



# BBC response to Ofcom's Call for Inputs on Diversity and Inclusion in Broadcasting – updating Ofcom's workforce data collection

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BBC Response

May 2022

## Response

The BBC is pleased to have the opportunity to feed into Ofcom's Call for Inputs on Diversity and Inclusion in Broadcasting around the ways that Ofcom collects workforce data. We would be keen to have a more detailed conversation with Ofcom on this subject, if it would be useful.

The BBC publishes its own workforce diversity data in the Equality Impact Report within its Annual Report and Accounts. For the 2020/21 report, see pages 260-306.<sup>1</sup>

### **Question 1**

#### **1a) Do you think Ofcom should change the way it asks about sex and gender?**

Yes, as Ofcom's current Diversity and Inclusion in Broadcasting Survey does not differentiate between biological sex/sex assigned at birth and gender identity. This is acknowledged in Ofcom's call for inputs.

#### **1b) If yes, how do you think we should change the questionnaire in relation to sex and gender to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

Rather than the current title of the section 'Gender', the title could be changed to 'Sex and Gender'. Within this, it would be preferable to collect data on gender identity, too, separately from the data on biological sex/sex assigned at birth.

#### **1c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sex and gender.**

The BBC Staff Census 2022 asked the following question to collect workforce data on gender identity. The contextual note in italics details how the BBC collects data on sex.

#### **Gender identity:**

What is your gender identity? (*this is different to your binary sex which we already hold as part of your National Insurance record*)

- Female
- Male
- Non-binary
- None
- Prefer not to say
- Other term preferred (If you prefer to use your own term, please provide it here)

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<sup>1</sup> <https://downloads.bbc.co.uk/aboutthebbc/reports/annualreport/2020-21.pdf>

**Question 2**

**2a) Do you think Ofcom should change the way it asks about sexuality?**

No.

**2b) If yes, how do you think we should change the questionnaire in relation to sexual orientation to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

**2c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sexual orientation.**

The BBC asks the following question to collect workforce data on sexual orientation.

**Sexual Orientation:**

What is your sexual orientation?

- Bi
- Gay man
- Heterosexual
- Lesbian/gay woman
- Other sexual orientation
- Prefer not to say

**Question 3**

**3a) Do you think Ofcom should change the way it asks about race and ethnicity?**

No.

**3b) If yes, how do you think we should change the questionnaire in relation to race and ethnicity to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

**3c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on race and ethnicity.**

The BBC asks the following question to collect workforce data on race and ethnicity.

**Ethnicity/race:**

What is your ethnicity/race?

Asian British
Bangladeshi/British Bangladeshi
Chinese/British Chinese
Indian/British Indian
Pakistani/British Pakistani

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Other Asian background
Black African/British Black African
Black British
Black Caribbean/British Black Caribbean
Other Black background
Middle/Near Eastern/Arab
Mixed Ethnicity
White British/English/Northern Irish/Scottish/Welsh
White European
White Gypsy/Irish Traveller
White Irish
White Roma
Other White background
Other ethnic group
Prefer Not to Say

**Question 4**

**4a) Do you think that Ofcom should change way it asks about disability?**

Yes.

**4b) If yes, how do you think we should change the questionnaire in relation to disability to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

It could be valuable to expand the disability/health criteria from those already gathered to also include the following:

- Learning difficulty alongside learning disability
- Speech difficulties
- Mental health
- Neurodivergence conditions such as Autism, ADHD, Dyslexia, Dyspraxia
- Long term health such as cancer or HIV/ RSI

**4c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on disability.**

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The BBC asks the following question to collect workforce data on disability.

**Disability:**

a) Do you have a disability or long-term condition (as defined by the Equality Act 2010)?

“You're disabled under the Equality Act 2010 if you have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on your ability to do normal daily activities.”

(Examples include physical disabilities, non-visible disabilities, sensory disabilities, learning disabilities, mental health conditions, long term health conditions such as cancer or HIV, and neurodiversity, dyslexia) Note: in certain circumstances this may also include repetitive strain injury or depression)

- Yes
- No
- Prefer not to say

If you answered Yes above, please fill in the following section about adjustments and the nature of your disability.

If you feel that you need adjustments and have not yet discussed this with your manager, HR or the disability access service, you are encouraged to do so and guidance can be found on Gateway. Remember that no data on this form is passed to HR or your line manager to review and therefore they will not be told about any adjustment needs you state here and you should do this separately to ensure you can be supported.

b) If Yes, do you require an adjustment to allow you to carry out your current or future role(s)?

- Yes
- No
- Prefer not to say

c) If Yes, what type of adjustment(s) do you have in place?

(Please tick all that apply):

- Working Patterns (including adjustment of hours and breaks)
- Modification of Duties
- Parking Provision
- Assistive Technology Software
- Physical Adjustment (including structural building alterations or changes to work space)
- Provision of Support Worker(s)

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- Other

d) Please tell us which of the following best describes your disability(s) - please tick as many options as appropriate:

- physical disabilities
- sensory disabilities
- learning disabilities
- learning difficulty including dyslexia
- speech difficulties
- mental health conditions
- neurodivergence
- long term health condition such as cancer or HIV
- repetitive strain injury
- other
- prefer not to say

**Question 5**

**5a) Do you think Ofcom should change the way it asks for information about socio-economic background?**

Yes.

**5b) If yes, how do you think we should change the questionnaire in relation to socio-economic background to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

The Social Mobility Commission's guidance is to ask the main question relating to parental occupation and to supplement this with a free school meals question, as well as a further question relating to type of school attended. However the fourth question, relating to the highest level of education of the parent, may not be collected by many organisations. The BBC follows this guidance and believes that it is best practice.

The BBC no longer collects the question on highest level of education of the parent as we swapped this out to include the free school meals question based on the advice of the Commission. In addition, despite it being essential to ask multiple questions to construct a tapestry to understand socio-economic background, four questions relating to this characteristic was too onerous to collect, hold and report on. For meaningful analysis, Ofcom may be best to collect data on just the three areas identified above.

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**5c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on socio-economic background.**

The BBC asks the following question to collect workforce data on socio-economic diversity.

**Socio-Economic Diversity:**

a) Which type of school did you attend for the majority of your time between the ages of 11 and 16?

- A state run or state-funded non-selective school
- A state run or state-funded selective on academic basis school (including selective academic faith schools)
- A state run or state-funded selective (not on academic basis) faith school or other basis school
- Independent or fee-paying school where your family paid for your fees
- Independent or fee-paying school where you received a bursary covering 90% or more of my tuition
- Attended school outside the UK
- Home-schooled
- I don't know
- Prefer not to say

b) When you were at school, did you receive free school meals?

- Yes
- No
- I don't know
- Does not apply to me
- Prefer not to say

c) What was the occupation of your main household earner when you were aged about 14?

- Modern professional & traditional professional occupations such as: teacher, nurse, physiotherapist, social worker, police officer (sergeant or above), software designer, accountant, solicitor, medical practitioner, scientist, journalist, civil / mechanical engineer.
- Senior, middle or junior managers or administrators such as: finance manager, chief executive, large business owner, office manager, retail manager, bank manager, restaurant manager, warehouse manager.
- Clerical and intermediate occupations such as: secretary, personal assistant, call centre agent, clerical worker, nursery nurse.

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- Technical and craft occupations such as: motor mechanic, plumber, printer, electrician, camera operator, sound technician, train driver, police officers, fire-fighter, military.
- Routine, semi-routine manual and service occupations such as: postal worker, machine operative, security guard, caretaker, farm worker, catering assistant, sales assistant, HGV driver, cleaner, porter, packer, labourer, waiter/waitress, bar staff.
- Long-term unemployed (claimed Jobseeker's Allowance or earlier unemployment benefit for more than a year)
- Small business owners who employed fewer than 25 people such as: convenience store owners, small plumbing companies, retail shop owner, single restaurant or cafe owner, taxi owner, garage owner
- Other such as: retired, looked-after child, my parents did not work, this question does not apply to me, I don't know
- I prefer not to say

**Question 6**

**6a) Do you think that Ofcom should change the way it asks about management experience and promotions?**

N/A

**6b) If yes how do you think we should change the questionnaire in relation to management experience and promotions to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

**6c) Do you think that Ofcom should change the job function groupings in the workforce questionnaire?**

N/A

**6d) If yes, how do you think we should change our questionnaire in relation to job function groupings to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

**6e) If you are a broadcaster or other data-collecting body, please provide information on the way you currently classify job types / seniority / promotions.**

The BBC classifies the job function families as the following:

- Commissioning
- Programming
- Sales/Marketing
- Support/Admin
- Technical/Engineering

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- Other

Our seniority classifications are in bands A,B, C,D, E, F and Senior Leader (SL).

Promotions are classified as going up a band, attachments are short term positions in a different department and may or may not be a promotion, and a transfer is a permanent move to a different department but not a promotion (sideways move)

### **Question 7**

#### **7a) Should Ofcom collect diversity data by nation and region?**

The BBC has already voluntarily provided Ofcom with data on key diversity characteristics by devolved nation and English region. We would welcome continuing our discussions with Ofcom and other stakeholders on this issue.

#### **7b) If yes, how do you think we should ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

#### **7c) If you are a broadcaster, please provide information on the data you current collect on the geographic location of your workforce.**

The BBC has data on the working base and home of its contracted employees.

### **Question 8**

#### **8a) Do you think Ofcom should collect cross-sectional data?**

Yes.

#### **8b) If yes, how should we ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

Cross-sectional data can provide insights into subsets of inequality which single characteristic data does not. In order for data provision and analysis to not become unwieldy, it could be sensible to start by asking about particular cross sections where we know there are inequalities, to understand if these are present in broadcasters' workforces.

#### **8c) If you are a broadcaster or other data collecting organisation, please provide information on what cross-sectional data you currently use within your organisation.**

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The BBC holds data which could be used for this, but do not currently publish analysis on this.

### **Question 9**

#### **9a) Do you think Ofcom should change and expand the benchmarks it uses?**

We consider that Ofcom's use of benchmarking would be a particularly important element in the context of national or regional analysis of diversity data.

#### **9b) If yes, how do you think we should change our benchmarks to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**

#### **9c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently benchmark data (particularly in relation to socio-economic background and diversity in different geographical regions).**

We benchmark our Socio-economic data against the limited data available in this area from the Labourforce Survey (ONS), the Social Mobility Commission and academic research which is based on other employers who collect this information.

### **Question 10**

#### **Do you have any views on other aspects of data collection practices that we have not considered in this Call for Inputs?**

We note that the other broadcasters covered by Ofcom's surveys and reports are either TV (ITV, Channel 4, Sky, Paramount and STV) or radio (Global and Bauer). However, the BBC is an integrated media organisation with significant activities in TV, radio and online, an integrated multi-platform news gathering operation and corporate functions that serve the whole of the BBC. Many staff either work directly on both TV and radio activities (especially in the News and Nations divisions) or do not directly work on either (e.g. finance, HR, etc.).

For its diversity and equal opportunities in TV and radio reports, Ofcom has required the BBC to artificially split the BBC's workforce between TV and radio. For its radio analysis, Ofcom has required the BBC to provide data for those staff directly working on radio activities. For its TV analysis, Ofcom has required the BBC to provide data on the rest of the BBC, i.e. those working on TV production, online and corporate functions (e.g. finance, HR, IT, etc.) As a result neither dataset represents an accurate picture of the BBC's diversity performance.

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While we understand that Ofcom's intention was to allow meaningful comparisons to be drawn between broadcasters in the two sectors, in fact the current approach diminishes comparability.

A better approach would be to issue one unified survey to the BBC to collect data on the diversity of its workforce as a whole, in recognition that its structure and output is significantly different to other broadcasters in the UK.