



## Single Equality Scheme

## About this document

Our Single Equality Scheme sets out how we are a responsible and diverse employer and regulator. It describes our Corporate Responsibility programme, how it fits into the organisation and our key achievements since the previous 2011 Single Equality Scheme publication. The Action Plan provides a detailed account of our upcoming objectives, how we intend to reach them and what we will do in order to achieve them.

# Contents

<b>Section</b>		<b>Page</b>
1	Foreword	3
2	Summary	4
3	Introduction	5
4	About Ofcom	7
5	Corporate Responsibility	8
6	Progress since 2011	10

<b>Annex</b>		<b>Page</b>
1	Action Plan	12
2	Governance Framework for Ofcom's Single Equality Scheme	25
3	Glossary	26

## Section 1

# Foreword



**Dame Patricia Hodgson**

**Chairman**

I am delighted to introduce Ofcom's third Single Equality Scheme. Consumers and citizens are at the heart of everything Ofcom does. In our strategy to deliver benefits to consumers and citizens we are mindful of the diversity of the UK and its nations.

We are also committed to diversity amongst our colleagues, helping us to understand and reflect the diversity of the people we serve.

At Ofcom, we believe that promoting both the principles and the practices of diversity and equality is essential for us as an organisation. It creates a culture where everyone is valued on their merits and makes us more effective as an employer and as the regulator of the communications sector.

Our third Single Equality Scheme will build upon what we have already accomplished. It sets out a clear framework for our detailed programme of work. The action plan covers all functions of the organisation and explains what we will do and when it will be done. As ever, we welcome comments, your responses will help us to ensure that our progress continues and that our diversity objectives are implemented across the organisation.

## Section 2

# Summary

Ofcom's Single Equality Scheme (SES) describes in one publication how diversity and equality are essential to how we operate, both as an employer and as the UK's communications regulator. The SES is a fundamental part of our Corporate Responsibility strategy and values, both of which are driven by our desire to be a responsive, effective and successful regulator that makes a difference to the lives of consumers.

To achieve our aspirations, we take steps to ensure that we are a good employer that values and welcomes the different ideas, skills and backgrounds of our colleagues. As a policy making organisation, we need diverse people from all backgrounds to enable us to make sound decisions and policies that are representative of the different perspectives within society at large.

Under the Equality Act 2010, as a public body Ofcom has a legal duty to have due regard to the need to promote equality of opportunity, eliminate unlawful discrimination and foster good relations between the key equality strands: age; disability; gender reassignment; pregnancy and maternity; marriage and civil partnership; race; religion or belief; sex; and sexual orientation. Ofcom also has similar but distinct equality duties under Northern Ireland legislation.

We are determined to do more than just meet our statutory obligations. We promote equal opportunities and we respect and acknowledge the diversity of individuals who work both in the organisation, and in the wider community we work with. We act responsibly towards the environment and encourage our colleagues to interact with the different communities around us.

This document explains Ofcom's role as the UK's communications regulator and demonstrates the progress we have made on Corporate Responsibility which encompasses our approach to diversity and equality. Our new SES objectives outline what we hope to achieve in the next three years and we have developed a series of actions to demonstrate how we will accomplish them. The SES objectives are to:

- Have a diverse mix of people at all levels of our organisation
- Consider the different needs and interests of all individuals and stakeholders when carrying out our work; and
- Create a culture where everyone's contribution is valued on its merits.

Our SES is a working document that will be reviewed and updated on a regular basis to make sure it continues to be significant and valuable.

## Section 3

# Introduction



**Neil Buckley**

**Director - Investigations**

**Corporate Responsibility Steering Group Chair**

At Ofcom we pursue the objectives of diversity and equality not just because we have statutory duties under the single equality legislation but also because we consider that it helps us to secure our more general duties to promote the interests of citizens and consumers.

As the Chair of Ofcom's Corporate Responsibility Steering Group, my role, supported by many colleagues from across the organisation, is to champion diversity and make sure we deliver the objectives we have set in the Ofcom Single Equality Scheme. The work we do covers three areas:

- diversity and equality
- footprint and sustainability
- volunteering and community

On a more personal level, it is very gratifying to work for an organisation whose culture and values are founded on the premise that diversity improves effectiveness. Ofcom strives to recruit and retain a diverse mix of people. Our ways of working reflect the diversity of our colleagues and in turn this helps build an ethos which values each of us as an individual regardless of our differences.

I believe that a workplace where everyone is treated fairly means colleagues can be confident that their contribution will be valued and that this can motivate them to want to do more and to become better at what they do.

In the last three years we have made substantive progress in delivering the objectives that we set. Benchmarking shows that we are a top employer across all the diversity strands. It is therefore difficult to single out one area; nonetheless I am particularly pleased with the improvements that we have made to support our disabled colleagues.

It is now time for us to review our successes and also to set ourselves new and more challenging goals for the next three years. We have therefore updated our Single Equality Scheme for a third time and are pleased to publish this important document once again.

Many colleagues have contributed to the review of the Scheme and our new action plan. The Scheme has also been the subject of internal consultation with all colleagues and with the committees that represent the nations and older and disabled citizens.

We would welcome any comments or views on our plan. The format has been revised so that we hope it is clearer both as to what we will do and when any particular objective should be met.

I would like to take this opportunity to thank all those who have contributed to this document and for the anticipated contribution of colleagues in implementing the Scheme over the coming years.

## Section 4

# About Ofcom

Ofcom is the UK's communications regulator. We regulate the TV and radio sectors, fixed line telecoms, mobiles, postal services, plus the airwaves over which wireless devices operate.

Ofcom exists to further the interests of consumers and citizens through a regulatory regime, which, where appropriate, encourages competition. We make sure that people in the UK get the best from their communications services, while ensuring that competition can thrive.

## The Communications Act 2003 and the Equality Act 2010

Ofcom operates under the Communications Act 2003. Our main duties are:

- To look after our consumers and citizens in relation to communications, and promote their interests; and
- To look after everyone's interests as consumers and citizens by promoting choice and competition where we think it is needed.

The Communications Act 2003 demands that Ofcom must, for example, look to the needs of elderly and disabled people, and people on low incomes.

As well as the duties under the Communications Act, as a public authority we have general duties to promote equal opportunities under the Equality Act 2010.

This legislation states that we have a responsibility to have due regard to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between different groups; and
- foster good relations between different groups,

In the following protected groups: age; disability; gender reassignment; pregnancy and maternity; marriage and civil partnership; race; religion or belief; sex; and sexual orientation.

In addition, Section 75 of the Northern Ireland Act 1998 requires public authorities operating in Northern Ireland, such as Ofcom, to promote good relations between people of different religious beliefs, political opinions or racial groups. Ofcom is required to provide an approved Equality Scheme, specific to Northern Ireland, stating how we aim to fulfil our duties.

The Equality Act 2010 impacts on a whole range of employment issues - from providing training opportunities, giving everyone fair access to our facilities, to maternity and paternity leave and flexible working time. As an employer of approximately 800 people, we must promote equality in the way we recruit new colleagues, and in how we treat our colleagues on a day-to-day basis.

Ofcom's Corporate Responsibility programme addresses all of these duties and shapes the way we work, both as an employer and as a regulator.

## Section 5

# Corporate Responsibility

At Ofcom, we take steps to ensure we are not only a responsible employer towards our colleagues; we also recognise and manage our impact on the wider environment and community.

Our Corporate Responsibility programme brings together three key areas of activity and is led by our strategic priorities that are embedded throughout the organisation:

- Diversity and Equality – Treat all colleagues with dignity and respect in an inclusive and fair working environment, promoting equality of opportunity for all.
- Footprint and Sustainability – Reduce our carbon footprint, provide value for money and ensure Ofcom's practices are environmentally sustainable.
- Volunteering and Community – Engage, inspire and develop colleagues while proactively seeking to support our local community.

The activities and support that make up our Corporate Responsibility programme are driven by the Corporate Responsibility Steering Group (CRSG). Members hold senior management positions within the organisation and set the strategic direction of our work. They are responsible for delivering and implementing our SES and ensuring that it remains effective and relevant to our colleagues and stakeholders.

We believe that embedding Corporate Responsibility into our organisational approach is a fundamental part of our success as a regulator. Being socially and environmentally responsible reduces our operational costs. Valuing, encouraging and promoting diversity creates a more engaged and efficient workforce. Being inclusive of different communities and representative of the diversity of society allows us to make better decisions that help consumers. The following section outlines our work in the key areas of Diversity and Equality, Footprint and Sustainability and Volunteering and Community.

## 1. Diversity and Equality

Treat all colleagues with dignity and respect in an inclusive and fair working environment, promoting equality of opportunity for all.

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. Part of our ethos is to be a place where people choose to work because it offers equal and inspiring opportunities to everyone.

We monitor our policies and practices extensively through colleague surveys, benchmarking and a biennial equal pay audit. We have continued to benchmark with Stonewall, Business Disability Forum, Race for Opportunity and Opportunity Now; more details on our continued improvement can be found in section 6.

We have a clear set of values which reflect our wish to work in an open, effective and people-driven way. Our values guide what we do, the way in which we do it and encourage the right behaviour:

- Communicating openly and honestly
- Listening with an open mind
- Making a difference
- Empowering and prioritising
- Investing and supporting our colleagues
- Genuine collaboration



Our behavioural competencies, which set out the standards and expectations of the skills and behaviour required for working at Ofcom, link directly to our values.

## 2. Footprint and Sustainability

Reduce our carbon footprint, provide value for money and ensure Ofcom's practices are environmentally sustainable.

We carried out our first carbon audit in 2007, and subsequently committed to a challenging 25% reduction in carbon emissions by 2013. Our most recent audit in 2013 showed that we have met this target and surpassed it by reducing our overall footprint by 30%. We have a developed programme in place to maintain this reduction and to ensure that our operations adhere to environmental best practice.

In 2009 our commitment to carbon reduction was recognised when we attained Carbon Trust Standard certification.



## 3. Volunteering and Community

Engage, inspire and develop colleagues while proactively seeking to support our local community.

To ensure that we make a positive impact, Ofcom has established a Colleague Volunteer Scheme which enables colleagues to make a difference to the community in which we work.

For example, we run a reading mentoring scheme with a local primary school in Southwark, through which colleagues coach young children to improve their literacy skills. We work with Careers Academies UK to provide internships and mentoring for 16 to 17 year old students. We also encourage teams to take an away day volunteering at a place of their choice; these can range from the *Blackfriars Settlement* where colleagues can provide local community support, to the *London Wildlife Trust* who help maintain nature reserves across London.

## Section 6

# Progress since 2011

Our Single Equality Scheme (SES), which we published in October 2011, set out the ways we intended to be a fair and equitable employer and regulator. It had three overarching diversity and equality objectives, these were to:

- Have a diverse group of people at all levels of the organisation;
- Consider the different needs and interests of all individuals and stakeholders when carrying out our work; and
- Create a culture where everyone's contribution is valued on its merits.

The action plan covered a three year period until 2014. This was written as a working document, so we have reviewed it on a regular basis. Group Directors reported annually to the CRSG on progress against their actions and we made small adjustments to our action plan as we went along to ensure that it remained relevant and appropriate.

It was a very busy period for Ofcom, but we continued to put equality and diversity at the centre of our policy making. All our projects were screened for disproportionate impacts on any of the protected groups; we held regular events celebrating the diversity of colleagues at Ofcom and we had some excellent results when comparing ourselves to other organisations.

Highlights of our progress and achievements include:

- Being rated a top 10 public sector employer within Business in the Community's gender and race equality indexes and being included in the Times Top 50 Employers for Women for the second year running;
- Developing a disability action plan setting out how we would ensure that Ofcom is a positive place for disabled employees and consumers. We made significant progress in implementing our improvements and, as a result, gained a place in the Business Disability Forum's Roll of Honour with a bronze award.
- Continuing to improve our score in the Stonewall Workplace Equality Index, which looks at our attitude to lesbian, gay and bisexual staff;
- Hosting events throughout the year in celebration of many diversity groups, and holding a technology event for older stakeholders from the local community;
- Planning the spectrum allocation for the largest disabled sporting event in history: the London 2012 Paralympic Games;
- Instructing telecommunications providers to improve the way they provide text-relay services to deaf people;
- Sponsoring the Institute of Electrical Engineering's 'Young Female Engineer of the Year' award for the three years in a row;

- Announcing our support for Time to Change, a campaign group that works to end discrimination and stigma relating to mental health, and launching an organisation-wide programme of awareness raising activities aimed at promoting colleague wellbeing;
- Making improvements to the 'quiet room' used by colleagues at Riverside House for prayer;
- Signing the Government Equalities Office's 'Think, Act, Report' campaign. This initiative encourages organisations to identify issues they have around gender equality, take action to remedy those issues, and report on their progress;
- Successfully trialling two apprenticeships in Spectrum Policy Group and extending the scheme across the organisation;
- Implementing an applicant tracking system which will enable us to monitor the diversity of applicants for jobs from initial enquiry stage to job offer;
- Updating and improving our reasonable adjustment process and policy;
- Refreshing and updating our diversity e-learning module, which all colleagues are required to complete and refresh every three years;
- Publishing our equal pay audit, which showed that whilst there were some differences in levels of pay amongst colleagues doing similar roles, there was no gender bias
- Publishing a new maternity/paternity policy which gives colleagues of both genders a benefit well beyond statutory requirements and gives males colleagues substantially more flexibility than previously; and
- Publishing our revised Northern Ireland Equality Scheme, approved by the Equality Commission for Northern Ireland.

There is, however, still work to be done and this has been included in our refreshed action plan. Some of the activities for the future build on work already started under the existing plan. Other activities reflect changes in the regulatory environment or have been developed in response to findings from some of the benchmarking surveys in which Ofcom participates.



**Annex 1**

# Action Plan

**Organisational Mix;**

have a diverse mix of people at all levels of our organisation

- Develop and implement initiatives to increase the diversity of our workforce so that it is representative of the wider community we work in
- Attract a diversity of talent to our employment vacancies and to our non-executive positions on Boards and Committees
- Promote the reflection of a diverse talent within our promotions and career development processes

**Way of Working;** consider the different needs and interests of all individuals and stakeholders when carrying out our work in our:

**Policies**

- Encourage broadcasters to employ a diverse range of talent
- Improve the accessibility of TV and Video on Demand services
- Encourage improvements to the text relay service
- Encourage the community radio sector to serve a diverse range of communities
- Promote effective co-ordination of Ofcom's work on participation and vulnerability
- Promote availability of accessible equipment
- Encourage Communication Provider's to publicise effectively their products and services for disabled people

**Communications and engagement**

- Engage and communicate with all our stakeholders in an open and accessible manner
- Publish easy-read guides for people with learning difficulties and any other audiences that might benefit

**Processes**

- Measure the impact of diversity and equality issues in all our work
- Use our research to understand the needs of different groups of citizens and consumers
- Further our equality objectives through our procurement activities

**Culture and Values;** create a culture where everyone's contribution is valued on merit

- Continue to develop a culture in which colleagues from all backgrounds feel included and where contributions from all perspectives are valued
- Promote consistency across internal pay levels
- Contribute to the local community through our Corporate Responsibility programme of activities

We will be mindful of the diversity of the UK and its nations.

## SINGLE EQUALITY SCHEME PROGRAMME OF WORK

### 1. Organisational Mix; have a diverse mix of people at all levels of our organisation

#### 1.1 Develop and implement initiatives to increase the diversity of our workforce so that it is representative of the wider community we work in

Activity	What we will do	When we will do it
a) Review and monitor the composition of our workforce	Publish a report	Annually
b) Review and monitor the composition of our Boards and Committees	Publish a report	Annually
c) Develop action plans to address specific areas, for example the Disability Action Plan and Gender Action Plan	Implement specific actions as set out in individual plans	As set out in individual plans but with an over-arching review annually
d) Take steps to increase the number of women in engineering and technical roles at Ofcom	Continue to sponsor the IET awards Provide work placements Deliver talks at schools and colleges	Ongoing with annual review of outputs
e) Provide pathways into the organisation for young people	Continue to provide graduate placements and apprenticeships Deliver talks at schools and colleges	Annually

## 1.2 Attract a diversity of talent to our employment vacancies and to non-executive positions on our Boards and Committees

Activity	What we will do	When we will do it
a) Track and report the diversity profile of applicants at each stage of the process for recruiting employees	Publish a report Develop initiatives to address any issues	Annually
b) Monitor the diversity profile of applicants for our Boards and Committees	Publish a report Develop initiatives to address any issues	Annually
c) Work with external recruitment agencies to increase the diversity of applicants for executive and non-executive positions	Engage with all our external recruitment agencies and set them objectives	Ongoing
d) Make our recruitment process disability positive	Keep abreast of best practice and reflect it in our online recruitment portal and process. Improve our process for arranging reasonable adjustments Train relevant colleagues on their responsibilities	2014/15
e) Promote awareness and drive unconscious bias training, particularly for employees involved in the selection process	Provide training events and briefings for recruiting managers	Ongoing

### 1.3 Promote the reflection of a diverse talent within our promotions and career development processes

Activity	What we will do	When we will do it
a) Monitor, track and report the diversity profile of colleagues who are promoted	Publish a report Develop initiatives to address any issues	Annually
b) Review our promotions process and our opportunities for colleagues to develop their careers	Assess our promotions process Develop initiatives to address any issues	2014/15

**2. Way of Working; consider the different needs and interests of all individuals and stakeholders when carrying out our work in our policies; communication and engagement; and processes:**

**Policies**

**2.1 Encourage broadcasters to employ a diverse range of talent**

Activity	What we will do	When we will do it
<p>a) Encourage broadcasters to create equal opportunities for everyone they employ, including freelancers, for all diversity groups.</p>	<p>Provide up to date guidance</p> <p>Work with licensees</p> <p>Encourage the development of best practice guidelines and promote them amongst broadcasters</p> <p>Refresh our toolkit on diversity and promote the CDN's best practice guidelines as part of a white label toolkit on diversity for the smaller broadcasters which are not currently CDN members</p> <p>Support and partner with the Creative Diversity Network, Channel 4, ITV, Sky and the BBC on the Diversity Monitoring System, a standardised cross-industry monitoring tool</p>	<p>2014/15 and ongoing</p>

## 2.2 Improve the accessibility of TV and Video on Demand services

Activity	What we will do	When we will do it
a) Improve the accessibility of domestic TV services	<p>Conduct assessments of the quality of live subtitling twice a year, publish the results with the Access Services Reports (audio and visual), and work with industry to make improvements.</p> <p>Carry out monitoring, including periodic mystery shopping to ensure that services such as free directory enquiries for blind people are being promoted.</p>	Ongoing
b) Devise and consult upon proposals for non-domestic channels to meet needs of sign language users in relevant EU Members States	Consult and seek views of relevant national member organisations of European Union of the Deaf.	By 2016
c) Encourage Video on Demand (VOD) service providers to make their services more accessible to those with sensory impairments	Ofcom has designated this work to ATVOD and will act in a supporting role. ATVOD will publish a report providing a resource for service providers that indicates the best way to overcome common hurdles in access service provision on VOD.	2014/15 and ongoing

### 2.3 Encourage improvements to the text relay service

Activity	What we will do	When we will do it
a) Encourage improvements to the text relay service	Monitor the service and work with industry and disability representatives to support improvements to the service	2014/15 and ongoing

### 2.4 Encourage the community radio sector to serve a diverse range of communities

Activity	What we will do	When we will do it
a) Encourage the community radio sector to serve a diverse range of communities around the UK	Provide a community radio licensing system that's open and accessible, so that community radio serves a diverse audience	Ongoing

### 2.5 Promote effective co-ordination of Ofcom's work on participation and vulnerability

Activity	What we will do	When we will do it
a) Promote effective co-ordination of Ofcom's work on participation and vulnerability	Develop the internal Participation and Vulnerability Coordination Group to examine participation and vulnerability issues.	2014/15 and ongoing

## 2.6 Promote availability of accessible equipment

Activity	What we will do	When we will do it
a) Promote the availability of easy to use equipment	<p>Publish and maintain web resources about usability.</p> <p>Work with others to increase knowledge and good practice, for example taking part in research and events.</p>	Ongoing

## 2.7 Encourage Communication Providers to publicise effectively their products and services for disabled people

Activity	What we will do	When we will do it
a) Encourage services for disabled people to be well-publicised as well as provided	Carry out monitoring, including periodic mystery shopping	Ongoing

## Communications and engagement

### 2.8 Engage and communicate with all our stakeholders in an open and accessible manner

Activity	What we will do	When we will do it
a) Meet consumer and citizen needs appropriately when they contact Ofcom	Train colleagues to be able to support the needs of all citizens and consumers.	2014/15 and ongoing
b) Consider the needs of consumers and stakeholders when producing content so it is easy to understand	Where possible, produce clear and user-friendly communications	Ongoing
c) Continue to develop our website so that it meets current accessibility standards	Provide an accessible website	Ongoing
d) Reflect the diversity of society in our communications	Produce inclusive communications	Ongoing
e) Make diversity groups aware of when a project or policy may impact them	Communicate in such a way that specific diversity groups are aware of our work	Ongoing

### 2.9 Publish easy-read guides for people with learning difficulties and any other audiences that might benefit

Activity	What we will do	When we will do it
a) Publish easy-reading guides for people with learning difficulties	Publish guides	Ongoing

## Processes

### 2.10 Measure the impact of diversity and equality issues in all our work

Activity	What we will do	When we will do it
a) Take account of diversity and equality as a matter of course in our market research	Conduct research that considers the different needs of stakeholders	Ongoing
b) Undertake equality impact assessments for all our policies and projects	Assess the impact on different diversity groups for all our work	Ongoing
c) Evaluate wider equality and diversity issues raised by MPs	Monitor correspondence from MPs and analyse equality issues raised with Ofcom via this correspondence.	Ongoing
d) Give proper weight to diversity, accessibility and equality when contributing to international policy debates	Contribute to improving diversity policies, both at EU-level and internationally	Ongoing
e) Promote the interests of citizens by examining how communications services contribute to all parts of society	Encourage communication services to meet the needs and expectations of a diverse range of citizen groups, meaning that all members of society are able to access and engage with essential communication services.	Report in 2014 and ongoing

## 2.11 Use our research to understand the needs of different groups of citizens and consumers

Activity	What we will do	When we will do it
a) Use our research to widen awareness and gain an indicative understanding of the experiences, needs and media literacy among different groups of consumers, including minority groups such as ethnic minority groups, disabled people and older people	Conduct research and produce reports	Ongoing

## 2.12 Further our equality objectives through our procurement activities

Activity	What we will do	When we will do it
a) Consider and reflect our equality objectives in our procurement practices	Procure goods and services taking into account our diversity objectives	2014/15 and ongoing

### 3. Culture and Values; create a culture where everyone's contribution is valued on merit

#### 3.1 Continue to develop a culture in which colleagues from all backgrounds feel included and where contributions from all perspectives are valued

Activity	What we will do	When we will do it
a) Engage and consult with colleagues	Run regular full colleague surveys and pulse surveys. Follow up with focus groups and specific action plans.	Every two years
b) Promote diversity awareness events within Ofcom	A series of internal events and presentations.	Ongoing
c) Communicate and train managers and colleagues on our reasonable adjustments policy	Communicate the policy through briefing sessions and on our intranet	Ongoing

#### 3.2 Promote consistency across internal pay levels

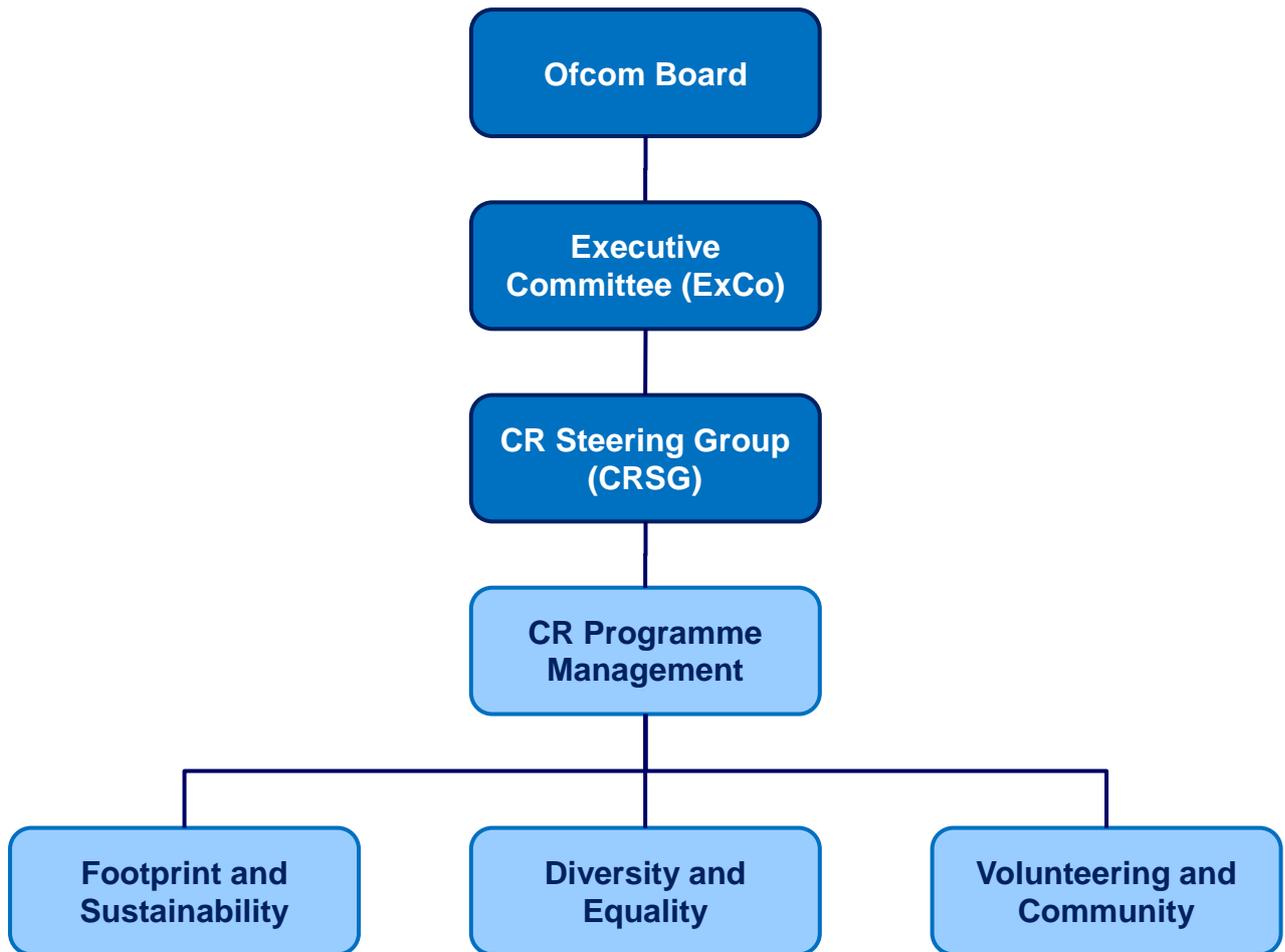
Activity	What we will do	When we will do it
a) Conduct an equal pay audit	Publish an equal pay report and take follow up action where necessary	Every two years

### 3.3 Contribute to the local community through our Corporate Responsibility programme of activities

Activity	What we will do	When we will do it
a) Run a programme of colleague volunteering activities	Provide volunteering opportunities for colleagues	Ongoing

Annex 2

# Governance Framework for Ofcom's Single Equality Scheme



## Annex 3

# Glossary

### **Colleagues**

All people employed by Ofcom

### **CRSG**

Ofcom's Corporate Responsibility Steering Group, who are responsible, amongst other things, for delivering and implementing our SES.

### **EIA**

Equality impact Assessment, designed to discover how a policy or project might affect diversity groups.

### **Executive Committee**

Responsible for overseeing the management of Ofcom.

### **The 'general duties'**

The duties of public bodies such as Ofcom to promote equality of opportunity and tackle discrimination in the areas of disability, gender and race.

### **Groups**

Ofcom departments.

### **LGBT**

Lesbian Gay Bisexual Transgender

### **Protected characteristics or protected groups**

As described in the Equality Act 2010, the projected groups or characteristics include; Race, Disability, Gender reassignment, Pregnancy and maternity; Religion or belief; Sex; and Sexual orientation.

### **SES**

Ofcom's Single Equality Scheme.