



Race Equality Scheme

Drawn up in accordance with Section 71 and
Schedule 1A of the Race Relations (Amendment) Act 2000

Consultation

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Section 1

Summary

- 1.1 Under the Race Relations (Amendment) Act 2000 (RRAA) public authorities, including Ofcom, are subject to a general duty to have due regard to the need:
 - a) to eliminate unlawful racial discrimination;
 - b) to promote equality of opportunity and good relations between persons of different racial groups.
- 1.2 Ofcom is also subject to two specific duties under the RRAA. Ofcom must carry out ethnic monitoring on its employment practices ; and Ofcom must publish a Race Equality Scheme (RES) which:
 - assesses which function and policies are relevant to the general duty, with a review of that assessment at least every three years;
 - sets out arrangements for assessing and consulting on the likely impact on the promotion of race equality of proposed new policies;
 - sets out arrangements for monitoring of policies for adverse impact on the promotion of race equality;
 - sets out arrangements for publishing the results of assessments, consultations and monitoring;
 - sets out arrangements for ensuring access to information and services; and
 - sets out arrangements for training staff on issues relevant to the duty.
- 1.3 This document sets out Ofcom's Race Equality Scheme. We undertake to review its operation in three years' time, in line with the RRAA.

Section 2

Foreword

Statement by the Chairman

The Office of Communications, Ofcom, is responsible for regulation across the range of electronic communications, covering television, radio, telecommunications and spectrum use. We have statutory duties derived principally from the Ofcom Act 2002, the Communications Act 2003, as well as from extensive other UK legislation and regulations, and European Directives. We are a substantial employer.

Ofcom is committed to promoting equality of opportunity and good relations between people of different racial groups. It is also committed to building and maintaining an environment in which unlawful racial discrimination is not tolerated and diversity amongst colleagues is valued.

These commitments are central to the work of Ofcom. We must strive to ensure that they are integrated into the way in which we function as individuals within Ofcom and the way in which Ofcom functions as a whole.

The Race Relations Act, as amended by the Race Relations (Amendment) Act 2000 (RRAA), places a general duty on Ofcom, as a regulatory body, to promote race equality.

This Scheme has been drawn up in accordance with the RRAA. Ofcom's aim is to apply its policies, in accordance with the spirit of the RRAA, to protect people of different racial groups against racial discrimination and ensure racial equality amongst all individuals within Ofcom.

In carrying through our duties we are determined to place diversity at the heart of Ofcom. For us, that includes issues relating to race and ethnicity, as well as gender, sexual orientation, disability, religion and belief and age.

We wish to ensure that Ofcom and the industries which we regulate meet all statutory obligations and go as much further in creating a climate within which diversity can flourish as determined energy and ingenuity can provide.

David Currie

Section 3

Introduction

About Ofcom

- 3.1 Ofcom is the regulator for the UK communications industries, with responsibilities across television, radio, telecommunications and wireless communications services. It is independent of Government but accountable to Parliament at Westminster.
- 3.2 Ofcom's sponsoring Departments of State are the Department of Trade and Industry and the Department for Culture, Media and Sport.
- 3.3 Ofcom was set up, and its powers and duties are provided for, under the Communications Act 2003. Its principal statutory duty in carrying out its function is to:
 - a) further the interests of citizens in relation to communication matters;
 - and
 - b) further the interests of consumers in relevant markets, where appropriate by promoting competition.
- 3.4 Ofcom's main office is located in London; it has, in addition, national offices in Wales, Scotland and Northern Ireland and a network of operational staff across the UK.
- 3.5 Under Section 3 of the Communications Act 2003 ('The Communications Act') Ofcom must have regard to the following in the performance of its duties:
 - The different needs and interests, so far as the use of the electromagnetic spectrum for wireless telegraphy is concerned, of all persons who may wish to make use of it.
 - The need to secure that the application, in the case of television and radio services, of standards falling within subsection (2) (e) and (f) of Section 3 is in the manner that best guarantees an appropriate level of freedom of expression.
 - The vulnerability of children and of others whose circumstances appear to Ofcom to put them in need of special protection.
 - The needs of persons with disabilities, of the elderly and of those on low incomes.
 - The opinions of consumers in relevant markets and of members of the public generally.
 - The different interests of persons in the different parts of the United Kingdom, of the different ethnic communities within the United Kingdom and of persons living in rural and in urban areas.
- 3.6 Section 27 of the Communications Act requires Ofcom to promote the development of opportunities for training and re-training of people working in the television and radio industries and to promote the equality of opportunity between persons of different racial groups in those industries.
- 3.7 Sections 264 and 265 of the Communications Act require that, in reporting on Ofcom's public service remit and the remit of licence providers, Ofcom should have regard to

the diversity of cultural activity in the United Kingdom, the range of religion and beliefs and the lives and concerns of different communities and cultural interests and traditions.

- 3.8 Section 337 of the Communications Act requires Ofcom to include conditions in the regulatory regime for broadcast licence holders to promote, in relation to employment, equality of opportunity between persons of different racial groups.
- 3.9 The Ofcom Board provides strategic direction for Ofcom – it is the main statutory instrument of regulation with a fundamental role in the effective implementation of the Communications Act.
- 3.10 The Content Board has been established by the Ofcom Board; this Board has delegated and advisory responsibility for a wide range of content issues, predominantly dealing with broadcasting.
- 3.11 An Ofcom Consumer Panel has been established to advise Ofcom on consumer interests in the markets regulated by Ofcom. It has a specific remit to inform Ofcom on consumer issues, specifically those of interest to rural customers, older people, people with disabilities and those on low income or who are otherwise disadvantaged.
- 3.12 Ofcom has five statutory advisory committees, one representing the interests of people living in each of the four UK nations, and one representing the interests of older and disabled people. These advisory committees have a direct reporting line to Ofcom's main Board and can advise on issues across Ofcom's remit and also our internal policies and procedures.

Ofcom's duties under the RRAA

- 3.13 The Race Relations Act 1976, as amended by the RRAA places an obligatory general duty on Ofcom to promote race equality. Ofcom is required to have due regard, in all of its activities, to:

- eliminate unlawful discrimination;
- promote equality of opportunity; and
- promote good relations between people of different racial groups.

The duty aims to ensure that the promotion of race equality is embedded in all of a public authority's activities in policy, service delivery and employment and Ofcom is fully committed to discharging this duty.

- 3.14 The RRAA also places on Ofcom specific duties to:

- Prepare a written statement of its race equality policy; and
- Have in place arrangements to:
 - o assess the impact of its policies on colleagues of different racial groups;
 - o monitor, by reference to those racial groups, the recruitment and career progress of staff; and
 - o publish its race equality policy and the results of its assessment and monitoring.

- 3.15 The publication of this Scheme is intended to fulfil the first of the specific duties of Ofcom set out above. Ofcom is fully committed to fulfilling all of its duties under the RRAA and recognises that the publication of a policy alone is not enough and that it has an obligation to ensure that the policy is translated into practice as an integral part of the working life of Ofcom. In addition to this Race Equality Scheme, Ofcom has statutory duties to produce an Equality Scheme under Section 75 of the Northern Ireland Act 1998 and a Welsh Language Scheme.
- 3.16 The Scheme identifies those areas where Ofcom will be collecting data in order to assess the impact of our policies, monitor our performance, take appropriate action and set down institutional practice. Further action plans will be developed to continue the implementation of the general duty to promote equality of opportunity, promote good relations between people of different racial groups and eliminate unlawful discrimination.
- 3.17 Ofcom is committed to promoting equality of opportunity and good relations between people of different racial groups. We are also committed to building and maintaining an environment in which unlawful racial discrimination is not tolerated and diversity amongst colleagues is valued.
- 3.18 Ofcom will provide appropriate training, equipment and support to our staff and provide them with the tools to deal with the challenges they may face in ensuring that unlawful racial discrimination is eliminated and diversity valued throughout Ofcom.
- 3.19 The successful implementation of this policy will contribute strongly to Ofcom's pursuit of our mission, including by:
- providing a framework under which Ofcom can assess and monitor the impact of our activities on different racial groups within the community;
 - providing a stimulus for action where it appears that particular groups are achieving less than others; and
 - reinforcing Ofcom's commitment to vocational aims and to quality, by emphasising the importance of achievement of potential for members of different groups.
- 3.20 Ofcom recognises that successful implementation of this policy is dependent partly on consultation with stakeholders. These include colleagues, trade unions, relevant Ofcom committees and external bodies with which Ofcom has partnerships. Ofcom expects that consultation on the implementation and development of this policy will lead to a more inclusive and diverse workforce.
- 3.21 Ofcom will conduct a comprehensive review of this Scheme within three years from the date of publication. This review will include an assessment of how Ofcom has complied with its obligations to promote race equality and how this has been advanced relative to the main policy areas.
- 3.22 Ofcom will consult with relevant stakeholders as part of the review and will consider any Guidance issued by the Commission for Racial Equality on the conduct of such a review. The results of the review will also be made public.

Section 4

Ofcom's functions and policies

4.1 The primary functions for which Ofcom is responsible fall into six areas:

- i) Ensuring the best use of the electric-magnetic spectrum;
- ii) Ensuring that a wide range of electronic communication services including high speed data services is available throughout the UK;
- iii) Ensuring the provision of a wide range of TV and radio services of high quality and wide appeal;
- iv) Maintaining plurality in the provision of broadcasting;
- v) Applying adequate protection for audiences against offensive or harmful material;
- vi) Applying adequate protection for audiences against unfairness or infringements of privacy.

1. Ofcom is committed to undertaking these functions by:

- Balancing the promotion of choice and competition with the duty to foster plurality, inform citizenship, protect viewers, listeners and customers and to promote cultural diversity;
- Serving the interests of the citizens and consumers as the communications industry enters the digital age;
- Supporting the need for innovators, creators and investors to flourish within markets driven by full and fair competition between all providers;
- Encouraging the evolution of electronic media and communication networks to the greater benefit of all who live in the United Kingdom.

2. These duties are clearly compatible with, and complementary to, Ofcom's obligations under the RRAA.

3. Ofcom is aware of the diverse origins of our partner organisations and employees and acknowledges that the communities which we serve are local, national and international.

Ofcom's policies on race equality

4.2 Under this Scheme, Ofcom will review our current core activities to ensure we adhere to the promotion of race equality so that:

- all colleagues and partner organisations are encouraged and supported to attain the highest standards of achievement;
- appropriate action is taken if it becomes apparent that specific groups of colleagues are not fulfilling their potential;

- relevant policies, procedures and practices of Ofcom are reviewed and revised where appropriate with a view to continue to promote good race relations and equality of opportunities; and
- effective steps are taken by Ofcom to deal with any circumstances in which the aims of this policy or the associated action plan are being obstructed.

4.3 Ofcom has identified the following key areas as being relevant to race equality:

- i) (i) The introduction of a new tier of community radio services, which make possible specific provision for ethnic linguistic minority provision;
- ii) Consumer protection issues which have a particular relevance to race equality e.g. ethnic groups who are particularly dependent on international telephony calling cards;
- iii) A policy of ensuring the provision of a wide range of TV and radio services of high quality and wide appeal by:
 - o working with public service broadcasters to implement programming quotas and to devise a flexible self-regulatory regime which underpins quality public service broadcasting.
- iv) A policy of maintaining plurality in the provision of broadcasting by:
 - o developing a new broadcasting licensing regime to foster self regulation and broaden choice;
 - o implementing changes to broadcasting content regulation to deliver additional citizen and consumer benefits;
 - o improving quality;
 - o increasing access.
- v) A policy of applying adequate protection for audiences against offensive or harmful material and against unfairness or infringements of privacy by:
 - o reviewing broadcast standards to ensure they appropriately reflect community standards;
 - o ensuring content complaints are dealt with effectively and efficiently.

4.4 Employment policies have been identified as a key area in race equality:

- vi) Ofcom currently employs around 800 staff. Employment policies for all staff including recruitment, management, development and retention are in line with best practice. They are subject to continual scrutiny and review.
- vii) In the appointment of members to Boards, Advisory Committees and the Consumer Panel, Ofcom complies with the best practice with members chosen by open public process.
- viii) In particular we will look at colleagues' recruitment, selection, career development, remuneration, training, discipline, grievance and dismissal and consider:

- o HR data and Information Systems: current workforce and recruitment and selection process;
- o promotions, training and development policy;
- o performance management process;
- o disciplinary policy data, analysis and, if required, action;
- o poor performance, policy data, analysis and, if required, action;
- o redundancies data, analysis and, if required, action;
- o grievances data, analysis and, if required, action;
- o exit data, analysis and, if required, action;
- o training and development data, analysis and, if required, action.

4.5 Procurement within Ofcom is delegated to Group buyers. Group buyers are supported by a centralised Procurement Team, within the Ofcom Finance Department, providing training, advice and assistance. The Procurement Team itself has prime responsibility for developing procurement policies and procedures, model contracts and forms, and assisting with major procurements (including framework agreements) which are subject to the EU Procurement Directives.

Section 5

Assessment and consultation

Screening process

- 5.1 Ofcom will develop a procedure for assessing and consulting on the likely race equality impact of proposed policies. Part of this procedure will be to ensure that Ofcom's annual planning process identifies potential policies. We will then highlight any potential policies during the public consultation phase of Ofcom's Annual Plan.
- 5.2 To decide whether we need to carry out a full impact assessment, we will make an initial assessment to decide whether the policy has any relevance to race equality or whether it will negatively impact some racial groups. This will be built into the regulatory impact assessment process we must undertake for each of our policies and will be monitored by Ofcom's Diversity Management Group.

Impact assessment

- 5.3 If after initial screening it is assessed that a policy could adversely affect a particular racial group (or groups), Ofcom will carry out a full race equality impact assessment.
- 5.4 In carrying out a race equality impact assessment, Ofcom will operate the following process:
 - i) All the aims of the policy will be identified;
 - ii) Appropriate evidence will be gathered and considered;
 - iii) The likely impact on racial groups will be assessed;
 - iv) If this assessment shows that the proposed policy is likely to have an adverse impact on a particular racial group (or groups), Ofcom will consider alternatives to the policy by:
 - o making changes to the proposed policy that satisfy the concerns raised;
 - o considering ways of putting the proposed policy into practice that remove or reduce its potential for adversely affecting some racial groups;
 - o finding alternative means of achieving the aims of the policy.
 - v) Ofcom will consult formally on key decisions throughout the impact assessment;
 - vi) Ofcom will then decide whether or not to adopt the policy, based on the evidence gathered, the results of our formal and informal consultations and the relative merits of the alternative approached considered;
 - vii) Arrangements will be put in place to monitor the policy for any adverse impact on a particular racial group (or groups). Ofcom will publish the monitoring reports and review the policy based on the outcome of the monitoring process;
 - viii) Ofcom will publish a report of the race equality impact assessment, including the evidence gathered and the outcome of our consultations. The report will include:

- o information on how the consultations were carried out;
 - o a summary of the main findings of assessments or monitoring;
 - o significant trends arising from the monitoring and assessment carried out;
 - o any steps which Ofcom proposes to take in the light of such findings or trends.
- ix) A range of communication strategies will be adopted. Ofcom will consult regularly with colleagues on this policy and any issues arising. We will also provide an opportunity for feedback to be received from colleagues through Ofcom's website. This facility will be publicised throughout Ofcom.

Consultation

- 5.5 Ofcom will consult on matters relating to our general duty to promote race equality, our Race Equality Scheme, and race equality impact assessments with colleagues, the general public, public sector organisations and groups representing ethnic minorities and, where appropriate, our licensees and industry stakeholders.
- 5.6 The arrangements outlined below will apply to all consultation exercises.
- 5.7 It is important that sufficient and timely information is provided to enable all affected groups and individuals to consider the full implications of proposals. Relevant documentation will be available for all consultations.
- 5.8 Consultation will begin as early as possible to allow adequate time for groups to consult among themselves. Ofcom will endeavour to provide a period of at least ten weeks for consultation on matters with a race equality impact. However, there may be exceptional circumstances where this timescale is not feasible e.g. where policies must be implemented immediately to comply with statutory requirements, a court judgment or to protect health and safety. In such cases Ofcom will indicate why a shorter period has been adopted. Such circumstances will be monitored, kept under review, justified clearly and detailed when Ofcom reports annually on progress made in implementing our Race Equality Scheme.
- 5.9 Ofcom's policy for the publication of documents, including consultations, is covered in detail in Section 8.
- 5.10 Staff in Ofcom engage regularly in consultation with various groups. Ofcom will ensure that those involved in facilitating consultations will have the necessary skills and sensitivities to communicate effectively, and arrange further training where this is appropriate. Such further training will be developed in consultation with the affected groups.
- 5.11 Ofcom will seek to ensure full participation at consultation meetings by careful consideration of accessibility and how the meeting is run.

Section 6

Monitoring policies for adverse impact

- 6.1 Ofcom will carry out ethnic monitoring of policies that are identified as having an impact on race equality, where this is relevant and proportional. We will ensure that policies that are assessed as being highly relevant or of high priority in race equality terms are monitored for adverse impact.
- 6.2 Ofcom's monitoring of policies relevant to the general duty will form part of the overall impact assessment, as set out in Section 5.4.
- 6.3 Ofcom is committed to monitoring and assessing the impact of its associated policies and practices on colleagues from different racial groups in order to promote race equality throughout Ofcom's community.
- 6.4 The purpose of monitoring and assessment is mainly to consider:
 - the extent to which different racial groups of colleagues are achieving and fulfilling their potential;
 - how differences between levels of achievement in different groups might be explained;
 - whether there are any steps which could be taken and which would be likely to promote greater levels of achievement in relation to any such groups;
 - whether any changes need to be made to the relevant policies and practices of Ofcom.
- 6.5 Information gathered from the monitoring process will be published and used to assist with the development and planning of future strategies to continue to improve Ofcom's performance in relation to promoting race equality effectively.

Section 7

Publishing results of assessments, consultations and monitoring

- 7.1 Ofcom will publish reports of impact assessments, consultations and monitoring carried out in relation to its duties under the Race Equality Scheme.
- 7.2 These reports will be made available alongside the relevant policy or consultation announcements, or as soon as possible thereafter, and be published on Ofcom's website. Ofcom's policy on public access to information is set out fully in Section 8.
- 7.3 The content of reports for impact assessments will include:
- a description and explanation of the proposed policy and a brief account of how we assessed its possible effects;
 - a summary of the results of our assessment including the likely impact of the proposed policy on promoting race equality;
 - any available technical reports;
 - a review of the proposed policy (or policy options) in the light of our assessment; and
 - a statement of what we plan to do next.
- 7.4 The content of reports on consultations will include:
- why we carried out the consultation;
 - how we consulted;
 - a summary of the replies received;
 - a review of the proposed policy (or options) in the light of the responses received, particularly concerning any adverse impact on promoting race equality, and;
 - a statement of what we plan to do next.
- 7.5 The content of reports on monitoring will include:
- an explanation of monitoring;
 - the monitoring systems and methods used;
 - a summary and assessment of the results of our monitoring, making clear whether we found any evidence of adverse impact on race equality; and
 - how we will use these results to develop future policy and practice.

Section 8

Public access to information

- 8.1 Ofcom is committed to providing effective information and services to members of the public.
- 8.2 Consideration will be given to making information available in fully accessible formats on request, and in a timely way to ensure meaningful consultation and the highest level of inclusivity in any policy decision-making. We will take steps to ensure that any barriers to proper consultation are removed, where practicable and proportionate, by giving consideration to appropriate formats - including large print, audio cassette, disc, Braille.
- 8.3 We will seek practical ways of facilitating access to Ofcom information for those whose usual language is neither English nor Welsh. Special consideration will be given to how best to consult with and communicate with young people, and those with a learning disability. Systems will be put in place to ensure that upon request and where practicable and proportionate, information is available in accessible formats in a timely fashion.
- 8.4 Ofcom will, within the first year following the approval of the Race Equality Scheme, assess its arrangements for providing information to members of ethnic minorities. Based on this assessment Ofcom will make recommendations on how public access to its information might be improved. It will consult on these recommendations and implement them appropriately. Ofcom will publicise the arrangements put in place and will monitor access to information and services to ensure equality of opportunity.
- 8.5 Ofcom will ensure that it promotes its responsibilities to promote race equality through a range of publications and media, including its website, public advertisements, internal communications, briefings to staff and the organisation's Annual Report. The Chief Executive and other senior staff will promote these responsibilities to staff and the public.
- 8.6 The arrangements outlined in this Scheme regarding the provision of information relating to race equality impact assessments will apply to the general provision of information and the publication of this Scheme.

Section 9

Employment and training

9.1 Ofcom is committed to creating inclusive employment policies which reflect and value diversity. So that we can monitor whether we are offering equality of opportunity and treatment to all groups of colleagues we seek so far as possible to collect data on the ethnic origin of everyone who works for Ofcom. This information will give us a more comprehensive profile of our workforce and will help us to analyse how our policies affect different groups across the organisation. In particular, we will monitor, by ethnic group (where the information is available), the number of:

- i) colleagues currently working for Ofcom;
- ii) applicants seeking employment with Ofcom;
- iii) colleagues applying for employment, training, and promotion;
- iv) colleagues who receive training;
- v) the outcomes from performance appraisals;
- vi) colleagues who are involved in grievance procedures;
- vii) colleagues who are the subject of disciplinary action; and
- viii) colleagues who end their service with Ofcom.

The results of this monitoring will be published annually.

9.2 The table below shows in more detail the activities we are required to monitor.

Activity	Achieve
Colleagues currently working for us	A system for analysing posts by ethnicity, gender, disability and age across the organisation
Applicants for employment	To ensure we provide equality of opportunity by identifying any areas where we may improve our recruitment process
Applicants for promotion	To ensure we provide equality of opportunity internally
Applicants for training and development	To ensure we provide equality of opportunity internally
i. Colleagues who	To ensure we provide equality of opportunity

receive training	internally
Outcomes from performance appraisals	To ensure that our policies and processes are applied fairly and consistently across the organisation
Colleagues who are involved in grievance procedures	To ensure that our policies and processes are applied fairly and consistently across the organisation
Colleagues who are the subject of disciplinary action	To ensure that our policies and processes are applied fairly and consistently across the organisation
Colleagues who end their service with us	To monitor patterns across the organisation

What will Ofcom do with the data?

- 9.3 We will collect employment monitoring data by ethnic group for all of the above activities and will publish anonymised results of the monitoring on our website each year. We will then analyse the monitoring data to find any patterns of inequality and take steps to remove barriers and promote equality of opportunity. This may include taking positive action and training.

Ofcom's Statement of Intent

- 9.4 We have published our statement of intent with regard to diversity affirming our commitment to the principle of equal opportunities both in the industry that we regulate and in the organisation itself. This makes clear that Ofcom opposes all forms of unlawful discrimination on the grounds of colour, race, nationality, ethnic origin, sex, marital status, disability, part-time or fixed term status, parental responsibilities, age, religion or sexual orientation. A full copy of the statement is published internally in the Colleague Handbook and externally on our website, and is set out below:

We are placing diversity at the heart of Ofcom by developing and implementing an integrated diversity policy. We oppose and will seek to overcome all forms of unlawful or unfair discrimination on the grounds of a person's race or ethnicity, gender, sexual orientation, disability, religion or belief and age in all aspects of our work.

In carrying out our statutory duties, including in respect of the industries we regulate, Ofcom will work to promote diversity in our policy development and encourage equality of opportunity. Ofcom will operate in an open and transparent manner and will seek to ensure its communications are as accessible as possible.

- ii. *As an employer, Ofcom's goal is to recruit, motivate, develop and retain outstanding people, reflecting the diverse communities we serve, who work together to deliver our common aims and objectives. We are committed to equality of opportunity in all areas of employment, including development and promotion. We aim to treat all colleagues fairly, with dignity and respect.*

General employment policies

- 9.5 We have developed a range of flexible working policies to accommodate cultural and religious beliefs and family responsibilities. These include policies on absence from work (including holiday entitlement, time off for public duties, sickness absence and compassionate leave), maternity/paternity/adoption leave and parental leave. Further work is planned to trial non-standard patterns of work that might be appropriate for Ofcom, such as term time working. We also have a room at Riverside House for colleagues to pray, contemplate or reflect.

Recruitment

- 9.6 We are currently reviewing our recruitment process to give active consideration to use of a much broader range of media and platforms for recruitment advertising. We also ensure that all vacant posts are advertised. We will monitor applications for recruitment by ethnicity and will use this information to identify ways to improve our recruitment process and ensure equality of opportunity for all racial groups.

Training and Professional Development

- 9.7 We provide diversity training for all our colleagues in three stages. We will ensure our Senior Management Group is made aware of their legal and statutory obligations regarding race equality as part of a comprehensive diversity training module. We will then run sessions with all those staff with line management responsibility, focusing on issues regarding diversity awareness, particularly relating to their management responsibilities and recruitment of new staff. We will then provide diversity awareness training for all staff, ensuring they are made aware of their responsibilities as Ofcom employees to promote equality, including amongst different racial groups. We intend to provide all three levels of training by the end of the first quarter of 2005/06.
- 9.8 Ofcom will also ensure that all colleagues with specific responsibilities under the Race Equality Scheme, for example carrying out race equality impact assessments, are provided with the necessary training and support to carry out their duties.

Colleagues who leave Ofcom

- 9.9 We monitor the reasons why our colleagues leave Ofcom and offer an exit interview to all colleagues who resign in order to track any underlying reasons for colleagues leaving.

Employers' Bodies

- 9.10 We belong to external bodies who promote diversity. This includes Opportunity Now, the Employers Forum on Disability and the Employers Forum on Age. Membership of these organisations enables us to benchmark ourselves against other organisations, network and share good practice. We are keen to encourage and work with other collective bodies within the industries which we regulate.

Diversity Champions

- 9.11 We have established 'diversity champions' for the Ofcom Board, the Content Board and our Senior Management Group. These individuals bring an overview and provide advice to the Diversity Management Group on specific diversity activities and monitor the performance of statutory duties and ensure that we meet the targets we have set ourselves.

Diversity Management Group

- 9.12 Our Diversity Management Group is a sub-committee of our Executive Committee and comprises senior managers from across the organisation. It meets monthly and is responsible for co-ordinating the implementation of diversity policies across Ofcom's Groups and for managing the internal and external communication of our approach to diversity. Each Group within Ofcom is responsible for its own diversity duties. The Chief Executive reports on Ofcom's diversity performance quarterly to the main board.

Diversity Network

- 9.13 Our Diversity Network is an online community open to all Ofcom staff, including those whose work touches on elements of our diversity policy, and those who act as a link-person for their team on diversity issues. Its members are charged with looking at how diversity can be incorporated into the way Ofcom works and with contributing ideas on how Ofcom as an employer can put into practice its intentions with regard to diversity. The Diversity Network is also delegated specific projects and tasks by the Diversity Management Group where appropriate.

Affinity Groups

- 9.14 To provide a support and networking channel for colleagues we offer to support the setting up of affinity groups for staff within Ofcom. The first such group has met over the Lent period to discuss, reflect and share thoughts and themes associated with Lent. We hope further affinity groups will be set up in the coming months.

Colleague Involvement

- 9.15 We have an information and consultation forum, called The Ofcom Colleague Forum. This provides a channel for liaison on organisational developments and acts as a sounding board for discussion of plans and proposals that might affect the working environment. Its terms of reference state that it "can expect to be consulted on such matters as ... diversity and equal opportunities." We also work with the Partner Union, to ensure that our pay policies comply with 'equal pay' principles.

Section 10

Compliance

10.1 The Scheme has been drafted in the spirit of the RRAA and every individual working with Ofcom, whether a colleague or a partnership body, is responsible for adhering to this policy. Each individual will be expected to apply its principles in day to day work and activities to ensure that unlawful racial discrimination is not tolerated and that race equality is promoted throughout Ofcom.

10.2 The **Chief Executive** is responsible for ensuring that the organisation fully complies with this Scheme. Each member of the **Senior Management Team** is responsible to the Chief Executive for ensuring that his/her area of responsibility fully complies with this Scheme.

10.3 Operational responsibility for compliance with this Scheme within Ofcom rests with the **Secretary to the Corporation**, who is a member of the Senior Management Team. Contact details are as follows:

Graham Howell
Secretary to the Corporation
Ofcom
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

Fax: 020 7981 3630

Email: graham.howell@ofcom.org.uk

10.4 Ofcom employs about 800 staff, mainly based in London and is at an early stage of its development. At the request of Ofcom's Board, a Diversity Management Group (DMG) has been formed. The DMG is responsible for ensuring that Ofcom's duties under the Race Equality Scheme are effectively mainstreamed.

10.5 Objectives and targets relating to Ofcom's statutory duties regarding racial equality will be integrated into Ofcom's corporate and annual plans. The implementation of Ofcom's obligations will be monitored and reported to the Ofcom Executive Committee on a quarterly basis, and reported to the Board annually. Ofcom will report annually to the public on progress made in implementing our Race Equality Scheme and complying with our duties under the Race Relations (Amendment) Act.

10.6 Ofcom will ensure that the implementation of its statutory duties is supported efficiently with the necessary resources. Ofcom will communicate with, and train its staff affected, on the requirements of these statutory duties, on this Scheme and on how to implement them effectively.

10.7 Ofcom will conduct a comprehensive review of this Scheme within three years from the date that the Scheme is published. This review will include an assessment of how Ofcom has complied with its statutory obligations regarding race equality.

10.8 Where a person believes that s/he has been directly affected by a failure by Ofcom to comply with this Scheme s/he should, in the first instance, bring her/his complaint to

the attention of the Secretary to the Corporation at the address shown in 11.3 above. Ofcom will ensure the accessibility of the procedure for those raising complaints.

- 10.9 Ofcom will investigate the complaint or give a reason for not investigating it. Ofcom will seek to provide a substantive response to the complaint normally within one month from the date of its receipt.