



Channel 4 response to Ofcom's Call for Inputs on Diversity and Inclusion in Broadcasting – updating Ofcom's workforce data collection

Introduction

Since Channel 4 was created in 1982, our commitment to inclusion, diversity and representation has been part of our DNA. It is written into our remit as set by Parliament. We also know that better representation within our workforce leads to greater diversity of thought and improved representation, portrayal and authenticity within our output. This makes us a better business and enables us to better serve our audience. Better representation also leads to better inclusive design, proactively removing barriers for our customers.

Channel 4 is dedicated to transparency around representation in our workforce and has been publishing workforce diversity data since 2015 when we first published our 360° Diversity Charter – a bold commitment to driving diversity at every level of the organisation and across the industry. Since 2015 we have set clear targets for representation within our workforce, reporting on our progress regularly and reviewing and updating our targets over time.

We have further built on this commitment to transparency over recent years. Since 2019, Channel 4 has gone beyond our mandatory pay gap reporting requirements on gender to voluntarily publish our ethnically diverse, disability and LGBTQ+ pay gaps. These reports set out the actions that we will take to reduce the pay gaps within the organisation and track our progress annually. Channel 4 has also brought in an internal diversity dashboard that shares current workforce data with staff on a quarterly basis and enables senior leaders to access live data on representation in their teams. This further drives accountability against our targets. In 2021 Channel 4 introduced additional inclusion questions within our regular staff surveys to better understand and track inclusion within the organisation.

Channel 4 is also looking to increase transparency about representation in our supply chain, both in terms of the leadership of the companies we commission from, and in terms of the workforce who make our programmes. In 2019 we set a target to double the number of ethnically diverse led companies we commissioned from. Having met that target the following year we built on this further in 2021 with a new commitment to triple our spend with ethnically diverse led indies by 2023. This was one of a number of new measures and commitments introduced following evaluation of our Black to Front project.

As a publisher broadcaster Channel 4 does not directly employ the people who make our television programmes and therefore the data which we provide to Ofcom does not include production roles. However, representation in our supply chain is of vital importance to Channel 4 and the content we put on-screen. We support Diamond as an important mechanism for tracking representation on-screen and across the industry workforce. We are also working with companies in our supply chain to improve the collection of diversity data within our suppliers and on our productions. It is important that there is pan-industry consensus and alignment on data collection wherever possible in order to provide meaningful analysis and comparable data sets. We hope that Ofcom's call for inputs will support greater alignment and draw on as wide a range of views as possible from across the industry and beyond.

The introduction of Ofcom's own data collection and reporting in 2017 has built on individual broadcasters' work to improve transparency, providing valuable, year on year, cross broadcaster data to track representation in the industry and understand where progress is being made or where greater efforts are needed.

Channel 4 currently collects staff diversity data in two ways, within our HR system which collects individual staff diversity data from the point of application, and through our staff surveys which collect data on an anonymous basis several times a year. At present we have deliberately tended to align the questions used in our HR system with those used by Ofcom to ensure that we can deliver against our

reporting obligations. As such, Ofcom's approach has very significant implications for Channel 4. We therefore welcome Ofcom's timely review of their approach and call for inputs. We know that effective workforce data collection relies on trust, robust and inclusive terminology and a positive user experience. This is an important opportunity to review Ofcom's terminology and language, to ensure that the right questions are being asked in the most inclusive way possible, which supports staff in sharing their personal data.

Key principles

Channel 4 believes that there are a number of key principles that should inform Ofcom's approach to the collection of inclusion and diversity data:

1. **Alignment with key population benchmarks and across the industry:** We share Ofcom's view that there is value in aligning with ONS guidance and their approach to data collection in order to have like for like national population comparators, particularly from the 2021 Census.
2. **Using consultation and evidence to improve inclusivity and efficacy:** We also share Ofcom's view that the language used and the way in which questions around workforce diversity are framed have important implications for workplace inclusion and response rates. Ofcom and the broadcasters should always look to ask questions in the most inclusive way possible and this should be informed by engagement with different communities and organisations, as well as with relevant experts. Therefore, whilst the ONS provides a useful starting point, their approach, and the appropriate level of granularity/range of responses should be reviewed on the basis of evidence, best practice and feedback around inclusivity from relevant communities, organisations and experts. Channel 4 would be happy to seek feedback on any proposals from our workforce and /or relevant Employee Resource Groups (ERGs) for the purposes of Ofcom's review.
3. **Granularity is valuable and 'prefer to self-describe' options can inform future response options:** Granularity is desirable both in terms of data analysis and inclusivity. In many areas, providing a longer list of options may be more inclusive and Ofcom can still combine groups for reporting purposes where data protection requires it. Once available, Census data should be used to review the range of options used in reporting questions, particularly in relation to gender, sexuality, and ethnicity. Channel 4 would encourage Ofcom to avoid the use of 'other' where possible and would encourage the use of 'prefer to self-describe' categories where appropriate. Free text trend analysis can be a valuable means of improving data collection to reflect self-identification so Ofcom should consider asking broadcasters to share information on free text responses to enable free text trend analysis on a cross industry basis. This could then allow Ofcom to continue to review and update the range of options annually to reflect evolving terminology within the I&D space. This will support inclusion and end-user buy in.
4. **Whilst granularity and cross-sectional data should both be pursued, data protection limitations must also be acknowledged:** For data publication purposes sub-groups may need to be used in reporting, particularly for smaller broadcasters where increased granularity and cross-sectional data may necessitate considerable redactions for data protection purposes. Channel 4 only has a workforce of around 1,000 staff in comparison to a BBC workforce of over 20,000, meaning that we will be comparatively limited in terms of the more granular data which can be published. It is important that Ofcom makes clear the reasons for any such redactions to avoid misconceptions around a deliberate lack of transparency. Ofcom should always look to find the optimum balance between granularity and publishable data.
5. **Changes should only be made on the basis of clear evidence:** Finally, changes to data collection will take time to implement and communicate to staff in order to ensure robust completion rates. Changes may also mean that comparisons cannot be made with previous years. It is

therefore important that this review is as comprehensive as possible and that any changes have a clear evidence base which outweighs any short-term negative impacts on data completeness.

Call for Input Questions

1. Sex and gender

Channel 4 would support Ofcom changing the way it asks about sex and gender and agrees that collecting more complete data on the gender identities of the broadcasting workforce will help Ofcom to identify areas of underrepresentation in the industry and better understand the barriers people with diverse gender identities face. Ofcom's approach should be informed by data from the 2021 Census and engagement with relevant communities and stakeholder groups.

At present Channel 4's question on gender follows Ofcom in providing male, female, other, and prefer not to say options, with an additional open text option where employees can self-describe. The option to self-describe is intended to be more inclusive and acknowledge the spectrum of gender identities, whilst also informing any future changes to our reporting on the basis of free text answers. Ofcom may also wish to consider moving away from the use of an 'other' category as the term may not promote inclusion in this context.

When asking about gender identity, Channel 4 would suggest that there is one very simple question on gender, with an extended list of options based on Census data and other feedback from stakeholder groups.

We would encourage Ofcom to consider a further additional question on gender identity with multiple choice options including 'my gender is the same as the sex assigned at birth', 'my gender is not the same as the sex assigned at birth', 'I consider myself trans', 'prefer to self-describe' and 'prefer not to say'. This question would capture i) if someone doesn't identify as trans and has not transitioned, ii) those who identify as trans and iii) those who have transitioned to their new gender and don't identify as trans.

2. Sexuality

When considering the most inclusive and appropriate form of wording to use in its questions on sexuality Channel 4 believes Ofcom should be led by feedback from the LGBTQ+ community.

Channel 4 agrees with Ofcom that gender and sexuality should be asked about separately within their reporting to ensure accurate reporting on underrepresentation of different parts of the LGBTQ+ community in broadcasting. Channel 4 currently aligns with Ofcom in providing 'Gay man' and 'Gay woman/lesbian' options. As Ofcom will be aware, the ONS do not refer to gender within their Census question on sexuality. Going forwards Ofcom should consider whether any reference to gender is required and/or fully inclusive in this context given that it is captured elsewhere.

Channel 4 also differs from Ofcom in that we no longer use the word 'straight' within our question around sexual orientation. Ofcom should consider views on whether the word 'straight' is necessary alongside heterosexual and/or the most inclusive language.

Channel 4 also differs from Ofcom by including pansexual as a specific option within our question on sexual orientation. As above, we think Ofcom should also consider whether it may be more inclusive to provide a longer list of options, informed by ONS data and consultation. We would also encourage the use of 'prefer to self-describe' as a category rather than using 'other'.

3. Race and ethnicity

Whilst Channel 4 has largely reflected Ofcom's current approach to asking about race and ethnicity our approach differs slightly from Ofcom's. We do not use Ofcom's 'Black, Asian and Minority Ethnic (BAME)' category and would question whether this category adds any value and/or promotes inclusivity. As Ofcom note, a number of UK broadcasters, including Channel 4, have made a public commitment not to

use the term BAME, which falsely aggregates the unique experiences of people from different ethnic backgrounds and can obscure the issues and barriers faced within specific ethnic groups. This follows recommendations from the Lenny Henry Centre for Media Diversity and was also supported by our consultation with Channel 4 staff. We support Ofcom's decision not to use this term in their reports and would encourage them to remove it from their options within this question.

At present, both Channel 4 and Ofcom follow the ONS in terms of the options provided under the mixed/multiple ethnic groups category. However, given recent population trends, Channel 4 believes that this list of mixed ethnicity options needs updating and suggests that Ofcom review and expand these options on the basis of 2021 Census data, and feedback from relevant stakeholders.

Channel 4 would also suggest that option 6a) in Ofcom's approach, 'Middle Eastern, including Arabic origin' should also be reviewed and additional, more specific, options should be considered based on evidence and feedback.

It is also important that Ofcom is mindful of relevant, evolving debates, including around the intersection between religion and ethnicity, for example whether Jewish or Sikh should be included as options within the ethnicity category.

As in other areas, Channel 4 would strongly recommend that Ofcom considers using a 'prefer to self-describe' category for ethnicity rather than 'other'.

Channel 4, like many others, has made a conscious decision to capitalise 'Black' when writing about race and ethnicity, for example 'Black woman'. We would encourage Ofcom to consistently capitalise Black in their questions and reports.

4. Long term health condition or disability

As Ofcom note, there are important complexities around disability, health conditions and impairments which mean that the wording of these questions have significant implications for how individuals interpret and respond to any question. Failure to get this right risks significant underreporting.

Channel 4 believes there are two important questions Ofcom must consider in relation to any question in this area: i) Does the wording capture all relevant conditions and impairments and ii) Do any of the terms, or lack of terms, place a barrier which would stop someone sharing their condition or impairment?

Ofcom is also right to consider the social model of disability as they review their approach. When considering the most inclusive and appropriate language to use they should also be informed by feedback from deaf, disabled, neurodiverse and mental health & wellbeing communities, as well as experts in these fields.

As Ofcom also highlight, the ONS reviewed their approach to questions around disability and health conditions ahead of the 2021 Census and followed the approach of the Government Statistical Service harmonised standard. However, Channel 4 is not convinced that Ofcom should follow the ONS in this area. We would encourage Ofcom to carefully assess the ONS' approach based on their own consultation and engagement with key stakeholder groups, including key industry groups like Deaf & Disabled People in TV and The Disabled Artists Networking Community (DANC). Ofcom's approach could also be informed by piloting different questions to provide an additional evidence base. Channel 4 would be very happy to support any such pilot if appropriate.

Channel 4 also notes the ONS' decision not to collect data on types of condition or impairment, as well as Ofcom's comments about the challenges in doing so given the importance of the social model. Until recently Channel 4 did not collect information on types of condition or impairment. However, we have recently expanded our questions to include this information as we believe the data provides important additional insights into the barriers within our industry and our organisation. It also better enables us to address these barriers and provide an inclusive environment and the right adjustments and support for our staff. We therefore believe that collecting this data on a cross industry level would be valuable as

long as there is a clear rationale and purpose behind this. We would be keen for Ofcom to explore whether there are inclusive ways to collect this information which are supported by evidence and where consensus can be reached by stakeholders on the most appropriate categories.

If Ofcom does use different categories of impairment or health condition within their reporting it is very important that multiple options can be selected. This will also provide valuable data on the prevalence of multiple conditions or impairments. As in other areas, we would also strongly recommend a free text option is provided.

We welcome the consultation and discussion Ofcom has already facilitated on this particular area and would be keen to have further detailed discussions with Ofcom in light of the findings from this review.

5. Socio-economic background

Channel 4's approach to questions around socio-economic background has changed over time, informed, in part, by Ofcom's guidance and the findings of their previous reports. When we first started collecting data on socio-economic background we worked closely with the Bridge Group and LSE Academic, Dr Sam Friedman. On their advice, we initially asked one single question about parental occupation at the age of 14. We still see that as the most important single indicator of socio-economic background and track this regularly through our staff surveys on an anonymous basis.

At present, Ofcom uses a slightly different categorisation of professions to Channel 4, categorising middle and junior managers as intermediate, whereas, on the basis of external advice, Channel 4 categorises them as professional. This has meant that our internal data has differed from that published by Ofcom. This review provides a valuable opportunity to review this categorisation and to drive alignment across the industry based on current best practice. We welcome Ofcom's continued engagement with external organisations like the Bridge Group to inform their approach.

In recent years Channel 4 has also introduced two further questions on school type and highest parental qualification to give us additional insights into the socio-economic background of our workforce. This has also enabled us to provide further data to Ofcom.

Channel 4 does not currently ask Ofcom's fourth question regarding free school meals as we think responses are less reliable to this question. We would be happy to discuss this further with Ofcom and would be very interested to see the advice of key stakeholders with expertise in this field.

Channel 4 asks questions about socio-economic background in two ways, through our HR system from the point of application and within our regular staff surveys. We have tended to have a higher completion rate through our anonymous staff surveys, providing more complete data but with more limited ability to analyse that data. Introducing new questions, particularly within the HR system, means additional work is required to ask staff to update their data in the system and drive up response rates. Channel 4 has found that staff can be more reluctant to complete these questions for a number of reasons and as such we would be minded to prioritise driving high response rates to a smaller number of questions. For this reason, we would also be minded to retain the current approach – subject to a review of the categorisation of professions – unless there is clear evidence that an alternative approach is needed.

6. Management, promotions and job functions

Channel 4 does not think changes to Ofcom's approach to management, promotions and job functions are necessary. Channel 4 has recently made changes to its internal framework of job families and levels and this revised framework will support us in reporting under Ofcom's existing categories.

7. Nations and Regions

Channel 4 has recently trialled collecting data on diversity by nation and region through our staff survey. We think this is a valuable additional area which Ofcom could look at. We look forward to seeing submissions on this point, however we are mindful that there may not currently be clear best practice to

draw in this area. As such, Channel 4 believes that Ofcom could play a valuable role in convening discussions within the industry and with relevant experts in order to develop an agreed approach.

For Ofcom's reference, the question Channel 4 recently trialled was as follows:

Thinking back to when you were growing up, in which of the following regions of the country were you living?

Employees could select from the following values:

- Scotland
- North East
- North West
- Yorkshire and the Humber
- East Midlands
- West Midlands
- Wales
- East of England
- London
- South East
- South West
- Northern Ireland
- Ireland
- Europe (Excluding UK/NI/Ireland)
- Africa
- North America
- South America
- Asia
- Oceania

Channel 4 chose to collect data on where people grew up, rather than where they live now, given how this impacts upon individual's experiences, accent, etc. These factors are also important in terms of on-screen representation and portrayal of the UK's different Nations and Regions.

We believe that collecting and analysing this information is important in an industry where a large number of jobs are based in London, but roles attract talent from right across the UK. This data will help us to better understand the make up of, and barriers within the industry and assess any progress over time. It can also enable greater evaluation of how offices away from London impact upon geographical representation within the industry.

8. Cross-sectional data

Channel 4 strongly agrees that it would be beneficial for Ofcom to collect and analyse cross-sectional data where possible. We have been working with the Sir Lenny Henry Centre for Media Diversity who are carrying out work to develop cross-sectional metrics and we would encourage Ofcom to engage with the centre on their emerging findings, as well as drawing on any other examples of best practice from across the industry and beyond.

9. Benchmarking

Channel 4 believes that Ofcom should continue to use widely recognised national population averages as their key benchmarks, particularly 2021 Census data when it is fully available. Whilst we believe these should be Ofcom's primary benchmarks, we agree that there may at times be value in expanding Ofcom's wider analysis to include additional, more granular benchmarks. For example, those could be based on

specific geographical populations or on certain sections of the industry like the data from the 'All In' Census which looks at the advertising workforce. We would, however, note that the talent pools which broadcasters draw from tend to be considerably wider than the individual cities in which their offices may be based.

Whilst Ofcom should avoid regular changes to the questions they ask, their use of benchmarks can be more responsive depending on the most appropriate and up to date population comparators at any given point.

10. Other areas of Ofcom's data collection

Religion

As in other areas Channel 4 would suggest that Ofcom uses trend analysis from the 2021 Census and/or previous surveys to consider the addition of further answer categories in their question on religion such as atheist, agnostic, humanist or spiritual.

Caring responsibilities

Ofcom does not currently collect any data on caring responsibilities. Channel 4 believes this is an important additional area which could be considered.

Training

Channel 4 believes that training has a vital role to play in promoting inclusion and accessibility, addressing underrepresentation and actively tackling racism, bullying and harassment. Ofcom may wish to consider whether there are any further quantitative questions they could ask around broadcasters' training provision, albeit on a voluntary basis.

For example, what proportion of staff have had training on a) anti-racism, b) bullying and harassment, and c) accessibility in the last 18 months.

This could supplement some of the qualitative questions about training which Ofcom already uses.

Mental Health and wellbeing

Channel 4 believes that mental health and wellbeing is closely linked to inclusion, diversity and representation and is another area where progress is needed within the industry. Ofcom should consider whether there is any further qualitative data they could request in this area to support positive change within the industry.