustment. Monitor feedback in the Colleague Survey	Disabled colleagues feel able to ask for assistance and the work environment becomes more open. Disabled citizens feel that Ofcom is place where they could work	All Managers, HR and CRSG	●	●	●
NA 2.7 Ofcom will use its procurement activities to further equality objectives.	Check the vendor has an acceptable diversity policy in place before we sign any contract with them Check whether the vendor has had any claims of discrimination upheld by an employment tribunal and how they have changed their policy and practice to address this	We work with organisations that share our vision and support and promote diversity.	Commercial Team, Operations	●	●	●

Objective	Activity	Outcome	Lead Department	Target Date 11/12	11/13	11/14
NA 2.8 Understand the nature of the wholesale obligations and the relationship with the protected groups, as defined in equality legislation.	Ensure appropriate training for project managers and specialists. Share best practice. Develop evidence base to establish potential linkages between policies and the protected groups.	Colleagues have a better understanding of how projects and policies impact on the protected groups.	Competition Group	●	●	●
NA 2.9 Ensure that the Broadcasting Code guidance we provide to broadcasters is up to date and reflects the Equality Act 2010.	Review the guidance to the Broadcasting Code to ensure that it is up to date and fit for purpose. In particular, ensuring that our Broadcasting Code guidance on generally accepted standards reflects current views and attitudes to equality issues. Compare the wording and scope of our guidance against the protected groups in the Equality Act 2010, and seek advice from the legal Team where appropriate.	Broadcasters will be provided with any further information that we determine is necessary and appropriate. This will assist them in ensuring that they apply 'generally accepted standards' to content involving equality issues, so as to provide adequate protection for members of the public from the inclusion of harmful and/or offensive material in programmes. Our guidance appropriately reflects the Equality Act 2010.	Standards Team, CIR	●		

Objective 3: Creating a culture where everyone's contribution is valued on its merits

Objective	Activity	Outcome	Lead Department	Target Date 11/12	11/13	11/14
N.A 3.1 Ensure consistency across internal pay levels.	Conduct an equal pay audit to investigate whether there are any disparities in the pay of male and female colleagues doing equal work. Investigate the causes of any gender pay gaps that cannot be satisfactorily explained on grounds other than sex. Set out how we intend to address any pay inequalities	Greater consistency across internal pay levels.	HR and Group Directors	●		
NA 3.2 Ensure our National and Regional offices are included in our policy making decisions.	Broaden the colleague induction modules Include a question in the PRD format asking whether there are any potential regional issues and encourage project teams to contact the national and regional offices if they are unsure Monitor the feedback in the Colleague Survey	Colleagues in our national and regional offices feel more included in the organisation. Our proposed policies better reflect regional issues where appropriate	Regional and National Offices, SPG, Competition Group, CIR, SCET and HR	●	●	
NA 3.3 Ofcom and its colleagues contribute to the local community through its Corporate Responsibility activities.	Colleagues take part in Corporate Responsibility activities, and managers ensure that these are recognised as an important part of career development, incorporated in personal development plans. Provide Team Volunteering opportunities as an option for Team development. Such as assisting with Silver Surfers day, the reading mentoring scheme and Partners in Business.	Colleagues develop skills by taking part in volunteering activities. The local community benefits from Ofcom being located in the area Increase colleague's understanding of citizen issues	HR and CRSG	●	●	

Objective	Activity	Outcome	Lead Department	Target Date 11/12	11/13	11/14
NA 3.4 Ofcom colleagues are supported with regards to paternity provisions.	Implement a new paternity leave policy that takes into account changes in legislation for paternity leave and pay.	A new paternity policy which is understood by colleagues, and compliant with legislation. HR	HR	●		
NA 3.5 As a new Group, SCET will work to develop a culture in which colleagues from all backgrounds feel included and where contributions from all perspectives are valued	Develop our mission statement as a Group Increase collaboration across the teams within the Group Develop better ways of brainstorming and sharing ideas, taking into account a range of views but recognising when a decision needs to be made Focus on cross Group professional development	Colleagues feel included in the Group and that their contributions are value	SCET	●	●	

ACTION PLAN 2 – BUSINESS AS USUAL

The actions below are those which we will continue to do on a day to day basis. Although they do not have a target date, these will be reviewed regularly to ensure that we are doing all we can to put equality and diversity at the heart of everything we do in our day-to-activities.

See Action Plans overleaf

Objective 1: Having a diverse mix of people at all levels of our organisation

Objective	Activity	Outcome	Lead Department
BAU 1.1 Ofcom operates in line with diversity and equality best practice.	Work with organisations such as Race for Opportunity, Stonewall and Employers Forum on Disability, to ensure that we are adopting best practice and make improvements where possible. Undertake external benchmarking surveys and measure our scores against best practice.	Change policy and practice based on advice, and measure our scores against best practice. We use the benchmarking survey results to determine where further action should be taken.	HR and CRSG

Objective 2: Considering the different needs and interests of all individuals and stakeholders when carrying out our work

Objective	Activity	Outcome	Lead Department
BAU 2.1 Make sure that Ofcom's Market Research Team is fully briefed on equality obligations.	Include diversity and equality updates at departmental meetings.	Ofcom's Market Research Team are able to; take diversity groups into account as a matter of course and are able to press project Teams on matters relating to protected groups; ensure that research agencies understand our need for data on equality groups.	Consumer Group
BAU 2.2 Ofcom projects and policies are undertaken with due consideration for any negative or positive impacts they may have on equality.	Colleagues assess Ofcom policies and projects using the Equality Impact Assessment (EIAs) Toolkit. EIAs are monitored on a monthly basis to ensure they are completed at the beginning of the project lifecycle. The legal Team will ensure that when advising on any project, colleagues are advised of the need to complete an EIA as early as possible. EIA completion rates are reported on a monthly basis to the Operations board.	Colleague awareness of EIAs is high and completion rates are 100%.	All Groups and Executive Committee

Objective	Activity	Outcome	Lead Department
BAU 2.3 Consumers and citizen's needs are met appropriately when they contact Ofcom.	Every colleague whose role involves direct contact with citizens and consumers is provided with mandatory specific training on disability.	Front line colleagues particularly those in Consumer Contact, Spectrum Engineering and Enforcement, and Facilities are trained and aware of the disability legislation and provided with appropriate assistance to be able to support the needs of citizens and consumers.	Professional Development and Consumer Contact Centre
	Ensure that colleagues who work with the public are trained in their responsibilities under the Equality Act 2010.		
	Quality assurance fed back to colleagues.		
BAU 2.4 Protect the interests of people with disabilities, and of older people, in relation to the communications markets.	Publish ongoing policy development initiatives designed to target their needs.	Disabled and older people are engaged with the market, and able to make informed choices regarding services.	Consumer Group
	Evaluate the experiences of disabled consumers and, where practicable, set out in the Consumer Experience report findings on different protected groups	Organisation is better informed about how people with disabilities experience the communications market	
BAU 2.5 Consumers and Stakeholders understand the content that Ofcom produces.	News stories on the home page of our website, and summaries of key public consultation documents, will be written in plain English.	The content Ofcom produces is clear and easy to understand so that Stakeholders and countries outside of the UK are better able to understand the work that Ofcom does.	P&P and Commercial Team, Operations and Web Team, CIR and International Team, CIR
	All documents, that are circulated both internally and externally, are in an appropriate font and format.		
	Publications will be made available in alternative formats, (where appropriate to do so) on request		

Objective	Activity	Outcome	Lead Department
	Use our language skills in presentations and, where appropriate and reasonable, use translation. Ensure information on colleagues' language skills is kept up to date on the Loop.		
BAU 2.6 The ongoing development of the Ofcom website meets current accessibility standards.	Attend relevant accessibility seminars and advise on improvements we need to make.	The material we publish on the Ofcom website is accessible	Web Team, CIR
BAU 2.7 Diversity within society is reflected in our communications.	Where we use photos or video clips, we'll make sure diversity groups are represented.	Publications are more inclusive and reflect the diversity of society.	Web Team, CIR
BAU 2.8 Evaluate wider equality and diversity issues raised by MPs.	Monitor correspondence from MPs. Analyse equality issues raised with Ofcom via this correspondence. Report on issues raised and submit to the CRSG.	Understanding of wider equality issues.	Government and Parliamentary Business Team, CIR
BAU 2.9 Ofcom gives proper weight to diversity, accessibility and equality when contributing to international policy debates.	The International Team sparks debate and highlights diversity and global citizenship – for example, in disability access in EU Framework/ Universal Service Obligation policy; EU initiatives on Media diversity; internet regulation and cross-border enforcement	Ofcom makes a real and positive contribution to improving diversity policies, both at EU-level and internationally	International Team, CIR

Objective	Activity	Outcome	Lead Department
BAU 2.10 The community radio sector serves a diverse range of communities around the UK.	Invite applications for community radio in a third round of licensing. (The application paperwork for this round has been changed and simplified. It reduces the amount of information required and is easier for applicants to complete). The licence decision process will take into account diversity issues	A community radio licensing system that's open and accessible, so that community radio serves a diverse audience	Community Radio Team, CIR

Objective 3: Creating a culture where everyone's contribution is valued on its merits

Objective	Activity	Outcome	Lead Department
BAU 3.1 Monitor equality and diversity at Ofcom.	Provide colleagues with an opportunity to share their views in the Colleague Survey. Ask a series of diversity related questions and act on the feedback.	Colleagues have an opportunity to comment and make suggestions. Better understanding of the issues and concerns of colleagues. Improve policies, working practices based on the feedback.	MR Team, Consumer Group, HR and CRSG
BAU 3.2 Ofcom continues to give due consideration to the faith and beliefs of colleagues from different religions.	Where possible, accommodate colleagues' religious leave requests. Publish guidance on our intranet and publish a calendar of religious holidays on the intranet.	Colleagues feel happy to work for an organisation that respects a diverse mix of religions and beliefs.	All Managers
BAU 3.3 SE&E Management Team continues to ensure that colleagues from their area, especially given the UK wide spread of the team, feel included within the organisation.	Establish regular, clear communication channels in the form of team or departmental meetings, email or other remote method, utilising technology as appropriate, to ensure that colleagues feel supported and are able to provide input/ feedback. Liaise with Professional Development and/or other relevant areas so that needs of non-Riverside House based staff are taken into account for training and development purposes. This includes prompt cancellation of events/meetings to save unnecessary travel and cost.	All colleagues, including those that work from home or in the regional offices, feel included within the organisation.	SE&E Management Team, Operations

Objective	Activity	Outcome	Lead Department
	Continue to support colleagues with remote working arrangements as necessary.		
	Make sure, if possible, that important meetings are held at times and locations that take into consideration travel from across the UK.		
	Work with the SE&E welfare representative to explore opportunities for team building/CR volunteering activities		
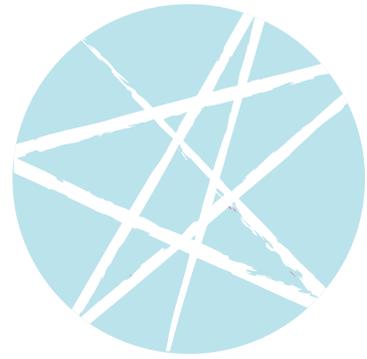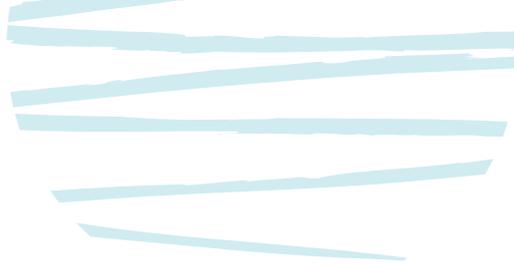
GOVERNANCE FRAMEWORK FOR OFCOM'S SINGLE EQUALITY SCHEME

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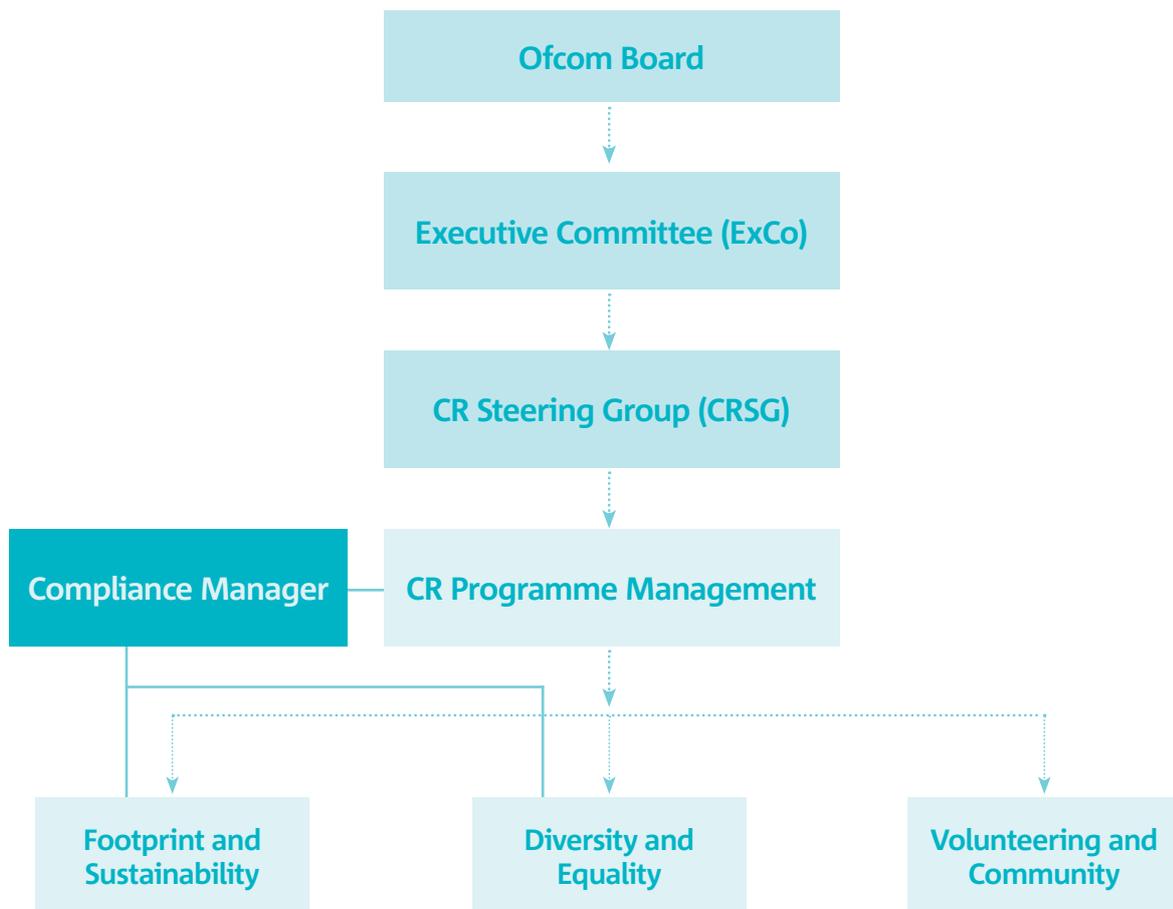
Annex 3

GLOSSARY

Colleagues
All people employed by Ofcom.

CRSG
Ofcom's Corporate Responsibility Steering Group, who are responsible, amongst other things, for delivering and implementing our Single Equality Scheme.

DEWG
Ofcom's Diversity and Equality Working Group, promoting diversity and equality across Ofcom.

EIA
Equality impact Assessment, designed to discover how a policy or project might affect diversity groups.

Executive Committee
Responsible for overseeing the management of Ofcom.

The 'general duties'
The duties of public bodies such as Ofcom to promote equality of opportunity and tackle discrimination in the areas of disability, gender and race.

Ofcom Groups
Ofcom departments.

LGBT
Lesbian Gay Bisexual Transgender.

Protected Characteristics
As described in the Equality Act 2010, the projected characteristics are; Age, Race, Disability, Gender reassignment, Pregnancy and maternity; Religion or belief; Sex; and Sexual orientation.

SES
Ofcom's Single Equality Scheme.

OF477 (Oct 11)

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call 020 7981 3040 or 030 0123 3333; textphone 020 7981 3043; email contact@ofcom.org.uk;

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