

Diversity and equal opportunities in **television** and **radio** 2019/20

Report on the UK-based broadcasting industry



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Executive summary

This is a unique year, and during lockdown we have all relied more than ever on broadcasters to keep us up to date, entertain us and bring us all together. Our research tells us that people want programmes that authentically portray life across the UK. They want shows that reflect their experiences and content they can trust. But we can't expect broadcasters to do this if their employees don't represent us in all our diverse characteristics and backgrounds.

This is Ofcom's latest report on the workforce diversity of UK broadcasters. We know that the pandemic has brought immense challenges for the industry, but it also offers new opportunities. These extraordinary times provide a chance to set out a plan for real change. Our goal is for UK broadcasters to regroup and rebuild for the future, with diversity and inclusion at their core.

Ofcom's reporting

For the past four years, Ofcom has held the broadcasting industry to account with annual monitoring reports on its workforce diversity. This year we are reporting on figures from a pre-pandemic period, 2019/20, which also precedes the death of George Floyd, the subsequent anti-racism protests and the ongoing public debate on racial inequality. Because of the significance of all these events, we also consider the response of broadcasters after the 2019/20 reporting period.

For the first time we have combined TV and Radio findings. In this report, we look at the actions that Ofcom and the broadcasters need to take to become quicker and more effective in making their workforces representative of the country. As part of the report we have published three new **data-rich interactive tools**, providing greater access to the information we collect. These can be explored by characteristic or by broadcaster, and also provide the full text of broadcasters' answers to our questionnaire, enabling people to interrogate the make-up of companies' workforces and understand the work broadcasters are doing to effect change.

Workforce diversity in 2019/20

Before the Covid-19 crisis there was some progress:

- More data was collected: this is particularly true for Radio broadcasters who are now collecting information on 93% of their workforce for disability, compared with 74% for Television broadcasters.
- Broadcasters (TV and Radio combined) appear to be employing a greater proportion of women (48%) minority ethnic people (14%) and disabled people (7%) in the UK than they did last year.
- Broadcasters undertook a [range of activities](#) to diversify their workforces and create a more inclusive culture within their organisations.

But progress is still far too slow and too many people are being left behind as some groups remain consistently under-represented:

- Disabled people are under-represented at all organisational levels; overall, only 7% of Television employees and 6% of Radio employees were disabled, compared with 19% of the working age population.
- Minority ethnic people – and particularly Black colleagues – are under-represented in senior management across the industry: 8% of those employed by TV broadcasters in senior management roles are from a Minority Ethnic Group (“MEG”) compared with a national workforce average of 12% (which increases to 35% in London and 31% in Manchester). Black colleagues are more underrepresented in senior management than other minority ethnic groups, at 1% (compared with 3% of the working population).

Accelerating change in 2021

We know that organisational change takes time and the legacy of underrepresentation and missed opportunities can't be turned around overnight. But we believe that with more focused effort, faster, more sustainable transformation can and should be achieved. We are encouraged by the renewed commitment we have seen across the industry during 2020. Diversity and inclusion must be seen as a shared endeavour if the industry is to change.

During the next twelve months we particularly want to see progress in these three key areas:

1. Critical under-representation

First, we want to see further improvement, and clear targets and plans in these areas:

- Greater progress in the representation of disabled people at all levels; and
- A faster increase in the diversity of crucial decision-makers (senior management, as well as employees in commissioning, content and creative roles), specifically addressing the under-representation of Black colleagues.

2. Understanding class and geographic diversity

Second, a new effort to understand and measure representation by class and geography. We know that a person's socio-economic background and where they live can have a massive effect on their opportunities in broadcasting, where employees are nearly twice as likely to have attended private school as the general working age population. We need to be able to understand better how other characteristics such as ethnicity interact with class and geography.

3. Accountability

Third, we expect broadcasters – in particular those in leadership roles - to be accountable for delivering not just diversity initiatives but real change. That includes:

- setting clear measurable workforce targets and diversity and inclusion objectives, with tangible outcomes;
- undertaking better, more transparent, evaluation of work designed to produce change, so that efforts can be focused and results accelerated; and
- holding production partners to account for meeting diversity requirements.

Ofcom's role

Continued engagement

This report is a product not just of data collection but of our continued, wide ranging engagement with those who know and care about diversity and inclusion in broadcasting. Since our last report, we've held dozens of meetings with people right across the creative industry, including broadcasters, commentators, academics, journalists, Diversity & Inclusion experts, freelancers, charities, industry bodies, and unions. We are determined to make sure that over the next year we continue to receive guidance, information and advice from a diverse range of people and organisations. As part of this, in 2021 Ofcom will also bring together many of these voices in a **special event**, which will hear from people right across industry and also look at the progress on our three priority areas above.

Collective action

We think far more can be achieved if broadcasters learn from each other and work together. To help this happen, Ofcom set up a regular **roundtable for TV and Radio**. This group of broadcasters has already been meeting to identify areas for collaboration and to share best practice. In the coming months it will explore:

- how best to measure and understand diversity of class and geographic diversity within workforces;
- collaborating on definitions of a 'diverse production'; and
- producing tools to find and access diverse talent.

We know that the diversity of the broadcast industry relies not just on broadcaster employees but also on the huge number of freelancers who work for independent production companies. This is why we believe that it is vital for broadcasters to support the Creative Diversity Network's 'Diamond' data monitoring programme.

Information and transparency

Ofcom's **monitoring** programme has formed the backbone of our Diversity and Inclusion work for the past four years. We'll continue to identify specific areas of weakness through our data collection, and work with broadcasters individually and collectively to address them.

Our **research** has underpinned better understanding of the importance and meaning of diversity to audiences across the country. In 2021 we'll be looking at what's missing from the existing research base to identify any areas which might benefit from further scrutiny. Alongside this report we have launched our refreshed [online diversity hub](#), which provides a centralised public resource for information and knowledge sharing, and includes Ofcom's formal guidance.

Ofcom too must continue to learn and challenge our own thinking. As an employer, we will act with the same degree of transparency that we require of those we regulate. As a regulator, we will remain open to constructive criticism and feedback on our approach, always seeking to ensure that we are making the most of our position to influence change.



Context

This report presents data from Ofcom’s most recent monitoring of the workforce diversity of the broadcasters we regulate, for the financial year 2019/201. For the first time the report combines TV and Radio monitoring data, in acknowledgement that the issues faced are largely the same across broadcasters. This is Ofcom’s fourth report on diversity in TV broadcasting, and the third for Radio.² For more information on Ofcom’s duties in this area, see the methodology report which accompanies this document.

Numerical data in this year is presented in a new interactive format (see tools [one](#) and [two](#)) which allows readers to interrogate the figures and explore particular areas of interest.

We have also asked broadcasters to address specific questions on their work to improve equality of opportunity, and for the first time, their answers are [presented verbatim](#), increasing the transparency with which we report on their activity.

Covid-19

This has not been a typical year, and we have made adjustments in our data collection and reporting in response to the Covid-19 crisis, which began towards the end of the reporting period and remains an issue worldwide. Consistent with Ofcom’s response to companies who faced resourcing challenges during this period across the various sectors we regulate, we required information from only the larger broadcasters (those with 100 or more employees) and requested less detailed data. As we continue to believe that high quality, comprehensive data collection is vital to hold broadcasters to account on improving diversity, we will be requiring broadcasters to supply the outstanding data for 2019/20 with next year’s data submission.

Looking to the future, we also asked broadcasters focused questions on the challenges and opportunities that have arisen from the pandemic. Our goal is for the industry to regroup and rebuild, with diversity and inclusion at its core.

¹ The reporting period is the complete months of April 2019 to March 2020 inclusive.

² In previous years, the reporting period for Radio broadcasters was calendar years. However, they have now reported on the financial year for the first time, to align with the reporting period for TV broadcasters.

Anti-racism protests

Worldwide anti-racism protests, following the death of George Floyd, have amplified the national conversation on diversity, and given an increased sense of urgency to this work. Ofcom is seizing this chance to understand better the issues of systemic inequality in the broadcasting industry, so that broadcasters can tackle these more effectively.

A number of broadcasters have announced significant steps in response to the anti-racism protests, either by making more diversity commitments or by accelerating their existing diversity strategies. We consider these initiatives in the section, ‘Accelerating change’, below.

What has Ofcom done since its last reports³?

What we said we would do	The progress we have made
Continue to seek additional powers to require broadcasters’ equal opportunities arrangements to cover a broader range of protected characteristics.	We remain committed to driving progress, but the public debate on diversity has been fast moving. We have been working with government, industry and other stakeholders to establish the best set of regulatory powers needed to drive greater diversity across the broadcasting industry.
Take enforcement action against those broadcasters who did not respond to our request for information.	We pursued enforcement action against those broadcasters who did not comply with our 2019 information request and recorded breaches of our rules ⁴ .
Share knowledge from our diversity and inclusion activity.	Ofcom has been holding quarterly roundtables with industry diversity leads to facilitate knowledge-sharing and best practice, and to foster industry-wide action. We also share ideas and information from our perspective as an employer. This forum is one way in which we can support diversity in the freelance workforce, explored in more detail in Annex 2.
Hold an industry event to refresh thinking on diversity.	Though plans for an industry event in the autumn have been postponed until 2021, due to Covid-19, diversity themes were prominent in discussions at Ofcom’s Small Screen: Big Debate event on the future of public service broadcasting in the UK. This virtual conference included a panel debate with the CEOs of the PSBs, all of whom stated their commitment to increasing diversity.

³ See our [second report into radio diversity](#) and our [third report into television diversity](#)

⁴ See for example our [Broadcast and On Demand Bulletin issue number 387](#)

What we said we would do	The progress we have made
Understand the impact of subscription video-on-demand (SVoDs) on diversity and inclusion in the UK ⁵ .	Our Media Nations 2020 report revealed that the greatest area of growth in the UK's viewing of content during lockdown has been for SVoDs, such as Netflix, Amazon Prime Video and Disney+. We have been engaging with these companies over their diversity strategies in the UK; some insights from the SVoDs are included in Annex 3.

What we asked broadcasters to do

In Ofcom's 2019 diversity reports, we detailed the areas we advised broadcasters to focus on in the coming year:

Sector	Area for improvement	Summary
TV and Radio	Representation	One major matter of concern for Ofcom was the general lack of representation of disabled people, so we said that broadcasters should improve this across all levels of their organisations. We also said that implementing targeted measures would help them achieve this, at the same time recognising the bold and ambitious goal the a number of Television broadcasters ⁶ had publicly set themselves of doubling their disability figures in Television production by 2020 ⁷ . Ofcom also identified a general lack of representation of people from minority ethnic backgrounds in Radio, as well as when it came to progressing to senior levels in Television We said broadcasters should seek to widen their talent pool, noting that Radio still compared poorly against UK workforce average, while Television should consider the diversity of the working age population in the (mainly) metropolitan areas in which they are based. We also highlighted a need for all broadcasters to improve representation of women in senior roles.

⁵ In last year's Diversity in Television report, we said that as there is likely to be greater recruitment from the UK production sector and wider labour market by these SVoD companies, we would like to take the opportunity to better understand the impact of these platforms on career development and progression for underrepresented talent in the industry. Our ambition is to gain a clearer, more holistic picture of diversity and inclusion when it comes to the future of the changing Television landscape.

⁶ These TV broadcasters are the BBC, ITV, Sky, Channel 4 and ViacomCBS. For details see the [Doubling Disability web pages](#):

⁷ Although broadcasters have had to extend the Doubling Disability project into 2021 due to Covid-19, the Creative Diversity Network commissioned a [research report](#) at the end of last year as part of the initiative.

Sector	Area for improvement	Summary
TV and Radio	Social mobility	Ofcom said it was imperative that all broadcasters took a holistic approach to social mobility, considering its interaction with protected characteristics, to increase industry access to all parts of society. Recognising there had already been Television industry-wide events on social mobility, Ofcom said it would like to see further collaboration between Television broadcasters on increasing the data collection on the social and economic background of their workforces.
Television	Evaluation	Ofcom said it expected broadcasters to evaluate and monitor all diversity initiatives, ideally including elements of quantitative and qualitative research, more focused engagement with employees, and check in points throughout the period of the project, to be able to adapt and improve how things are done.
Radio	Clear goals	Ofcom said, to address shortfalls in representation, broadcasters should set defined targets with clear delivery dates to assess progress, demonstrating a clear public commitment to improving shortfalls, which can also help inspire a more inclusive culture.
Radio	Leavers	There continued to be large gaps in information, across nearly all groups, on the number of people leaving a broadcaster, so we said we would like to see monitoring of leavers improve significantly.

Details of how the industry has responded to our 2019 expectations can be found throughout this report, and in particular in the section ‘Behind the numbers’ below. The broadcasters’ responses can be found in full in [Data Tool 3](#). For the reasons outlined above, we have asked fewer broadcasters to respond to this year’s diversity information request and we have not asked for the same amount of data⁸ or information that we have in previous years. Therefore, broadcasters may have undertaken activity in response to our 2019 expectations which is not reflected in their responses this year. Where appropriate, we acknowledge when progress has been made or where it appears that more work is required.

⁸ Ofcom will require broadcasters to supply the outstanding data for 2019/20 with next year’s data submission.



The numbers

As required by their licence conditions, broadcasters must make arrangements for promoting equality of opportunity in employment between men and women, people of different racial groups and disabled people, and make arrangements for training. To help us assess how they're meeting these obligations, we require them to provide data on the make-up of their workforces for each of these characteristics⁹, as well as information on training. We also report information that broadcasters are asked to provide voluntarily on three other characteristics outlined in the Equality Act 2010¹⁰ (age; sexual orientation; and religion or belief) and on socio-economic background¹¹.

We have presented this year's numerical data in two interactive tools, which can be used to compare 2019/20 data with those of the previous two years:

Tool 1: An overview of the entire broadcasting industry across six characteristics - sex, racial group, disability, age, sexual orientation and religion or belief. Employee figures can be broken down by level of seniority, and data can be viewed at an aggregated industry, main broadcaster¹² or other broadcaster level, for both TV and Radio.

Tool 2: Compares UK-based employee profiles across eight major UK broadcasters, with benchmarking against the UK workforce make-up.

In this section we look at key findings and how much progress has been made in the figures since our 2018/19 report. We use 'pp' to refer to a percentage point change, i.e. a rise from 10% to 15% is a 5pp change.

In last year's reports we called on broadcasters to keep up momentum in promoting diversity and inclusion and urgently to improve the representation of disabled people at all levels and minority ethnic groups and women at senior levels in particular. We asked broadcasters to understand their workforce through improved data collection, set clear goals, and focus on those leaving the industry. We highlighted the important role that understanding social mobility can play in improving opportunities for people with one or more protected characteristics.

⁹ We refer to these characteristics as the 'mandatory characteristics'.

¹⁰ The Equality Act 2010 applies in Great Britain. Different equality law applies in Northern Ireland.

¹¹ Throughout this report, we use the term 'class' as an informal shorthand to refer to socio-economic background.

¹² BBC, ITV, Channel 4, ViacomCBS and Sky for TV, and BBC Radio, Global and Bauer for radio.

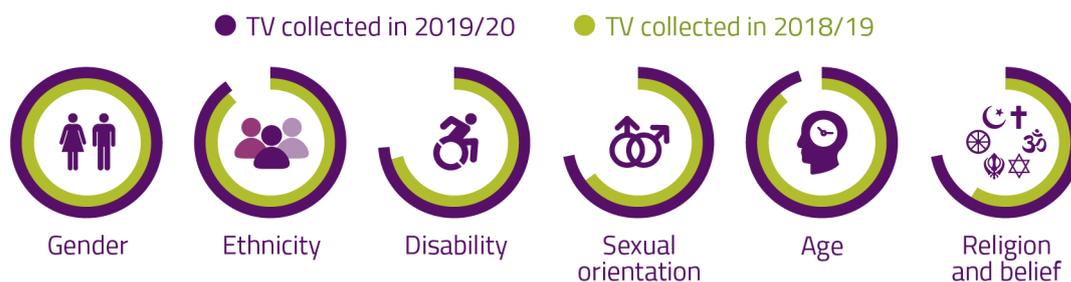
We understand that organisational change can take time, but we remain concerned about the pace of change. Broadcasters have commonly told us they have prioritised initiatives relating to race/ethnicity over the past year, followed by gender and then disability. However, we are not yet seeing this focus translate into greater representation in the workplace.

Data collection – closing the gap

Last year we asked the main broadcasters to show leadership by boosting diversity and demonstrating commitment to understanding their workforces.

There have been encouraging signs, as more employees in the Television industry continue to share their data on sexual orientation, as well as religion or belief, with ITV collecting data on religion or belief for the first time. Disclosure of disability information is also on the rise. Sky in particular has made significant progress in addressing large data gaps¹³, particularly for sexual orientation and religion or belief where it has increased collection by 14/15 percentage points, to 75% and 76% respectively. However, these three characteristics still account for the largest groups of ‘not collected’ data across TV and we urge all broadcasters to push for further improvements. We would particularly like to see ViacomCBS address its disability data gap, which at 64% is the largest for any of the main broadcasters across the mandatory characteristics.

TV Broadcasters – how much information was collected?



Radio broadcasters – how much information was collected?



When it comes to gaps in the overall data, the picture across the Radio industry has also improved.. As well as more data being collected, more data was ‘visible’¹⁴ to Ofcom. This was particularly true

¹³ We refer to ‘not collected’, ‘data gap’ and ‘no data’ where an employer has not requested data or the employee has not responded at all to the request or the employer left a section of our questionnaire blank without explanation.

¹⁴ ‘Visible data’ is that which has been collected and which the employee has disclosed to their employer and consented to share with Ofcom.

for Global which had large increases in visible data for disability (up from 38% to 82%), sexual orientation (up from 37% to 77%) and religion and belief (up from 34% to 62%) and we welcome this improvement. However, as the chart above shows there's still considerably more for the Radio industry to do.

Spotlight on the major TV and Radio broadcasters

Figure 1 below shows how the eight main broadcasters' workforces¹⁵, together with those of the public service broadcasters ("PSBs") in the Nations, compare to national working age population benchmarks for each of the protected characteristics. Further information can be found in Annex 1, and all data for the main eight broadcasters (including breakdowns by age, sexual orientation and religion or belief) is included in our [interactive Tool 2](#), where they can be explored in more detail.

Indicates the proportion is below the benchmark for the UK working age population
Indicates the proportion is on or above the benchmark for the UK working age population
Arrows indicate whether the proportion has risen, fallen or stayed the same since 2018/19
*** indicates that the numbers are too small to report, for data protection reasons

Figure 1: Broadcasters comparison to national working age population benchmarks

Broadcaster	Characteristic	All Levels		Senior Management		Promotion		Visible Data	
		19/20		19/20		19/20		19/20	
TV									
	Women	45%	↑	43%	→	42%	↓	100%	→
	MEG	14%	↑	8%	↓	13%	↓	96%	→
	Disabled	10%	→	8%	↓	7%		96%	→
	Women	55%	↓	45%	↑	50%	↓	97%	↓
	MEG	17%	↓	***		13%	↓	95%	↓
	Disabled	10%	↓	***		***		86%	→
	Women	54%	↑	44%	→	54%	↑	100%	→
	MEG	11%	↑	8%	→	14%	↑	85%	↑
	Disabled	7%	↑	***		***		78%	↓

¹⁵ By 'main TV broadcasters' we mean the TV broadcaster groups with the largest share of the UK audience: BBC, ITV, Channel 4, ViacomCBS and Sky (see the [Barb Viewing Report 2020](#) page 29).

By 'main Radio broadcasters' those broadcasters with the largest share of the UK audience: BBC, Global and Bauer Radio.

Broadcaster	Characteristic	All Levels		Senior Management		Promotion		Visible Data	
		19/20		19/20		19/20		19/20	
	Women	41%	↑	39%	→	42%	↑	100%	→
	MEG	18%	↑	8%	→	21%	↑	85%	→
	Disabled	4%	↑	***		***		69%	↑
 (Includes Channel 5)	Women	54%	↑	46%	↑	52%	↑	100%	→
	MEG	20%	→	12%	↑	28%	↑	100%	↑
	Disabled	8%	→	***		***		36%	↑
Radio									
 MEDIA GROUP	Women	58%	↑	48%	↑	45%	↓	100%	→
	MEG	6%	↑	***		***		97%	↓
	Disabled	7%	↓	***		***		94%	↑
 BBC RADIO	Women	51%	↑	42%	↑	57%	↑	100%	→
	MEG	9%	→	6%	↓	***		97%	→
	Disabled	9%	→	13%	↑	***		93%	→
 global	Women	53%	→	45%	↑	57%	↑	100%	→
	MEG	12%	↑	8%	↑	***		95%	↑
	Disabled	3%	↑	***		***		82%	↑
PSBs in the nations									
 S4C	Women	35%		***		***		58%	
	MEG	***		***		***		61%	
	Disabled	***		***		***		2%	
 stv	Women	50%	↑	***		58%	↑	99%	↓
	MEG	4%	↑	***		***		93%	↑
	Disabled	7%	↑	***		***		60%	↑

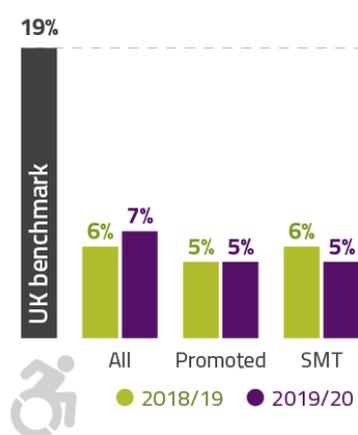
Progress by characteristic

Disability

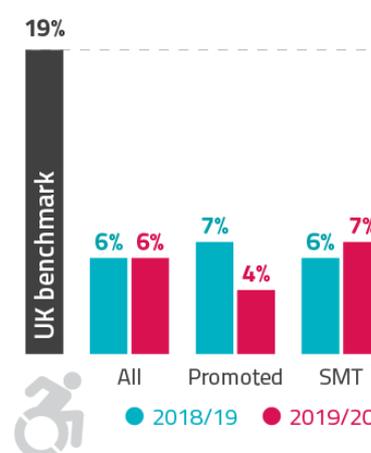
Last year we said that the Television industry had fallen short in reflecting the true diversity of the UK population, across its workforce. The most stark disparity in representation was for disabled workers, and this remains the case.

Although broadcasters are collecting more information on disability (up 3pp to 74% for TV and up 5pp to 93% for Radio), we are not seeing any apparent progress in this area. Typically the figures year-on-year have shown a fluctuation of around 1-2 percentage points up or down, which suggests there has been no meaningful increase in opportunity for disabled people working in broadcasting.

Disabled employees in TV



Disabled employees in Radio



Of the eight largest broadcasters, only three (ITV, Sky and Global) increased the representation of disabled people at an all colleague level last year. While this is progress, in each case the improvement was from a very low base, taking them up to 7%, 4% and 3% respectively. It is also of concern that Bauer Radio recorded a 2pp fall in its total disabled workforce bringing it down to 7%. BBC TV and Channel 4 achieve the best levels of representation for all colleagues at 10% but this represents a 1pp fall for Channel 4 and no change for BBC TV.

At senior management level BBC Radio increased its representation of disabled people by 2pp to 13%. BBC TV, the only other broadcaster with numbers large enough to report on, fell 1pp to 8%.

The main Television broadcasters have signed up to the **'Doubling Disability'¹⁶ initiative**, but the deadline for delivery of those targets has been delayed for a year until December 2021 in response to the impact of Covid-19. In light of this, and the above data, we want to see all broadcasters adopt clear plans with targeted action and measurable outcomes, to provide more opportunities for more disabled people to join and progress in their workforces (see Accelerating Change). We will be following up with each of the main broadcasters to understand more about what they are currently doing, and how they intend to tackle this ongoing representation deficit more effectively.

¹⁶ See footnote 6

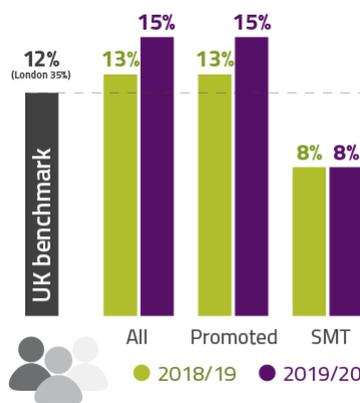
Race / ethnicity

Overall representation of minority ethnic groups increased. We are pleased to see increases in the proportion of colleagues being promoted who are from Minority Ethnic Groups (MEG), as this is an important way of addressing the acknowledged shortfall in more senior positions. However, across the sector the changes in promotion opportunities does not yet appear to be translating into more MEG colleagues in senior management.

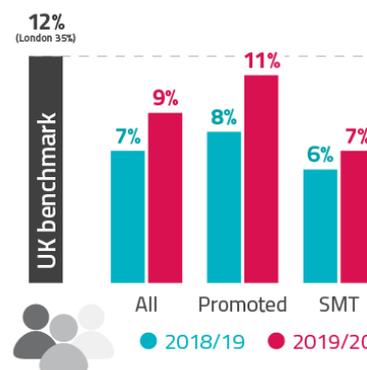
In TV, there was a small improvement from 13% to 15% for all UK-based employees, above the national workforce benchmark of 12%, but well below the figure for London (35%) and Manchester (31%) where most broadcasters are based. ViacomCBS (20%), Sky (18%) and Channel 4 (17%) continued to lead among the main broadcasters at the all colleague level.

For the Radio industry overall, the rate of increase was greater, up from 6% to 9%, but was still below the national workforce figure.

MEG employees in TV



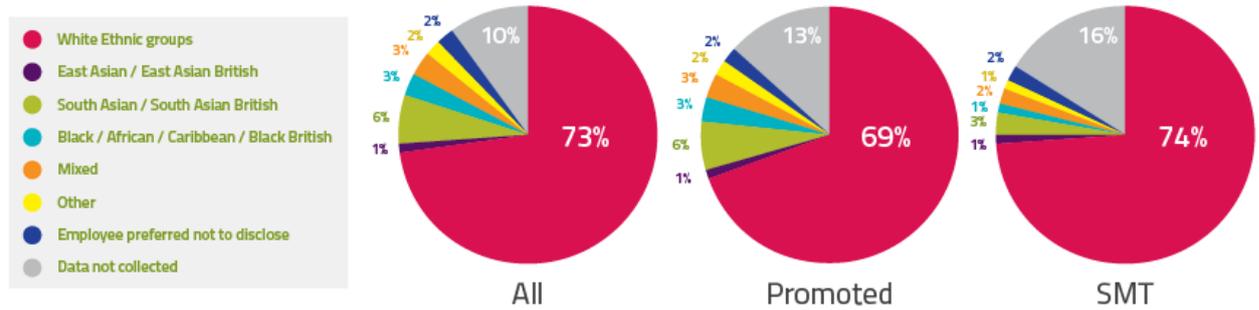
MEG employees in Radio



It is not possible to understand the inequalities at play here if we consider these colleagues as a single homogenous group. When we look at the breakdown figures for 2019/20, we can see that the proportion of South Asian and Black employees in Television was 6% and 3% respectively – in line with or above the UK working age population (5% and 3% respectively¹⁷), as is the proportion of colleagues promoted. However, both Black and South Asian colleagues are less likely to be employed in a senior management position: by a factor of half for South Asian employees and a third for Black employees. This is a pattern we also see across the wider freelance industry – see the Creative Diversity Network’s latest report [Racial and Ethnic Diversity: a deep-dive into Diamond data](#). For the actions we expect broadcasters to take to address under-representation in their own workforces, see the section ‘Accelerating Change’ below.

¹⁷ ONS Labour market statistics [A09: Labour market status by ethnic group](#) (Average of Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20). All in employment.

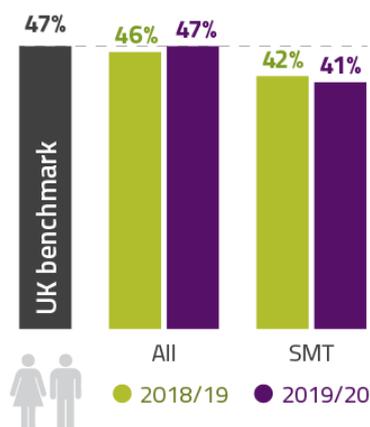
Breakdown of TV employees by specific minority ethnic group



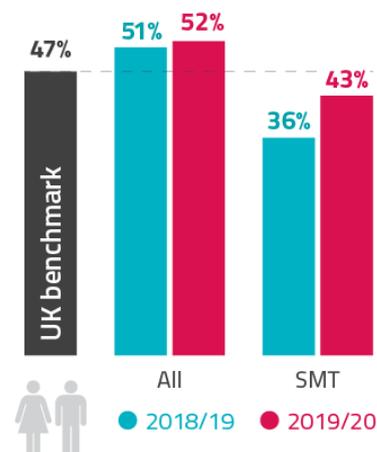
Gender

Looking at the whole of the broadcasting industry, the proportion of women employed quite closely reflects the UK working age population more generally (47% of which is female). Of the largest broadcasters, Bauer, BBC Radio, Channel 4, Global, ITV and ViacomCBS all outperformed national benchmarks for the representation of woman at the all employee level in 2019/20. Women remain underrepresented at senior levels though. Radio now leads TV in this respect with the proportion of senior roles occupied by women rising by 7pp to 43% (while in TV the proportion fell by 1pp to 41%). Bauer made impressive progress, increasing female senior management representation by 12pp to 48%, becoming the only broadcaster to surpass the national representative benchmark (47%) this year. Global also substantially increased its representation of senior women (by 10pp) up to 45%.

Women in TV



Women in Radio



Sexual orientation

Our data show that the levels of representation for LGB colleagues¹⁸ - in common with other characteristics - are fairly static, averaging between 6-8% of workforces, with the exception of Sky which records just 3% of its workforce as LGB. Given the lack of consistent nationally representative

¹⁸ In our questionnaires we ask about LGB colleagues. In talking about initiatives to increase representation we intend this to cover LGBTQ+ colleagues.

benchmarks (which range from 2%- 7%¹⁹) we urge broadcasters to continue to gather data and work with their employees and staff networks to understand better their individual workforces and ensure colleagues within this grouping receive the same equality of opportunity as all other people.

Age

Age is one of the characteristics for which we have the highest amount of visible data. It tells us that broadcasters' workforces tend to be younger than the UK working age population more generally (in which 32% of people are aged 50 or older²⁰). Of the main broadcasters, only BBC Radio fully represents this group, with 35% of its workforce aged 50+. As detailed below, in the coming year we will encourage broadcasters to provide more information on the ways in which different characteristics interact – for example age and gender – and whether from that we can learn anything about who is being excluded from the workforce and what to do about it.

Religion or belief

People with religious beliefs make up 28% of the broadcaster workforce in TV and 39% in Radio. There is some uncertainty over how well this represents the make-up of society more generally, as there are varying estimates in relation to the working age population²¹. This is another area where we feel the data would also benefit from additional information on the links between characteristics – those between religion/faith and ethnicity, for example. We hope this might provide broadcasters with greater insight into whether they are failing to represent particular groups of people off-screen.

¹⁹ While 2% is the ONS figure ([ONS Sexual identity, UK: 2018](#)), [Stonewall](#) refers to estimates of 5-7% When analysing the financial implications of the Civil Partnership Act 2004 the Department of Trade and Industry [used an estimate of 5%](#).

²⁰ ONS Labour market statistics Table [A05: Labour market by age group: People by economic activity and age \(seasonally adjusted\)](#) (Apr-Jun19, Jul-Sep19, Oct- Dec19, Jan-Mar20). All employed people/women/men

²¹ We have used here the 2011 Census figure of 67% religious. However NatCen's [British Social Attitudes 28](#) (2011-2012) suggests that 50% were non-religious in the same year.

Class and geographic diversity – the missing part of the picture

Our [2019 TV report](#) reported for the first time on the social and economic background / class of people working for broadcasters. We found that those working in Television were twice as likely to have attended private school as people in the working age population more generally, and that twice as many Television workers come from “professional” family backgrounds.

The volume of data submitted this year is still very limited. In 2018/19 only three of the main TV broadcasters (BBC, ViacomCBS and Channel 4) collected data on socio-economic background (Radio broadcasters were not asked for this data). In 2019/20, ITV also began collecting this data.

Having asked Radio broadcasters for this data for the first time in 2019/20 we were pleased to see that in addition to the BBC some other Radio broadcasters (Wireless, British Forces Broadcasting Service or “BFBS”) provided this data. However, the number of TV and Radio broadcasters collecting data is still low and relates to only 41% of employees (although this is up from 30% in 2019).

Broadcasters are asking a range of questions to ascertain employees’ socio-economic background: parental occupation when aged 14; type of school attended and highest level of education achieved by parents²².

Channel 4 employees currently share the most information on socio-economic background, with data captured for 79% of its workforce. As this is currently limited to information on parental occupation, we would like to see the broadcaster capture other aspects (such as school attended) in future. We encourage all broadcasters to adopt multiple measures of socio-economic background, as this is likely to give a more complete and accurate picture of a very complex characteristic. All the broadcasters have a substantial data gap for this characteristic (with a typical disclosure rate of between 40% and 60%) and we urge them to continue to close this in the year ahead.

Because of the high percentage of data ‘not collected’ last year we needed to look at the figures just for those who responded, in order to achieve a more meaningful picture of the likely make-up of industry. It has been necessary to take the same approach for 2019/20. We again find that Television employees are nearly twice as likely to have come from “professional” family backgrounds as people in the working age population more generally (58% compared with 33%²³). They also remain nearly twice as likely to have attended private school (13% compared with 7%²⁴ in the general population).

The following charts look at those broadcasters who collected data on socio-economic background. Of the main eight broadcasters, Sky and Global do not yet collect this data. ViacomCBS collects the data but was not able to provide it to Ofcom this year²⁵.

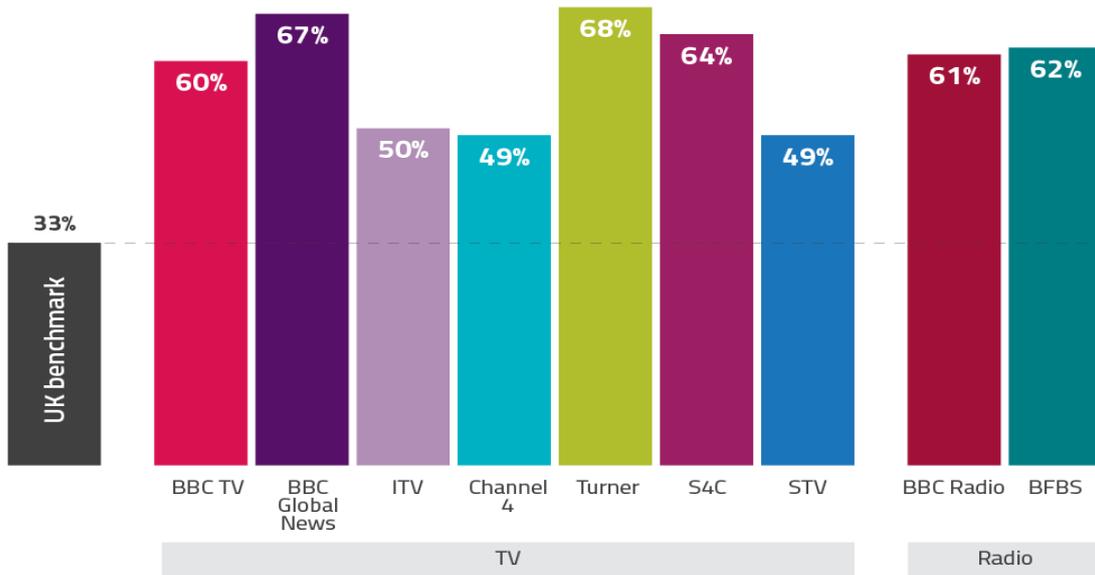
²² Ofcom also asks about eligibility for free school meals as children but this data is rarely collected by broadcasters.

²³ [Social Mobility Commission and the Bridge Group \(Jan2017\)](#)

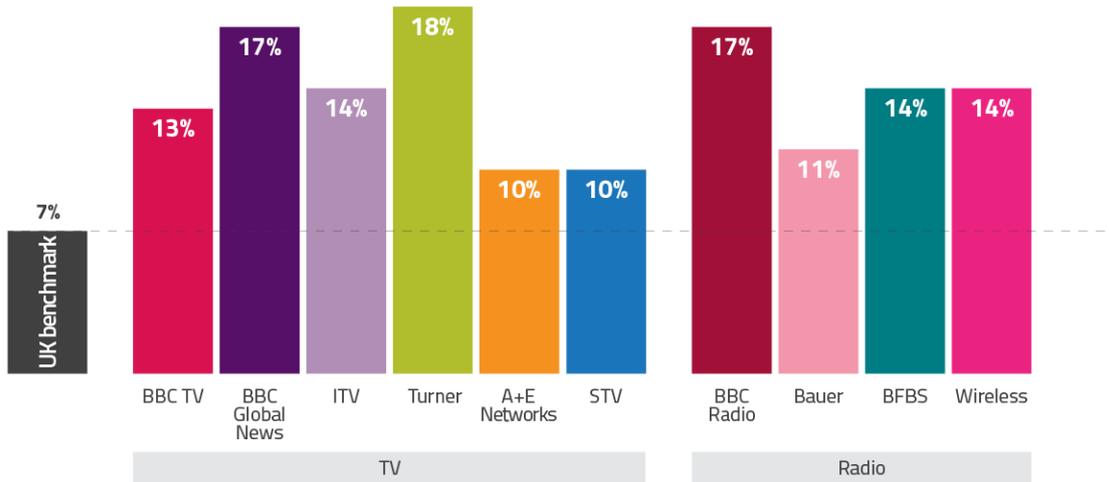
²⁴ Sutton Trust report [Leading People 2016](#), published February 2016.

²⁵ ViacomCBS gave Ofcom the following statement in relation to its collection of data on socio-economic background: “Earlier this year we identified an issue with part of our social mobility dataset, following a change in the data capture methodology between 2018 and 2019. In light of this, we have opted not to provide social mobility data in this year’s report. Our immediate plan of action is to clear our existing social mobility data and reengage with employees to update their information. Social mobility is an important area of focus as part of

% of parents in professional occupations



% who attended private school



our overall diversity and inclusion drive. During the reporting period of 2020/21, our intention is to leverage the expertise of external organisations to help deliver a meaningful and engaging narrative and strategic action plan.”



Behind the numbers

This is about the numbers, and how quickly they are changing, but numbers only tell part of the story. We believe change is sustainable only if the workplace fosters **inclusivity** – broadcasters need to recruit a diverse range of employees but also to retain them and enable them to progress.

This year we asked broadcasters a range of questions in order to understand their approach to increasing diversity and inclusion within their organisations. We asked specifically about their approach to ensuring diversity in the commissioning process, and also in relation to their freelance production partners²⁶. We also asked them to look at the actions they have taken to bring about change, and to give us a frank assessment of which have been the most and the least successful.

We have published the full set of broadcaster responses verbatim for the first time [here](#). Where broadcasters appear to have taken significant steps in a particular area, we have drawn attention to them in our summaries below. At the end of this section we focus on an issue that runs through broadcaster responses to many of our questions: the role of socio-economic background and geographical location.

Commissioning

For broadcasting to play a meaningful role in the lives of people in the UK and truly resonate with audiences, it must aim to reflect authentically the breadth and variety of all communities in the programmes that are produced and broadcast.

Commissioning is the process by which new programmes or content get chosen and approved for production. The commissioning team plays a key role in deciding which programmes get made, the content included, who makes them, and who appears in them. So we believe that the commissioning process and team can be pivotal in increasing the diversity of the broadcasting workforce (including the independent production sector) and ensuring diverse on-screen/on-air content.

For this to happen we think that the key decision-makers in this process – the channel controllers, commissioning editors and their teams – need to themselves be drawn from the diversity of backgrounds and experience that audiences want to see or hear in the content they are offered. In previous years we have asked for diversity data to be split according to job type – this year in our reduced information request we asked only for information by seniority level. However we will

²⁶ See Annex 2 for responses and discussion in relation to independent production partners and the freelance workforce.

receive the outstanding data for this year and collect the full range of data next year in order to understand the make-up of commissioning teams.

This year we asked broadcasters to describe how they have approached diversity in relation to the commissioning process, detailing any specific actions taken to improve diverse representation throughout the commissioning process (in specific cases or more generally).

Steps taken by broadcasters to improve the diversity of programme commissioning

In the aftermath of the killing of George Floyd and the international protests around systemic racial inequality, UK broadcasters appear to have increased their efforts to make sure they have a diverse range of people involved in their programme making.

Commissioning codes and criteria

The BBC's annual [progress report](#) on its delivery of the [BBC's Diversity Commissioning Code of Practice](#) shows how the BBC is working to embed diversity at all stages of the production process and within the content that is produced²⁷. The BBC also announced a new Creative Diversity Commitment, which will require 20% of the talent on new network TV and Radio commissions from April 2021 to be from diverse backgrounds with a focus on the characteristics of disability, ethnicity and social mobility. It also plans to ringfence £100m of its existing TV commissioning budget over three years (2021/22-2023/24) for productions including diverse representation, talent and/or diverse-led companies.

ITV has adopted new diversity criteria in its commissioning strategy, with programmes needing to demonstrate two on-screen and off-screen measures to drive diversity and inclusion in their production to be eligible for commission.

The broadcaster has also set a requirement for any returning series commission with more than one writer to have female representation. This is in addition to initiatives to support creative diversity at ITV such as *Original Voices* for minority ethnic and disabled scriptwriting talent and *Comedy 50:50* aimed at increasing female writing talent across its comedy genre output.

ViacomCBS has announced a 'No diversity, no commission' policy and, in a similar pattern to some of the other main broadcasters, is appointing a new role in its commissioning team responsible for on and off screen diversity.

Channel 4 has reported that research informs its commissioning decisions and every genre has a strategy for improving representation and portrayal. The broadcaster is also tracking both the diversity of its top 100 programmes and its on-screen authenticity of portrayal, through how diverse communities feel about representation and portrayal at Channel 4.

Sky has enhanced its support of the Mama Youth project by commissioning fresh content such as 'Unmuted' and 'Life & Rhymes'.

²⁷ [Analysis of the BBC's delivery against its Diversity Commissioning Code of Practice can be found in Ofcom's Annual Report on the BBC.](#)

Radio commissioning and the Audio Content Fund

The [Audio Content Fund](#) provides grants for the creation of original Radio productions in the UK. The evaluation criteria against which applications are assessed include, among other factors, whether: the content promotes diversity on-air and off-air; fresh voices are supported; the nations and regions of the UK are reflected; and public service value is added.

We consider it a positive sign that several Radio broadcasters have cited support from the fund as a means to improving diversity in the last year.

Bauer's Absolute Radio secured an Audio Content Fund grant to create 'Time to Listen', a series featuring musicians and comedians promoting positive mental health. **Communicorp** has also taken part in the scheme, which helped fund a project with a new independent production company that Communicorp had not used before. The broadcaster told us that the fund has helped broaden its commissioning network and ties with production companies of which it may not previously have been aware. **Wireless'** talkSPORT also received funding for its new minority ethnic-led roundtable football discussion show, '*Oranges at Half Time*'.

Looking ahead, BBC Radio has announced plans to allocate £12m of its existing commissioning budget over the next three years to diverse and inclusive content commissioned by network radio and BBC Sounds.

News/current affairs and sports commissioning

A number of broadcasters that deliver news and sports content have told us that in the last year they have taken action to broaden the diversity of their programmes in these genres. **Sky** has increased the diversity of its news and sports presenters and guest teams and placed a greater focus on issues of racial inequality, supporting Black Lives Matter across its output, for example.

BBC Global News has reported that it has concentrated on increasing the proportion of underrepresented groups across its sites by focusing on having diverse and authentic voices to cover film and travel features and, more generally, plans to track the characteristics of known contributors, as well as the diversity of images used in news stories. It is encouraging that an evaluation approach is being adopted by BBC Global News to monitor the diversity of its output.

Other news and sports focused broadcasters have highlighted steps to boost diversity in their programmes through schemes such as **Bloomberg's** 'New Voices' project, to increase its inclusion of female experts and officials, while **Wireless'** talkSPORT Radio station has improved the representation of female presenters across its football and wider sport programmes, which Wireless says has led to a change in attitudes among its traditionally male-dominated audience. Likewise, **BT** says it uses its TV platform to promote gender equality through sport broadcasting, which includes women's football coverage and also its 'BT Sport Action Woman of the Year Awards'.

Ofcom response

We recognise that increasing diversity in commissioning requires a concerted and sustained effort.

Based on our findings from broadcasters' submissions, as well as through our engagement with the wider industry, we have identified the following actions and factors which can help to increase the amount of diverse creative content on-screen and on-air:

- Ensure the **make-up** of the commissioning team is diverse and ideally embedded across the UK's nations and regions.
- Allow for independent decision-making and **autonomy** for commissioners, as this, and the freedom to take more risks, can lead to more diverse programme output.
- Consider an approach that can draw in people with **multiple characteristics** as part of commissioning initiatives.
- Commissioning guidelines can be broad or specific, but they should be **clear** in their expectations.
- Commissioning should be supported by monitoring **data** on representation, portrayal and authenticity.
- Ensure that production companies are held **accountable** for the diversity of their production teams.

What has worked, and what hasn't?

Broadcasters' successes

Ofcom requested that broadcasters describe their most successful new and ongoing initiatives to increase diversity in their organisations, together with their least successful initiative. We also asked broadcasters to describe the two most successful actions they had taken to support inclusion (for example in relation to progression, senior leadership, the make-up of key teams/departments or the more general fostering of inclusive behaviours and social norms). We asked broadcasters to include the timeframe for each action taken, together with any evaluation of it, undertaken or intended. The most widely successful initiatives this year have concerned recruitment reviews, apprentice/trainee/work experience programmes and actions taken concerning the internal culture of organisations including Employee Resource Groups ("ERGs", also known as staff networks).

Staff networks and internal culture

We believe that inclusivity should be the true goal for any organisation that wants to create a culture where all employees are able to be themselves and to participate and flourish in an authentic way. An inclusive culture enriches a working environment and can contribute to an organisation's productivity and success. Ofcom welcomes the various actions broadcasters have identified as effective means of encouraging inclusivity within their organisations.

A+E Networks has launched *Belong@A+E*, a new employee resource group which the broadcaster has told us aims to educate its workforce on diversity and inclusion.

BBC has remained committed to delivering diversity and inclusion. Whether it is the mentoring and development that under-represented groups continue to benefit from through the RISE programme, or the celebration of creativity and ethnic diversity on offer at BBC CDX (Creative Diversity

Xperience), or the new staff network RAISED 'Real Action in Socio-Economic Diversity' (600 members have joined so far), the broadcaster has taken a number of steps to improve its culture of inclusion.

Recruitment and progression

In our report last year, we recommended that broadcasters develop fresh thinking around recruitment and progression, particularly in relation to improving the representation of employees from minority ethnic groups and disabled people. We also called on Radio broadcasters to address under-representation by setting defined targets with clear delivery dates to assess progress.

We therefore welcome the fact that many broadcasters consider their most successful initiatives and actions taken over the last year have concerned recruitment and progression, particularly in relation to improving the representation of women, people from minority ethnic backgrounds and disabled people. The ability to achieve significant change through delivering equal opportunities is something that the largest broadcasters have the scale and resource to do. It is for this reason that we are encouraged to see some of the biggest TV and Radio broadcasters recognise areas where they need to improve and make the necessary interventions.

Last year, we recommended that **ITV** should improve workforce representation for disabled people and people from minority ethnic backgrounds. Having initiated a review of its recruitment and talent attraction processes, the broadcaster says it has seen a 33% increase in the proportion of new employees from minority ethnic backgrounds, and 28% in new employees who identify as having a disability.

We identified **Bauer Radio's** lack of minority ethnic representation at all levels of the organisation in last year's Radio report. The broadcaster has told us that it has had high levels of recruitment in 2019, for which every member of its leadership team had unconscious bias training with a new half-day training programme made mandatory for any hirer. It also created a best practice recruitment manual emphasising inclusivity as a core value throughout. Although it still has a long way to go, Bauer Radio's minority ethnic representation has doubled since it last reported, from 3% to 6%.

Ofcom welcomes these initiatives. We also emphasise the continued need to focus on retention and progression of colleagues, in addition to recruitment. As the numbers above suggest, for women and those from a minority ethnic background, a key issue is progression to the senior, decision-making levels of an organisation. So we encourage broadcasters to continue using the insight provided by staff networks (as above) to improve workplace culture for those from under-represented groups.

Training and early talent pipelines

Ofcom recognises the crucial role that training can play in addressing under-representation in the workforce and as part of an organisation's recruitment and retention programme. We welcome the success of training programmes mentioned by broadcasters, which create more access to the industry for under-represented groups, especially in areas where under-representation is particularly stark (such as women in technology).

Sky has reported on the success of its ongoing 'Get into Tech' programme, which lasts 15 weeks and provides women who have little or no technical experience with an introduction to coding, to help them explore this as a possible career option.

Global Radio says it has sought to boost its representation of women in early talent pipelines for graduates, apprentices and others, reporting that 56% of those promoted and 83% of apprentices offered full-time roles were female. The broadcaster has also reported that its employees mentored around 50 Global Academy students, of which 76% were female and 63% were from minority ethnic groups, while the broadcaster has also identified ways to deepen its relationship with the Academy.

BT has reported that one of its most successful new initiatives has been ‘BT Sport Takeover’, in which 15 local media students underwent an eight-week training programme, culminating in the production of a half-hour magazine programme. Aiming to educate, inspire and empower students from disadvantaged backgrounds to work in the TV industry, BT found that many of the students are now seeking a career in the TV industry, with some also applying for relevant university courses.

The **British Forces Broadcasting Service (BFBS)** has told us about the resources it had invested into a work experience scheme it intended to run with Birmingham City University. Due to start in March 2020, this would have been a three-week placement for students at BFBS, with accommodation, travel and subsistence, to ensure that the opportunity was open to all. The chosen university has an ethnically diverse mix of students, a feature the broadcaster says would help it address its diversity needs. This initiative will now be launched remotely later in the year.

We welcome the fact that BFBS, despite being a small broadcaster, with limited resources, is making a concerted effort to improve its diversity, particularly around minority ethnic talent where it has pushed its workforce figures up by 2pp to 7% representation. It is important to recognise that being a smaller or medium-sized company can come with its own set of employment challenges, but, where action is taken to improve diversity, its level of engagement and inclusivity of culture can be transformed faster than that of some larger organisations. We strongly encourage all small and medium sized companies to assess what more they can do to increase diversity and improve inclusivity within their organisations.

What has been less successful?

We have previously made clear that assessing the performance of schemes effectively is crucial if broadcasters are to learn from, and build upon experiences, so they can plan future goals in a more informed and targeted way. This year, we asked broadcasters on a voluntary basis to share not only their achievements but also what they learned from their least successful initiatives. Sharing such findings beyond their own organisations can help others emulate success, avoid pitfalls and help the industry collectively deliver positive change more quickly. While many broadcasters shared their experiences, some broadcasters (Al Jazeera, Bloomberg, Nordic Entertainment Group, SAT-7, STV and Disney) did not respond to this section of our information request. We will engage with these broadcasters to establish their reasons for not providing this information and in order to get a more transparent picture of how their work in this area is progressing.

The broadcasters who have been open with us and provided such information, have named a range of challenges they have faced in achieving success in their diversity initiatives. Their detailed responses can be read [here](#). For some, ideas may have been sketched too broadly to be able to make a real difference, or there may have been a lack of employee engagement, whereas, for other broadcasters, schemes may have become hampered by sudden changes in business practice.

Evaluation

Last year, Ofcom explored the potential value that evaluation of diversity and inclusion initiatives could deliver for Television broadcasters. We asked the main five broadcasters (BBC, ITV, Channel 4, ViacomCBS and Sky) to evaluate some of their initiatives based on the process and impact of each case. Through this exercise, we developed some best practice recommendations on how to evaluate diversity initiatives²⁸ and, in doing so, how to turn good intentions into consistent, sustainable practice and meaningful change.

This year, we asked broadcasters to describe how they evaluated their most successful initiatives and actions. We are disappointed that generally broadcasters did not provide a detailed response to this question, beyond noting outcomes against targets. This is a barrier to demonstrating the transparency and accountability which our diversity monitoring and reporting aims to increase.

We recognise that, simply because broadcasters have not given information on the evaluation of their initiatives to Ofcom, it does not mean that evaluation is not taking place. While we encourage broadcasters to measure outcomes against [targets](#), we also recognise that such evaluation does not guarantee continued success. Broadcasters are required by conditions of their licences both to “review” their equal opportunities arrangements for race, sex and disability, and each year to “publish [...] observations on the current operation and effectiveness of the arrangements”.

In order to deliver meaningful change through robust accountability, we urge all broadcasters to consider the best ways to evaluate any actions they take to promote diversity and inclusion.

In our view, the use of data and insights as part of the process of evaluating ‘what good looks like’ is highly effective. In its recent [‘Blueprint for Belonging’](#) the BBC has flagged useful recommendations on how to evaluate initiatives. The importance of data, internal audits, the frequency of evaluation and a ‘feedback loop’ approach are all elements of best practice when it comes to diversity and its evaluation.

We are encouraged that Sky has undertaken analysis from survey data to develop behavioural insights that tell the broadcaster how diverse and inclusive its leadership is. In our report on Diversity in Television last year, we invited the industry to collaborate and explore creative and alternative ways to tackle under-representation and inclusion and to explore the possibilities that behavioural insights analysis might hold. Therefore, we welcome Sky’s initiative to use this data to promote inclusion and would encourage other broadcasters to develop their data analysis to make similar progress.

We also like the boldness and creativity that has been evident in Channel 4’s new inclusion and diversity strategy, which was launched in 2019 and includes, among a number of positive goals, plans to develop a new metric to measure inclusion, going a step beyond the monitoring of diverse representation.

²⁸ “Evaluation of broadcasters’ initiatives”, page 33-34 of [Ofcom’s guidance](#)

Spotlight on class and location

We do not think that it is possible to understand and address inequalities fully, when considering race and disability for example, without also appreciating the role played by class. Diversity should ideally deliver a valuable mix of ideas and perspectives that increase the richness and variety of the content produced. What any individual may offer is often linked to their upbringing more than any other characteristic. The difficulty in bringing about change, however, is that those who can afford to sustain early career setbacks while trying to break into broadcasting, remain advantaged over those who have neither the financial support nor the desirable 'soft skills' acquired from a more privileged education and/or background. The economic impact of Covid-19 may have made it even harder for many people trying to break into the industry, and this makes it even more important that broadcasters know the true make-up of their current workforce and understand where and how people from disadvantaged backgrounds might be able to find career opportunities.

Similarly, the geographic location of employees plays an important role in expanding the diversity of broadcaster's workforces. We can see this in the responses from broadcasters who are this year, more than ever, looking at regional and national diversity as a means to ensure diversity of social and economic background in their workforces. For example:

In recruitment

- We said in our Television 'In Focus' report last year that we hoped to see the positive impact of relocation at Channel 4 for minority ethnic groups and people from a wider range of socio-economic backgrounds. This year **Channel 4** has used its new national HQ in Leeds and creative hubs in Glasgow and Bristol to improve the diversity of its workforce. The broadcaster held its 'Diverse Festival' in Bradford and engaged a network of minority ethnic ambassadors in the region, holding workshops at Leeds University and initiating video recruitment interviews. It is a positive sign that Channel 4 says that it has seen a rise in applicants from working class backgrounds as a result of its regional focus.
- **S4C** has reported on its first group of in-house apprentices in its Carmarthen HQ. By offering high-level training/entry outside Cardiff, the broadcaster says this is creating local social mobility. We very much welcome the opportunities that are being created by the broadcaster for young people from a range of socio-economic backgrounds in Wales and hope to see further progress in the coming year.

In commissioning

- **ViacomCBS** has backed its Channel 5 initiative in which the channel partnered with nine diverse-led production companies in the nations and regions who will benefit from a development fund to create a popular, mainstream slate of programmes. The production companies selected are based in a diverse range of locations, from Northern Ireland to Yorkshire, Manchester and the West Midlands, and seven new indie commissions have been awarded as a result of this initiative.
- **Channel 4's All4TheUK** strategy has also resulted in commissioning heads across a range of genres moving their offices into the nations and regions. The broadcaster has a target to allocate 50% of its production spend in the nations and regions by 2023. It has also introduced evaluation initiatives around commissioning, as above.

TV production in the nations and regions plays a crucial role in helping to maintain a healthy UK production sector, driving economic growth and thousands of job opportunities throughout the UK and benefitting viewers by delivering a diverse range of programmes and editorial perspectives. To help promote TV production in the nations and regions, Ofcom has imposed quotas²⁹ on the public service broadcasters to ensure that a suitable proportion of their network programmes are made outside of the M25. Ofcom can't determine the location of the decision makers who commission the shows. But we encourage broadcasters to consider appointing more commissioning decision makers outside London who may be better placed to draw upon local talent and different editorial voices to deliver a more reflective range of output.

²⁹ [Regional TV production and programming](#)



Accelerating change

The Covid-19 crisis and death of George Floyd came after the end of the period which has been reported on in this document. These global events have lent a new sense of urgency to broadcasters' attempts to promote equality of opportunity, and there is consensus across industry that now is a time for action, not more words. In this section we look at how broadcasters are responding to widespread anti-racism protests, along with the challenges and opportunities presented by the Covid-19 crisis. We also outline what Ofcom expects of broadcasters in 2020/21 and what we will do to support progress.

How broadcasters are responding to anti-racism protests

The recent international debate on racism and racial inequalities has been reflected in new public commitments from the UK's major broadcasters. For example:

- The **BBC's Creative Diversity Fund** and the *Creative Diversity Commitment* (described in *Commissioning* above) both aim to improve on and off screen diversity and will introduce a mandatory 20% diverse-talent target focused on the characteristics of ethnicity, as well as disability and social mobility, in all new network commissions from April 2021.
- **ITV** announced [plans to accelerate change](#) in diversity and inclusion on screen and across ITV by creating more opportunities for those from Black, Asian, minority ethnic and other underrepresented groups.
- **Channel 4** has [committed](#) to being an anti-racist organisation and launched its Black, Asian & minority ethnic-led Indie Accelerator, where ten indies are selected in partnership with The TV Collective to work with Channel 4 and be championed by Commissioning Heads of Department for unscripted genres.
- **ViacomCBS Networks UK** has introduced a new "[no diversity, no commission](#)" content policy to help promote diversity both on-screen and behind the scenes at Channel 5.
- **STV** [announced](#) that it has renewed its commitment to using its privileged position as an employer, public service broadcaster and producer to address the longstanding and systemic issue of racism and improve the representation of Black, Asian and Minority Ethnic people both on and off screen.
- **Sky** has [committed £30m](#) over three years to support the fight against racial injustice and to invest more in diversity and inclusion. It will focus on "improving representation at all levels, making a difference in communities impacted by racism, and use the power of Sky's voice and platform to highlight injustice".

The response by broadcasters to the anti-racism protests has signalled that the industry acknowledges the unique role it must play in not only addressing inequality of opportunity for people from minority ethnic backgrounds, but also changing perceptions of inauthentic portrayal of diverse experiences in Television and Radio programmes. In the follow-up to this moment, we believe it is vital that broadcasters take a long-term, sustainable approach to addressing inequality and underrepresentation. We have emphasised this message above where we underline the importance of sustainable initiatives that are evaluated and show the *difference* that interventions have made and will continue to make in the future.

Black people need to be involved in any measures for change that are aimed at increasing opportunity amongst those from Black communities. Without the visible participation and engagement of Black people, particularly in advisory and decision-making roles, it is not likely that any change will be lasting when it comes to tackling the problem of structural inequality that the global anti-racism protests have highlighted.

We would encourage broadcasters to support employees from White backgrounds in engaging and educating themselves on racism. We believe that active participation of the majority of an organisation's employees will be critical to ensuring that racial inequality does not end up as an issue that affects only some groups, but is owned by everyone and becomes a question of what kind of culture and values are the most important to reflect as an organisation.

Covid-19 challenges and opportunities

We asked broadcasters about the key challenges that they had faced due to the Covid-19 crisis, and the opportunities that may also arise from it. The crisis has had a disproportionately negative impact on under-represented groups in general and specifically in the creative industries³⁰. Yet some of the new ways of working which have been born of necessity could in future help create a more diverse and inclusive industry.

Recruitment and retention

In addition to the impact on the freelance workforce, broadcasters have reported freezes on internal recruitment and development opportunities due to the financial impact of the Covid-19 pandemic. **ITV** found that the reduction in recruitment due to the crisis has resulted in limited opportunities to promote internal diverse talent and hire externally, so it has invested heavily in social media campaigns and external partnerships (e.g. Evenbreak) to reach diverse talent. **Channel 4** said there had been disruption to its Tokyo Paralympics Production Training Scheme (14 disabled trainees were to be placed at production companies, but the **pandemic** saw many trainees furloughed).

Remote working

Most broadcasters have acknowledged the shift to remote working has created significant challenges for a range of colleagues. The **BBC** reported challenges for some disabled staff who needed work adjustments translated to their homeworking environment, particularly if dedicated space to work was unavailable. A common theme was that people with parenting responsibilities have needed more flexible working arrangements. While colleagues were working from home and schools were closed, **Sky** said that child caring responsibilities most often fell to female colleagues,

³⁰ See the Creative Access report [On The Verge](#)

so created a Covid-19 leave policy to help alleviate the additional pressure being placed on working mothers. **Turner** has also reported its efforts to create an inclusive culture and encompass the different commitments employees may be juggling (e.g. introducing flexible management practices and additional time off for parents). Other broadcasters have reported creating targeted support groups for parents while working from home, to share resources and support one another.

While there have been challenges presented by homeworking, **ViacomCBS** recognised that it presents opportunity when it comes to promoting diversity and inclusion. In the absence of a physical space, the broadcaster has developed the concept of virtual events, with more speakers and information than previously. **Discovery** also said that events and training sessions were more accessible and inclusive as a result of home-working and moving online.

Similarly, across Radio and Television, there is an acknowledgement that situation has in some ways widened the talent pool as physical location is no longer a significant barrier to employment, so broadcasters can recruit more broadly across the nations and regions, and can continue to offer a remote working culture in the future, to attract a broader range of talent (e.g. working parents, disabled people, members of religious groups where flexible working can fit around set prayer times, or people who might otherwise have found travel costs or distances to large production centres prohibitive).

Mental and physical health

Many broadcasters noted the impact Covid-19 has had on the mental and physical health of people across all industries, with remote working increasing feelings of isolation and exacerbating existing conditions. People in underrepresented groups (e.g. disabled people) may be more or differently affected by new ways of working.

Many broadcasters reported on their efforts to ramp up mental health support initiatives, regularly sharing key contacts for support lines and other services available to colleagues. **Bauer** highlighted the impact on furloughed workers and the challenges in ensuring these employees feel supported and included while not working, with communication playing a key role. **Wireless** has conducted weekly 'Mental Wellness Check-In' surveys to understand how employees are coping and where additional support may be needed. Other broadcasters have offered resilience training and employee assistance programmes to support employees now and in future.

Broadcasters have had to consider the physical health of colleagues when working from home, including colleagues who may have needed to shield. **Sky** has provided additional health care support for its staff (e.g. an extended healthcare digital GP service) and **Wireless** has streamed live workouts for all employees (for example yoga, HIIT and virtual running). Broadcasters also reported an awareness of the rise in domestic violence as a result of the national lockdown, and have offered various means of support, with **Bloomberg** for example having launched domestic violence guidelines.

Ofcom response

We recognise that the Covid-19 crisis is likely to have an impact on businesses and working environments for some time. In particular, we anticipate that the pandemic will continue to affect broadcasters and so will feature significantly in next year's diversity in broadcasting report.

When commissioning picks up, we think there will be an opportunity for a ‘new normal’ that embraces diversity when recruiting and avoids a return to previous ways of working. By capitalising on recruitment opportunities, with diversity at the core of their hiring decisions, broadcasters can improve the future workforce diversity of the industry. By carrying forward the initiatives they have put in place around mental and physical health, broadcasters can build towards a truly inclusive workforce in which all employees have the opportunity to contribute.

Broadcaster priorities for the year ahead

In submissions to Ofcom, broadcasters have outlined to us their areas of focus for 2020/21. Most commonly, broadcasters are looking at their diversity and inclusion strategies as a whole, developing training and expanding the role of their staff networks.

Introducing and updating diversity and inclusion strategies

Several broadcasters across both Television and Radio have recently introduced, or are in the process of introducing, new diversity and inclusion strategies. These show that broadcasters are expanding their commitments, and that there is a particular focus on leaders taking responsibility for developing diversity and inclusion within their organisations and being accountable for delivering it. Examples of these include:

- **UKTV’s** plan to, as part of its ongoing diversity and inclusion strategy, launch a reverse-mentoring scheme which encourages senior leaders to learn from diverse colleagues at all levels of the organisation.
- **Bauer Radio’s** plan to fully embed its ‘Belonging at Bauer’ diversity and inclusion plan throughout the next 12 months. This includes a focus on Bauer’s leadership, and how diversity and inclusion targets will be integrated into its targets with equal weighting to its commercial objectives.

Developing employee/sector diversity and inclusion training

Many broadcasters are looking at introducing new training and expanding current training, aimed at furthering diversity and inclusion. The emphasis of the training varies, reflecting the individual broadcasters’ areas of focus. Examples include:

- **BBC’s** plan to develop new anti-racism training for all colleagues, as well as its plan to develop language guidance which details how BBC staff should talk about all protected characteristics and other characteristics, like socio-economic groups.
- **Discovery’s** plans to introduce mandatory unconscious bias sessions for colleagues, part of its ‘Global MOSAIC’ initiative.
- **S4C’s** plan to continue its partnership with Teledwyr Annibynnol Cymru (the representative of the Welsh independent TV production sector) to deliver independent production sector training.
- **Global Radio’s** plan to provide unconscious bias training to all its employees and Board members by the end of 2020 is well on its way to being achieved.
- **Channel 4’s** plan to consolidate and strengthen its training and skills work, helping to further a diverse talent pipeline through its Channel 4 Academy.

- **BT** plans to prioritise its recently launched Ethnicity Rapid Action Plan, specifically to address the challenges of race in its workplace and focusing on, among other things, ‘Educating and empowering our people’, which provides mandatory race awareness training for all employees.

Looking ahead to next year, we would encourage all broadcasters to evaluate and report on the outcomes of these and other similar actions.

Expanding the role of staff networks and other similar groups

Broadcasters have told us that they plan to expand the role and influence of staff networks and other similar groups in 2020/21 with some of this work already underway:

- **Global Radio** has already created four new diversity networks and “refocused” its existing networks.
- **Sky** plans to create a new Internal Diversity Action Group.
- **A+E Networks** intend to increase its reliance on its ‘Belong’ employee group, aiming to help ensure programming decisions are as diverse as possible.
- **BBC Global News** plan to establish a network which will help ensure diversity and inclusion discussions remain ongoing – this will include a focus on how its own staff networks can help push this forward.

We understand the value and impact of increasing the influence of staff networks and employee resource groups. Encouraging colleague engagement within a broadcaster’s overall diversity and inclusion plan is a crucial and positive step forward.

We also recognise that there are some potential risks attached to staff networks, which broadcasters need to guard against. There is a danger that staff empowerment can tip over into excessive responsibility and expectation being placed on individual staff networks and colleagues to lead change. Staff network/ERG representatives do this work on top of their regular jobs. Burn-out and fatigue can set in if employers are not mindful and supportive of partner employees on networks. Change is best achieved by balancing the support role of networks with the main driving force that must come from leadership and management, who are ultimately accountable for delivering on their organisation’s diversity and inclusion priorities.

What we expect from broadcasters in 2020/21

We know that organisational change takes time and the legacy of under-representation and missed opportunities can’t be turned around overnight. But we are encouraged by the renewed commitments we have seen across the industry during 2020 and believe that with continued, focused effort, faster and more sustainable transformation can and should be achieved.

During the next twelve months we particularly want to see progress on the critical areas of under-representation (including disability), an increased understanding of the role of class and location, and greater evidence of senior broadcasting staff taking accountability for tangible improvement.

Addressing critical areas of under-representation

Making progress on disability

The publication of this report coincides with the 25th anniversary of the passing of the Disability Discrimination Act. Ofcom's monitoring has showed consistent under-representation of disabled people across broadcaster workforces. Disabled people are under-represented not just in television but across all employment, and we do not under-estimate the scale of the challenge in bringing about change. But for there to be improvement, the recruitment, retention and progression of people with disabilities has to become a priority. Broadcasters are uniquely placed to drive change in this area and to change perceptions through their on-screen and on-air content. To do this though there must be significantly greater opportunity for disabled people to be employed and valued off-screen and off-air.

A number of larger broadcasters are already working towards the 'Doubling Disability' goal of doubling the percentage of disabled people working in UK broadcasting by the end of 2021³¹. While this project in large part tackles under-representation in the freelance workforce, we look forward to seeing any impact on the broadcasters' own workforces. We hope and expect other broadcasters to take note of any effective methods used. As described earlier in this report, we want to see all broadcasters adopt clear targeted action with measurable outcomes to help increase disabled people's access to the broadcast industry and progression within it. We will be following up with each of the main broadcasters to understand how they intend to do this.

Diversifying decision-makers

Broadcasters should focus on the retention and progression of colleagues with under-represented characteristics, and in particular those from minority ethnic groups, in order to ensure diversity in decision-making levels and roles – specifically, senior management, content and creative and, especially in Television, commissioning. For next year's industry monitoring, we will resume our collection of detailed workforce data for job levels, job types, as well as data to help us track areas such as training and retention.

Getting better data and using data better

Broadcasters should start to consider diversity within groups as well as between them, looking at the way in which the protected characteristics (and socio-economic background) interact. People are not defined by a single characteristic and their equality of opportunity is influenced by multiple interacting factors. We therefore encourage broadcasters to:

- start to provide data, where possible, on the representation in their workforce of intersecting characteristics. We are particularly interested, as a starting point, on those in a minority ethnic background who also come from a working class background; and

³¹ **Doubling Disability** is supported by the BBC, Channel 4, ITV, Sky, ViacomCBS/C5, ITN, Pact and the Department for Work and Pensions (DWP). It is run by the Creative Diversity Network and the CAMEo Research Institute at the University of Leicester. The original target date was end of 2020 but this has been delayed by the Covid19 crisis – see footnote 6.

- engage with employee networks to identify the more nuanced barriers to progression for particular groups within their workforce.

Understanding the role of diversity of class, and national/regional diversity

We have previously encouraged the industry to put social mobility at the heart of their diversity priorities and this has started to become an area of focus for some broadcasters. We think further action in this area is critical, and want all the main broadcasters to increase efforts to tackle the ‘class ceiling’ that exists in broadcasting as a matter of urgency.

We also believe that the people who work in the industry should reflect the geographic diversity of the UK. Our view is that if broadcasters are able to reflect the nations and regions of the UK better in their workforces, they may also achieve a greater range of employees from different socio-economic backgrounds too.

Those broadcasters who have a natural reach across the UK in terms of their business operations have little excuse not to have a workforce that is regionally balanced. We are particularly keen to look at where decision-making roles are based, as this is central to harnessing and sustaining the input from a diverse range of areas and people. We would like organisations to consider the current potential of remote working as a new and empowering way of finding and including talent from across the UK.

The starting point here should be for broadcasters to know the make-up of their current workforce by socio-economic background. We also want all broadcasters to consider how they can begin to collect data on the split of their workforce by nation/region, as appropriate, and provide information on key diversity characteristics (ethnicity, class) broken down by nation/region and within that by job type / seniority.

Increasing accountability

We expect broadcasters to:

Set clear and measurable workforce diversity targets and diversity and inclusion objectives with tangible outcomes

Our baseline expectation is that broadcaster workforces will reflect the make-up of the broader UK working age population. In our formal guidance, we encourage broadcasters to take accountability for setting targets for their own workforce diversity, on the understanding that broadcasters’ circumstances vary. In setting targets or in undertaking targeted initiatives, broadcasters should take into account two key factors:

1. The make-up of the local working age population in the area where they are based. This may lead those in London, for example, to aim for higher levels of minority ethnic representation to better reflect those of the capital.
2. The unique role of broadcasters as content makers for larger areas, usually the whole of the UK. We believe that a diverse workforce is not just fair, but means that broadcasters are more likely to make programmes that speak to everyone.

In planning diversity strategies or initiatives, we expect broadcasters to establish clear objectives, tangible goals and methods for tracking progress and outcomes to enable proper evaluation.

Undertake better evaluation of work designed to produce change

We expect broadcasters to know whether their actions are working to improve diversity, through appropriate evaluation, which could involve monitoring, data analysis, or behavioural insights.

Hold production partners to account

We believe that senior management should be held accountable for progress (or lack of it) and broadcasters should set out consequences for production partners who do not adhere to diversity requirements.

Ofcom's role in driving progress

Continued engagement – following up on this report

As we have done in previous years, Ofcom will engage – individually and/or collectively - with all broadcasters who have submitted information, to follow up on those areas identified in this report as in greatest need of improvement. For most broadcasters this will require a targeted effort to recruit and retain disabled employees, and greater support for minority ethnic colleagues to progress to senior levels.

More broadly, Ofcom will use its online hub (see below) to set out its ongoing programme of engagement with other interested parties including commentators, academics, charities, industry bodies and unions. We need to ensure that our work is itself informed by a genuinely diverse range of viewpoints and experiences both within the broadcasting industry and outside it.

To further the debate, Ofcom will in 2021 hold an event engaging a range of people who know and care about diversity and inclusion, to push for progress on the three priority areas above (critical under-representation, class and geography, accountability).

Collective action - joining forces for maximum impact

Ofcom is in a unique position to influence change. While our legal remit in this area is limited, we can and will continue to shine a light on areas of progress and failure. We also facilitate engagement and collective action across industry, so broadcasters, experts and other stakeholders can share information and join forces to deliver maximum impact. We welcome and encourage a commitment to ongoing, evaluative, transparent conversations.

Our quarterly roundtable group has already begun work on a number of actions which we believe could have a material impact on progress:

Cross-broadcaster cooperation and coordination between staff networks

In our information request this year we asked broadcasters what Ofcom could do best to support progress, and were asked in response to support best practice and knowledge sharing among broadcasters in general and broadcaster ERGs / staff networks in particular. We believe that in order to understand how and why people are made to feel included and able to progress (or not), broadcasters can learn from the lived experience of their employees.

Development of a cross-industry database to help broadcasters and production companies find a diverse range of off-screen talent

We are supporting broadcasters in their efforts to identify and/or develop a talent database which gives them all easier access to potential employees from disabled and minority ethnic groups.

Initial conversations over coordinated definitions of a ‘diverse production’ or ‘diverse-led production company’

As outlined above under ‘Commissioning’, many broadcasters already have or are developing commissioning guidelines, codes, or requirements, designed to increase the diversity of their productions. For such requirements to operate, however, broadcasters need to decide how to define a ‘diverse’ production or partner production company. Such definitions will vary according to the particular circumstances of each broadcaster. We asked our broadcaster roundtable group to consider working together on these definitions. We welcome its agreement in principle and will be supporting progress in the coming months.

Information and transparency

Next year will mark five years since Ofcom began its current comprehensive monitoring of industry diversity. We aim to publish a full review of progress made in this time, taking an overarching look at the trends which have characterised progress (or lack of it) during this period. We will work with broadcasters to increase their collection of data on **socio-economic status** and **national/regional workforce** diversity.

As an employer Ofcom publishes its own Diversity and Inclusion programme, sets diversity targets for its workforce and collects data on the diversity profile of its employees. We have learned and will continue to learn from the work done by broadcasters, and in turn feed back our own experiences as an employer.

Alongside this report we are launching our refreshed [online diversity hub](#): it includes a wealth of resources offering general information on broadcasting diversity, a research library, specific support for broadcasters looking to learn from best practice, and reporting data as well as our published guidance. The hub puts our work on broadcasting diversity in the broader context of Ofcom’s wide ranging work in this area, including regulation of the BBC, broadcasting standards and the [accessibility of broadcasters’ services to disabled viewers](#). The hub will also include the results of new analysis to be conducted by Ofcom over the coming months, to identify any research on diversity and inclusion which may be needed in order to support broadcasters’ progress and to help Ofcom target our future work as effectively as possible.

In providing these resources, we know that Ofcom too must continue to learn and challenge our thinking. As an employer, we will act with the same degree of transparency that we require of those we regulate. As a regulator, we will remain open to constructive criticism of our approach to regulating the diversity of broadcasters³². We do not have all the answers, but we are in a unique position to help make the broadcasting industry of the coming years one which reflects the society we live in, and one which in turn is able to reflect that society on-screen.

³² See for example [David Olusoga’s MacTaggart Lecture](#) at the 2020 Edinburgh TV Festival.

Annex 1: Data tables for the main broadcasters and the public service television broadcasters in the Nations

Main TV Broadcasters

	UK labour market / population*	2019/20 UK-based TV industry	Percentage Point (PP) change year-on-year	UK-based employees				
				2019/20	2019/20	2019/20	2019/20	2019/20
				BBC	Channel 4	ITV	Sky	ViacomCBS
Gender								
Men	53%	53%	-1pp	55%	42%	46%	59%	46%
Women	47%	47%	+1pp	45%	55%	53%	41%	54%
Not collected (Data gap)		0%	No change	0%	3%	0%	0%	0%
Women in senior management		41%	-1pp	43%	45%	44%	39%	46%
Racial group								
Minority Ethnic Groups (MEG)	12%	15%	+2pp	14%	17%	11%	18%	20%
White Ethnic Groups (WEG)	88%	73%	+2pp	82%	78%	74%	67%	73%
Not disclosed		2%	-3pp	3%	1%	3%	2%	2%
Not collected (Data gap)		10%	-1pp	1%	5%	13%	13%	5%
MEG in senior management		8%	No change	8%	***	8%	8%	12%
Disability								
Those with a disability	19%	7%	+1pp	10%	10%	7%	4%	8%
No disability	81%	64%	-3pp	82%	76%	71%	65%	28%
Not disclosed		4%	No change	4%	2%	5%	2%	1%
Not collected (Data gap)		26%	-3pp	4%	13%	16%	30%	64%
Age								
Under 50 years old	68%	75%	+6pp	72%	88%	81%	87%	91%
50+	32%	19%	-2pp	28%	12%	18%	13%	9%
Not disclosed		0%	No change	0%	0%	2%	0%	0%
No consent (to provide to Ofcom)		1%	-1pp	0%	0%	0%	0%	0%
Not collected/No data (Data gap)		5%	-6pp	0%	0%	0%	0%	0%
Sexual Orientation								
Lesbian/Gay/Bisexual (LGB)	2%	5%	+1pp	7%	8%	6%	3%	8%
Heterosexual	93%	60%	+7pp	73%	81%	73%	65%	72%
Not disclosed	4%	6%	-1pp	8%	4%	6%	7%	6%
No consent (to provide to Ofcom)		1%	No change	0%	0%	0%	0%	0%
Not collected/No data (Data gap)		28%	-7%	13%	8%	15%	25%	14%
Religion or belief								
Religious	67%	28%	-1pp	37%	44%	21%	33%	28%
Non-religious	26%	35%	-13pp	54%	40%	23%	33%	32%
Not disclosed	7%	8%	No change	9%	8%	5%	10%	4%
No consent (to provide to Ofcom)		1%	No change	0%	0%	0%	0%	0%
Not collected/No data (Data gap)		28%	-13pp	0%	8%	51%	24%	36%

Main Radio Broadcasters

		2019/20	Percentage Point (PP) change year-on-year	2019/20	2019/20	2019/20
	UK labour market / population*	UK Radio industry		BBC	Global	Bauer
Gender						
Men	53%	48%	-1pp	49%	47%	42%
Women	47%	52%	+1pp	51%	53%	58%
Not collected (Data gap)		0%	No change	0%	0%	0%
Women in senior management		43%	+7pp	42%	45%	48%
Racial group						
Minority Ethnic Groups	12%	9%	+2pp	9%	12%	6%
White Ethnic Groups	88%	85%	+5pp	88%	83%	91%
Not disclosed		2%	-1pp	2%	2%	1%
Not collected (Data gap)		4%	-5pp	1%	3%	1%
Disability						
Those with a disability	18%	6%	No change	9%	3%	7%
No disability	82%	82%	+14pp	84%	79%	87%
Not disclosed		5%	-9pp	3%	4%	5%
Not collected (Data gap)		7%	-5pp	4%	14%	1%
Age						
Under 50 years old	68%	76%	+4pp	65%	91%	84%
50+	32%	22%	-2pp	35%	9%	16%
Not disclosed		0%	No change	0%	0%	0%
No consent (to provide to Ofcom)		0%	-1pp	0%	0%	0%
Not collected/No response (Data gap)		2%	-1pp	0%	0%	0%
Sexual Orientation						
Lesbian/Gay/Bisexual (LGB)	2%	6%	+1pp	7%	6%	6%
Heterosexual	93%	66%	+12pp	66%	71%	73%
Not disclosed	4%	6%	-10pp	7%	8%	3%
No consent (to provide to Ofcom)		0%	-12pp	0%	0%	0%
Not collected/No response (Data gap)		22%	+9pp	20%	15%	19%
Religion or belief						
Religious	67%	39%	+9pp	36%	55%	32%
Non-religious	26%	38%	-2pp	56%	17%	43%
Not disclosed	7%	10%	-8pp	8%	13%	4%
No consent (to provide to Ofcom)		0%	No change	0%	0%	0%
Not collected/No response (Data gap)		13%	No change	0%	15%	21%

Public service television broadcasters in the Nations

	UK labour market / population*	2019/20 UK-based TV industry	Percentage Point (PP) change year-on-year	2019/20 STV	2019/20 S4C ³³
Gender					
Men	53%	53%	-1pp	49%	23%
Women	47%	47%	+1pp	50%	35%
Not disclosed		0%	No change	0%	3%
Not collected (Data gap)		0%	No change	0%	40%
Women in senior management		41%	-1pp	***	***
Racial group					
Minority Ethnic Groups (MEG)	12%	15%	+2pp	4%	***
White Ethnic Groups (WEG)	88%	73%	+2pp	89%	60%
Not disclosed		2%	-3pp	7%	***
Not collected (Data gap)		10%	-1pp	0%	39%
MEG in senior management		8%	No change	***	***
Disability					
Those with a disability	19%	7%	+1pp	7%	***
No disability	81%	64%	-3pp	53%	***
Not disclosed		4%	No change	40%	0%
Not collected (Data gap)		26%	-3pp	0%	98%
Age					
Under 50 years old	68%	75%	+6pp	81%	46%
50+	32%	19%	-2pp	19%	12%
Not disclosed		0%	No change	1%	2%
No consent (to provide to Ofcom)		1%	-1pp	0%	0%
Not collected/No data (Data gap)		5%	-6pp	0%	40%
Sexual Orientation					
Lesbian/Gay/Bisexual (LGB)	2%	5%	+1pp	7%	***
Heterosexual	93%	60%	+7pp	52%	53%
Not disclosed	4%	6%	-1pp	41%	***
No consent (to provide to Ofcom)		1%	No change	0%	0%
Not collected/No data (Data gap)		28%	-7%	0%	40%
Religion or belief					
Religious	67%	28%	-1pp	21%	28%
Non-religious	26%	35%	-13pp	36%	32%
Not disclosed	7%	8%	No change	43%	1%
No consent (to provide to Ofcom)		1%	No change	0%	0%
Not collected/No data (Data gap)		28%	-13pp	0%	39%

³³ S4C completed the questionnaire on a voluntary basis

Notes on these tables

We requested data this year only from those broadcasters employing 100 or more people. To provide a meaningful comparison in these tables, when comparing with previous years we have compared like with like i.e. looked at past data for those broadcasters similarly employing 100 or more people.

*** indicates figures too small to report on for data protection reasons.

Sources used for UK population figures:

- Gender = ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Mar 20). All employed males and females (employees and self-employed).
- Racial Group = ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Mar 20). All in employment.
- Disability = ONS Labour market statistics A08: Labour market status of disabled people (Average of Apr-Mar 20).
- Proportion of all 16-64 who are 'Harmonised Standard Definition Disabled'
- Sexual orientation = ONS Sexual identity, UK: 2018 - Percentage of UK population who identify themselves as LGB
- Age = ONS Labour market statistics Table A05: Labour market by age group: People by economic activity and age (seasonally adjusted) (Average of Apr-Mar 20). All employed people/women/men
- Religion = Census 2011

Annex 2: The freelance workforce

The freelance workforce is central to the broadcasting industry. Ofcom’s formal powers relate primarily to the employees of broadcasters rather than their production partners and the freelancers those partners employ³⁴. But Ofcom remains determined to advance diversity and inclusion within the freelance community and we aim to promote it in three ways:

1. We continue to support the Creative Diversity Network’s production monitoring system, [Diamond](#). This is a single online system used by the BBC, ITV, Channel 4, Channel 5 and Sky to obtain consistent diversity data on the programmes they commission from independent production partners.
2. We facilitate cross-broadcaster conversation and collective action on diversity and inclusion across different workforces. See “Ofcom’s role in driving progress” above for information on the work of our broadcaster roundtable group in relation to the diverse commissioning requirements.
3. We ask broadcasters (including but not limited to the main five TV broadcasters) to provide information to us voluntarily on their efforts to increase the diversity of their freelance workforces. Last year we published a specific [report on freelancers](#). Due to the challenges faced by broadcasters during the Covid-19 pandemic, we have not asked broadcasters to provide quantitative diversity data on freelancers this year. However, we have asked for qualitative information, specifically on whether broadcasters have considered how to improve diversity within the freelance workforce and what actions, if any, they have taken to address shortfalls in representation that they have identified and prioritised.

What broadcasters told us in 2020:

- **New broadcasters are establishing processes to collect freelancer data:** Some broadcasters such as Bauer and A&E Networks have made progress towards collecting diversity data on freelancers. Bauer explained that, while progress is slow, they are moving towards sending out data requests and A&E similarly have started recording equal opportunities data which will enable it to monitor representation in the near future.
- **Many of the smaller broadcasters still do not collect data on freelancers.** This incomplete picture limits the industry’s ability to identify continuing areas of under-representation and to fully understand where meaningful steps can be taken to address them.
- **There are limited new initiatives aimed at increasing the diversity of freelancers** and currently little in the way of evaluation of such schemes. We have described the importance of evaluating and tracking schemes, particularly those aimed at freelancers who are often financially vulnerable and without a ‘safety net’.

³⁴ With the exception of the BBC. The BBC must make arrangements for promoting equality of opportunity among employees of the UK Public Services and those making programmes or other material for inclusion in any of those Services. See our latest [BBC Annual Report](#) for more information.

The events of 2020 have seen freelancers being hit particularly hard, as productions stopped meaning fewer work opportunities and greater financial challenges. Though there have been a range of support packages and initiatives to help with the impact, Television and Radio broadcasters will struggle if there is an exodus of diverse freelance talent from the industry.

The larger TV broadcasters have committed to supporting freelancers through initiatives such as BBC's Creative Diversity Commitment, Channel 4's Production Training Scheme and 'Indie Accelerator' development funds, ITV's partnerships with Screenskills/NFTS and Creative Access, Sky's on-screen targets and links with Mama Youth, and ViacomCBS' Channel 5 partnership with MEG-led production companies in the nations and regions.

Ofcom response

We welcome Channel 4's suggestion that Ofcom could facilitate an increased focus on production companies and freelancers, ensuring they remain a key part of the diversity conversation in the future. We are conscious of the ongoing work of the [Creative Diversity Network](#) (CDN) and we will seek to collaborate with CDN, PACT, and other bodies to engage with the issues faced by indie production companies and the freelance community.

Based on our analysis of broadcasters' submissions on freelancers, we ask them to take the following points into account in future:

- It is important for smaller broadcasters to collect data on freelance employees for an accurate picture of what diversity looks like for the organisation and its commissions.
- To understand the impact and value of freelance initiatives, broadcasters should evaluate such initiatives to maximise good outcomes for participant freelancers.
- Where broadcasters have commissioning guidelines or requirements in place, we expect broadcasters to ensure that there are clear consequences when independent production partners do not follow them. We believe there is a genuine desire to move beyond words to action in this area, but that can only happen if broadcasters take accountability for following up on their public commitments to diversity and inclusion.

Annex 3: How diverse are SVoDs in the UK?

During the Covid-19 national lockdown in April this year, people in the UK spent over six hours a day watching TV and online video content – a rise of almost a third on last year³⁵. Much of this rise can be attributed to a near doubling of time spent on subscription video-on-demand (SVoD) platforms. These companies are playing an increasingly significant role in the UK’s media industry, recruiting from the same pool of talent as the broadcasters we report on above. As we said in last year’s report, we need a better understanding of the impact of these platforms on progression for underrepresented talent in the industry. That is why this year we asked some of the main SVoDs to talk to us on a voluntary basis about their approach to diversity and inclusion.

These companies fall outside of Ofcom’s formal diversity and equal opportunities powers (as they are not licensed UK broadcasters³⁶) and we do not have numerical data on the SVoDs’ workforce make-up as we do for the broadcasters’ workforces. As a result, we aren’t in a position to subject the SVoDs’ workforce figures or diversity strategies to scrutiny, as we do above in relation to broadcasters. This Annex is not intended to compare the performance of SVoDs and broadcasters - the information and their internal guidance is instead offered with the aim of providing useful insight into the approach taken by some of the SVoDs in the UK and is consistent with Ofcom’s goal to encourage an open and collaborative approach to diversity and inclusion across the entire sector. We will be continuing our discussions with the SVoDs throughout 2020/21.

NETFLIX

In terms of workforce diversity, Netflix is still a small but growing operation in the UK and tells us it has plans to monitor the diversity of its workforce, in the way that the company does in the US. As a global company, Netflix [publishes](#) data on its global workforce for gender, and its US workforce for race/ethnicity.

Netflix says that its productions generate employment opportunities across the UK’s nations and regions and in 2019, Netflix created over 5000 jobs for cast and crew on UK original productions and co-productions. The concentration of production was spread across a range of English cities and towns from Norwich to Liverpool, as well as in Newport, Wales and Edinburgh, Scotland. By the end of 2020, Netflix will spend an estimated \$1bn on both UK originated and non-UK originated content produced in the UK.

Netflix has shared its **UK Diversity & Inclusion Best Practice Guidelines** [see below] which support the production of its UK-commissioned original series. The company describes these guidelines as setting a range of aspirational targets that Netflix would like to achieve for minority ethnic, gender, disability and LGBTQ+ representation of talent. Netflix told us that these guidelines are intended to drive discussion with production partners, highlighting shortcomings and the reasons behind them so Netflix can continue to improve on its approach.

³⁵ See our 2020 [Media Nations](#) report

³⁶ Some SVoDs (such as Amazon Prime Video and Disney Plus) are notified On Demand Programme Services (ODPS) and therefore regulated by Ofcom under the ODPS rules. We publish a [list of regulated ODPS](#).

Netflix explained it has increased its focus on localised content in the UK and has, since 2019, expanded its slate of UK content with 50 shows produced. The company has appointed 10 UK-based commissioners to oversee a range of genres. Netflix says that all of these commissioners built their careers in UK Film and TV, including at the public service broadcasters.

Netflix's operations have a decentralised nature, both structurally and culturally³⁷, and it says that this allows the executives significant creative and financial autonomy when it comes to commissioning. Having multiple, independent decision-makers in commissioning is something that Netflix believes naturally leads to a more diverse range of content on the service and more people seeing their lives reflected on screen.

Netflix is investing in training including schemes such as the 'Diverse Directors' initiative for 'Top Boy'³⁸.

The platform has launched a collection of films, shorts and Television series which celebrate the Black British experience. This slate of content has been launched for Black History Month but will remain on the service and Netflix has signaled that it will continue to grow beyond that point.

Netflix says that its UK commissioned content reflects the history, culture and other specificities of the UK and has given examples of shows that resonate strongly with British audiences, including 'The Crown', 'After Life', football period drama 'The English Game', sports documentary 'Sunderland Til I Die', 'Our Planet', and the first Netflix children's animation 'Robin Robin' from Aardman Productions.

"Netflix Diversity & Inclusion Best Practice Guidelines for UK Original Scripted Series

Why are we doing this?

We want to ensure that our shows are diverse in front of and behind the camera, and more specifically reflect the diversity of the UK population. We also want working conditions on all our shows to reflect our Netflix company culture and therefore to be supportive and inclusive at all levels. We recognise there is a long way to go before diversity and inclusion are standard across the UK television industry. As this is the case, we need to prompt conversations about, and action to increase, diversity and inclusion across all our scripted shows and the teams we build to create great programming. The guidelines below have been developed in consultation with external advisors; they are likely to continue evolving in line with our needs and our understanding of best practice.

³⁷ See the [Netflix document about their culture](#).

³⁸ A [Broadcast article](#) on Top Boy includes how the production is "training the next generation of black directors":

How?

- *Keep it simple - we will outline clearly what we think best practice looks like (which may evolve as we learn)*
- *Encourage discussion - of the guidelines at early stage development/pitch and then again as prep starts and throughout production*
- *Collaborate on solutions - Production + Netflix Execs*

The Guidelines

At the relevant points in the production process use best endeavours to achieve the following targets³⁹:

BAME

- *At least 20% of speaking roles unless factual/historical accuracy dictates otherwise*
- *At least one BAME writer in every writers room*
- *At least one BAME Head of Department, Producer or Director on every show*

Gender

- *Aim for gender balance in writers' rooms on all shows*
- *On shows with more than one Director, at least one female Director*
- *Aim for gender balance in Heads of Departments on all shows*

Disability

- *One speaking role for an actor with a registered disability unless factual/historical accuracy dictates otherwise*
- *Disabled actors should be cast in disabled roles unless storyline/factual/historical accuracy dictates otherwise*
- *We require a writer and/or consultant with a comparable disability for disabled characters that will feature heavily within a series and/or for series with themes of disability*
- *Work with and support actors and crew members regarding any reasonable adjustments required to enable the individual(s) to work on the production*

Socio-Economic Diversity

- *Commitment to ensure all interns and work experience staff on Netflix productions are paid no less than the UK Living Wage (or London Living Wage, depending on location)*
- *Travel/expenses paid for cast based outside London on callbacks*

LGBTQ+

- *Commitment to ensure representation within the writer's room and in paid production roles on set. While it is illegal to directly inquire about a person's sexual preference/sexuality there should be opportunities to brief agents, etc. when possible.*
- *We require a LGBTQ+ writer and/or consultant for LGBTQ+ characters that will feature heavily within a series and/or for series with LGBTQ+ themes.*
- *Transgender actors should be cast in transgender roles*

³⁹ For clarity, these are aspirational targets that we would like to achieve and not quotas or requirements. All hiring decisions will be based on merit and not on the basis of an individual's characteristics.

- *At least 8% of characters with speaking roles represented as LGBTQ+ unless factual/historical accuracy dictates otherwise*

General

- *All Netflix teams to take part in Respect@Netflix awareness training to promote an inclusive work environment for everyone*

Focus on a path to success

If a guideline can't be met in the first season of a show, the reasons need to be documented and existing and future training efforts revisited to ensure it can be met on future seasons.

Legal considerations

In the UK there is a distinction between unlawful discrimination and positive action:

- *Discrimination is unlawful: It is unlawful to discriminate on grounds of sex, gender, disability, race or ethnic origin (and some other protected characteristics). A company must not offer employment or other work to anyone because they are (or are not) a woman, disabled, or from a BAME community. In deciding who gets a job, the employer should look at the skills and experience needed to perform the role and decide who would be the best person and be able to evidence the decision if challenged.*
- *Positive action: "Positive action" means the steps that an employer can take lawfully to encourage people from groups with different needs or with a past track record of disadvantage or low participation to apply for jobs. For example, an employer can use positive action where it thinks reasonably and on the basis of evidence that participation in an activity by people from BAME backgrounds, women or disabled people (or other protected groups), is disproportionately low. In such a case, an employer can take proportionate action to enable or encourage participation. Before or at the application stage, an employer could take steps to encourage people from underrepresented groups to apply or could offer training or support. This "positive action" is not the same as "positive discrimination" which as explained above is not permitted."*



Amazon told us that it is focused on how Prime Video can provide the most diverse range of programmes possible for its customers in the UK and globally.

The company's UK Originals team is still in its infancy, having been set up in 2017, and Amazon explained Prime Video is in the process of building its UK commissioning team and working with a range of production companies. The company has said that, through its first commissions, it is demonstrating a commitment to bringing diverse perspectives to its catalogue.

Amazon Prime Video has announced the production of 'Jungle', a six-part drama series on the UK grime and drill music scene and aims to "empower a varied collection of British storytellers to create captivating content which reflects the diversity of the UK today"⁴⁰.

'Small Axe', an anthology drama series based on the experiences of Black British people spanning six decades, is a partnership between Amazon Studios and BBC Studios. As part of the production of this series, there was particular focus on production training and recruitment in two areas - minority ethnic talent as heads of department and entry-level opportunities for working class employees.

Amazon Prime Video tells us its original content has a spread in terms of production taking place across the UK's nations and regions, and it has a new 8-part LGBTQ+ themed dating series in the pipeline.

Beyond commissioning, Amazon Prime Video says that it takes pride in its unique culture, which it says honours and respects different perspectives, and is embodied in its [diversity commitment](#).

Amazon Prime Video told us of a number of stakeholder partnerships to promote diversity in the UK industry. The company took part in a listening exercise (along with BBC, ITV, Channel 4 and Netflix) with the BAME TV Taskforce, after it published a letter demanding action on racial equality. The company has also joined the UK Coalition for Change, alongside other PSBs and industry organisations, to tackle issues such as the pan-industry response to bullying, harassment and instances of discrimination towards marginalised groups.

Amazon Prime Video has been partnering with Triforce Creative Network (TCN), an organisation which promotes inclusion and access to the industry for diverse talent, on WriterSlam - a competitive development scheme for scriptwriters which includes a paid development commission from Amazon.

Ofcom's response

We have been encouraged by the openness of Netflix and Amazon Prime Video to discuss and share with us their diversity thinking as they continue to increase their broadcasting and production footprint in the UK.

⁴⁰ [Variety, 27 August 2020](#).

Over the next year we encourage the SVoDs to measure and publish data on their workforce make-up, as is the case for UK broadcasters. For example, Netflix gives prominence in its US workforce diversity figures to the breakdown of representation by ethnic group rather than aggregating an overall figure for minority ethnic employees. This is something Ofcom already asks of UK broadcasters, and we hope that Netflix is soon able to present equivalent findings on ethnicity and other characteristics for its UK-specific workforce.

We acknowledge that there are positive examples of co-productions that both the main SVoDs have backed that are increasing the diversity of content available to UK audiences and also widening the support for new and diverse talent.

For both Netflix and Amazon, the diversity of their content seems to be closely connected to a globally-focused business model that has to cater to many different viewing needs and cultural appetites on the same platform.

We don't yet know how this approach will serve diverse UK local audiences in the longer term, and whether the increase in recruitment by the SVoDs for production roles in the UK will contribute to the future sustainability of careers across the freelance production sector. Given that the main platforms are only commissioning in specific genres, we cannot yet say that we have a clear picture of how SVoDs impact diversity across all types of content. There are other aspects to consider such as the impact of significant content budgets on production costs in the UK, and whether having different terms of trade from the UK industry is going to empower diverse storytelling or not in the long term. Some of these questions were explored by the PSBs and the wider UK industry at Ofcom's Small Screen: Big Debate event⁴¹, which looked at the future of public service broadcasting in the UK.

In addition to Netflix and Amazon Prime Video, we are also aware that there are other global companies who have launched their own SVoD services in the UK in the last year, such as Apple TV+ and Disney+. We hope to be able to engage with these and other platforms in the coming year, so we can further develop our knowledge and insight into the variety of different approaches that streamers in the UK are taking on diversity and inclusion.

⁴¹ [Small Screen: Big Debate](#)