Ofcom
making communications work
for everyone

Making **Ofcom** work for **everyone**

Ofcom's diversity and inclusion strategy

Diversity and inclusion

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Melanie's Foreword

Communications services have never been more important. During the coronavirus pandemic, people across the UK have relied on broadband and mobile connections to work, learn and keep in touch. Telecoms engineers and postal workers have helped us to stay connected, while broadcasters offered trusted information and educational programming.

Ofcom's job of making communications work for everyone has also been more crucial than ever. We are working to support better broadband and mobile services for people, wherever they are in the UK. This year we are setting new regulations which will help to deliver fibre broadband to rural areas and we are making more airwaves available for mobile services. We have set new expectations on telecoms firms for supporting lower income and vulnerable consumers. We have continued our work to protect audiences from harm on TV and radio, and we are beginning the task of protecting users of video-sharing platforms. Alongside this we are setting clearer rules to make TV accessible to people with hearing or sight impairments. And we are also preparing to take on an important new role in protecting people from harmful content online.

If we are to do our job effectively for everyone in the UK – across our nations, regions and communities, and for people of all ages and backgrounds - Ofcom itself must reflect the UK today.

Recent events have lent even greater urgency to this point. The killing of George Floyd in the US caused grief and hurt among many people in the UK, especially in our Black communities. It led many organisations to re-examine their culture and practices. Ofcom's colleague network, RACE (Raising Awareness of Culture and Ethnicity), challenged us to go further in making our workplace as equitable and inclusive as possible.

These concerns are important to me personally, and I know Ofcom has further to go.

Five years ago, we set ourselves targets to improve our workforce diversity by 2020. On gender, we committed to an equal split of men and women across the organisation, and for women to make up 40% of senior roles. We also sought to increase the proportion of colleagues from minority ethnic backgrounds in senior roles from 9% to 13%.

I'm encouraged that we have achieved an equal gender balance and exceeded our target for women in senior roles. Ofcom was named this year by The Times as a Top 50 Employer for Women. But I am disappointed that, for senior minority ethnic representation, we have only reached 11%. That is a setback for Ofcom, but it shouldn't discourage us from setting a bolder vision, and our resolve to do better has never been stronger.

I want Ofcom to be a confident and connected organisation, where everyone's skills and contributions are valued and respected, and where people of all characteristics and backgrounds can succeed in their career. And we will use that diversity of thought and experience, and a culture of inclusion and respect for each other, to deliver better outcomes for people in the UK.

This strategy sets out our ambitions for the next five years. We are setting more stretching goals on gender equality and ethnicity at senior levels. We are also setting ourselves a new and challenging target to improve the representation of disabled people at Ofcom. We are committing to making Ofcom's Boards and statutory Advisory Committees truly representative of the UK. We aim to meet all of these challenging targets by 2026.

But we are also going beyond headline targets and protected characteristics. We need to increase our diversity of thought, drawing the best talent from a range of socio-economic backgrounds and increasing our presence outside of London. We want our Black colleagues to see measurable improvement in getting their voices heard in our work. And we want to make tangible improvements in our workplace culture, so that everyone's contribution is valued and respected.

We expect to be judged against our aims – not in five years' time, but in every year as we report regularly on whether we have made sufficient progress towards our goals.

This work is absolutely central to who we want to be – an organisation that is truly representative of the whole UK, so that we can make communications work for everyone.

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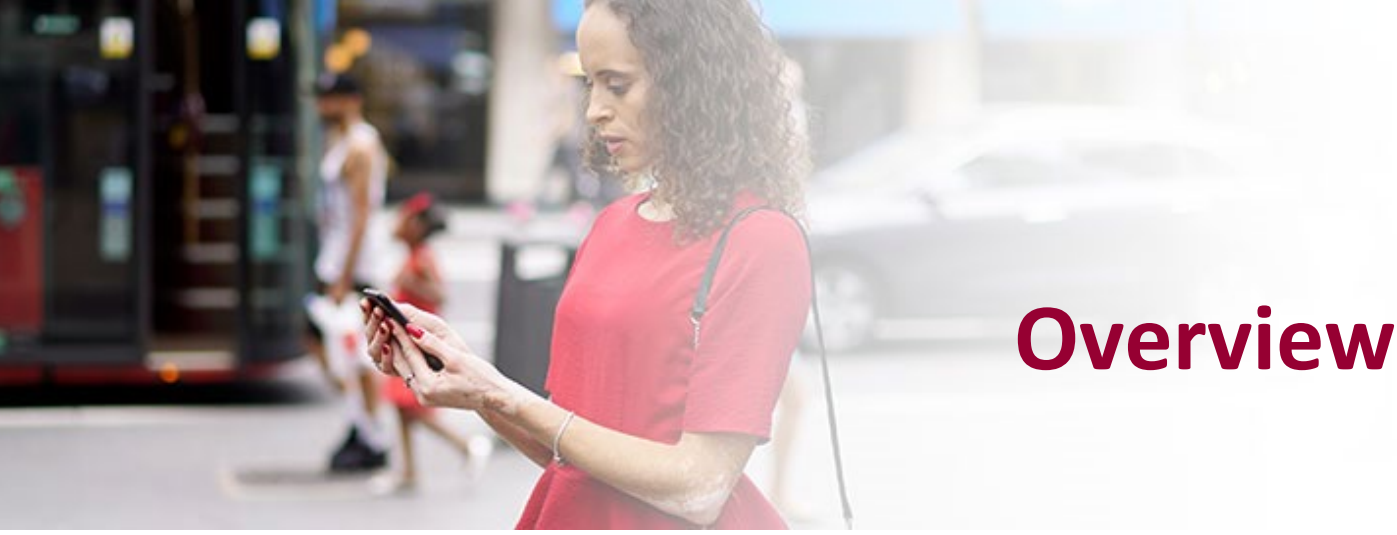


Overview

Making Ofcom work for everyone

Ofcom's mission is 'making communications work for everyone'. The industries we regulate play an increasingly vital part in people's lives: connecting them to family, friends and workplaces; enabling them to access essential services such as health and education; bringing them news; and entertaining them. If we are to make sure communication services really do work for everyone in the UK then we must understand the needs of people across the different nations, regions and communities within the UK. To do our job really well, we should have a workforce made up of people with a wide range of backgrounds and experiences, and we should make sure that our colleagues can bring all those diverse experiences to their work.

To deliver on this, we will increase the diversity of our workforce and we will foster a culture in which everyone feels they are valued and can be themselves at work. This doesn't mean we agree all the time. It means we listen to each other, seek and give challenge, and treat each other with professionalism, respect and kindness.

This is our five-year strategy for making Ofcom a more diverse and more inclusive organisation. Our strategy will evolve over that time, as we make progress towards our targets and gain a greater understanding on areas such as socio-economic or class diversity. We will be driven by the principles and commitments set out in this strategy.

What do we want to achieve?

In section two, we set out our vision for the type of organisation that we want to be. We want Ofcom to have:

- a truly diverse workforce;
- a naturally inclusive culture;
- processes, systems and policies that are fair;
- colleagues who take personal responsibility for diversity and inclusion;
- leaders who are role models; and
- stronger connections with the communities we serve.

To help drive these improvements, we are setting ourselves new five-year workforce targets - to improve ethnicity and gender representation at senior levels within Ofcom, and representation of colleagues with disabilities across our organisation.

Our 2026 targets:

- **Senior ethnicity:** 16% of our senior leaders from minority ethnic backgrounds.
- **Senior gender balance:** An equal gender balance at senior levels.
- **Disability:** 15% of our colleagues are disabled.
- **Boards and committees:** An approximately equal gender balance and a level comparable with the relevant populations on disability (15%) and ethnicity (10%).

In addition to these targets, we will bring new focus to understanding and broadening our socio-economic or class diversity, as well as increasing our regional diversity, with more colleagues based outside London. These are particularly important areas to help make sure our regulatory work is informed by people with a broad range of experiences, backgrounds and perspectives.

We will also focus on improving both representation and experiences for Ofcom colleagues from a Black ethnic background, taking account of feedback from our RACE network, and analysing engagement scores from Black colleagues in our annual colleague survey.

Improving our data will also be an important priority. We will measure, monitor and report on many different aspects of our diversity, including all characteristics protected by law and more. We may set ourselves additional targets during the next few years. We will also track the actual experiences of our people through regular colleague surveys. Our strategy itself is based on our data, which can be found here: Ofcom diversity profile.

How will we achieve it?

We will deliver our vision and our targets and priorities by overhauling our systems and processes to make sure they are fair by design, and by supporting our leaders and all our people to build an inclusive and respectful culture.

Section three - Systems and Processes - explains how we will build greater equity and fairness into our regulatory work, so that we have fair, clear and effective regulatory systems and processes in place which take account of the needs of all groups of people. We will also build equity and fairness into the design of our people policies, with an early focus on the policies which have the most impact, such as recruitment, career progression and performance management.

Section four - Culture and Leadership - sets out how we will improve the experiences of all Ofcom colleagues of all backgrounds, and harness our differences to improve our work. We will strengthen our inclusive and respectful culture through the way in which we manage and lead at Ofcom. We will make sure all our people feel valued, have a voice and can contribute their best to our work. This section sets out the expectations we have of leaders at Ofcom to be role models, to listen and educate themselves about the diverse experiences of our people and the challenges they face, and to use that knowledge to inform the way we act and the decisions we make.

Finally, section five - Delivering our Strategy - explains how we will develop our governance to deliver this strategy by creating accountability and responsibility. We explain how we will measure and report on the progress we are making.

Our vision

Our vision to make Ofcom work for everyone

Ofcom was formed in 2003, bringing together five different regulators across the communications sectors. Since then, we have been given new responsibilities by Parliament, such as regulation of the postal service and the BBC, and so we have had to evolve as rapidly as the sectors we regulate. We expect to expand our work even further over the next five years as we take on a new role helping to protect people from harmful content online and add to our responsibilities for ensuring telecoms networks are secure and resilient. In this section of our strategy we set out our vision for the type of organisation that we want Ofcom to be in five years' time.

Ofcom today

Today Ofcom is a vibrant organisation of around 1,000 people. We have staff based in London, Birmingham, Warrington and Baldock as well as Cardiff, Edinburgh and Belfast. Our employees come from many different professions, specialisms and career backgrounds and do a wide and varied range of jobs. Some examples of roles in Ofcom include: those in our consumer contact team who provide advice and deal with complaints from members of the public; spectrum engineering officers who investigate reports of radio interference; content standards experts who investigate complaints about television programmes under the Broadcasting Code; policy and technology experts, economists and lawyers working on projects to inform and adapt the regulation of our sectors; people, finance and IT professionals who support us all in doing our work; and many more.

Our thriving employee networks and interest groups play an important role in supporting diversity and inclusion at Ofcom. These include the Ofcom Women's Network, Parents and Carers Network, Affinity Network for LGBT colleagues and allies, RACE Network, a Religion and Faith Network, a Disability and Wellbeing Group, a Social Mobility Interest Group and a Colleagues Advocating Racial Equality Group. These networks and groups are open to all colleagues to join or ally themselves to. They provide support for their members, organise awareness-raising events and influence change through a range of initiatives.

Ofcom in five years

By 2026, we expect Ofcom to have grown further, both in size and in the variety of work that we do, as we are granted new regulatory responsibilities by Parliament. We will have recruited more people with the range of skills and experience we need for our new duties, increasing our expertise in areas like data analytics and emerging technologies. We plan to expand our footprint outside London, to

support the recruitment of more people based in the North of England. As we grow, we want to increase our diversity in many ways and to build a strong, inclusive organisation which is a fantastic place to work.

We have set out a vision for diversity and inclusion at Ofcom over the next five years, which is designed to guide us as we deliver our strategy – the six statements in the vision provide the framework for our strategy and the principles upon which we operate and take action. It is represented as a wheel to show the inter-connected nature of the elements, which contribute to, and build on, each other.

Our vision for Diversity and Inclusion

WE TAKE PERSONAL RESPONSIBILITY

Diversity and inclusion is a personal purpose and mission for all of us. We all play our part, no matter who we are, what we do and where we are located.

WE ARE TRULY DIVERSE

We reflect the diverse society we serve, in many different ways. We need to do so, to better appreciate people's diverse needs and the challenges they face.

OUR LEADERS ARE ROLE MODELS

Our leaders set an example to others in how to live our values. They build diversity and inclusion into their daily decisions to make Ofcom a fantastic place to work for our colleagues, and to make communications work for everyone.

WE ARE CONNECTED TO COMMUNITIES

Our colleagues are deeply connected to communities and under-served groups, so we can hear consumers' voices and learn about the society we serve. We use our own advantages to boost others and create positive social outcomes. We encourage colleagues to participate actively in areas they care about.

WE ARE NATURALLY INCLUSIVE

Our culture means that everyone feels they belong, are valued and have a voice. We understand and celebrate many types of diversity, including combinations of identities. We know that every one of us brings diversity to Ofcom, and that we are all more than just our characteristics.

WE ARE FAIR BY DESIGN

We consciously design and monitor the way that we do things, the decisions we make and the systems we use so that they are fair and equitable for our colleagues and for the people we serve. We know that we sometimes need to support people differently, in order to treat them equally.

The vision clearly sets out the expectations we have of all Ofcom colleagues and our senior leaders and the principles upon which we will develop our culture, bring fairness to the ways we operate and drive greater inclusion. Inclusion for us means everybody, of every background and life experience, is represented, and not just the nine characteristics protected in law. We recognise everyone has a different starting point in life, and we will create opportunities with this in mind. We will connect to communities to make sure we understand and address the challenges that different communities face.

Our targets and priorities

In this section we explain our targets and priorities for the strategy period. We have set a small number of headline targets, focused on improving the representation of colleagues with different protected characteristics in Ofcom overall, at senior levels, and in our boards and advisory committees. We are making public commitments to improve our representation in these areas and setting stretching targets that we aim to reach by 2026. We will report on our progress each year.

In addition to these targets, we have some priority areas to which we will give particular focus over the next five years. Some of these involve increasing Ofcom's diversity in other ways; some are about improving the representation and experiences of different groups of people. In all these areas, and others, we will collect, publish and closely monitor our data. Informed by our data, we may set further targets and goals for ourselves over the next five years.

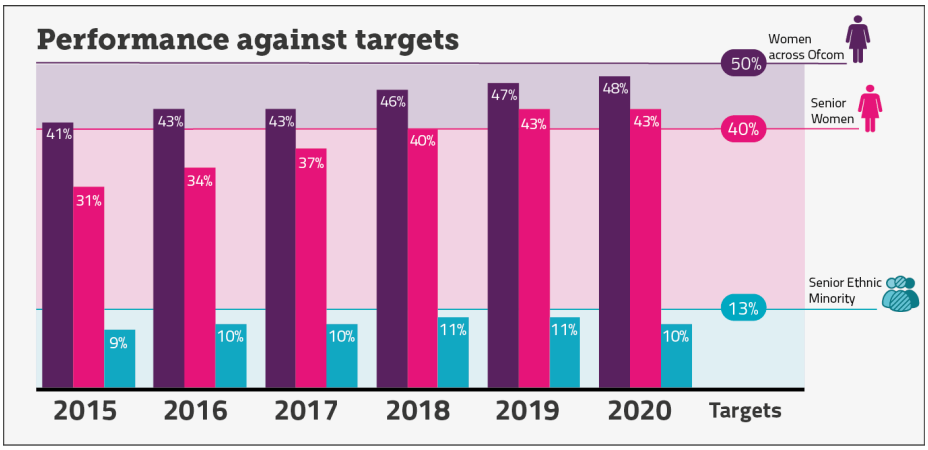
'We are truly diverse' – We reflect the diverse society we serve, in many different ways. We need to do so, to better appreciate people's diverse needs and the challenges they face.

Performance against our 2020 targets

In 2015 our diversity and inclusion strategy included targets for women to make up half of our organisation overall and 40% of our senior roles by the end of 2020. We also set a target for 13% of our senior roles to be held by people from a minority ethnic background.

We have reported on our progress against these targets each year, and this is set out in Figure 1 below.

Figure 1



Note: data based on 31 March in each year. Senior roles defined as our top two grades of Principal and Senior Managers and Specialists (SMS).

We met our 40% senior gender target in March 2018 and, in September 2020 we achieved an equal gender split across the organisation. In 2020 Ofcom was named by The Times and Business in the Community as a Top 50 Employer for Women and we are proud of the progress we have made for women over this five-year period.

But movement towards our senior minority ethnic target has been slower. We delivered an initial improvement from 9% in 2015, but then remained at around 10-11% since 2016. Over the past few years, although our hire rate for senior colleagues from minority ethnic backgrounds improved, it did not improve by enough to increase the overall proportion of senior colleagues from minority ethnic backgrounds at a time when Ofcom was expanding overall. At the end of 2020, 11% of our senior roles were held by people from a minority ethnic background. We have not reached our target of 13%.

2021 to 2026 targets

Over the next few years as we prepare to take on new regulatory responsibilities, we have a great opportunity to bring in new skills and diverse thinking. We are deliberately setting ourselves challenging targets to improve our representation in a few critical areas.

By 2026, 16% of our senior leaders will be from minority ethnic backgrounds

Within Ofcom, 21% of our staff are from minority ethnic backgrounds. But this is true for only 11% of our senior leaders. Our data has also shown us that our minority ethnic population is not evenly spread through our different professional groups, particularly in our industry and regulatory professional groups, or across the different grades of the organisation. This tells us we are missing opportunities to have diverse voices across all aspects of our work.

Across the UK, 12% of the working age population is from a minority ethnic background, but this rises to 35% in London, where the majority of our colleagues are based. As an organisation with a significant London presence we would expect to see greater ethnic diversity among our senior leaders, mirroring that of Ofcom as a whole. We need to do more to attract diverse talent, and to support a pipeline of talent from more junior levels into senior roles. We are therefore increasing our senior ethnicity target from 13% to 16%. We believe this is challenging, but achievable with sustained focus and with the actions set out in this strategy.

In addition to this high-level target, we will focus internally on increasing the representation of people from minority ethnic backgrounds across Ofcom's groups and professions. We will also maintain a focus on differences in representation and experiences for different ethnic groups within Ofcom. We know that we have particular work to do on the representation of our Black colleagues at senior levels and in our regulatory work, and on their experiences within Ofcom.

Our Black colleagues

The death of George Floyd and the resulting anti-racism protests in the UK challenged us to pause, talk with our RACE network and reflect upon the experiences of our Black colleagues.

We recognised that we had previously looked at our data through a broader minority ethnic lens, and this had masked some of the starker messages about representation of our Black staff and their experiences in Ofcom.

Five per cent of Ofcom's workforce is from a Black ethnic background, but a smaller percentage of senior roles are held by people from a Black ethnic background. Our Black colleagues are also under-represented in our regulatory work, and over-represented in our corporate services roles.

We also looked at our colleague survey data. It showed some striking differences between the experiences of Black people, those from other minority ethnic backgrounds and White people within Ofcom. For example, only 63% of Black colleagues answer positively when asked if they agree with the statement "I believe I am treated with fairness and respect as an individual [at Ofcom]". The same question is answered positively by 90% of White colleagues, 90% of Asian colleagues and 86% of colleagues from a mixed ethnic background.

This spring we brought together our RACE network and our senior leadership group to highlight some of these differences in representation and experiences, and to start the conversation on how Ofcom can improve for our Black employees. Many of the actions set out in sections four (systems and processes} and section 5 (culture and leadership) of this strategy will support improvements, but we want this conversation to be ongoing throughout the strategy period.

By 2026, we will increase the proportion of disabled people in Ofcom to 15%

In all areas of Ofcom's regulatory work, it is essential that we consider the needs of disabled people, recognising that without accessible communication sectors, they can be left extremely vulnerable and isolated. Our statutory duties include specific responsibilities relating to disabled citizens and consumers.

Within Ofcom 11% of our workforce have told us that they are disabled. By disabled, we mean a disability and/or long-term condition such as arthritis, asthma, back problems, dyslexia, depression, mobility condition, sickle cell, hearing, speech or visual impairment, for example. This has increased from 2015 when only 2% of our workforce said they were disabled. However, this is an area where we still have some of the biggest gaps in our data. Eleven percent have told us they would prefer not to tell us whether or not they consider themselves to be disabled, and 8% have not answered this question on our data system at all.

Our work to date has focused on making sure Ofcom is an inclusive workplace for disabled people. We have been developing our knowledge, behaviour and practices on disability through mandatory disability awareness training for all, introducing a system for recording disability-related absence and improving our recruitment, development and performance-management processes to account for appropriate adjustments. We overhauled our workplace adjustments policy, provided comprehensive guidance for line managers and introduced a workplace adjustments passport.

Now that we have put in place these fundamental measures we are setting a new ambition to make sure Ofcom is welcoming to all disabled people and setting a new workforce target of 15%. We know this will be challenging, but we are clear in our ambition in this area.

We will take a three-pronged approach to making progress towards this target. We will continue to educate everyone at Ofcom on what constitutes disability (including long-term health conditions), we will focus on inclusion to make sure those with a disability feel more comfortable sharing their personal data with us, and we will prioritise attainment of the Government's Disability Confident scheme at Level 3; a scheme developed by employers and disability organisations which encourages employers to recruit and retain disabled people and those with long-term conditions. We are currently at Level 2 (Disability Confident Employer) and aim to attain the highest level of Disability Confident Leader.

By 2026 we will have an equal gender balance at senior levels

Having achieved an equal gender balance across Ofcom overall, we believe we need to keep up our focus on gender over the coming years and to ensure a gender balance among senior leaders in Ofcom. At the end of 2020, 45% of our senior roles were held by women.

We also will track and monitor recruitment, progression and retention and the diversity mix within our cohort of senior women (for example minority ethnic senior women and disabled women).

We expect that in the long term, the proportion of men and women in our senior leadership roles may fluctuate slightly over time. We are also conscious that not everyone will choose to identify with one of those two genders. We are therefore aiming for an equal balance between male and female senior leaders, rather than talking about 50% targets.

By 2026 our boards, advisory committees and panels will have an equal gender balance and a membership that reflects the UK in ethnicity and disability

Non-executive members of the Ofcom Board are appointed by the Secretary of State for Digital, Culture, Media and Sport, but we also have a set of other statutory boards, committees and panels to which members are appointed by the Ofcom Board. These include: our Content Board, which supports the Ofcom Board on matters relating to broadcasting or online content; Advisory Committees for each of the nations (England, Scotland, Wales and Northern Ireland); and the Consumer Panel and Advisory Committee for Older and Disabled people. These bodies provide advice, input and – in some cases – oversight of our regulatory work. Having boards, advisory committees and panels that are representative of the different perspectives within our society will enable us to make the best decisions for everyone in the UK.

We recognise that the current balance of our non-executives is not representative of UK society. We are constantly looking for new ways to extend our reach so that we can attract applicants from a diverse range of backgrounds. For the first time, we published overall data on the diversity of our non-executive members in terms of gender, ethnicity and disability in our 2019/2020 Annual Report & Accounts (see Figure 2 below) and will continue to report on them each year.

Figure 2

Gender	66% male	32% female	2% not disclosed
Ethnicity	90% white	7% minority ethnic	2% not disclosed
Disability	85% no disability	10% disability	5% not disclosed

We have already taken a number of steps to try to widen the applicant pool for non-executive director roles - scrutinising the language we use in advertisements to make sure it is accessible and promoting vacancies through trusted networks, as well as formal adverts and postings on LinkedIn and Twitter. By setting a target in this area, we are confirming our commitment to increasing our diversity and making sure our decisions are based on the broadest range of voices possible.

The diversity of the non-executive membership of the Ofcom Board itself is a matter for the Government, but we will aim for equal gender balance and a level comparable with the working age populations on ethnicity and disability among the boards and committees to which the Ofcom Board makes appointments. Ofcom's boards and committees are spread across the UK, and they include some committees specifically appointed to reflect different nations within the UK. We have set our targets informed by both the UK adult populations and the relevant adult populations for those nations. We will aim for an equal gender balance, 15% of non-executive directors with disabilities and 10% of non-executive directors from a minority ethnic background.

These targets differ slightly from the Ofcom workforce targets on ethnicity and disability for several reasons. In setting our senior representation targets for Ofcom we have considered the profile of the full Ofcom workforce, which we believe we should aim to reflect at senior levels. All our workforce targets have also been informed by analysis of how much change we can achieve in the workforce over five years with sustained effort. Our boards and committees are different, since they have greater churn than our workforce during this period. They also have a different geographic spread to Ofcom's workforce.

Other strategic priorities

Socio-economic background, or class diversity

If Ofcom is to make communications work for everyone in the UK, we need to understand the perspectives of people from a wide range of socio-economic or class backgrounds. Indeed, we have a statutory duty to take into account the needs of people on low incomes when carrying out our work.

Our data collection in this area is at a very early stage. In the past two years we began to ask about socio-economic background in our colleague survey, and we have now begun to ask our workforce to provide this data on our people data system. Our survey information suggests that people who grew up in AB (upper middle class/middle class) backgrounds are over-represented at Ofcom.

We want class to be a strong focus for the next five years, ensuring that we have people from different class backgrounds working across Ofcom, but our data is not yet strong enough to draw any conclusions or set targets. We will build our understanding and expertise in the analysis and interpretation of our data on class, which can be harder to analyse as it relies on a basket of measures, and we will consider the interaction of class with other characteristics. We will continue to develop our data, taking into account best practice such as the Social Mobility Commission's

toolkit on measuring socio-economic diversity and working with other organisations like the Social Mobility Foundation.

We may set ourselves targets at a later stage during the strategy period but will first focus on building our data and our knowledge. We also recognise that it is not enough to improve the representation of people from different class backgrounds. We also need to build an inclusive culture in which everyone feels comfortable sharing their backgrounds and experiences at work.

We will further develop our prioritised socio-economic action plan, which will continue to focus on our progress against the Social Mobility Index, class-inclusive recruitment and ensuring diverse perspectives in our regulatory work.

Regional diversity

Ofcom has offices in London, Birmingham, Warrington, Baldock, Cardiff, Belfast and Edinburgh. Eighty one per cent of our workforce use our London office as their primary location, although we know that not all of them live in London. Having regional diversity, by which we mean members of our workforce based outside London, and in different geographic locations across the UK, is very valuable for our regulatory work, and can really help us to bring in different views and perspectives. We want to increase our geographic footprint, particularly in the North of England, and will plan to do so as we expand to take on our new functions. This is also an area in which we are likely to set workforce targets further into the five-year strategy period.

Sexual orientation and gender identity

Five per cent of our workforce have told us that they are lesbian, gay or bisexual (LGB). Much of our work on sexual orientation focuses on inclusion and allyship, supported by our Affinity Network for LGBT colleagues and allies. We've entered the Stonewall Workplace Equality Index for the past 12 years. The index assesses the progress a wide range of organisations are making in promoting LGBT equality in the workplace. This year we were proud to have achieved our highest ever ranking at 111 of 502 participating employers, rising 72 places in the index since 2019. This improvement was driven by some key things such as our Dignity and Respect at Work policy, Transitioning at Work policy and the strength and energy of our Affinity Network. We will continue to focus on allyship, advocacy and inclusion to drive representation in the organisation and to take account of the diversity within the LGBT+ community.

Improving our data on many types of diversity

All of our work on diversity and inclusion is underpinned by data. In addition to the targets and priority areas described above, we will continue the work already underway to improve our people data, and we will use that data to identify further areas for improvement. Alongside this, we will also continue to welcome feedback from our workforce and our employee networks, and to use that to identify further areas for improvement.

Our strategy is designed to deliver positive outcomes for all, not just colleagues with the characteristics discussed above. But we know that there will be specific challenges faced by people in particular groups. Strong data can help us to identify those challenges and make changes where needed. For example, we know from our annual survey that around a fifth of our workforce have caring responsibilities. We recently introduced a question on caring responsibilities in our people

system so we will eventually be able to report on the outcomes for carers from recruitment to progression to the proportion who leave us.

We will keep developing our people system with the aim of capturing data in an inclusive way. As well as adding a question on caring responsibilities, we also introduced questions about different types of disabilities to help us better tailor our support and a question on gender identity (alongside legal gender).

Measuring and improving inclusion

As we move towards becoming a naturally inclusive organisation, we will need to track our progress so we can do more of what works, and less of what is not as effective. Section six, delivery of our strategy, sets out how we propose to do so.

To guide us we will be introducing a new way to measure and track inclusion, using a new survey tool. This will enable us to build up a baseline for inclusion within Ofcom and to measure our progress. It will also enable us to analyse the results for our individual diverse communities (where the threshold is met), our larger teams, and all professional groups in Ofcom.

Making Ofcom work for everyone

We know that there are many more types of diversity than those mentioned in our targets and priorities, and many more groups who can face particular disadvantages, both within our workforce and the people we serve. We have set out above our particular priorities during the strategy period, but our efforts on diversity and inclusion will go much further. As part of this, we will continue to meet our obligations as an employer and as a public body in relation to particular characteristics protected by law, such as age, religion and belief or political opinion (in Northern Ireland). But we will also go much further. The fact that a specific group or characteristic is not mentioned above does not mean we do not consider it important, or that we will not focus on it during the strategy period. This strategy is designed to make Ofcom work for everyone. The next few sections of this document set out the action we will take to do so.

Processes and systems

In this section, we look at the processes and systems that we operate as a regulator and as an employer. These processes and systems determine how we choose our people, how we support them both personally and professionally, who works on our projects and how we assess the impact our work will have on the consumers we serve. We set out how we will apply the principles of our vision to them, to ensure we **connect to communities** in our regulatory work and beyond and make everything we do is **fair by design**.

We are connected to communities – Our colleagues are deeply connected to communities and under-served groups, so we can hear consumers' voices and learn about the society we serve. We use our own advantages to boost others and create positive social outcomes. We encourage colleagues to participate actively in areas they care about.

We are fair by design - We consciously design and monitor the way that we do things, the decisions we make and the systems we use so that they are fair and equitable for our colleagues and for the people we serve. We know that we sometimes need to support people differently, in order to treat them equally.

Our regulatory work

As the regulator of the communications sectors, we recognise the real-life impact of the work that we do and the decisions we make.

For example, our Networks and Communications Group has been reviewing the prices that providers charge broadband customers who are out of contract. We estimate that out-of-contract customers pay a total of £500m more, compared to average prices. So, we have worked with broadband providers to automatically reduce prices for vulnerable customers such as those suffering financial, health or emotional problems, who are out of contract – which, along with other pricing changes, we estimate can benefit around one million vulnerable out-of-contract customers by an average of around £70 each per year.

Our Spectrum and Technology Groups have introduced a new licensing approach, enabling innovative uses of the radio frequencies that devices use to communicate wirelessly. These easy-to-apply-for innovation and trial licences are supporting the way some businesses in rural areas use technology to deliver their services. We've been exploring how the next generation of mobile technology can benefit those in rural industries such as agriculture, not just in urban areas. We've seen first-hand how technology is changing the face of agriculture in a trip to Coleg Glynllifon near

Caernarfon – learning how access to the radio frequencies that we manage is allowing farmers to monitor irrigation, scan their animals' health remotely, or use grass sensors to monitor the rate of growth so their animals don't graze for too long in one spot.

Our Broadcasting and Online Content Group continues to work with the broadcasting industry to improve its diversity. We've held broadcasters to account in our annual diversity reports, gathered data on who is working in TV and radio, and continued to build relationships with broadcasters of all shapes and sizes to further influence attitudes and drive change in the sector. Progress is being made, but it is still too slow, and some groups remain consistently under-represented. Our research tells us that audiences want programmes that authentically portray life across the UK. They want shows that reflect their experiences and content they can trust. We know that talented people from across the UK expect to have opportunities in the broadcasting industry – wherever they come from.

We also recognise the important role that we play in upholding the standards set out in the Broadcasting Code – the rules that govern what we watch on TV and hear on the radio. We know that we must seek a wide range of views from different communities to help us understand attitudes towards programmes that are broadcast, and to help inform our thinking in response to the broad range of complaints we receive. We are committed to keep connecting with communities, learning and better understanding the different perspectives of different audiences, and sharing our thinking clearly with broadcasters, so they can learn too.

In all these areas, and many others, we will be a more effective regulator if we understand as much as possible about the different groups of people who will be affected by our work.

Equality impact assessments

Before making a decision we assess the impact of that decision on the people of the UK. We commit to undertaking market research to get the views of particular communities that we think may be particularly affected and ensuring the views of under-represented groups are made clear to our senior decision makers. Our consultation process means everyone has the opportunity to share their thoughts on any changes we're proposing before we make a decision.

But we believe we can do more. In year one of our strategy we'll conduct a full review of our processes for understanding the impact of the regulatory decisions we make.

We will explore how we can make our consultation process more inclusive, particularly among under-represented community groups. We will bring our vision of fairness by design into our governance framework so that when we are looking at a policy or reviewing equality impact assessments we can be confident that we have explored a broad range of views and reached a fair outcome.

Building in diversity and inclusion as we plan our regulatory work

The groups within Ofcom leading our regulatory work on each part of the communications sector will take responsibility for developing their own diversity and inclusion regulatory plans.

Our directors will be responsible and accountable for these plans and for truly embedding diversity and inclusion in the regulatory work carried out by their groups. We expect the leaders of our groups to be role models – to listen, educate and understand the diverse communities we serve, the

challenges and barriers they face and the needs they have, and to use that knowledge to inform the regulatory decisions we make. A commitment to diversity and inclusion will form part of all our directors' and group directors' collective objectives, and they will be held accountable to this by Ofcom's Chief Executive and senior management team.

In setting these plans teams will consider how we can best engage with the people that we represent when we make a proposal that affects them. They will be encouraged to trial new, innovative approaches to hear from those who are affected, such as by direct engagement through social media. They might explore how emerging technology can play a part in our regulatory work, such as artificial intelligence. And they might include targets to look back on regulatory interventions we've made – completing in-depth evaluations on our policies with a specific focus on the communities affected. We expect our directors to be ambitious, innovative and far-reaching in what their plans will include.

To prepare for this in 2021, we will be holding leadership workshops to help directors establish their plans and to enable us to share learning between different groups within Ofcom.

Connecting to underrepresented communities as an organisation

As part of our strategy, we want Ofcom to connect better to our communities and in particular to make sure we have insight and empathy for different community group needs. One of the ways in which we can do this is through the opportunities we support as an employer. We already have an extensive programme of local engagement from our partnerships with Careers Ready, Speakers for Schools and Better Bankside. We will continue to support and expand our opportunities for Ofcom colleagues to engage with communities.

Ofcom as an employer

The systems, processes and policies that we use as an employer have a huge impact on our ability to build a diverse workforce and an inclusive culture. We need to get these systems, processes and policies right if we are to deliver the vision we set out in section two and ultimately to do high quality work for the benefit of citizens and consumers.

We have made a good start over the past couple of years by introducing new or updated policies which remove barriers and provide the support that enables more of our people to do their jobs effectively. These changes include our new workplace adjustments policy, which makes it easier to request adjustments not only for disabled colleagues but also for parents and carers, colleagues with religious or cultural observances or those going through life changes where additional time or support might be needed (such as divorce). They also include our transitioning at work policy for trans colleagues, our carers' policy and updated family policies which recognise surrogacy and fertility treatment, increased paid paternity leave and new support for colleagues who experience miscarriage.

In this strategy, we will now go further. We will overhaul the core systems, processes and policies that we use as an employer to make them fairer by design, recognising that in order to treat everyone fairly we will have to support some people differently.

Based on consultation with our workforce, we have identified recruitment processes, career progression and performance management as the highest priorities and the areas we should initially focus on. So, we will start by reviewing these important processes.

Recruitment

To make sure we are hiring from the widest talent pool possible, we must look at how we hire. Inclusive recruitment processes lead to larger recruitment pools. These larger pools provide us with greater opportunities to increase our diversity by bringing in a broader range of skills, experience and cultural awareness.

We have made some immediate changes to our recruitment processes:

- Hiring managers must run job requirements through an inclusive language insight tool, including the description of the job and the language we use.
- It has been mandatory for our recruitment panels to have a mix of genders. We have now made it mandatory for there to also be ethnic diversity on our recruitment panels.
- We are trialling different and more specialist job advertisement boards and will monitor how effective these attraction methods continue to be, to make sure we reach the widest possible talent pool in the UK.

These changes have contributed to a rising proportion of recruitment for senior roles from a minority ethnic background, which has increased from 26% to 32% during 2020.

To further increase our capacity, enable us to have better data and strengthen our reach, in early 2021 we will partner with an external recruitment delivery partner. Hiring decisions will remain with Ofcom but our partner will work with us to achieve our vision and targets, helping us to effectively attract, source and shortlist diverse candidates for every role.

In 2021 we will review all our existing recruitment practices, including our role descriptions, questionnaires and interview formats, to make sure that they are objective and inclusive. We are already testing strengths-based assessment techniques instead of just competency-based assessments. We will carefully analyse the results and introduce this assessment across the organisation if it proves to be effective.

Throughout the strategy period, we will use our diversity data to target and reform aspects of the recruitment process. We will not be afraid to innovate in our approach to bringing diverse talent into Ofcom.

Career progression

The second key area of focus is career progression. Recruitment alone will not get us to where we need to be, so we also need to focus on developing colleagues from under-represented groups into senior roles.

Our colleague survey data tells us minority ethnic colleagues responded less positively to questions about appraisal support from managers and about feeling valued. Our networks have also reported concerns that opportunities to develop their careers do not always feel fairly distributed.

We will support all colleagues with a more senior, specially trained, career manager in the first year of our strategy. We will continue running, Rise, our targeted development programme for high-performing individuals from under-represented groups that we launched in 2019. And we will refocus our internal coaching programme to ensure it supports talent from our most under-represented groups, such as Black colleagues, and provide return-to-work coaching for all those coming back from family leave. Making sure these new changes work for our under-represented colleagues is a core part of our success measures.

Rise - creating a pipeline of diverse leaders

We have started work to give targeted and bespoke career support to high-performing individuals from under-represented groups through our Rise career programme which we launched in the Summer of 2019.

Rise is a targeted development programme for colleagues from groups currently under-represented at senior level in Ofcom. There are currently 54 people on the scheme. Our focus on these groups is based on our senior-level targets for women and minority ethnic colleagues, combined with our diversity and inclusion programme priorities of minority ethnicity and disability. The emphasis with Rise is on intersectionality – where one or more diversity characteristics intersect. All of our Rise participants have a senior sponsor and some participants have already been promoted.

Below, two of our Rise participants share their thoughts on the programme.

"The Rise team has clear objectives and is taking concrete steps to help further the progression of its members. Communication has been regular and transparent both in terms of job opportunities across Ofcom but also updates on the milestones set out by the team. I have been empowered to take a ten-week course to grow my strategic skills and have been provided with some coaching to improve my visibility and presence in high-profile situations". Rise Participant A

"I have been a member of the Rise programme since September 2019 and have always supported the concept and opportunities it allows for colleagues. In the past six months I have seen a definite step-change in the way the programme is being run and I look forward to continuing as a member". Rise Participant B

We currently spend 10% of our entire learning and development budget on Rise and we will maintain these investment levels for the duration of the strategy period, creating better access to career and promotion opportunities through sponsorship, targeted development workshops and opportunities for mentoring. We also intend to extend participation in the programme to more colleagues from 2022, so we have a full pipeline of leaders from under-represented groups advancing through Ofcom.

In addition to specific support for our underrepresented groups, we will offer full and frank feedback to those who internally apply for roles. Like our external panels, any internal recruitment panels will always be diverse in gender and ethnicity.

We recognise that not all people are looking for promotion and, in any organisation, not everyone can be promoted. Career progression does not always equate to promotion, and many people will have careers that include Ofcom alongside experience in our commercial sectors or elsewhere in the public sector. But we do think we can develop every member of our workforce. We are committed to making sure there are opportunities for all of our people to develop their careers while they are at Ofcom. This is about everyone doing their best work and making it easier, and more attractive, to work across our broad range of industries. A policy professional, or a lawyer, should be able to come to Ofcom and develop policy or conduct legal casework across areas such as telecoms, broadcasting, post and online, for example.

Over the strategy period we will review processes which link to career progression, such as how we allocate our work. We will improve our reporting and tracking of projects and secondments so we can identify patterns or trends. We will look at how we create career paths for both technical and management roles.

Performance management

Our third focus area is performance management. In 2021 we will undertake a full review of our performance management process and ensure the changes are implemented from 2022 onwards.

We already track how our existing performance review processes affect different groups and report this both internally and externally on an annual basis. In the past year, and very positively, we have seen broad equality in how the performance ratings are distributed between men and women and colleagues of white and minority ethnic backgrounds. This data has helped us to ensure that performance is being effectively managed with strengths rewarded and development areas being identified - an essential process for all high-performing organisations.

Feedback from line managers and our networks, and responses from colleagues to questions on receiving feedback as part of the colleague survey, suggest that we need to get better at giving feedback throughout the year with greater clarity on both the strengths and the areas for development. We will examine how we can improve feedback for colleagues consistently throughout the year.

Lastly, we will review how this links to reward. We annually report on our gender and ethnicity pay gaps and later this year we will publish our first disability pay gap report. We will make sure our new approaches to performance management have a positive impact on our work to address pay gaps.

Culture and leadership

In this section we set out how, through our leadership and our work on organisational culture, we will help to develop an organisation which is **naturally inclusive**, in which we all **take personal responsibility**, and in which **our leaders are role models**.

We are naturally inclusive - Our culture means that everyone feels they belong, are valued and have a voice. We understand and celebrate many types of diversity, including combinations of identities. We know that everyone of us brings diversity to Ofcom and that we are all more than just our characteristics.

Our leaders are role models - Our leaders live our values every day. They build diversity and inclusion and colleague's wellbeing into their daily decisions to make Ofcom a fantastic place to work for our colleagues and to make communications work for everyone.

We take personal responsibility - Diversity and inclusion must be a personal purpose and mission for all Ofcom colleagues. We all play our part, no matter who we are, what we do and where we are located.

An inclusive culture

We have explained in this strategy how diversity of thought and experience will strengthen our work as a regulator, but we only reap the benefits of this diversity if our people feel able to be themselves at work and share their own diverse experiences, and if they are listened to when they do.

We want to strengthen Ofcom as an inclusive place to work. This doesn't mean we agree all the time. We hold each other to high standards, seeking and giving challenge, but we always listen to each other and treat each other with professionalism, respect and kindness.

Two-thirds of our people already feel they have a strong sense of belonging to Ofcom. While this is a positive start, we want to radically improve this over the next five years. We also acknowledge that this is not a consistent view across Ofcom; some groups feel less included than others. For example, fewer Black people working for Ofcom have a strong sense of belonging (56%).

Fairness in our systems and processes – covered in the previous section – plays an important role in creating an inclusive workplace culture and the benefits that brings. However, it is not enough to have fair processes alone. We also need managers, leaders and colleagues to behave in an inclusive way, being conscious of disadvantages that people might face and taking steps to try and address these.

Example: Ofcom's support throughout the pandemic

Like many other organisations, the coronavirus (Covid-19) pandemic has forced us to reflect on how we can best serve our colleagues while making sure we continue to perform our duties. We closed most of our offices in late March, until early summer, and this meant that most of our staff were required to work from home.

We provided financial and practical assistance to colleagues in obtaining the equipment needed to work from home. But working from home can be a challenge regardless of what equipment you have.

A colleague shared in a July 2020 survey response*: "(I struggle with the ...) inability to separate work and home life. Because of my living arrangements, I have been spending most of my day in the same room and this makes it very hard to switch off and put any mental divider down even at the end of a long day or at weekends/on leave."*

We took steps to provide every colleague with support for their mental health through our 50 mental health first aiders and a range of other tools.

We adopted the philosophy of families first and provided maximum flexibility to support our staff. With schools being closed, and parents and carers having to manage their children's learning, we made paid dependant leave available to all colleagues which could be taken in days, half-days or hourly blocks. We also extended our paid volunteering leave to eight days and introduced paid time off for carers.

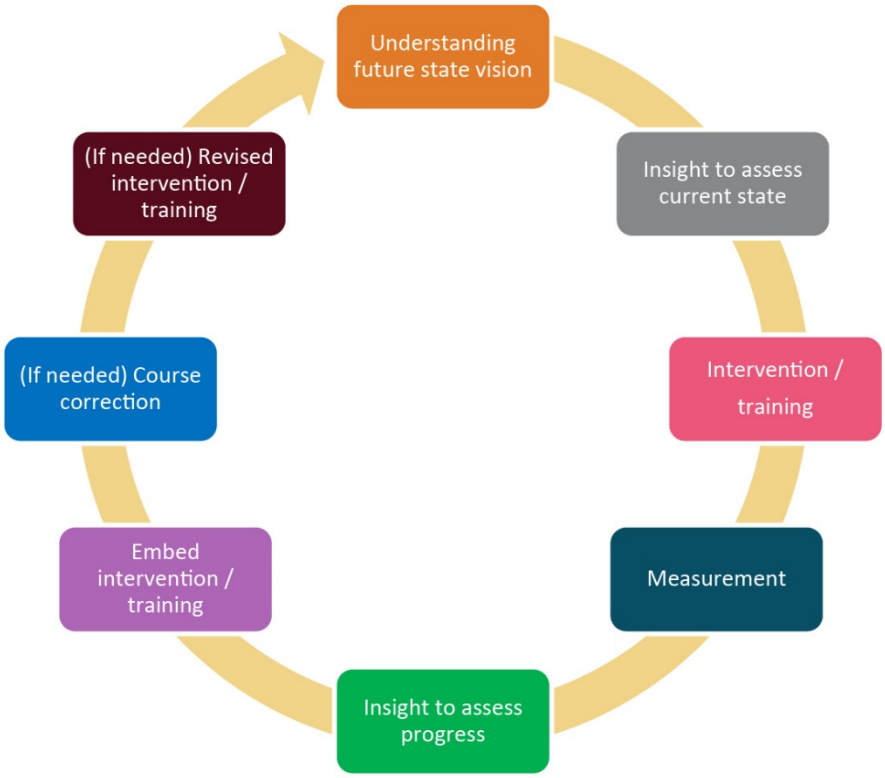
By making sure colleagues were well-supported, we were able to deliver an extensive programme of work in 2020 across all the sectors we regulate. Our colleagues also reacted very positively to the efforts we made, with 96% of our colleagues telling us we have offered them the support they need.

"I can honestly say that Ofcom has been fantastic in how it has dealt with everything from home equipment / set up, IT equipment and support, colleague communications and general support for its colleagues, ranging from dependency leave to mental health awareness .... I could go on and on."

Measuring and tracking inclusion

We will introduce a new way to measure and track inclusion through the strategy period. In early 2021 we will test a new inclusion tracker. This tracker is made up of statistically validated measures of inclusion covering areas such as the ability to have a voice and to speak up, belonging and feeling valued. We will also track how our leaders act as role models for our values and behaviours via a new survey tool, which enables us to break down the results by teams and by diverse groups, wherever the numbers are large enough.

By having a consistent set of measures for inclusion, and by regularly measuring it over each year, we will be better able to track our progress against our strategy and change our approach if we need to. The figure below shows our approach.



The new Inclusion tracker, which will be used in evenly-spaced, small surveys throughout the year, will be complemented by our annual employee survey which will continue to provide us with an extensive insight into sentiment on a whole range of areas linked to our workplace and culture.

Adding respect to our values

In 2015 we launched the Ofcom values of **collaboration**, **agility**, **excellence** and **empowerment.** These values describe the way we should work at Ofcom. During 2019 and 2020 we worked with colleagues to help articulate the behaviours linked to these values, which showed how important respect was to people at work. This was amplified over the summer of 2020, after the raw emotions of the conversation around race, and racism, in the UK. Over 400 colleagues felt that it was very important to the future success of Ofcom that everyone, particular our managers and leaders, lived all of our values every day.

In light of this feedback, we have decided that we will strengthen the focus on our values. In 2021 we will revisit previously planned work to underline the behaviours for colleagues which underpin our values, and to embed these values and behaviours into processes, policies and everyday work.

We will also add **respect** as a new value for Ofcom and work with colleagues in 2021 to set out the behaviours that underpin this new value.

Health and wellbeing

Throughout the strategy period we will support our colleagues with their physical and mental health. We are committed to ending any stigma attached to having poor mental health and are looking further at how we provide targeted mental health support for specific groups such as minority ethnic colleagues.

Our wellbeing programme, Thrive@Ofcom, launched in early 2020 and has also been vital during the pandemic, making support to colleagues available when and where they needed it most.

We have recently completed our first refresh of this programme, and will do so each year. This year we will continue to focus on short term support (over the next 12 months) through the challenges created by Covid-19. Our longer-term wellbeing programme (2021-2023) will focus on four strategic priorities:

1) mental wellbeing;
2) physical wellbeing;
3) financial wellbeing; and
4) corporate social responsibility (CSR), which involves 'doing good to feel good'.

For each of the priorities we will use our data and colleague engagement to develop specific targeted interventions.

Our colleague networks

We are fortunate to have vibrant and active employee networks and groups representing some of our diverse communities within Ofcom. These networks and groups play an important role in supporting colleagues, helping Ofcom to raise awareness of diversity and inclusion, and holding senior managers to account both in our ambition and our delivery. In previous years we've seen events and campaigns organised by our networks around areas such as menopause, ethnicity and trans awareness. They also offer us a great insight into how our people feel from different diversity groups.

We will keep working with our networks and groups to bring our diversity and inclusion strategy to life. We will learn from and support them, and take on a co-ordinating role to achieve even greater collaboration across all networks and groups, delivering a real intersectional approach to celebrating diversity and inclusion at Ofcom. We are investing in training our network chairs and leaders in a joint pilot programme with Henley Business School. We will also ensure that each network is supported and sponsored by one of Ofcom's senior leaders, and that we align funding to support the events and learning across Ofcom.

Ensuring our leaders are role models

The quality of our people leadership makes a huge difference to our culture and to our performance as an organisation. We are recognising this in a new performance objective on values and behaviours for all our directors.

Our new senior leadership objective

Role modelling Ofcom values and behaviours – personally role modelling our values and behaviours in everything you do, every day, both with your teams and across Ofcom. Actively driving and delivering our diversity & inclusion agenda and associated targets, both for your group and the wider organisation.

Beginning in 2021, we will pilot new, specific inclusive leadership training for all directors in Ofcom. We will also develop our approach to coaching and mentoring for our senior leaders in the next two to three years, with a particular focus on reverse mentoring, a two-way reciprocal mentoring relationship. We will measure progress against this leadership objective in a new leadership survey, and will hold leaders to account for their performance.

Alongside the training of our most senior leaders in Ofcom, we will launch a new people management development programme for all managers in Ofcom. This will be designed to make sure all people managers are grounded in the basics of good people management and the ability to build successful diverse teams. It will be a two-year programme and will be measured throughout to ensure it makes a tangible difference for our colleagues. The programme will include areas such as building and using diverse teams, inclusive leadership and valuing individual strengths.

Personal responsibility

With around 1,000 people working for Ofcom, we know real change starts when everyone engages. One of the elements in our vision is that we all take personal responsibility. We want to help people engage with topics which may currently be outside their comfort zone or lived experience, and continue to build awareness, acceptance and understanding of difference.

Starting the conversation

Colleagues have told us that they want to make people feel more included but sometimes it is hard to start the conversations needed to make this happen. Sometimes they are unsure whether some conversations are appropriate for the workplace. We will help colleagues to overcome these barriers so they can do what they think is right to support others.

We are currently piloting targeted, peer-to-peer inclusion training in our Spectrum Group. This has a focus on understanding the impact of exclusion and on how we can better understand our own attitudes, behaviours and approaches to topics which can arise at work. This programme also aims to make the link back to how diversity and inclusion will support Ofcom in our mission of making communications work for everyone. We will learn from this programme, measure its impact and then determine our next steps.

Raising awareness

We are also building awareness through training on particular types of diversity (for example, understanding neurodiversity). We often tailor this training for four groups: our senior leaders; our people managers; the teams who directly interface with the public, such as our contact centre and reception colleagues; and all colleagues. This helps colleagues to consider their own roles in creating an inclusive workplace.

In addition to formal training, through the strategy period we will continue to support and co-ordinate work to raise awareness of issues related to diversity and inclusion, working closely with our employee networks. We will continue to use a range of methods, such as bringing in external speakers, blogs from colleagues on our intranet and all Ofcom events.

Delivering our strategy

In this section we explain how we will deliver our strategy and measure our progress along the way.

Accountability

Our diversity and inclusion strategy has been approved by the Ofcom Board and will be overseen by our Chief Executive, Dame Melanie Dawes and the rest of our Senior Management Team. Our Senior Management Team and our directors will be responsible for applying this strategy in their work.

Ofcom's Board and People Committee will hold our Senior Management Team to account for progress in delivering the strategy. Progress against our targets and regulatory action plans will be reported to them on a regular basis.

Ofcom is fortunate to have many strong networks and groups of colleagues who are passionate about diversity and inclusion. We expect our employee networks and groups to continue to play a vital role in holding our leaders to account by providing a collective voice for colleagues to speak up on issues with senior management and improve our awareness. We will create a Diversity and Inclusion Interest Group, comprising representatives from our networks and interest groups. It will be consulted and informed on our diversity and inclusion work alongside our main employee representative body, the Colleague Forum.

Measuring our progress

We have used data and evidence to identify where we need to focus our attention, and we will use this data to measure our progress on diversity and inclusion and inform our future work. We will develop our data so that we can identify where we need to do more, and where we are making a positive difference.

Our interventions will be based on evidence such as representation data, employee engagement scores and feedback, which is gathered, owned and reported on by our People and Transformation team. Our strategy includes a broad range of internal measures to track progress on diversity and inclusion, such as surveys and insight tools.

We will continue to improve our data. We have recently enhanced our people data system for collecting representation data. We will increase our ability to create more granular and aggregate reporting based on a range of organisation attributes, including the ability to report on multiple characteristics at the same time.

We will also seek external benchmarking on diversity measures such as Stonewall's Workplace Equality Index (sexual orientation) and Social Mobility Foundation's Social Mobility Employer Index.

Reporting

We will publish annual updates on our diversity and inclusion strategy. These updates will include progress against our targets and areas of focus. Separately, as part of our Annual Report and Accounts, we will report on our diversity data as an organisation, including our boards and committees. We will also continue to report on our gender pay gap, our ethnicity pay gap and in 2021 we will also start reporting our disability pay gap.