

Equality Impact Assessment

Question	Response		
1. What is the aim/purpose of this work?	To refresh the Connected Working framework to emphasise office attendance expectations for colleagues. Face-to-face interactions foster belonging and a shared corporate identity, whether with immediate colleagues or across teams. They help us learn from each other's expertise particularly for less experienced, junior and early careers colleagues. It is important we have face-to-face contact to problem-solve, learn from each other, and build strong and effective working relationships and awareness of Ofcom's work across the organisation.		
2. How will it work?	Under their contracts of employment, colleagues are generally required to attend the office full time, with a policy currently asking colleagues to spend 'half' their time in an office (unless they have agreed any workplace adjustments (WPAs) or agreed contractual flexible working arrangements). It is proposed colleagues will be expected to attend an Ofcom office 2 days per week: providing greater clarity than the 'half and half' current position. The change in policy represents a slight reduction in the amount of time that colleagues would be expected in the office. However, the change is intended to ensure more consistent application of the policy which is not being adhered to consistently. Colleagues who can attend an office (who don't have alternative contractual or WPA arrangements in place) currently attend the office an average of 1.15 days per week, and 13.5% of are not attending at all. Therefore, a clear policy outlining office attendance expectation is deemed necessary. There will be a transitional period from April to September to enable colleagues to ease into more regular office attendance. Colleagues with existing WPAs that exempt them from attending an office will continue to do so.		
3. Who may/may not benefit and why?	<p>It is intended that a majority of colleagues will benefit from the clarification of the policy and in person contact, especially in terms of an opportunity to connect and develop their experience and understanding of Ofcom's work, and for overall colleague wellbeing. However, Ofcom also acknowledges the potential challenges and adverse impacts on groups as detailed below. Some of the barriers and challenges highlighted may be workplace specific (for which Ofcom commits to addressing for colleagues as much as is possible and reasonable) others are an impact of broader societal barriers (for which Ofcom commits to supporting colleagues as much as is possible, accepting that some of those cannot be fixed purely by an employer).</p> <p>In addition, Ofcom recognises that potential formal action against those who do not attend the office, may have a disproportionate effect on the groups below. To mitigate this, a clear policy and accompanying guidance as well as input from ER team is pivotal. Disciplinary action will only be taken when it is clear that an exception does not apply, taking advice from external expertise if required (OH, Access to Work etc).</p> <p>Recognising the current policy of 'half and half' and the varied ways in which this has been developed since the pandemic, in order to give teams and individuals time to make necessary adjustments, a period of transition is proposed (where an exception does not apply).</p> <p>For some colleagues, even with the published policy of 'half and half' we know that they will need to make changes. The transition period, CPM guidance, and mitigations listed below are intended to help all colleagues, but specifically those with additional barriers or needs, adhere to the policy. Ofcom adopts a social model of disability, and this will continue through all WPA conversations.</p>		
Group	Potential for positive/negative impact?	Explain why/give examples of any evidence/data used	Action to address/mitigate negative impact/magnify positive impact
Disability	High – adverse/negative impact	<p><u>1 (a) Colleagues with disabilities, underlying health conditions and neurodiversity with formal WPAs in place.</u></p> <p>Those with formalised WPAs in place/home-worker contracts may be unsure what happens to those agreements in light of a new policy being published.</p> <p>16% of colleagues have declared themselves as having a disability.</p>	<p><u>1 (a) Mitigation</u></p> <p>Those with formalised WPAs in place or are permanent home workers will retain their existing arrangements and will not be required to attend office regularly if already agreed. Colleagues will be able to apply for WPAs.</p> <p>If considered necessary due to any disabilities, underlying health conditions and neurodiversity. Note Ofcom adopts the social model of disability, and this is threaded through the WPA policy. Any colleague may speak directly to the people team in confidence if they are unsure or do not wish to speak to the CPM in the first instance.</p>
		<p><u>1 (b) Colleagues with disabilities, underlying health conditions and neurodiversity disability with informal/local WPAs in place</u></p> <p>Those with informal WPAs/ homeworking agreements, may be adversely impacted by having to attend the office 2 days per week.</p>	<p><u>1 (b) Mitigation</u></p> <p>CPMs should discuss with their colleague formalising any existing WPA/ homeworking arrangements, taking advice from the People Team.</p> <p>Colleagues with disabilities, underlying health conditions and neurodiversity should be allowed to continue with existing arrangements whilst their case is considered.</p>

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	<p><u>1 (c) Colleagues with fluctuating symptoms</u></p> <p>Colleagues with fluctuating symptoms may be adversely impacted by a 2 day a week attendance. For example, some weeks, symptoms related to a disability/underlying health condition/neurodiversity may be mild and will accommodate physical attendance, whilst other weeks symptoms may be significant and be exacerbated by in person attendance.</p>	<p><u>1(c) Mitigation</u></p> <p>Colleagues will be able to apply for or update any existing WPAs to reflect fluctuating conditions.</p> <p>Colleagues with fluctuating symptoms will be permitted to not attend the office when symptoms are significant and as agreed through a WPA agreement. CPMs will ensure they undertake disability training, which includes equipping CPMs to support colleagues through the WPA process and educating them on the social model of disability.</p> <p>Subject to what is agreed in the best interests of the colleague through their WPA, colleagues will not be expected to make up in- person days once symptoms have reduced (e.g. having to work 4 days in the office in a single week to make up for days lost the previous week).</p>
	<p><u>1 (d) Office space and noise</u></p> <p>Those with disabilities, underlying health conditions and neurodiversity may be adversely impacted by noise, lighting, heating, desk space etc in the office. Mandating attendance may make Ofcom sites busier creating overwhelming scenarios on days when they attend.</p>	<p><u>1(d) Mitigation</u></p> <p>CPMs should have a discussion with affected colleagues to discuss any WPA that can support office attendance.</p> <p>If adaptations cannot be made, then reduced presence may be considered as a Workplace Adjustment.</p> <p>Ofcom, where possible will endeavour to make the physical workplace inclusive of those with disabilities, underlying health conditions and neurodiversity.</p> <p>Note Ofcom adopts the social model of disability, and this is threaded through the WPA policy. Any colleague may speak directly to the people team in confidence if they are unsure or do not wish to speak to the CPM in the first instance.</p>
	<p><u>1 (e) Travelling at peak times</u></p> <p>Colleagues with disabilities, underlying health conditions and neurodiversity may face additional barriers or complications with travelling during peak time, especially when public is heavily congested and space is limited.</p>	<p><u>1 (e) Mitigation</u></p> <p>Flexibility with start and finish times on in person attendance days is permitted in the policy and can be used to assist colleagues whose disabilities/underlying health conditions/ neurodiversity disability are exacerbated/impacted by travelling at peak times.</p> <p>CPM training and documented WPA if required will further support colleagues.</p>
	<p><u>1(f) Physical Exertion</u></p> <p>Colleagues with disabilities, underlying health conditions and neurodiversity may face physical and psychological exhaustion from coming into the office.</p>	<p><u>1 (f) Mitigation</u></p> <p>Flexibility with start and finish times on in person attendance days is permitted in the policy and can be used to assist colleagues whose disabilities/underlying health conditions/ neurodiversity is exacerbated/impacted by longer days in the office.</p>

		Those with disabilities, underlying health conditions and neurodiversity often face barriers navigating everyday life which can lead to added planning, anxiety and physical exhaustion in comparison to non-disabled colleagues.	CPM training and documented WPA if needed will further support colleagues.
		<u>1 (g) Side Effects of Medication</u> Some medication can cause side effects throughout the day, but notably in the early mornings and later in the day. This may make in person attendance more difficult for disabled colleagues.	<u>1 (g) Mitigation</u> Flexibility with start and finish times on in person attendance days is permitted in the policy and can be used to assist colleagues whose disabilities/underlying health conditions/ neurodiversity disability are exacerbated/impacted by travelling at peak times. CPM training and documented WPA if needed will further support colleagues.
		<u>1 (h) Colleagues with Autoimmune Diseases</u> Colleagues with autoimmune diseases may be adversely impacted by attendance, especially where they are susceptible to illness and exposure from other colleagues	<u>1 (h) Mitigation</u> A documented WPAs will be put in place for those with autoimmune diseases Any colleague may speak directly to the people team in confidence if they are unsure or do not wish to speak to the CPM in the first instance.
		<u>1 (i) Costs</u> Disabled colleagues may not be able to use public transport, especially if it not accessible (not just due mobility, but lighting, noise, space etc)	<u>1 (i) Mitigation</u> Colleagues with underlying health conditions who find public transport difficult to navigate and therefore rely on taxis will be supported by PCW in applying for an Access to Work grant should taxi travel be required. Whilst the grant is considered, requirement for physical presence in the office may be paused.
		<u>1 (j) CPMS (also applies to all groups detailed below and not just disability)</u> Some colleagues may not have a good relationship with their CPM which facilitates an honest discussion about supported needed. This may adversely impact advocating for the support they need and may lead to formal action being taken. In addition, some CPMs may not feel confident having sensitive conversations about disability/underlying health conditions/neurodiversity and the implications of the new hybrid working policy	<u>1 (j) Mitigation</u> Any colleague may speak directly to the people team in confidence if they are unsure or do not wish to speak to the CPM in the first instance. CPMs training on supporting colleagues with disabilities, the WPA process and the social model of disability will support CPMs in being properly equipped to support colleagues.
		<u>1 (k) Bias and organisational culture</u> Research indicates organisations with low disability representation can risk causing a negative impact through unconscious bias, microaggressions and bullying and harassment	<u>1 (k) Mitigation</u> CPMs are required to undertake training on unconscious bias. Colleagues are made aware of how to report bullying & harassment in confidence, both via Ofcom's policies or through Whistleblowing processes. The Employee relations team monitors D&I data of ER cases to look for patterns of concern so that they can be addressed.
Sex	Medium-adverse/negative impact	<u>2 (a) Part time working</u> Part time workers may be required to attend the office for proportionately more of their working week than other colleagues. At Ofcom, 56.2% of	<u>2 (a) Mitigation</u> Those working under 0.8 FTE will have to attend the office for 1 day per week.

		those that work part time are women. this means that they may be proportionately more impacted.	
		<p>2 (b) Childcare Responsibilities</p> <p>In the UK, women predominantly hold responsibility for childcare, providing over twice as many hours of unpaid care as men (23.2 billion vs 9.7 billion annually). This disproportionate burden often results in women reducing hours and working part-time. This means that women may be adversely impacted by coming into the office.</p>	<p>2 (b) Mitigation</p> <p>Colleagues with unplanned and emergency childcare requirements are provided for in Ofcom's family friendly policies. Colleagues who have to take unexpected time off for childcare responsibilities and cannot attend the office will not typically be expected to make up in person days the following week.</p> <p>Colleagues can be flexible with their start and/or end times when working from the office to meet childcare needs.</p>
		<p>2 (c) Caring Responsibility</p> <p>In England, women aged between 55 to 59 years provided the most unpaid care (19.9%) and women were more likely to provide unpaid care than men in every age group up to 75 - 79 years, (2021 Census).</p> <p>In the 2025 Colleague Survey, of the people that took part in the survey 16.3% disclosed that they were either primary or secondary carers.</p>	<p>2 (c) Mitigation</p> <p>Colleagues who have to take unexpected time off for caring responsibilities will be able to discuss this with their CPM and/or a member of the people team. If they cannot attend the office, they will not typically be expected to make up in person days the following week.</p> <p>Colleagues can be flexible with their start and/or end times when working from the office to meet <u>caring responsibility</u> <u>caring</u> needs.</p>
Ethnicity	Low - adverse/negative impact	<p>4 (a) Cultural Observation</p> <p>In some cultures, marriages and funerals include an extended period of celebration and mourning and thus minority ethnic colleagues may be affected by the requirement to come into the office twice a week.</p> <p>27.4% of colleagues have declared they are from a minority ethnic background. 41.7% of colleagues have declared themselves religious.</p>	<p>4 (a) Mitigation</p> <p>Colleagues who require additional leave will be able to discuss this with their CPM and/or a member of the people team.</p> <p>For any short-term periods of homeworking, this will (as now) typically be accommodated for colleagues who can work but will need to be available at / close to home during working hours. CPMs will be expected to discuss this with their CPM and seek advice from the people team for any guidance.</p>
		<p>4 (b) External/Societal Consideration</p> <p>In recent years, external events have resulted in some religious and minority ethnic colleagues feeling unsafe traveling to work and this may impact colleagues feeling comfortable attending the office.</p>	<p>4 (b) Mitigation</p> <p>Colleagues who feel unsafe are encouraged to speak to their CPM or a member of the people team in confidence, who can advise on options to help colleagues work from the office, or agree temporary homeworking in particular periods of heightened unrest.</p>
	Medium - adverse/negative impact	<p>4 (c) Bias and organisational culture</p> <p>Research indicates organisations with low minority ethnic representation can risk causing a negative impact through unconscious bias, microaggressions and bullying and harassment</p>	<p>4 (c) Mitigation</p> <p>CPMs are required to undertake training on unconscious bias.</p> <p>Colleagues are made aware of how to report bullying & harassment in confidence, both via Ofcom's policies or through Whistleblowing processes.</p> <p>The Employee relations team monitors D&I data of ER cases to look for patterns of concern so that they can be addressed.</p>
Sexual orientation	No impact	No impact identified.	N/A
Pregnancy or maternity	Medium-adverse/negative impact	<p>5 (a) Pregnant Colleagues</p> <p>Pregnant colleagues may be unable to attend office during pregnancy due to ill health.</p>	<p>5 (a) Mitigation</p> <p>CPMs will be flexible in their approach and support pregnant colleagues, including allowing deviation from the policy. Colleagues that cannot come into the office one week due to pregnancy related illness will not be expected to make up any in-person days the following week/s.</p>

		<p>5 (b) Maternity</p> <p>Colleagues with maternity related illnesses may not be able to attend the office.</p>	<p>5 (b) Mitigation</p> <p>CPMs will be flexible in their approach and support pregnant colleagues, including allowing deviation from the policy. Colleagues that cannot come into the office one week due to maternity related illness will not be expected to make up any in-person days the following week/s. For Maternity related illnesses which fall under disability, see disability.</p>
Gender reassignment	Medium-adverse/negative impact	<p>6 (a) Colleagues undergoing gender re-assignment</p> <p>Colleagues undergoing gender re-assignment may require different appointments ranging from counselling to body language coaching, HRT appointments, and surgery. During this time colleagues may not be able to attend the office regularly.</p>	<p>6 (a) Mitigation</p> <p>As per Ofcom’s Transitioning at work policy, Ofcom and CPMs will maintain a flexible approach to transitioning colleagues and any appointments related to gender re-assignment will be treated as medical appointments. Ofcom will remain flexible and where a colleague prefers to WFH in the initial stages of their transition this would typically be permitted.</p> <p>Colleagues will not be expected to make non-attendance time up in the following weeks.</p>
		<p>6 (b) Use of Facilities</p> <p>The current and immediate position with lack of clarity ahead of publication of the EHRC guidance (and equivalent in Northern Ireland) may make it difficult for colleagues post or during transition to feel safe and comfortable in the office.</p>	<p>6 (b) Mitigation</p> <p>Ofcom is committed to providing suitable facilities for all colleagues. Ofcom recognises that the facilities it offers and may be able to offer, can vary across different sites and CPMs should raise any potential concerns with the people team as soon as possible. Where it is agreed that it is appropriate, CPMs can authorise colleagues to utilise WFH to support. Any such agreement would normally be on a temporary basis.</p> <p>Colleagues with any questions can contact a member of the people team in confidence if they would prefer that in the first instance to talking to their CPM.</p>
		<p>6 (c) Bias and organisational culture</p> <p>Research indicates organisations with low representation of colleagues who have gone through or who are experiencing gender reassignment, can risk causing a negative impact through unconscious bias, microaggressions and bullying and harassment</p>	<p>6 (c) Mitigation</p> <p>CPMs are required to undertake training on unconscious bias.</p> <p>Colleagues are made aware of how to report bullying & harassment in confidence, both via Ofcom’s policies or through Whistleblowing processes.</p> <p>The Employee relations team monitors D&I data of ER cases to look for patterns of concern so that they can be addressed.</p>
Marriage and civil partnerships	No impact	No identified impact	
Age	Medium-adverse/negative impact	<p>8 (a) Older Colleagues</p> <p>Older colleagues are more likely to develop disabilities, and underlying conditions so may feel the impact of increased office attendance.</p> <p>Older colleagues are more likely to have primary and secondary caring responsibility as well. Nearly three in five carers in England and Wales are aged 50 years and over, with one in five people aged 50 to 69 acting as an informal carer.</p> <p>21.6% of colleagues are 50 or over.</p>	<p>8 (a) Mitigation</p> <p>Please see section 1 (Disability) and section 10 (Parents and Carers)</p>
Religion or belief	Medium-adverse/negative impact	<p>9 (a) Religious observation and commitments</p>	<p>9 (a) Mitigation</p>

		Ofcom's WPA policy extends to religious observation and practices. Colleagues with religious practices, such as fasting or prayers, may find office attendance at certain times of the year or certain days challenging.	Colleagues who require additional leave will be able to discuss this with their CPM and/or a member of the people team. For any short-term periods of homeworking, this will typically be accommodated for colleagues who can work but will need to be available at / close to home during working hours. CPMs will be expected to discuss this with their CPM and seek advice from the people team for any guidance.
		9 (b) External/Societal Considerations In recent years, external events have resulted in some religious and minority ethnic colleagues feeling unsafe traveling to work and this may impact colleagues feeling comfortable attending the office twice weekly.	9 (b) Mitigation Colleagues who feel unsafe are encouraged to speak to their CPM or a member of the people team in confidence, who can advise on options to help colleagues work from the office, or agree temporary homeworking in particular periods of heightened unrest.
		9 (c) Bias and organisational culture Research indicates organisations with low representation of colleagues who are open about their faith or religious identity, can risk causing a negative impact through unconscious bias, microaggressions and bullying and harassment.	9(c) Mitigation CPMs are required to undertake training on unconscious bias. Colleagues are made aware of how to report bullying & harassment in confidence, both via Ofcom's policies or through Whistleblowing processes. The Employee relations team monitors D&I data of ER cases to look for patterns of concern so that they can be addressed.
Parents and Carers*	High – adverse/negative impact	10 (a) Colleague with Caring Responsibilities (primary and secondary) and childcare Colleagues with caring and childcare may feel greater impact of office attendance requirements.	10 (a) Mitigation Ofcom's Carer's Policy allows for flexibility and WPAs for those with caring responsibilities. This support will remain in place. If a colleague is unable to attend an office due to caring responsibilities, they will not be expected to make in person days up the following week. Ofcom's family friendly policies allow flexibility for those with children.
Socio Economic background*	Medium-adverse/negative impact	11 (a) Colleagues from DE and C1/C2 Backgrounds Colleagues from lower socio-economic backgrounds, particularly lower earners, may feel greater financial impact of increased office attendance. Notes: There are intersectional considerations with respect to SEB for example: <ul style="list-style-type: none"> • Research shows that those from a minority ethnic background are more likely to have less savings and be paying a higher % of their salary on rent (BITC). • The Carers UK State of Caring 2025 survey found that nearly half (49%) of carers said they have cut back on essentials such as food, heating, clothing and transport costs, while a third of carers (32%) have taken out a loan from the bank, used credit cards, or used a bank account overdraft. • In 2025, disabled workers in the UK faced a 15.5% pay gap, earning £2.24 per hour less than non-disabled peers, totalling over £4,000 	11 (a) Mitigation Colleagues who experience hardship are encouraged to speak to a member of the people team who can signpost appropriate financial wellbeing services.

		less annually, added in the potential of medical costs, disabled colleagues may have less disposable income for travel than non-disabled peers.	
Part-time*	Medium-adverse/negative impact	<p><u>12 (a) Part Time Workers</u></p> <p>Part time workers may be impacted by increased office attendance.</p> <p>8.39% of Ofcom colleagues have a part-time contract.</p>	<p><u>12 (a) Mitigation</u></p> <p>Those working under 0.8 FTE will have to attend the office for 1 day per week.</p>
		<p><u>12 (b) Bias and organisational culture</u></p> <p>Research indicates organisations where part-time workers are underrepresented or less visible, can risk causing a negative impact through unconscious bias, microaggressions and bullying and harassment.</p>	<p><u>12 (b) Mitigation</u></p> <p>CPMs are required to undertake training on unconscious bias.</p> <p>Colleagues are made aware of how to report bullying & harassment in confidence, both via Ofcom's policies or through Whistleblowing processes.</p> <p>The Employee relations team monitors D&I data of ER cases to look for patterns of concern so that they can be addressed.</p>
4. What options do I have?	The updated policy ensures consistency and clarity for colleagues. The policy acknowledges that there will be colleagues who cannot attend the office 2 days per week (on a temporary or permanent basis) for legitimate reasons, and the appropriate support will be put in place for those colleagues such as temporary or permanent WPAs and/or Flexible Working.		
5. How will we evaluate actual impact?	Ofcom's people team will closely monitor attendance data, D&I data and cases of workplace adjustments and flexible working applications to ensure the policy is applied as intended and therefore mitigates the risk of discrimination. The EqIA has been prepared to ensure Ofcom has an understanding of the impact of the policy for colleagues with protected characteristics and describes the mitigations seeking to prevent unfair treatment. In addition, colleagues have feedback options such as colleague forum, union membership, and the colleague survey through which they can disclose feedback and impact. Full review of policy in April 2027.		