

---

# Diversity and Inclusion in Broadcasting – updating Ofcom’s workforce data collection

Call for Inputs

**CONSULTATION:**

Publication Date: 7 April 2022

Closing Date for Responses: 19 May 2022

# Contents

---

## Section

1. Overview	2
2. Background	3
3. Call for Inputs	5

## Annex

Annex 1. Diversity in broadcasting for tv workforce survey 2021	20
Annex 2. Diversity in broadcasting for radio workforce survey 2021	21
Annex 3. Responding to this Call for Input	22
Annex 4. Ofcom's consultation principles	25
Annex 5. Consultation coversheet	26

# 1. Overview

## Call for Inputs to review our Diversity in Broadcasting Workforce Surveys

Having employees that represent our society helps broadcasters to create innovative, imaginative and authentic TV and radio programmes that reflect the lives and experiences of their audiences.

Ofcom has a legal duty to promote equality of opportunity in broadcasters' workforces. We can ask broadcasters to provide information about their equal opportunities policies and the make-up of their staff.

Since 2016 Ofcom has collected this information from broadcasters using yearly broadcaster surveys.<sup>1</sup> We ask for quantitative data on the make-up of each workforce, and qualitative information on policies and initiatives around diversity and inclusion.

Over the last five years our monitoring programme has driven greater transparency and accountability across the industry. Our work has helped broadcasters to better understand who is working for them and where there are specific areas which need addressing. This data has enabled us to shine a light on areas of underrepresentation in the industry and to monitor the progress of broadcasters' efforts to improve representation through their diversity and inclusion work.

We know more than ever about the makeup of the broadcasting sector, but there remain gaps in our knowledge – where we ask for information on a voluntary basis (e.g. around socio-economic background), where we ask questions in a particular way (e.g. around sex/gender) or where we don't yet ask any questions at all (e.g. around geographic location).

In our [Five-year review](#) in 2021 we announced our intention to review the data we collect from broadcasters. As society's attitudes towards diversity and inclusion develop Ofcom must continually reflect on what we do and how we do it in order to best carry out our duties to promote equality of opportunity for people of all backgrounds.

This Call for Inputs focuses solely on the quantitative section of the data survey.

Our aim is to gather information that helps us to collect better, more complete data that enables us to achieve our objectives to identify underrepresentation and monitor broadcaster efforts to increase representation. There are four areas of focus for this document:

Are we asking the right questions in the right way to achieve our objectives?

Are we using the most appropriate and inclusive language in our questions?

Are we collecting the right amount of data to achieve our objectives and are there new areas of data we should collect?

Are we effectively benchmarking the data we collect to achieve our objectives?

This Call for Inputs is the first step in the process of updating our survey and reviewing the suitability of the information we collect. We will publish our findings and set out our plans in the Autumn.

---

<sup>1</sup> There are two surveys, one for TV and one for radio, both are annexed at the end of this document.

## 2. Background

### Ofcom's approach to diversity data collection

- 2.1 Every year, Ofcom collects information from broadcasters on the diversity of people working for them. This is one way in which we deliver our duties under the Communications Act 2003 (“the Act”), which requires Ofcom to take steps it considers appropriate for promoting equality of opportunity in relation to employment and training/retraining by the television and radio broadcasters we regulate, between men and women (sex), persons of different racial groups and for disabled people.
- 2.2 Ofcom must also set licence conditions requiring broadcasters to make arrangements for promoting equality of opportunity between men and women, people of different racial groups and for disabled people.<sup>2</sup> In doing so, broadcasters must have regard to Ofcom's published [Guidance](#).
- 2.3 Ofcom does not have powers under the Act to: set and/or enforce workforce diversity quotas or targets; require the provision of data on the freelance broadcasting workforce; manage or enforce ring-fenced or contestable funding; or handle complaints relating to workforce diversity.
- 2.4 We believe that it is vital for people from diverse backgrounds to be present and thriving at all levels within broadcasting. A diverse and inclusive broadcasting sector is not just an aim in its own right but is a key ingredient for TV and Radio programmes which authentically represent and portray all audiences.<sup>3</sup> It matters who makes the programmes we watch and listen to.
- 2.5 This is why, in addition to requiring broadcasters to provide employee information on sex, race and disability, we also ask for data on some of the other protected characteristics set out in the Equality Act 2010 (“the Equality Act”) on a voluntary basis. These are currently religion or belief, sexual orientation and age, in addition to these protected characteristics we ask about socio-economic background.
- 2.6 By collecting and reporting quantitative and qualitative diversity workforce data we aim to:
- highlight where underrepresentation exists in the industry revealing the barriers that stall diversity and equality in broadcasting; and
  - monitor the overall efficacy of broadcasters' diversity and inclusion strategies at removing these barriers and improving diversity and inclusion within the industry.
- 2.7 In September 2021, we published our Five-year review of diversity and equal opportunities in UK broadcasting. We:

---

<sup>2</sup> In instances of non-compliance with their licence conditions, Ofcom can take enforcement action against broadcasters.

<sup>3</sup> Ofcom's research shows time and again how important it is for audiences to be able to connect with characters and personalities that they watch or listen to

- observed that, while we know more than ever about the makeup of the broadcasting sector, gaps remain in our understanding of areas where broadcasters provide us with information on a voluntary basis, such as religion, sexual orientation, and socio-economic background;
- highlighted areas where we do not currently collect data but consider it would be useful to do so, such as geographic location, gender identity and intersectional data (where some different characteristics may interact significantly to reduce equality of opportunity, referred to in this document as 'cross-sectional' data);
- considered that it is time to re-evaluate the data we collect and how best to collect and report on it; and
- said that we would launch this Call for Inputs, to inform our thinking on how best to update and improve the quantitative workforce questionnaire we ask broadcasters to complete.

## 3. Call for Inputs

### Scope

- 3.1 The purpose of this Call for Inputs is to gather information from stakeholders in order to develop the quantitative sections of our [TV Workforce Questionnaire](#) and [Radio Workforce Questionnaire](#).
- 3.2 Ahead of publishing this Call for Inputs we have had discussions with a range of stakeholders to help further develop our thinking on the areas to focus on to improve our data collection. As a such, we are asking for views on:
- whether the questions we ask broadcasters are giving us the data we need to achieve our objectives (see 2.6);
  - whether the language and definitions we use to refer to diversity characteristics are appropriate and inclusive;
  - the breadth of the data we request from broadcasters, including geographical locations and cross-sectional data; and
  - how we can improve the consistency and further increase the value of the data we collect, through re-evaluating our benchmarks and aligning our questionnaire to other data sets.
- 3.3 For broadcasters answering this Call for Inputs, we are also asking for information on how you currently collect data from your employees in relation to particular characteristics.
- 3.4 This Call for Inputs does **not** cover:
- the qualitative section of the workforce questionnaire;
  - how Ofcom uses workforce data to inform policy decisions;
  - whether Ofcom should require broadcasters to implement specific diversity and inclusion schemes or initiatives;
  - data collection concerning freelancers; or
  - Ofcom’s [Guidance](#) on Diversity in Broadcasting.

### Updating Language and Questions

#### Introduction

- 3.5 In the Five-year review we said that we would ask stakeholders to comment on the way in which we pose questions about the characteristics captured in our questionnaire, including the terminology we use.
- 3.6 Given that one of our key objectives is to identify underrepresentation, in many cases one clear option is for us to follow the current guidance provided by the Office for National Statistics (“ONS”). Much of the ONS guidance was recently reviewed to inform the 2021

Census. In the past we have used the data collected by the ONS as a “benchmark” or point of comparison in relation to the UK working age population.<sup>4</sup> If we ask questions in the same way as the ONS it will make it easier for us to compare broadcasters’ workforces with the population more generally.

- 3.7 We aim to use appropriate and inclusive language in our surveys. We believe that this may increase the number of employees willing to answer questions and provide data.

### Sex and Gender

We require broadcasters to provide data relating to men and women, which can also be expressed as ‘sex’.<sup>5</sup> At present, we do not ask broadcasters to provide quantitative information on gender identity or the protected characteristic of gender reassignment.<sup>6</sup> Gathering more complete data on the gender identities of the broadcasting workforce will help Ofcom highlight where there is underrepresentation in the industry and build a picture of the barriers people with diverse gender identities face.

- 3.8 It is worth noting that, as we can only require broadcasters to provide data on sex, any data on gender identity would have to be given voluntarily.

- 3.9 There are a number of ways we could collect data on sex and gender. It is important for us to consider how we can better align our questions to ensure they are comparable to key benchmarks, such as the Census. The ONS guidance for questions on sex and gender identity recommends the following two questions:

What is your sex?

- Male
- Female

Is the gender you identify with the same as your sex registered at birth?

- Yes
- No [Enter gender identity]<sup>7</sup>

- 3.10 We are keen to hear from stakeholders on the best way to ask these questions to ensure they are inclusive, better aligned with relevant benchmarks and helps us to achieve our objectives.

---

<sup>4</sup> See section 7 of the [Methodology](#) document which accompanied our 2021 Five Year Review, for example.

<sup>5</sup> This is because of the way our legal duties are expressed in the Communications Act 2003 which refers to equality of opportunity between men and women. In the Equality Act 2010 the protected characteristic of ‘sex’ is said to be a reference to the characteristics of being a man or a woman.

<sup>6</sup> Section 7(1) of the Equality Act states that a person has the protected characteristic of gender reassignment “if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person’s sex by changing physiological or other attributes of sex”.

<sup>7</sup> Information on how the ONS developed these questions can be found [here](#).

## Figure 1: Current terminology used to refer to sex and gender as it appears in the workforce questionnaire

### Section C: Gender

- a) Male
- b) Female
- c) Other (e.g. Intersex, non-binary)
- d) Employee preferred not to disclose
- e) Data not collected

### Question 1

- 1.a Do you think Ofcom should change the way it asks about sex and gender?
- 1.b If yes, how do you think we should change the questionnaire in relation to how it asks about sex and gender to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 1.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sex and gender.

### Sexual orientation

- 3.11 We ask broadcasters to provide information to Ofcom in relation to sexual orientation on a voluntary basis.
- 3.12 When referring to sexual orientation, in our annual monitoring reports to date, we have used the acronym “LGB” (Lesbian, Gay, Bisexual) in place of “LGBT”, “LGBTQ+” or other such acronyms that encompass a broader spectrum of sexualities and identities. Our rationale for using LGB has been based on the legal definition of sexual orientation as a protected characteristic in the Equality Act. We have used this term when monitoring broadcasters’ workforces to achieve consistency over our initial five-year review period.
- 3.13 We recognise that sexual orientation encompasses more sexualities than lesbian, gay and bisexual. As part of our wider review of our workforce questionnaire, we think now is an appropriate time to revisit the terminology we use for sexual orientation in our workforce questionnaire.
- 3.14 Please note, we intend to capture gender identities under sex and gender in our workforce questionnaire and annual monitoring reports (see ‘Sex and Gender’, above). We recognise that gender identity and sexuality are often taken together due to complex shared histories within the LGBTQ+ community. However, we see value in separating the gender and sexuality questions for the purposes of this survey so we can accurately report on underrepresentation of different parts of the LGBTQ+ community in broadcasting.

## Figure 2: Current terminology used to refer to sexual orientation as it appears in the workforce questionnaire

### Section G: Sexual Orientation

- a) Heterosexual/ Straight
- b) Gay men
- c) Gay women/ Lesbian
- d) Bisexual
- e) Other sexual orientation

### Question 2

- 2.a Do you think Ofcom should change the way it asks about sexual orientation?
- 2.b If yes, how do you think we should change the questionnaire in relation to how it asks about sexual orientation to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 2.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sexual orientation.

### Race and ethnicity

- 3.15 Broadcasters are required to provide information to Ofcom in relation to the race and ethnicity of their employees.<sup>8</sup>
- 3.16 A recent paper from the Lenny Henry Centre<sup>9</sup> criticising the widespread use of the acronym 'BAME' (rhyming with name) resulted in a public commitment from many broadcasters to avoid the use of the term. Since we began our Diversity in Broadcasting work in 2017, we have not used the acronym 'BAME' in our reporting, instead opting for the term M.E.G. (Minority Ethnic Group). However, we recognise that, where possible, it is preferable not to use a collective acronym at all as this does not differentiate between the varying experiences of people of different races/ethnicities.
- 3.17 While we do not use the term 'BAME' in our reporting, it is still used in the workforce questionnaire as an option after we list out numerous more specific options, as seen in Figure 3. We use a collective term in the survey to ensure there is an option for those people who would prefer not to disclose the specifics of their ethnicity. It is also used to enable smaller broadcasters who do not collect detailed data to still complete the section. We would like to hear from stakeholders about whether we should continue to include any

---

<sup>8</sup> The Communications Act 2003 requires us to promote equality of opportunity between persons of different racial groups. "Racial groups" is defined in section 9 of the Equality Act or in the case of Northern Ireland in the Race Relations (Northern Ireland) Order 1997

<sup>9</sup> Sir Lenny Henry Centre. [BAME: A report on the use of the term and responses to it. Terminology Review for the BBC and Creative Industries.](#)

collective term alongside the specific options and if so, whether that term should be B.A.M.E., M.E.G. or alternative terminology.

- 3.18 We could change the way we ask for data on race and ethnicity. For example, we could add more options (such as nationality) to the list to ensure we accurately capture diversity of background to pinpoint underrepresented groups. This could also ensure that people are more likely to recognise themselves in the options and provide this data. In doing this we would need to consider how we could effectively benchmark this data against ONS population statistics to achieve our goal of understanding where there is underrepresentation in the industry.

### **Figure 3: Current groupings used to refer to different racial groups as it appears in the workforce questionnaire**

#### **Section D: Racial Group**

- 1) White:
  - a) English / Welsh / Scottish / Northern Irish / British
  - b) Irish
  - c) Central or Eastern European
  - d) Gypsy or Irish traveller
  - e) Other white background
- 2) East Asian / East Asian British:
  - a) Chinese
  - b) Other East Asian background
- 3) South Asian / South Asian British:
  - a) Indian
  - b) Pakistani
  - c) Bangladeshi
  - d) Other South Asian background
- 4) Black / African / Caribbean / Black British:
  - a) African
  - b) Caribbean
  - c) Other black / African / Caribbean background
- 5) Mixed:
  - a) White and Black Caribbean
  - b) White and Black African
  - c) White and Asian
  - d) Other mixed / multiple racial background

- 6) Other:
- a) Middle Eastern, including Arabic origin
  - b) Other ethnic group
  - c) Black, Asian and Minority Ethnic (BAME)
  - d) Employee preferred not to disclose
  - e) Data not collected

### Question 3

- 3.a Do you think Ofcom should change the way it asks about race and ethnicity?
- 3.b If yes, how do you think we should change the questionnaire in relation to how it asks about race and ethnicity to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 3.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on race and ethnicity.

### Disability

- 3.19 Broadcasters are required to provide information to Ofcom about their employees in relation to disability.
- 3.20 While the industry has made significant progress since 2017/18 in gathering information from employees on disability, Ofcom recognises that issues remain in the collection of disability data which could be helped by Ofcom requesting that broadcasters ask different questions of their employees. Many employees may choose not to identify as disabled. This may be because they do not consider themselves disabled despite having a condition that would be considered an impairment by the Equality Act<sup>10</sup> or because they feel uncomfortable declaring a condition to their employer.
- 3.21 At present, our workforce questionnaire sets out a list of types of disability (or no disability). We are aware that this can be construed as an unhelpful approach as it focusses on disability as an inherent feature of the person (known as the ‘medical model’ of disability) rather than a feature of the way in which a person is functionally impaired by the organisation of their environment / society (the ‘social model’). We understand that some people view the social model as more helpful as it focuses on recognition and removal of barriers. For example, we note that the charity Scope has adopted the social model for understanding disability in its Everyday Equality Strategy.<sup>11</sup>
- 3.22 We also recognise that people with the ‘same type’ of disability may have very different needs and experiences in the workplace. However, there may be merit in retaining these questions to identify broad differences in the obstacles faced by different people. We

---

<sup>10</sup> The Equality Act 2010 states that a person has a disability if they have physical or mental impairment, and the impairment has a substantial and long-term adverse effect on a person’s ability to carry out normal day-to-day activities.

<sup>11</sup> See Scope’s [‘Social model of disability’](#) article.

would value views on whether our question should be amended to introduce different ‘groupings’, for example in line with the harmonised standard for questions on impairment produced by the Government Statistical Service.<sup>12</sup>

- 3.23 In our Five-year review, we referred to the approach taken by the ONS in the most recent census,<sup>13</sup> which includes asking about long-term illnesses and conditions and the extent to which they reduce a person’s ability to carry out day to day activities. We could in our survey, ask a question along these lines instead or in addition to our current question (or a variation of it) and would value stakeholders views.

#### **Figure 4: Current terminology used to refer to disability as it appears in the workforce questionnaire**

##### **Section E: Disability**

- a) No disability
- b) Sensory disability (e.g hearing/visually impaired)
- c) Physical Disability / Muscular-skeletal (inc. co-ordination, dexterity, mobility, wheelchair user)
- d) Mental Health (inc serious depression, bipolarity)
- e) Cognitive / Learning disabilities (inc. dyslexia, Down’s syndrome, autism)
- f) Multiple, Long term or other disability / condition (This includes conditions such as diabetes, epilepsy, arthritis, asthma, speech impairments, facial disfigurements)
- g) Has a disability
- h) Employee preferred not to disclose
- i) Data not collected

##### **Question 4**

- 4.a Do you think that Ofcom should change way it asks about disability?
- 4.b If yes, how do you think we should change the questionnaire in relation to how it asks about disability to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 4.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on disability.

##### **Socio-economic background**

- 3.24 While not listed as a protected characteristic under the Equality Act, we recognise that understanding the socio-economic background of broadcasters’ workforces is crucial to understanding the barriers to opportunity faced by some in entering or progressing in the industry. However, as we said in the Five-year review, we currently receive only a limited

---

<sup>12</sup> Government Statistical Service. [Impairment harmonised standard](#).

<sup>13</sup> Government Statistical Service. [Measuring disability for the Equality Act 2010 harmonisation guidance](#).

amount of visible data<sup>14</sup> (across both TV and radio broadcasters) about the socio-economic background of staff.

3.25 In section I of our workforce questionnaire, we ask broadcasters to provide information on four aspects of their employees' socio-economic background:<sup>15</sup>

- i) The occupation of the main household earner when the employee was aged 14;
- ii) The type of school the employee attended for the most time between the ages of 11-16;
- iii) The highest level of qualification achieved by either parent(s) or guardian(s) by the time the employee was 18; and
- iv) Whether the employee was eligible for Free School Meals at any point during their school years.

3.26 The questions we currently use to collect information regarding socio-economic background, take a similar approach to the Social Mobility Commission's cross-industry toolkit.<sup>16</sup> However, as outlined in the Social Mobility Commission's accompanying report,<sup>17</sup> we are aware that this approach has several limitations. For example, the Social Mobility Commission considers that the questions requesting information on the highest parental qualification may not reflect that the parent had a bursary to attend higher education or that they got the qualification later in life.<sup>18</sup>

3.27 To increase the quantity and breadth of usable data we collect in this area, we welcome views on approaches we could take to help ascertain the socio-economic background of broadcasters' employees and to reflect current thinking in this area.

3.28 As in other areas, as far as possible we are aiming for questions that will enable us to compare broadcaster employees with the general working population. However, most available information on the population looks at current socio-economic **status** (e.g. occupation) rather than socio-economic **background** (e.g. parental occupation). We would welcome views on whether we are asking our questions in a useful way to meet our objective of monitoring underrepresentation, which may suggest where barriers to entry and progression might exist.

---

<sup>14</sup> Visible data refers to data that; an employer has requested from an employee; an employee has disclosed to their employer; and the employee has consented to share with Ofcom.

<sup>15</sup> Please see Annex I for the full breakdown of the socio-economic groupings we use in our workforce questionnaire.

<sup>16</sup> Social Mobility Commission. (2020). '[Social Mobility Commission's cross-industry toolkit](#)'

<sup>17</sup> Social Mobility Commission. (2021). '[Simplifying how employers measure socio-economic background: An accompanying report to new guidance](#)'

<sup>18</sup> Social Mobility Commission. (2021). '[Simplifying how employers measure socio-economic background: An accompanying report to new guidance](#)'

## Figure 5: Current terminology used to refer to socio-economic background as it appears in the workforce questionnaire

### Section I: Socio-economic background

#### 1. Occupation of main household earner when employee was aged 14.

- a) Modern professional occupations (such as teacher, nurse, physiotherapist, social worker, musician, police officer [sergeant or above], software designer).
- b) Clerical and intermediate occupations (such as secretary, personal assistant, clerical worker, call centre agent, nursery nurse).
- c) Senior managers or administrators - usually responsible for planning, organising and co-ordinating work, and or finance (such as finance manager, chief executive).
- d) Technical or craft occupations (such as motor mechanic, plumber, printer, electrician, gardener, train driver).
- e) Semi-routine manual and service occupations (such as postal worker, machine operative, security guard, caretaker, farm worker, catering assistant, sale assistant).
- f) Routine manual and service occupations (such as HGV driver, cleaner porter, packer, labourer, waiter/waitress, bar staff).
- g) Middle or junior managers (such as office manager, retail manager, bank manager, restaurant manager, warehouse).
- h) Traditional professional occupations (such as accountant, solicitor, medical practitioner, scientist, civil / mechanical engineer).
- i) Long term unemployed (claimed Jobseeker's Allowance or earlier unemployment benefit for more than a year).
- j) Inactive (including those that were retired).
- k) Don't know / not applicable
- l) Employee preferred not to disclose
- m) Data collected but no consent to provide to Ofcom
- n) Data not collected

2. What type of school employee attended for the most time between the ages of 11 – 16.
  - a) State-run or state-funded school – selective on academic, faith or other grounds
  - b) State-run or state-funded school – non-selective
  - c) Independent or fee-paying school – bursary
  - d) Independent or fee-paying school – non-bursary
  - e) Attended school outside of the UK
  - f) Don't know
  - g) Employee preferred not to disclose
  - h) Data collected but no consent to provide to Ofcom
  - i) Data not collected
3. Highest level of qualification achieved by either of parent(s) or guardian(s) by the time employee was 18.
  - a) Degree level or degree equivalent or above (e.g first or high degrees, postgraduate diplomas, NVQ/SVQ, level 4 or 5 etc)
  - b) Qualifications below degree level (e.g A-Level, SCE Higher, O-Level, SCE Standard / Ordinary, NVQ/SVQ, BTEC etc)
  - c) No qualifications
  - d) Don't know
  - e) Employee preferred not to disclose
  - f) Data collected but no consent to provide to Ofcom
  - g) Data not collected
4. Whether employee was eligible for Free School Meals at any point during their school years.
  - a) Yes
  - b) No
  - c) Not applicable (finished school before 1980 or went to school overseas)
  - d) Employee preferred not to disclose
  - e) Data collected but no consent to provide to Ofcom
  - f) Data not collected

### Question 5

- 5.a Do you think Ofcom should change the way it asks for information about socio-economic background?
- 5.b If yes, how do you think we should change the questionnaire in relation to socio-economic background to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 5.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on socio-economic background.

### Job titles and groupings

- 3.29 Our objective in this area is to gain a more nuanced understanding of the opportunity to progress through organisations from non-management roles to senior decision-making roles. We are particularly interested in gaining a deeper insight into those holding senior positions who are often more able to influence both recruitment and the content that is broadcast to audiences. Accurately reflecting seniority and job title groupings within companies can help us identify which groups of employees in a broadcaster's workforce are underrepresented and, understand where barriers to progression may exist.
- 3.30 Currently, we collect data on employees in different job areas and the seniority of staff. As Figure 5 shows, we currently divide job title groupings into three categories: senior management, junior/middle management, and non-management. We are now considering how we could re-evaluate the groupings used for job levels and titles to gain more transparency and better understanding of seniority and influence within the broadcasters' organisations.
- 3.31 In our Five-year review, we said that we would explore including a more detailed approach to data on promotions. We would welcome views on the merit of adding detail to the question on promotions to ascertain who is being promoted into a senior management role.
- 3.32 We are aware that some broadcasters find it difficult to map the job titles and groupings in their organisations to the job groupings listed in our questionnaire. We would welcome views on how we could change these to better reflect the realities of the job types and functions in broadcasting. It is important we can accurately map diversity data onto job functions so we can better understand whether there is underrepresentation in certain job types in the industry.

## Figure 6: Job role groupings and joiners and leaver information currently included in the workforce survey

### For TV and Radio

1. UK based employees who joined your organisation between DATE and DATE
2. UK based employees who left your organisation between DATE and DATE
3. UK based employees who completed development training between DATE and DATE
4. UK based employees who were promoted between DATE and DATE
5. UK based employees at senior management level
6. UK based employees at junior/middle management level
7. UK based employees at non-management level

### For TV

8. UK based employees in a broadcast management role
9. UK based employees in a business management and administration role
10. UK based employees in an organisational, technical, engineering and data analytics role
11. UK based employees in a sales and marketing role
12. UK based employees in a creative and content role
13. UK based employees in a journalism role
14. UK based employees in an on-screen talent role

### For Radio

15. UK based employees in a programmes / programming role
16. UK based employees in a journalism / news role
17. UK based employees in a technical / engineering role
18. UK based employees in a sales role
19. UK based employees in a marketing / press / PR role
20. UK based employees in a support functions / admin role

### Question 6

6.a Do you think that Ofcom should change the way it asks about management experience and promotions?

6.b If yes how do you think we should change the questionnaire in relation to management experience and promotions to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

6.c Do you think that Ofcom should change the job function groupings in the workforce questionnaire?

6.d If yes, how do you think we should change our questionnaire in relation to job function groupings to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

6.e If you are a broadcaster or other data-collecting body, please provide information on the way you currently classify job types / seniority / promotions.

## Widening the scope of data collection

### Diversity data for the Nations and Regions

- 3.33 We want to better understand representation of the protected characteristics (and socio-economic background) across the UK's regions and nations. We see value in identifying how the diversity of workforces compares to regionally specific population data, so we can better understand whether broadcasters are reflecting the diversity of the communities in which they operate.
- 3.34 We are keen to hear from stakeholders on the best way to collect geographic data to meet our objectives. While most staff at broadcasters with multiple UK offices have a hub to which they are assigned, changing work patterns since the pandemic mean that many people no longer go to their assigned office and may live many miles away from it. We need to consider whether asking for diversity data by hub is an effective way of understanding whether staff are representative of the community in which that hub is based. The benefit of collecting data by hub is that it would highlight how well broadcasters are tackling underrepresentation in their workforces throughout the UK. For example, if a broadcaster is meeting targets in its Manchester office but not in the Cardiff office, we can encourage it to assess why this might be the case and how it may need to vary the approach to recruitment and retention in different places.
- 3.35 Alternatively, we could request data on where staff live. We could ask broadcasters to aggregate employees' postcode data into regions so that we could take an industry wide view of the diversity of broadcasters' workforces by region, as compared to the population data for that area. There are benefits to collecting data in this way for organisations that have a flexible approach to home and office working, for example some staff might work multiple days a month in two office locations and at home. Using postcode data may give us the most useful and stable data as ways of working change in ways we cannot always anticipate. We would welcome views on this topic.

### Question 7

- 7.a Should Ofcom collect diversity data by nation and region?
- 7.b If yes, how do you think we should ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 7.c If you are a broadcaster, please provide information on the data you current collect on the geographic location of your workforce.

### Cross-sectional data

- 3.36 In our Five-year review’s recommendations to broadcasters, we stated that the industry needs to provide Ofcom with intersectional data, to help us to build an understanding of how disadvantage is compounded where particular characteristics are combined (whether in relation to protected characteristics or other characteristics such as socio-economic background or geographic location). We already collect data on sex and age and so are able to provide insight into the experience of – for example – older women.
- 3.37 As part of our Five-year review, our commissioned consultants *Included* recommended that future research “should adopt an intersectional approach to ensure the challenges arising from complex identity categories are understood. The collection of intersectional data can, in turn, help build better informed target inclusion strategies.”
- 3.38 We aim to start collecting cross-sectional<sup>19</sup> data. However, as the scope for cross-sectional data is large, we would welcome views on which cross-sections of data are likely to shed light on compounded disadvantage and potential barriers to full representation.

### Question 8

- 8.a Do you think Ofcom should collect cross-sectional data?
- 8.b If yes, how should we ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 8.c If you are a broadcaster or other data collecting organisation, please provide information on what cross-sectional data you currently use within your organisation

## Reviewing data consistency and collection

### Re-evaluating our Benchmarks

- 3.39 Throughout the Five-year review, we compared broadcasters’ workforce data with relevant UK benchmarks. The benchmarks are generally corresponding data from the ONS in relation to the UK labour market (for sex, race and ethnicity, disability and age).

---

<sup>19</sup> In this document we use the term ‘cross-sectional’ instead of ‘intersectional’ to avoid confusion as we are aware that ‘intersectional’ can be used more narrowly to refer only to the cross-section of particular characteristics

- 3.40 However, we highlighted in the Five-year review the potential need to re-evaluate the benchmarks we use, to accurately assess the diversity of broadcasters' workforces. For example, we highlighted that many of the main broadcasters have a strong presence in major cities, such as London and Manchester, where minority ethnic populations are larger than the 12% UK wide benchmark, at 35% and 31% respectively. We have also flagged that for some characteristics, such as socio-economic background, obtaining comparable UK-wide data is not straightforward.
- 3.41 We would welcome views on whether it is preferable for Ofcom to benchmark any of its current data in a different way. For the current benchmarks used, please refer to section 7 of the [Methodology](#) document which accompanied our Five-year review.

#### Question 9

- 9.a Do you think Ofcom should change and expand the benchmarks it uses?
- 9.b If yes, how do you think we should change our benchmarks to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 9.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently benchmark data (particularly in relation to socio-economic background and diversity in different geographical regions).

### Other areas for consideration

- 3.42 Given the broad scope of this Call for Inputs, we would like to provide you with the opportunity to give your views on aspects of our data collection practices that we have not focussed on. For example, we have not asked specifically about age and religion or belief, which are two protected characteristics that we also ask about in our workforce questionnaire. We would welcome input from anyone who believes these two areas would also benefit from updated questions (including terminology used in the questionnaire response options).

#### Question 10

Do you have any views on other aspects of data collection practices that we have not considered in this Call for Inputs?

# Annex 1. Diversity in broadcasting for tv workforce survey 2021

The latest version of the current diversity in broadcasting tv workforce survey can be found [here](#).

## Annex 2. Diversity in broadcasting for radio workforce survey 2021

The latest version of the current diversity in broadcasting radio workforce survey can be found [here](#).

# Annex 3. Responding to this Call for Input

## How to respond

- A3.1 Ofcom would like to receive views and comments on the issues raised in this document, by 5pm on 19 May 2022
- A3.2 You can download a response form from <https://www.ofcom.org.uk/consultations-and-statements/XXX>. You can return this by email or post to the address provided in the response form.
- A3.3 If your response is a large file, or has supporting charts, tables or other data, please email it to [diversityinbroadcast@ofcom.org.uk](mailto:diversityinbroadcast@ofcom.org.uk), as an attachment in Microsoft Word format, together with the [cover sheet](#).
- A3.4 Responses may alternatively be posted to the address below, marked with the title of the consultation:
- Natalie Fox  
Ofcom  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA
- A3.5 We welcome responses in formats other than print, for example an audio recording or a British Sign Language video. To respond in BSL:
- send us a recording of you signing your response. This should be no longer than 5 minutes. Suitable file formats are DVDs, wmv or QuickTime files; or
  - upload a video of you signing your response directly to YouTube (or another hosting site) and send us the link.
- A3.6 We will publish a transcript of any audio or video responses we receive (unless your response is confidential)
- A3.7 We do not need a paper copy of your response as well as an electronic version. We will acknowledge receipt of a response submitted to us by email.
- A3.8 You do not have to answer all the questions in the consultation if you do not have a view; a short response on just one point is fine. We also welcome joint responses.
- A3.9 It would be helpful if your response could include direct answers to the questions asked in the consultation document. The questions are listed at Annex 6. It would also help if you could explain why you hold your views, and what you think the effect of Ofcom's proposals would be.
- A3.10 If you want to discuss the issues and questions raised in this consultation, please email [diversityinbroadcast@ofcom.org.uk](mailto:diversityinbroadcast@ofcom.org.uk).

## Confidentiality

- A3.11 Consultations are more effective if we publish the responses before the consultation period closes. In particular, this can help people and organisations with limited resources or familiarity with the issues to respond in a more informed way. So, in the interests of transparency and good regulatory practice, and because we believe it is important that everyone who is interested in an issue can see other respondents' views, we usually publish responses on [the Ofcom website](#) at regular intervals during and after the consultation period.
- A3.12 If you think your response should be kept confidential, please specify which part(s) this applies to, and explain why. Please send any confidential sections as a separate annex. If you want your name, address, other contact details or job title to remain confidential, please provide them only in the cover sheet, so that we don't have to edit your response.
- A3.13 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and try to respect it. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A3.14 To fulfil our pre-disclosure duty, we may share a copy of your response with the relevant government department before we publish it on our website. This is the Department for Business, Energy and Industrial Strategy (BEIS) for postal matters, and the Department for Culture, Media and Sport (DCMS) for all other matters.
- A3.15 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's intellectual property rights are explained further in our [Terms of Use](#).

## Next steps

- A3.16 Following this consultation period, Ofcom plans to publish a statement in Autumn 2022.
- A3.17 If you wish, you can [register to receive mail updates](#) alerting you to new Ofcom publications.

## Ofcom's consultation processes

- A3.18 Ofcom aims to make responding to a consultation as easy as possible. For more information, please see our consultation principles in Annex 4.
- A3.19 If you have any comments or suggestions on how we manage our consultations, please email us at [consult@ofcom.org.uk](mailto:consult@ofcom.org.uk). We particularly welcome ideas on how Ofcom could more effectively seek the views of groups or individuals, such as small businesses and residential consumers, who are less likely to give their opinions through a formal consultation.
- A3.20 If you would like to discuss these issues, or Ofcom's consultation processes more generally, please contact the corporation secretary:

Corporation Secretary  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA  
Email: [corporationsecretary@ofcom.org.uk](mailto:corporationsecretary@ofcom.org.uk)

## Annex 4. Ofcom's consultation principles

### Ofcom has seven principles that it follows for every public written consultation:

#### Before the consultation

- A4.1 Wherever possible, we will hold informal talks with people and organisations before announcing a big consultation, to find out whether we are thinking along the right lines. If we do not have enough time to do this, we will hold an open meeting to explain our proposals, shortly after announcing the consultation.

#### During the consultation

- A4.2 We will be clear about whom we are consulting, why, on what questions and for how long.
- A4.3 We will make the consultation document as short and simple as possible, with an overview of no more than two pages. We will try to make it as easy as possible for people to give us a written response.
- A4.4 We will consult for up to ten weeks, depending on the potential impact of our proposals.
- A4.5 A person within Ofcom will be in charge of making sure we follow our own guidelines and aim to reach the largest possible number of people and organisations who may be interested in the outcome of our decisions. Ofcom's Consultation Champion is the main person to contact if you have views on the way we run our consultations.
- A4.6 If we are not able to follow any of these seven principles, we will explain why.

#### After the consultation

- A4.7 We think it is important that everyone who is interested in an issue can see other people's views, so we usually publish the responses on our website at regular intervals during and after the consultation period. After the consultation we will make our decisions and publish a statement explaining what we are going to do, and why, showing how respondents' views helped to shape these decisions.

# Annex 5. Consultation coversheet

## BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

## CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing

Name/contact details/job title

Whole response

Organisation

Part of the response

If there is no separate annex, which parts? \_\_\_\_\_

---

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

## DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom aims to publish responses at regular intervals during and after the consultation period. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

## Annex 6. Consultation questions

Ofcom's objective when changing its questionnaire is to identify underrepresentation in broadcasting and highlight the barriers to progression in the industry.

### Question 1

- 1a) Do you think Ofcom should change the way it asks about sex and gender?
- 1b) If yes, how do you think we should change the questionnaire in relation to sex and gender to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 1c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sex and gender.

### Question 2

- 2a) Do you think Ofcom should change the way it asks about sexuality?
- 2b) If yes, how do you think we should change the questionnaire in relation to sexual orientation to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 2c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sexual orientation.

### Question 3

- 3a) Do you think Ofcom should change the way it asks about race and ethnicity?
- 3b) If yes, how do you think we should change the questionnaire in relation to race and ethnicity to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 3c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on race and ethnicity.

### Question 4

- 4a) Do you think that Ofcom should change way it asks about disability?
- 4b) If yes, how do you think we should change the questionnaire in relation to disability to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?
- 4c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on disability.

#### Question 5

5a) Do you think Ofcom should change the way it asks for information about socio-economic background?

5b) If yes, how do you think we should change the questionnaire in relation to socio-economic background to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

5c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on socio-economic background.

#### Question 6

6a) Do you think that Ofcom should change the way it asks about management experience and promotions?

6b) If yes how do you think we should change the questionnaire in relation to management experience and promotions to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

6c) Do you think that Ofcom should change the job function groupings in the workforce questionnaire?

6d) If yes, how do you think we should change our questionnaire in relation to job function groupings to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

6e) If you are a broadcaster or other data-collecting body, please provide information on the way you currently classify job types / seniority / promotions.

#### Question 7

7a) Should Ofcom collect diversity data by nation and region?

7b) If yes, how do you think we should ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

7c) If you are a broadcaster, please provide information on the data you current collect on the geographic location of your workforce.

#### Question 8

8a) Do you think Ofcom should collect cross-sectional data?

8b) If yes, how should we ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

8c) If you are a broadcaster or other data collecting organisation, please provide information on what cross-sectional data you currently use within your organisation.

#### Question 9

9a) Do you think Ofcom should change and expand the benchmarks it uses?

9b) If yes, how do you think we should change our benchmarks to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

9c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently benchmark data (particularly in relation to socio-economic background and diversity in different geographical regions).

#### Question 10

Do you have any views on other aspects of data collection practices that we have not considered in this Call for Inputs?