

## Ofcom Northern Ireland



### Public Authority Statutory Equality and Good Relations Duties Annual Progress Report

**Contact:**

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Documents published relating to our Equality Scheme can be found at:

[https://www.ofcom.org.uk/data/assets/pdf\\_file/0023/123737/Revised-NI-Equality-Scheme.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0023/123737/Revised-NI-Equality-Scheme.pdf)

**Signature:**

A rectangular box containing a handwritten signature in black ink that reads "Jonathan Rose".

**This report has been prepared using a template circulated by the Equality Commission.**

**It presents our progress in fulfilling our statutory equality and good relations duties, and implementing Equality Scheme commitments and Disability Action Plans.**

**This report reflects progress made between April 2022 and March 2023**

## **PART A – Section 75 of the Northern Ireland Act 1998 and Equality Scheme**

### **Section 1: Equality and good relations outcomes, impacts and good practice**

- 1 In 2022-23, please provide **examples** of key policy/service delivery developments made by the public authority in this reporting period to better promote equality of opportunity and good relations; and the outcomes and improvements achieved.

*Please relate these to the implementation of your statutory equality and good relations duties and Equality Scheme where appropriate.*

#### **Key policy developments as regulator & employer**

##### **Advisory Committee for Northern Ireland**

Ofcom's Advisory Committee for Northern Ireland met, formally, four times during the reporting period and also held numerous informal sessions throughout the year to ensure they provided timely advice to Ofcom on a wide variety of topics. The Committee continued to ensure that the specific circumstances of citizens and consumers in Northern Ireland are properly considered in Ofcom's policy making. Details of the Committee and its meetings can be found on the Ofcom website, [here](#). We appointed two new members to the Advisory Committee during the reporting period.

##### **Board member for Northern Ireland**

The Northern Ireland Economy Minister appointed Ofcom's first Board member for Northern Ireland, Karen Baxter, in March 2022. This position on the Ofcom Board had been enabled by the Digital Economy Act in 2017, which mirrored previous legislation enabling the appointment of members to represent Scotland and Wales. However, the Northern Ireland appointment had been delayed because of the suspension of devolution from 2017 to 2020, and then by the prioritisation of Covid in government business from 2020 to 2022. Throughout the reporting period, Karen Baxter engaged with a wide variety of local stakeholders and ensured that Northern Ireland had a voice at the Ofcom Board.

##### **Content Board member for Northern Ireland**

We appointed a new Northern Ireland member to Ofcom's Content Board during the reporting period, ensuring that Northern Ireland issues continued to be considered in Ofcom's broadcasting policy matters.

##### **Disability Action Plan**

Following a public consultation, we published our new Disability Action Plan (DAP) for Northern Ireland in July 2022. Our hope is that this Action Plan, working alongside our internal strategies and our regulatory role, will combine to make a real difference to the lives of disabled people in our community. Our DAP is available on our website, [here](#).

### **Increasing staff numbers in Northern Ireland**

We have continued with a policy of recruiting colleagues on a location-neutral basis across the UK. This has meant that some new colleagues joining the organisation, and some existing colleagues relocating, have chosen to be based in Ofcom's Belfast office. By the end of the reporting period we had 15 colleagues located in the Belfast office. This compares to eight colleagues based in the office pre-Covid.

While these additional roles are not NI-specific, we continue to monitor and report annually on the community background of all colleagues working in Northern Ireland. To help us do this as accurately as possible, our internal HR system now allows NI-based colleagues to record their own community background.

### **Diversity & Inclusion Progress Update**

In August 2023 we published an [update on progress](#) two years into Ofcom's UK-wide five-year Diversity & Inclusion Strategy. The update specifically covered the reporting period between April 2022 and March 2023. During this time we:

- grew as an organisation to 1,384 colleagues at March 2023. Overall, 54% of colleagues are female, 25% from minority ethnic backgrounds, 13% are disabled and over 8% are LGBT++
- exceeded our five-year senior ethnicity target three years early
- narrowed our median pay gaps for gender (11.8%), ethnicity (9.9%) and disability (10.9%)
- strengthened our inclusive recruitment processes, creating an employer brand toolkit to help us widen our outreach to candidates with diverse skills and backgrounds
- created a careers website to build awareness of who we are, what we do and reasons to work here
- refreshed our wellbeing programme, with interventions focused on preventative and proactive approaches that benefit the inclusion of all our colleagues
- conducted more in-depth analysis of our colleague experience, resulting in refreshed priorities for improving the experiences and representation of Black colleagues, and a refocused approach to disability inclusion
- rolled out a leadership and skills development programme for all our Career and Performance Managers
- leveraged our ongoing partnerships to identify ways to further embed socioeconomic diversity, LGBT+ inclusion and gender inclusion
- became a Times Top 50 Employer for Women for the fourth consecutive year and received a Bronze accreditation from the Stonewall Workplace Equality Index.

### **New BBC Operating Licence**

During the reporting period, Ofcom consulted extensively on a new Operating Licence for the BBC. The Operating Licence is designed to ensure that the BBC effectively fulfils its Mission and promotes its Public Purposes: to provide impartial news and information; to support learning; to show creative, high-quality and distinctive output; and to reflect, represent and serve the UK's diverse communities and support the creative economy across the UK.

The new Licence, which came into effect on 1 April 2023, will benefit audiences by safeguarding important content, while enabling the BBC to adapt and innovate in how it delivers content to viewers and listeners. For the first time, the licence also sets broad requirements on the BBC's online services – BBC iPlayer, BBC Sounds and the BBC website – and requires the BBC to comprehensively report on its plans and performance.

The new Operating Licence continues to set quotas on the BBC in Northern Ireland to produce news and current affairs programming for the local audience, as well as a broad range of non-news content for TV, radio and online, including programming in Irish and Ulster-Scots. The Operating Licence also requires the BBC to produce a proportionate amount of network content from Northern Ireland that is shown across the UK.

### **Supporting investment in broadband and mobile networks**

People rely on communications networks to live, work, shop and use public services – from video calls to remote working, online gaming, banking and healthcare. The average UK home now consumes almost six terabytes of data each year. We need fast, affordable broadband and mobile connections to extend to every part of the country.

New Ofcom regulations, set in March 2021 and designed to incentivise and support investment in new full fibre networks, are having a positive effect. Full fibre-based networks are expanding rapidly, and Northern Ireland is benefitting significantly from rapid commercial rollout as well as publicly funded rollout which combined mean that almost 90% of homes and businesses here are connected to full-fibre broadband. This is almost double the overall UK figure.

We continue to implement the Broadband Universal Service Obligation scheme meaning decent broadband is now accessible to thousands more homes. We made decisions to protect call boxes where they are still needed most and to remove requirements around the provision of fax machine services.

Getting a good mobile signal is essential for people to keep in touch, live and work on the move. We oversaw the progress of mobile operators in building a Shared Rural Network to improve reception in hard-to-reach areas, including travelling 42,000 miles to test coverage and ensure operators are providing accurate data. We continued to play a role in the Shared Rural Network NI working group and the Northern Ireland Executive's Mobile Action Plan working group and barrier busting taskforce, working with a range of stakeholders to help deliver improved 4G and 5G coverage across Northern Ireland.

To encourage investment, we clarified our future approach to the mobile market and the allocation of airwaves. To help people make informed decisions about which mobile provider to use, we are developing better information on network quality.

### **Affordable, reliable post**

In July 2022, we concluded a wide-ranging review of the postal market and put in place rules that will apply for the next five years, until March 2027. We are continuing to give Royal Mail the flexibility it needs to set prices and innovate. But to keep prices affordable, we maintained existing price caps on Second Class letters and lighter parcels.

Our decisions also reflected the huge importance of parcels. More than 10 million are delivered, on average, every day in the UK. But we found around two-thirds of customers were experiencing problems with delivery. We introduced new guidance requiring all parcel firms to tighten up their complaints handling. We also required parcel firms to set clear, effective policies for treating disabled customers fairly.

### **Affordable phone and broadband**

Ensuring people can access affordable broadband and mobile services remains a priority for Ofcom. Our work on affordability this year came at a time when many households faced growing financial pressures. Our research in this area led to us working with industry to ensure most major providers now offer social tariffs to eligible customers. Take-up has increased significantly, but millions more could still benefit.

### **Protecting vulnerable customers**

Customers should get the right information, at the right time, about their contracts – helping them make better choices, often saving money as a result. We constantly monitor compliance with our rules, opening investigations where we think providers may be falling short.

As a priority, we want to make sure vulnerable people get the help, support and services they need. Under our rules, all communications providers must have clear, effective policies and procedures for identifying customers in vulnerable circumstances. On the whole, we have found that providers are treating these customers fairly. And since June 2022, telephone and broadband firms must offer a free Emergency Video Relay service for deaf British Sign Language users to make it easier for them to get help in emergencies.

### **Tackling scams**

Scams cause financial and emotional harm to millions of people, especially the most vulnerable. Our intervention means providers must do more to help prevent telephone numbers being misused. We also raised awareness of nuisance calls through social media and other channels.

### **Ensuring diversity in broadcasting**

The broadcasting sector should be as diverse as the audiences it serves. We have expanded the breadth of data we collect on broadcasters' workforces to help promote equity, diversity and inclusion. This follows a five-year review of progress in 2021, where we identified further improvements that the sector could make to reflect its diverse audience.

In November we published a [new framework and guidance](#) for how we collect and use diversity data from broadcasters. Our new toolkit will inform work over the coming year, helping us to collect and report on the industry's progress in our annual Equity, Diversity and Inclusion in Broadcasting report.

### **Upholding broadcast standards**

We have continued to set and enforce broadcast standards, to protect audiences from harmful content on TV and radio, and to take into account the importance of broadcasters' right to

freedom of expression. This year we assessed 37,109 complaints, completed 128 investigations and found 77 cases in breach of our broadcasting rules.

### **New digital radio services**

This year we have continued to license new small-scale DAB digital radio services across the UK. Our licensing programme in this area has led to 177 new digital radio stations being on air around the UK, giving listeners access to a range of local and specialist content that meets their needs.

### **Making TV programmes accessible**

People who are deaf, have hearing loss, are blind or partially sighted need to be able to access and enjoy TV programmes that are available to everybody. This is why broadcast 'access services', such as subtitles, audio description and signing, are supplied by broadcasters.

We have continued to enforce minimum requirements for these essential services, and we report each year on levels of accessibility on broadcast and on-demand services. We are currently updating our best practice guidance for accessibility and will include guidance specific to on-demand services, informed by consultation and new research.

With the UK Government proposing accessibility requirements for on-demand programme services, such as Netflix and Disney+, we launched a review of our guidelines for broadcast accessibility, including specific guidance around on-demand. We will consult on changes to these guidelines in 2023.

This year, an Ofcom investigation found that Channel 4 breached the conditions of its broadcast licence following an extended outage of its subtitling, signing and audio description services in 2021. After an incident at a broadcast centre run by Red Bee Media, Freesat audiences who rely on subtitles were unable fully to access Channel 4 programmes for nearly two months. The outage meant Channel 4 fell short of a requirement to subtitle 90% of its programme hours on Freesat; and we found it breached another licence condition by failing effectively to communicate with audiences about the incident.

Our broader review of the Red Bee incident in June highlighted an urgent need for all broadcasters to improve and audit their disaster recovery plans. These must include clear communications plans in case of interruptions to services.

A separate Ofcom review this year found that organisations which deliver broadcasting services need to urgently review their contingency plans, to avoid the kind of transmission failure that occurred when Yorkshire's Bilsdale transmitter caught fire in 2021. We highlighted that their reviews should consider up-front planning for recovering services, how emergency equipment would be deployed, and greater clarity over how support and information would be provided to consumers affected by a major loss of TV or radio services. We will be monitoring the effectiveness of new initiatives put in place.

### **Supporting special radio services**

We have developed an innovative new method of spectrum planning, which enables us to identify small gaps in spectrum that can be used for 'restricted' radio service broadcasts. These are radio services covering small areas, typically used for finite periods or within a particular

## PART A

establishment or location. Examples include dedicated radio services for religious observances such as Ramadan, hospital radio services, university radio services, drive-in movie soundtracks and commentary for events such as air shows. We have simplified our licensing approach for these services, providing opportunities for more of them to be licensed.

- 2 Please provide **examples** of outcomes and/or the impact of **equality action plans/** measures in 2022-23 (*or append the plan with progress/examples identified*).

**Below we outline the progress on each of the five Actions during 2022-23.**

***Action point 1: We will assess and publish accurate information on the levels of broadband and mobile connectivity in Northern Ireland.***

***Progress:*** In December 2022, Ofcom published the Connected Nations report, providing an update on the coverage of the UK's fixed, mobile and broadcast network and the capacity of fixed and mobile broadband networks. An [individual report for Northern Ireland](#) included extensive details on these networks, including accurate information on the availability of broadband and mobile coverage across NI as a whole, and local council areas.

***Action point 2: We will monitor and produce reports on the amount of network programming produced in Northern Ireland by the Public Service Broadcasters***

***Progress:*** In August 2022, Ofcom published its [Media Nations report for Northern Ireland](#), giving an overview of the broadcasting TV and Radio sectors, looking at broadcasters' performance and the audiences' viewing and listening habits. In November 2022, we published our 5<sup>th</sup> annual report on the BBC, and as noted in Section 1 above, at the end of the reporting period we published a revised Operating Licence for the BBC which included specific obligations for programming for the audience in Northern Ireland and across the UK network.

As also noted in Section 1 above, in November 2022 we published a [new framework and guidance](#) for how we collect and use diversity data from broadcasters. Our new toolkit will inform work over the coming year, helping us to collect and report on the industry's progress in our annual Equity, Diversity and Inclusion in Broadcasting report.

***Action point 3: We will seek to provide interested groups with appropriate information on relevant licensing processes.***

***Progress:*** We awarded licences for new small-scale DAB multiplexes in the Newry, and Belfast and Lisburn areas. We continue to see demand to provide 'restricted service' radio licences, with 120 licences granted in 2022/23, eight of which were in Northern Ireland. Restricted services are radio services with small coverage areas that are used to broadcast at events (for example providing commentary at an air show), or within establishments (for example a hospital radio service). Interest in these services has increased in recent years, particularly to provide services at drive-in events like drive-in movies.

As noted in Section 1, above, we have developed an innovative new method of spectrum planning and simplified our licensing approach for these services, providing opportunities for more of them to be licensed. We have continued to administer the Community Radio Fund on behalf of DCMS, who made additional funds available to support community radio licensees. In the past year, the Community Radio Fund Panel made 35 awards to stations across the UK, one of which was to a community radio station in Northern Ireland.



***Action point 4: We will seek to ensure that any research programmes include representative samples from Northern Ireland. We will seek to ensure that colleagues in the Belfast office, and members of Advisory Committees, remain reflective of Northern Ireland society. We will continue to use specific Northern Ireland Diversity Monitoring Forms for any recruitment in Northern Ireland.***

***Progress:*** All of Ofcom's major UK-wide research work during 2022/23 included samples from Northern Ireland, some of them boosted to take account of variances in our population. In our main UK-wide research survey we included specific questions regarding the viewing of Republic of Ireland TV channels in Northern Ireland. Some of our UK-wide research projects also used focus groups in Northern Ireland to provide qualitative data.

Recruitment during the year included new colleagues for both the Ofcom NI team, and colleagues from other parts of the organisation who are now based in the Belfast office. Additionally, We completed the appointment of two new Advisory Committee members, Aodhan O'Donnell and Colm Murphy, and a new Ofcom Content Board Member for Northern Ireland, Maria McCann. All recruitment was carried out using NI diversity Monitoring Forms.

In April 2022, we submitted an annual Fair Employment Monitoring Return for our Northern Ireland office.

***Action point 5: As the UK leaves the European Union, we will work with fellow regulators, governments and industry to preserve cross-border communications services for Northern Ireland consumers.***

***Progress:*** We continued to engage with HMRC and the Consumer Council for Northern Ireland on the potential impact on parcel deliveries from GB to NI as a result of the NI Protocol and latterly the Windsor Framework. There may be some consumer detriment in the form of extra costs for retailers/parcel operators, with some potentially deciding to charge extra or choosing not to deliver to NI, when new processes are implemented over the next 18 months.

PART A

**3** Has the **application of the Equality Scheme** commitments resulted in any **changes** to policy, practice, procedures and/or service delivery areas during the 2022-23 reporting period? *(tick one box only)*

Yes                       No (go to Q.4)                       Not applicable (go to Q.4)

Please provide any details and examples:

**3a** With regard to the change(s) made to policies, practices or procedures and/or service delivery areas, what **difference was made, or will be made, for individuals**, i.e. the impact on those according to Section 75 category?

Please provide any details and examples:

**3b** What aspect of the Equality Scheme prompted or led to the change(s)? *(tick all that apply)*

As a result of the organisation's screening of a policy *(please give details):*

As a result of what was identified through the EQIA and consultation exercise *(please give details):*

As a result of analysis from monitoring the impact *(please give details):*

As a result of changes to access to information and services *(please specify and give details):*

Other *(please specify and give details):*

## Section 2: Progress on Equality Scheme commitments and action plans/measures

### Arrangements for assessing compliance (Model Equality Scheme Chapter 2)

- 4 Were the Section 75 statutory duties integrated within job descriptions during the 2022-23 reporting period? *(tick one box only)*
- Yes, organisation wide
  - Yes, some departments/jobs
  - No, this is not an Equality Scheme commitment
  - No, this is scheduled for later in the Equality Scheme, or has already been done
  - Not applicable

Please provide any details and examples:

- 5 Were the Section 75 statutory duties integrated within performance plans during the 2022-23 reporting period? *(tick one box only)*
- Yes, organisation wide
  - Yes, some departments/jobs
  - No, this is not an Equality Scheme commitment
  - No, this is scheduled for later in the Equality Scheme, or has already been done
  - Not applicable

Please provide any details and examples:

- 6 In the 2022-23 reporting period were **objectives/ targets/ performance measures** relating to the Section 75 statutory duties **integrated** into corporate plans, strategic planning and/or operational business plans? *(tick all that apply)*
- Yes, through the work to prepare or develop the new corporate plan
  - Yes, through organisation wide annual business planning
  - Yes, in some departments/jobs

PART A

- No, these are already mainstreamed through the organisation's ongoing corporate plan
- No, the organisation's planning cycle does not coincide with this 2022-23 report
- Not applicable

Please provide any details and examples:

**Equality action plans/measures**

**7** Within the 2022-23 reporting period, please indicate the **number** of:

Actions completed:  Actions ongoing:  Actions to commence:

Please provide any details and examples (*in addition to question 2*):

**8** Please give details of changes or amendments made to the equality action plan/measures during the 2022-23 reporting period (*points not identified in an appended plan*):

None

**9** In reviewing progress on the equality action plan/action measures during the 2022-23 reporting period, the following have been identified: (*tick all that apply*)

- Continuing action(s), to progress the next stage addressing the known inequality
- Action(s) to address the known inequality in a different way
- Action(s) to address newly identified inequalities/recently prioritised inequalities
- Measures to address a prioritised inequality have been completed

**Arrangements for consulting (Model Equality Scheme Chapter 3)**

**10** Following the initial notification of consultations, a targeted approach was taken – and consultation with those for whom the issue was of particular relevance: (*tick one box only*)

- All the time
- Sometimes
- Never

PART A

- 11** Please provide any **details and examples of good practice** in consultation during the 2022-23 reporting period, on matters relevant (e.g. the development of a policy that has been screened in) to the need to promote equality of opportunity and/or the desirability of promoting good relations:

Public consultations allow stakeholders to comment on, and respond to, our proposals before any final decisions are made. If the period for consultation is too short, some of those with important views to share may not have enough time to prepare their responses. If it is too long, the market concerned may have changed dramatically. When we decide how long a consultation should last, we need to strike the right balance between these two considerations. The table below is an analysis of the length of our consultations by sector during the reporting period.

	Consultation period at least ten weeks	Consultation period less than ten weeks (inc category 2 and category 3 consultations)
Telecoms	2	5
Broadcasting	1	8
Spectrum	7	11
Post	0	1
ECC	0	14
Other	0	4
<b>Total</b>	<b>10</b>	<b>43</b>
<b>Total (22/23)</b>	<b>19%</b>	<b>81%</b>
Total (21/22)	8%	92%

- 12** In the 2022-23 reporting period, given the consultation methods offered, which consultation methods were **most frequently used by consultees**: (*tick all that apply*)

- Face to face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email with an opportunity to opt in/out of the consultation
- Internet discussions
- Telephone consultations
- Other (*please specify*):

PART A

Please provide any details or examples of the uptake of these methods of consultation in relation to the consultees' membership of particular Section 75 categories:

Ofcom's default method of consultation is via written documents with the opportunity to comment in writing. For our 2023/24 Plan of Work consultation, we notified all our stakeholders by email. We also held an event about the consultation, to which our equality stakeholders and all other stakeholders were invited.

**13** Were any awareness-raising activities for consultees undertaken, on the commitments in the Equality Scheme, during the 2022-23 reporting period? *(tick one box only)*

Yes       No       Not applicable

Please provide any details and examples:

**14** Was the consultation list reviewed during the 2022-23 reporting period? *(tick one box only)*

Yes       No       Not applicable – no commitment to review

**Arrangements for assessing and consulting on the likely impact of policies (Model Equality Scheme Chapter 4)**

[Insert link to any web pages where screening templates and/or other reports associated with Equality Scheme commitments are published]

**15** Please provide the **number** of policies screened during the year *(as recorded in screening reports)*:

52
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**16** Please provide the **number of assessments** that were consulted upon during 2022-23:

39	Policy consultations conducted with <b>screening</b> assessment presented.
	Policy consultations conducted <b>with an equality impact assessment (EQIA)</b> presented.
	Consultations for an <b>EQIA</b> alone.

**17** Please provide details of the **main consultations** conducted on an assessment (as described above) or other matters relevant to the Section 75 duties:

Impact assessments are an important part of the decision-making process. Section 7 of the Communications Act 2003 requires us to carry out an impact assessment when we are proposing to do anything for the purposes of, or in connection with, the carrying out of our functions, and we consider the proposal to be important. Impact assessments ensure, among other things, that in relation to our decisions:

- a wide range of options are considered, including the option of not regulating;
- these options are clearly presented;
- the potential effects that would flow from each option are analysed carefully; and
- the costs associated with the chosen option are outweighed by the benefits.

In March 2023, we published Ofcom’s impact assessment guidance which reemphasised Ofcom’s commitment to conducting assessments as an integral part of the policy-making process, and stated that we expected to carry out impact assessments in most of our policy decisions. We publish a list of the impact assessments we carry out during the year and summary by sector is provided in the table below.

<b>Number of consultation documents</b>	<b>Total</b>	<b>IA explicit in published document</b>
Telecoms	7	6
Broadcasting	9	3
Spectrum	17	12
Post	1	1
ECC	14	13
Other	4	4
<b>Total</b>	<b>52</b>	<b>39</b>

Equality Impact Assessments (EIAs) consider the extent that policies and projects are fair by design and deliver proportionate outcomes for diverse groups. Last year we refreshed our “Clarity from the Start” tool, which sets out the aims and purpose of a project, to include guidelines covering EIA principles. This year we have been working with project teams across Ofcom to embed the changes to our project tools, and to develop our capability in assessing who is affected by our work, and how we should take account of their interests.

We are consulting on changes to our guidance on impact assessments covering the following key changes:

- Recognising how our duties differ across an increasingly wide range of sectors.
- Maintaining our bias against intervention while clarifying that the law may require us to intervene.
- Updating how we present our EIAs to stakeholders.

- Increased recognition that qualitative impacts are an important part of assessing some policy decisions.
- Recognising that impact assessments are an important input for ex-post evaluations.
- Updating how we develop an EIA in light of new assessment approaches and resources.
- Updating the guidance to reference our current public sector equality duties and obligations in relation to the Welsh language.

### **Plan of Work 2023/24**

Each year in March, Ofcom publishes a Plan of Work which sets out our priorities and describes the other work we will be conducting in the coming year. This follows a consultation process which begins at the end of the previous calendar year.

Our Plan of Work for 2023/24 included four specific objectives for our work in Northern Ireland:

1. As part of our MoU with the Northern Ireland Government – which saw the appointment of Ofcom’s first Board Member for Northern Ireland in 2022 – we will continue working with Departments to provide regulatory support and technical advice on key issues like full-fibre rollout, telecoms security and resilience, migration from legacy services, mobile connectivity and cost-of-living pressures. This will include being part of a barrier-busting taskforce as part of the Government’s Mobile Action Plan, which seeks to remove barriers to improved 4G and 5G connectivity.
2. Acknowledging changes to the broadcasting landscape both locally and across the UK, we will engage with local stakeholders to make sure they maintain a clear understanding of the importance of local content and audiences, as well as highlighting regulatory requirements that ensure the production and prominence of content that means Northern Ireland audiences are well served.
3. We will seek to strengthen and deepen local stakeholder relationships in on line safety as the Bill progresses and the regulatory regime develops. We will work with officials in Government Departments, the local tech sector, safeguarding groups, and consumer advocacy groups to improve understanding of the regulatory regime as it takes shape, and to ensure that Northern Ireland issues are given due consideration as we support the passage of the Online Safety Bill in the UK Parliament.
4. We will work closely with our counterparts in the Republic of Ireland – ComReg and the Broadcasting Authority of Ireland – and offer advice to the UK Government and consumer bodies to help make sure people and businesses in Northern Ireland continue to benefit from communications services that are provided on a UK-wide and all-island basis.

We brought the consultation, and specifically the Northern Ireland objectives, to the attention of all our stakeholders in Northern Ireland, including our equality consultees at a hybrid event held in Belfast in January 2023.





PART A

Not applicable

- 23** Please provide any details or examples of monitoring that has contributed to the availability of equality and good relations information/data for service delivery planning or policy development:

Not applicable

**Staff Training (Model Equality Scheme Chapter 5)**

- 24** Please report on the activities from the training plan/programme (section 5.4 of the Model Equality Scheme) undertaken during 2022-23, and the extent to which they met the training objectives in the Equality Scheme.

Ofcom requires all colleagues to complete mandatory e-learning modules. The Respect, Diversity & Inclusion module provides colleagues with the opportunity to understand or raise their awareness of the importance of diversity and inclusion to Ofcom and our individual and collective rights and responsibilities. We expect all colleagues to complete the programme within four weeks of joining Ofcom and to repeat it every 12 months.

- 25** Please provide **any examples** of relevant training shown to have worked well, in that participants have achieved the necessary skills and knowledge to achieve the stated objectives:

Not applicable

**Public Access to Information and Services (Model Equality Scheme Chapter 6)**

- 26** Please list **any examples** of where monitoring during 2022-23, across all functions, has resulted in action and improvement in relation **to access to information and services**:

Not applicable

**Complaints (Model Equality Scheme Chapter 8)**

- 27** How many complaints **in relation to the Equality Scheme** have been received during 2022-23?

Insert number here:

0
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Please provide any details of each complaint raised and outcome:

### Section 3: Looking Forward

28 Please indicate when the Equality Scheme is due for review:

December 2024

29 Are there areas of the Equality Scheme arrangements (screening/consultation/training) your organisation anticipates will be focused upon in the next reporting period? *(please provide details)*

It is too early to say which areas we will focus on when it comes to reviewing the updated Scheme.

30 In relation to the advice and services that the Commission offers, what **equality and good relations priorities** are anticipated over the next reporting period? *(please tick any that apply)*

- Employment
- Goods, facilities and services
- Legislative changes
- Organisational changes/ new functions
- Nothing specific, more of the same
- Other (please state):

**PART B - Section 49A of the Disability Discrimination Act 1995 (as amended) and Disability Action Plans**

**1. Number of action measures for this reporting period that have been:**

**15**

Fully achieved

**1**

Partially achieved

**2**

Not achieved

**2. Please outline below details on all actions that have been fully achieved in the reporting period.**

2 (a) Please highlight what **public life measures** have been achieved to encourage disabled people to participate in public life at National, Regional and Local levels:

Level	Public Life Action Measures	Outputs <sup>i</sup>	Outcomes / Impact <sup>ii</sup>
National <sup>iii</sup>	Continue work to attain Level 3 of the Government’s Disability Confident Scheme, to be a Disability Confident Leader.	Ongoing throughout the reporting period.	Demonstrates Ofcom’s commitment to being a diverse, fair and inclusive employer.
Regional <sup>iv</sup>	Promote the advertisement of Non-Executive Director posts through disabled stakeholder groups, such as Disability Action, and note in advertisements that we guarantee an interview to disabled candidates who meet all the essential criteria of the job description.	We did this for the recruitment of two Advisory Committee members during the report period.	To help us better reflect UK society in relation to disabled people and achieve our target of having 15% of non-executive directors across Ofcom with disabilities.

PART B

Local <sup>v</sup>	Ensure ongoing quantitative and qualitative research includes a representative sample of disabled citizens and consumers.	Ongoing throughout the reporting period.	Ofcom gains in-depth knowledge about issues of concern to disabled people, enabling regulatory resources to be directed where they can have the most impact, leading to improved communications services for disabled people.
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2(b) What **training action measures** were achieved in this reporting period?

	Training Action Measures	Outputs	Outcome / Impact
1	Continue to raise disability awareness among staff through the mandatory e-learning courses of Equality in the Workplace and Unconscious Bias.	Completed by all colleagues on an annual basis. All managers have had access to introductory training on disability.	Improved staff awareness of issues faced by disabled people, and of their relevance in the workplace.

2(c) What Positive attitudes **action measures** in the area of **Communications** were achieved in this reporting period?

	Communications Action Measures	Outputs	Outcome / Impact
1	Publish our annual disability pay gap report for Ofcom.	We published our annual Diversity & Inclusion strategy progress update in July 2022, which included our pay gaps in 2021-22.	Demonstrates Ofcom's commitment to ensuring there is a fair and equitable pay structure, while hiring and retaining the best talent. Supports Ofcom's aim to be a diverse, fair and inclusive employer.

PART B

2	Continue to publish progress updates on our Diversity & Inclusion Strategy priorities and workforce targets, including an annual statistical report on the diversity of Ofcom colleagues; the diversity profile (disability, gender and ethnicity) of our nonexecutive board members and senior management team in our Annual Report and Accounts and gender, ethnicity and disability pay and equal pay audits.	We published our annual Diversity & Inclusion strategy progress update in July 2022.	Demonstrates transparency in relation to Ofcom’s commitment to being a diverse, fair and inclusive employer.
3	Conduct stakeholder engagement with organisations representing the interests of disabled people.	<p>Throughout the year, the Communications Consumer Panel, which incorporates Ofcom’s Advisory Committee on Older and Disabled People (ACOD), published research, provided advice to Ofcom and advocated on behalf of more vulnerable consumers.</p> <p>For our annual Electronic Programme Guide (EPG) Accessibility Report, we were grateful to RNIB for establishing a focus group which allowed us to engage with users of these features and better understand how they are working for consumers in practice, across a range of devices used to access the EPG (e.g. connected TVs or set-top boxes).</p>	Ofcom gains in-depth knowledge about issues of concern to disabled people, enabling regulatory resources to be directed where they can have the most impact, leading to improved communications services for disabled people.
4	Monitor Ofcom complaints data to identify disability issues relevant to complaints.	Ongoing throughout the reporting period.	Ofcom gains in-depth knowledge about issues of concern to disabled people, enabling regulatory resources to be directed where they can have the

PART B

			most impact, leading to improved communications services for disabled people.
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2 (d) What action measures were achieved to ‘**encourage others**’ to promote the two duties:

	Encourage others Action Measures	Outputs	Outcome / Impact
1	Continue the publication of the annual monitoring report on ‘Diversity and equal opportunities in TV and Radio’, based on equal opportunities data and information on diversity initiatives from broadcasters.	Report published in November 2022.	Ensure that TV and radio broadcasting represents and accurately reflects UK society.
2	Continue to work with Government on accessibility of on-demand services, following our publication of further recommendations to Government on making the accessibility of on-demand services a legal requirement.	With the UK Government proposing accessibility requirements for on-demand programme services, such as Netflix and Disney+, we launched a review of our guidelines for broadcast accessibility, including specific guidance around on-demand. We will consult on changes to these guidelines in 2023.	Promote accessibility of On Demand Programme Services (ODPS) for those with sight and/or hearing impairments.
3	Publish the annual Television and on-demand programme services: Access Services Report on broadcasters’ compliance with the requirement to deliver a certain proportion of their programmes	We published our annual report for the full calendar year of 2021 in May 2022. And our report for the first six months of 2022 was published in October 2022.	The report allows consumers to compare the extent to which traditional broadcast television and catch-up or on-demand services are accessible to people with sight and/or hearing impairments.

PART B

	with subtitles, signing, and audio description.		
4	Continue to publish an annual Electronic Programmes Guide (EPG) Accessibility report outlining the improvements for people with visual impairments.	We published our annual report in May 2022.	Ensures that people with visual impairments are able to use EPGs in the same way that people without such disabilities use them.
5	Implement a new package of consumer protection measures contained within the European Electronic Communications Code (EECC), a new EU directive that updates the regulatory framework for communications services.	New rules on the provision of contract information, extended customer rights to exit and the provision of an emergency video-relay service come into effect from June 2022.	The EECC contains a package of measures designed to protect customers of broadband, mobile, pay TV and landline services – in particular to ensure these customers can shop around with confidence, make informed choices, switch easily and get a fair deal.
6	Implement new rules that require telephone and broadband companies to offer a free, 24/7 video relay service for British Sign Language (BSL) users to contact the emergency services via a dedicated mobile app and website.	Introduced by Telecoms companies by June 2022.	BSL users will have equivalent access to the emergency services as other people in the UK.
7	Work with telecoms providers to ensure reasonable measures are in place to protect customers throughout the switchover from the 'public switched telephone network' (PSTN) to 'Voice over Internet Protocol' (VoIP).	Ongoing, throughout the reporting period.	Customers, particularly those more vulnerable, experience minimal disruption and are protected from harm during the switchover.

2 (e) Please outline **any additional action measures** that were fully achieved other than those listed in the tables above:



PART B

	Action Measures fully implemented (other than Training and specific public life measures)	Outputs	Outcomes / Impact
1			

3. Please outline what action measures have been **partly achieved** as follows:

	Action Measures partly achieved	Milestones/ Outputs	Outcomes/Impacts	Reasons not fully achieved
1	Our Fairness for Customers programme seeks to ensure people, particularly those who might be vulnerable (including because of a disability), are treated fairly by the companies who provide their home phone, broadband, mobile and pay-TV services. This programme informs many of our key work areas such as switching, pricing, and the use of consumer data.	Update was due in 2022/23.	Update on how communication companies are delivering on their commitments to ensure people, particularly those who might be vulnerable, are treated fairly.	While we did not publish an update on Fairness for Customers programme, it continues to be at the heart of our consumer protection work, and is especially important at the time when consumers are feeling the effects of the rising costs of living.

4. Please outline what action measures **have not been achieved** and the reasons why.

	Action Measures not met	Reasons

PART B

1	Aim for staff in Northern Ireland team to be JAM (Just A Minute) card friendly for those with neurodiverse conditions and those with dementia.	During the reporting period we recruited additional staff to be based in our Belfast office, so we felt it would be better until the staffing numbers stabilised before delivering the training.
2	Source and rollout training for staff on neurodiversity.	All managers have had access to introductory training on disability. Wider neurodiversity training is scheduled to roll out before the end of the financial year.

5. What **monitoring tools** have been put in place to evaluate the degree to which actions have been effective / develop new opportunities for action?

(a) Qualitative

We publish an annual update on our UK-wide Diversity & Inclusion Programme which contains both qualitative and quantitative assessments of our progress against the commitments we've made in our programme. The update also sets a future focus for our work in the year ahead. The annual update for 2022/23 was published in August 2023 and is available here: [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0028/265492/2022-23-diversity-inclusion-progress-update.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0028/265492/2022-23-diversity-inclusion-progress-update.pdf)

(b) Quantitative

6. As a result of monitoring progress against actions has your organisation either:

- made any **revisions** to your plan during the reporting period or
- taken any **additional steps** to meet the disability duties which were **not outlined in your original** disability action plan / any other changes?

NoPlease select

PART B

If yes please outline below:

	Revised/Additional Action Measures	Performance Indicator	Timescale
1			
2			
3			
4			
5			

7. Do you intend to make any further **revisions to your plan** in light of your organisation’s annual review of the plan? If so, please outline proposed changes?

No

<sup>i</sup> **Outputs** – defined as act of producing, amount of something produced over a period, processes undertaken to implement the action measure e.g. Undertook 10 training sessions with 100 people at customer service level.

<sup>ii</sup> **Outcome / Impact** – what specifically and tangibly has changed in making progress towards the duties? What impact can directly be attributed to taking this action? Indicate the results of undertaking this action e.g. Evaluation indicating a tangible shift in attitudes before and after training.

<sup>iii</sup> **National** : Situations where people can influence policy at a high impact level e.g. Public Appointments

<sup>iv</sup> **Regional**: Situations where people can influence policy decision making at a middle impact level

<sup>v</sup> **Local** : Situations where people can influence policy decision making at lower impact level e.g. one off consultations, local fora.