

## Your response

Question	Your response
<p><b>1a) Do you think Ofcom should change the way it asks about sex and gender?</b></p> <p><b>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?</b></p> <p><b>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.</b></p>	<p>BT Sport believe that Ofcom should try to remove the 'other' option and should include more options such as non-binary. From BT Sport's own internal research, we have found that selecting 'other' is not a nice experience for individuals and we have tried to move away from that by either providing more categories to choose from and by including 'Prefer to self-describe' as an option.</p> <p>We also recommend Ofcom ask for information on the trans community, see the question we ask our staff below.</p> <p>When collecting diversity data of our people, BT Sport uses the ONS as a guide, in addition to knowledge gathered through intensive consultation with organisations such as Stonewall, we provide more detailed categories for individuals to choose from.</p> <p>With Gender, Male/Female being a legal HMRC requirement, we therefore collect this data at point of employment.</p> <p>BT Sport also asks the below voluntary questions of our people:</p> <p>What is your gender:</p> <ul style="list-style-type: none"> <li>- Female</li> <li>- Male</li> <li>- Non-Binary</li> <li>- Prefer not to say</li> <li>- Prefer to self-describe</li> </ul> <p>We then ask:</p> <ul style="list-style-type: none"> <li>- If you selected any 'Prefer to self-describe' option in the last question, use this space to provide more detail.</li> </ul>

	<ul style="list-style-type: none"> <li>- Do you consider yourself to be trans? <ul style="list-style-type: none"> <li>o No – My gender is the same as it was assigned at birth</li> <li>o No- however, my gender is not the same as assigned at birth</li> <li>o Yes I consider myself trans</li> <li>o Prefer to self-describe</li> </ul> </li> </ul> <p>We ask these questions via our HR database.</p>
<p><b>2a) Do you think Ofcom should change the way it asks about sexuality?</b>  <b>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?</b>  <b>2c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sexual orientation.</b></p>	<p>BT Sport believe that Ofcom should try to remove the ‘other’ option and should include more options. From BT Sport’s own internal research, we have found that selecting ‘other’ is not a nice experience for individuals and we have tried to move away from that by providing more categories to choose from and by including the ‘Prefer to self-describe’ option.</p> <p>From BT Sport’s own internal research our people wanted to be able to select ‘Queer’ as an option here – we will be adding this to our category to our survey.</p> <p>BT Sport asks the below voluntary questions of our people:</p> <p>We ask:</p> <ul style="list-style-type: none"> <li>- What is your sexual orientation? <ul style="list-style-type: none"> <li>o Bi</li> <li>o Gay/Lesbian</li> <li>o Heterosexual/Straight</li> <li>o Prefer to self- describe</li> <li>o Prefer not to say</li> </ul> </li> <li>- If you selected prefer to self-describe, use this space to describe in more detail</li> </ul> <p>We ask these questions via our HR database.</p>
<p><b>3a) Do you think Ofcom should change the way it asks about race and ethnicity?</b>  <b>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?</b></p>	<p>BT Sport believe that Ofcom should try to remove the ‘other’ option and should include more options. From BT’s Sport own internal research, we have found that selecting ‘other’ is not a nice experience for individuals and we have tried to move away from that by providing more categories to choose from and by including the ‘Prefer to self-describe’ option.</p>

**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.**

BT Sport would advise Ofcom to not encourage an individual to identify as 'other' and that 'prefer to self-describe' is more suitable.

We also feel that grouping, such as 'BAME' is not a useful way of capturing different cultural and ethnic experiences and would recommend that Ofcom refrain from using the term

BT Sport asks the below voluntary questions of our people:

We ask:

- What is your Ethnic origination?
  - Asian – Bangladeshi
  - Asian – Chinese
  - Asian – Indian
  - Asian – Pakistani
  - Asian British – Bangladeshi
  - Asian British – Chinese
  - Asian British – Indian
  - Asian British – Pakistani
  - Any other Asian background, please describe
  - Black – African
  - Black – Caribbean
  - Black African - British
  - Black Caribbean - British
  - Black British - other background, please describe
  - Any other Black background, please describe
  - Mixed / Multi-ethnic groups – White & Asian
  - Mixed / Multi-ethnic groups – White & Black African
  - Mixed / Multi-ethnic groups – White & Black Caribbean
  - Any other Mixed/Multi-ethnic background, please describe
  - Other ethnic group - Arab
  - Other ethnic group - Jewish
  - Other ethnic group - Sikh
  - Any other ethnic group, please describe
  - White – English / Welsh / Scottish / Northern Irish / British
  - White – Gypsy / Irish Traveller
  - White – Irish

	<ul style="list-style-type: none"> <li>○ Any other White background, please describe</li> <li>○ Prefer not to say</li> <li>○ If you selected an answer with 'please describe' please use this space to do so.</li> </ul> <p>We ask these questions via our HR database.</p>
<p><b>4a) Do you think that Ofcom should change way it asks about disability?</b></p> <p><b>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?</b></p> <p><b>4c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on disability.</b></p>	<p>BT Sport believe that Ofcom should try to remove the 'other' option and should include more options. From BT Sport's own internal research, we have found that selecting 'other' is not a nice experience for individuals and we have tried to move away from that by providing more categories to choose from and including the 'Prefer to self-describe' option.</p> <p>BT Sport asks the below voluntary questions of our people:</p> <p>We ask:</p> <ul style="list-style-type: none"> <li>- Do you consider yourself to be disabled? <ul style="list-style-type: none"> <li>○ Yes</li> <li>○ No</li> <li>○ Prefer not to Say</li> </ul> </li> <li>- If you answered 'Yes' to the last question, please provide more detail. <ul style="list-style-type: none"> <li>○ Dyslexia</li> <li>○ Other 'neurodiverse' (such as dyscalculia, autism)</li> <li>○ Hearing</li> <li>○ Long-term health condition (such as diabetes, Multiple Sclerosis, heart condition, epilepsy)</li> <li>○ Mental health</li> <li>○ Mobility</li> <li>○ Musculoskeletal (including back, neck and shoulder)</li> <li>○ Speech</li> <li>○ Visual</li> <li>○ Prefer not to say</li> <li>○ Prefer to self-describe</li> </ul> </li> </ul> <p>We ask these questions via our HR database.</p>
<p><b>a) Do you think Ofcom should change the way it asks for information about socio-economic background?</b></p>	<p>BT Sport doesn't collect socio-economic data. BT Sport would welcome guidance on how to collate this from our people. We would be</p>

**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?**  
**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.**

happy to be part of the conversation on how to obtain this data and would welcome suggestions on best practice, especially for small organisations such as BT Sport.

BT Sport would be concerned about potential data protection issues. As BT Sport has a relatively small number of staff, we would need to ensure individuals are protected at an aggregated level and ensure individuals cannot be identified.

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

**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?**

**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.**

BT Sport would like to know what Ofcom's view is on sideways movement of staff? Staff may move from one role to another within the same band or from one department to another but this may not necessarily be captured as a promotion. We collate data on promotions based on job level and job category and movement into other job levels.

We collect data on start and end date of job so are able to track fluctuations in total number of staff.

BT Sport would like to understand the significance of capturing staff such as premises building Manager, Caterer, Cleaner, Security, IT, as in some cases these are outsourced to 3<sup>rd</sup> party companies and therefore BT Sport would not collect diversity data on these individuals.

When completing the data request, BT Sport aligns the job roles as close as possible to the Job types, using the appendix in the data information request – we feel these roles/types are sufficient. We feel it would be useful for the compliance editor roles and content complaints roles to be added as Job type as currently these are not reflected in the job categories.

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


**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**

BT Sport has data on contracted locations of place of work for staff which could be provided.

BT Sport has data on home addresses of individuals but sharing this information may have data protection issues. As BT Sport has relatively a small number of staff, we would need to ensure individuals are protected at an aggregated level and ensure individuals cannot be identified. Giving out postal codes may be

<p><b>current collect on the geographic location of your workforce.</b></p>	<p>difficult and also sensitive data; however we may be able to give detail on the county of residence, but we would need to seek further legal guidance on this.</p>
<p><b>8a) Do you think Ofcom should collect cross-sectional data?</b>  <b>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?</b>  <b>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.</b></p>	<p>BT Sport believe that any multiplier has a disadvantage and a compounding effect.</p> <p>Due to the size of the BT Sport workforce, we feel identifying intersectionality would have potential data protection issues. We feel the data would become too granular and it would therefore lead to individuals being potentially identified. Larger organisations may find this more beneficial and easier to provide. Also, with such a small workforce many of our answers would be &gt;10 and therefore marked up as confidential and not for publication, so we question how useful this would be to Ofcom.</p>
<p><b>9a) Do you think Ofcom should change and expand the benchmarks it uses?</b>  <b>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?</b>  <b>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).</b></p>	<p>BT Sport uses the same categories as Ofcom based on the ONS. As mentioned, we have consulted with other organisations such as Stonewall in order to gather richer data on our people. We would recommend Ofcom consult with other similar bodies. We have benchmarked our data based on the ONS data on the regions our offices are in – not a national average – we would recommend Ofcom use the regional and national average.</p>
<p><b>Do you have any views on other aspects of data collection practices that we have not considered in this Call for Inputs?</b></p>	<p>BT Sport also asks our staff questions around the below categories that Ofcom may find useful:</p> <ul style="list-style-type: none"> <li>- Carer Status</li> <li>- Marital status</li> </ul> <p>For Ofcom’s information, BT are launching a new system in October and there will be a big declaration campaign at this time to encourage our people to provide richer data. This system will allow for a better way of collating data and will include changes to our questions after feedback from our people.</p>



Regarding freelancers' diversity data, including on-screen talent, this still proves difficult to collect, however we would welcome best practice from other broadcasters.

We are aware that the Creative Diversity Network collects diversity data but this does not yet include News and Sport broadcasting. We recognise these genres come with their own nuances and are heavily staffed using freelancers, of which we have established the difficulties of collecting diversity data for these individuals.