Diversity at Ofcom 2020/21 and Pay gap 2020/21 report

Diversity at Ofcom 2020/21 – Welsh overview

A Braille copy of this report is available on request and we welcome requests for formats other than print, for example an audio recording or a British Sign Language video

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1. Overview

Ofcom makes sure people get the best from their broadband, home phone and mobile services wherever they are in the UK. We monitor standards on TV and radio. We also oversee the universal postal service, look after the airwaves used by wireless devices, and help to make sure people don't get scammed and are protected from bad practices.

We have set new expectations on telecoms firms for supporting lower income and vulnerable consumers. Alongside this we are setting clearer rules to make TV accessible to people with hearing or sight impairments.

We have recently taken on the regulation of video-sharing platforms, and we are preparing to take on new powers to ensure a safer life online for everyone. Protecting consumers is at the heart of what we do.

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 country as it is today.

At Ofcom we are determined to **do all we can to promote diversity, equality and inclusion inside our organisation** and in the sectors we regulate. These are fundamental to achieving our purpose: to make communications work for everyone.

A new diversity and inclusion strategy

In January 2021, we published a new Diversity and Inclusion Strategy 2021-2026. We are setting more stretching goals to deliver a better balance of gender and ethnicity at senior levels and a new target to improve the representation of disabled people at Ofcom. We are committing to making our boards and advisory committees truly representative of the UK. We aim to meet all these targets by 2026.

Our targets have been informed by data in our 2019/2020 Diversity at Ofcom report, along with other evidence including our colleague surveys and work with our nine employee network groups.

We have a clear vision for the type of organisation we want to be, and the areas to which we will give particular focus. 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.

We will foster a culture in which everyone feels they are valued, have a voice 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.

We expect to be judged against our aims, so we will report annually on whether we are making progress towards our goals.

Being held to account

This annual report sets out the make-up of our workforce overall as well as the outcomes for particular groups of employees, from jobseekers to new joiners to those deciding to move to a new employer. We also look in depth at our pay gap data as of March 2021.

This is the first report under the new strategy, making this data the baseline. Data in this report covers some of the protected characteristics under the Equality Act 2010[1] but also includes part-time workers, a characteristic that is not protected under the Act. We aim to compare our overall diversity profiles to the most recently available and robust population sources that are available.

Future reports will continue to set out in detail how we have progressed.

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[1] Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

2. About our diversity data

When people join Ofcom, we ask them to complete a diversity monitoring form and to review their information annually or when details need to be updated.

Data in this report is based on information provided by our workforce and covers April 2020 to March 2021, unless indicated otherwise. This report fulfils part of our duties under the Equality Act 2010 and helps to inform our approach to equality, diversity and inclusion at Ofcom.

The questions we ask staff cover gender (referred to as 'sex' in the Equality Act 2010 and by which we mean the sex assigned to a person at birth or the sex a person has legally transitioned to), ethnicity ('race' in the Equality Act 2010), disability, sexual orientation and religion or belief. Age data is taken from date-of-birth information and, along with gender, is a required field for HMRC reporting purposes. Part-time working information is based on people's contractual hours once they join us.

In 2020 we added to our diversity monitoring form questions on caring responsibilities, category of disability, gender identity (by which by mean an individual whose gender is different to or does not sit comfortably with, that assigned at birth), and a set of questions to gauge socio-economic background. Our completion rates are currently around 25% for these new questions and our aim is for a 75% completion rate so we can analyse the data in a robust and meaningful way.

People are free to decide not to answer the questions, and this information is included in our datasets. We also use information from our recruitment system, which is held separately and is entirely voluntary. We have more work to do to improve data completion of applicants, particularly from third party recruiters, and so there are some limitations when looking this data.

Only data that covers at least 10 people is captured in this report, to protect people's private information. There will therefore be some data points where we either aggregate data or where we don't show any data at all. This is often the case for ethnicity and any ethnicity breakdowns as well as sexual orientation breakdowns. Internally we are considering all data points, particularly on ethnicity breakdowns as we committed to in our diversity and inclusion strategy, and we will keep focusing on differences in representation and experiences for different groups within Ofcom.

We have carried out internal communications campaigns to encourage our employees to share their diversity data with us. These campaigns have notably decreased our 'no data' gaps, particularly around disability, sexual orientation and religion or belief. 'No data' gaps are where colleagues have not provided their information to us at all, which is different to choosing 'prefer not to say'. Closing our 'no data' gaps has given us a much more accurate reflection of the profile of our workforce in these areas, which enables us to better understand the impact of our processes, policies and systems around areas such as progression and retention. Closing our no data gaps on disability has enabled us for the very first time to voluntarily publish our disability pay gap in May 2021, alongside our ethnicity pay gap, also published voluntarily, and our gender pay gap. As of March 2021, our no data gaps for disability, sexual orientation and religion or belief were 7% respectively. We will run further internal communications campaigns to continue to encourage our staff to share their information with us, although the sharing of such information will always be voluntary.

3. Ofcom's diversity and inclusion strategy

## A look at our 2015-2020 workforce targets

In this section, we set out our closing position on our most recent set of five-year workforce targets.

In 2015, we established three diversity targets to be achieved by the end of 2020:

- **equal gender balance**: women to make up 50% across Ofcom;
- **more women at senior level (principal and senior managers and specialists)**: women to make up at least 40% of colleagues at senior level; and
- **senior ethnic diversity**: 13% of colleagues at a senior level to be from a minority ethnic background.

Where we refer to women in our targets and throughout this report, we mean people born with characteristics that are labelled as female as well as people that may have legally changed their sex to female.

We met our overall gender balance target in September 2020. We met and exceeded our senior gender ambition of 40% - as at December 2020 this was 44%. While we made some progress on our senior ethnicity target, we failed to meet our ambition; 11% of senior roles were held by people from minority ethnic backgrounds at the end of December 2020, two percentage points short of our 13% target. We recognise there is more work to do in this area. The infographic below tracks our progress over the 2015-2020 period.
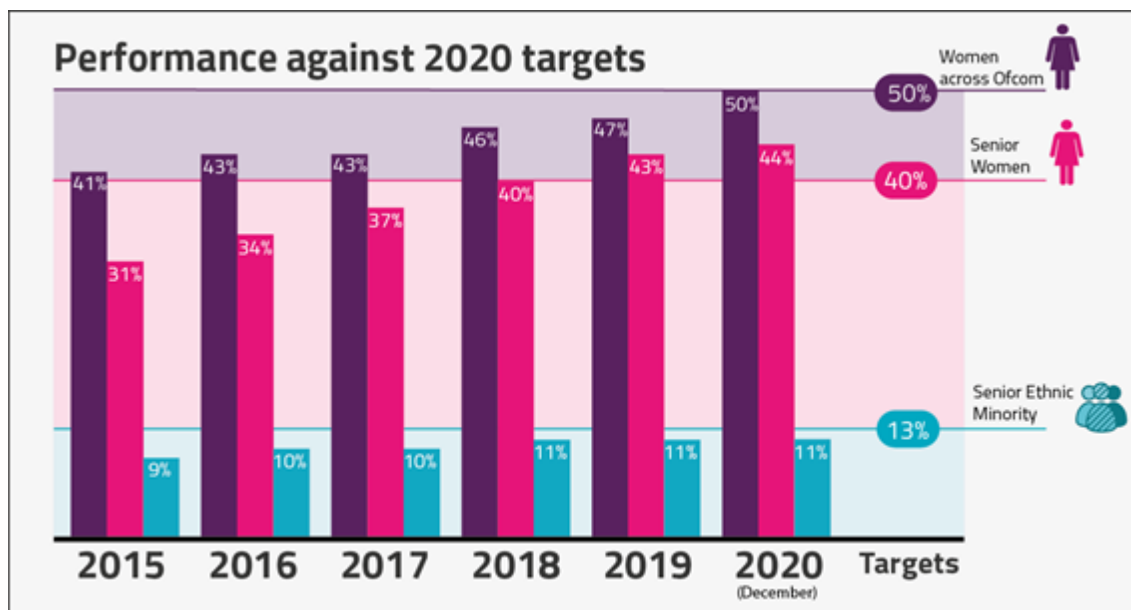
Covers the 2015-2020 target period. Base: all Ofcom employees as at the end of March in each year, apart from 2020 which is based on 31 December as we were then working to determine a new set of five-year targets which was to start from March 2021.

Our 2021-2026 targets and key areas of focus in our diversity and inclusion strategy

Our starting position

Our new diversity and inclusion strategy sets out our focus and commitment to minority ethnic and gender representation at senior levels, alongside disability across our entire workforce. This includes new workforce targets in these areas of under-representation:

- **senior ethnicity**: 16% of our senior leaders from minority ethnic backgrounds (starting position 11%)
- **senior gender balance**: An equal gender balance at senior levels (44% starting position)
- **disability**: 15% of our workforce are disabled (12% starting position)

We have also, for the first time, set targets for our boards and committees over which we have recruitment control:

- an approximately equal gender balance and a level comparable with the relevant populations on disability (15%) and ethnicity (10%). Progress on this will be published in our Annual Reports and Accounts.

Our diversity and inclusion strategy also includes a new focus on socio-economic diversity at Ofcom. Our first step is to gather and understand relevant data and we have introduced three questions in our HR database to help us do this: parental occupation of main/highest income earner in household when the employee was aged 14; the type of school the person mainly attended between the ages of 11 and 16 (state or private including whether it was selective or not, or overseas); and highest level of qualification achieved by either parent(s)/guardian(s) by the time the person was 18. We may consider setting targets on socio-economic diversity in the future once our data is robust enough (at least a 75% completion rate) and if it indicates under-representation.

In addition, we made commitments to increasing our out-of-London presence and on improving the representation and experiences of our Black employees.

Achievements since the launch of our diversity and inclusion strategy

Developed group-level action plans.

There are a number of groups within Ofcom. These are: Network and Communications; Broadcasting and Online; Technology; Economics; Spectrum; Strategy and Research; and Legal and Corporate. Each group's individual plans and KPIs include workforce aspirations, linked to our new workforce targets on senior gender, senior ethnicity and disability Ofcom-wide. This is alongside inclusion aspirations and consideration of internal and external talent pipelines. They also contain specific areas of focus relevant to each professional area and their local setting.

New Manchester Hub. We will open a new hub in Manchester later in 2021 as we grow by approximately 30% in the next five years to take on the regulation of the online safety and telecoms security regimes.

New strategy on ethnicity. We launched a refreshed strategy to improve the representation and experiences of our Black colleagues.

Partnership with external recruiter to focus on diverse hiring. As we transform our recruitment practices and approach in year one of our strategy, we have partnered with an external recruiter who operate as an extension of our own internal resourcing team. They have created a diversity and inclusion recruitment strategy which supports our goals and will be reviewing our selection and assessment approach later this year to make them as fair and inclusive as possible. And we have started the work on overhauling our performance management approach and have held a series of workshops with a wide range of employees of all job levels and a variety of roles. We are also seeking feedback from our colleague diversity networks through surveys they are carrying out with their members.

More input from external partners on best practice. We value external perspectives on our diversity, inclusion and equality work. This enables us to see what others are doing to improve their workplaces for different people. This helps us to identify where we are doing well and where we can do more. We therefore use the following external benchmarking:

- Social Mobility Foundation's Social Mobility Index;
- Investing in Ethnicity's Maturity Index;
- Stonewall's Workplace Equality Index;
- Time Top 50 Employers for Women from Business in the Community;
- Employers for Carers/Carers UK Carers Confident accreditation; and
- Business in the Community's Race at Work Survey

Named a Times Top 50 Employer for Women. We were delighted to again be named a Times Top 50 Employer for Women in April 2021 and proud to have achieved Carer Confident Accomplished level 2 (level 3 is the highest) in November 2020, just before the launch of our strategy. We have recently entered the Social Mobility Index and Maturity Index for ethnicity, and will be entering the Stonewall Workplace Equality Index in the autumn. The Business Disability Forum provides us with invaluable perspectives as we transform our recruitment, performance and career processes and approach, and we are committed to working towards Disability Confident Level 3 (the highest level) status as part of our disability ambitions.

Guidance we get from these different benchmarking organisations is purely advisory, and we make our final decisions on any organisational policies, approaches and procedures after discussing them with our colleagues and through our Ofcom governance process.

4. Ofcom's diversity profile

This section focuses in more detail on the diversity make up of our organisation overall, as well as across the following areas:

- job level;
- line managers;
- recruitment stages;
- new starters;
- performance ratings;
- promotion outcomes; and
- leavers.

To make sense of the data, we compare the proportions of each group to the proportions they represent at Ofcom. As well as some 'no data' gaps in our statistics, 'prefer not to say' can also contribute to the results and therefore to what we can learn from the numbers, particularly where the proportions they account for are larger. To narrow or close these gaps, we will continue to build on previous internal communications campaigns to encourage our people to provide their diversity data and to build a culture in which people feel comfortable sharing their information with us.

Some of the data shown may not add up to 100% due to rounding of values.

Organisational portrait

Ofcom is a vibrant organisation of just over 1,000 people. In non-Covid times we have staff based in our London, Birmingham, Warrington and Baldock offices as well as Cardiff, Edinburgh and Belfast. Most of our people have worked from home in the past year during lockdown, except for some of our key workers, such as spectrum engineers.

Eighty-one per cent of our workforce use London as their primary base and 19% are based outside of London with Warrington (5%), Baldock (5%) and Edinburgh (4%) making up most of this.

There are five grades across Ofcom ranging from Administrator to Senior Management and Specialists ('SMS' – director level). The largest proportion of employees are Senior Associates who make up two-fifths of our organisation (42%) followed by Associates (28%). There are broadly similar proportions of SMS (7%) and Administrators (5%) and close to a fifth (18%) are Principals.

Ofcom job levels — All colleagues as at end of March 2021 (n=1056)

- SMS (7%)
- Principal (18%)
- Senior Associate (42%)
- Associate (28%)
- Admin (5%)
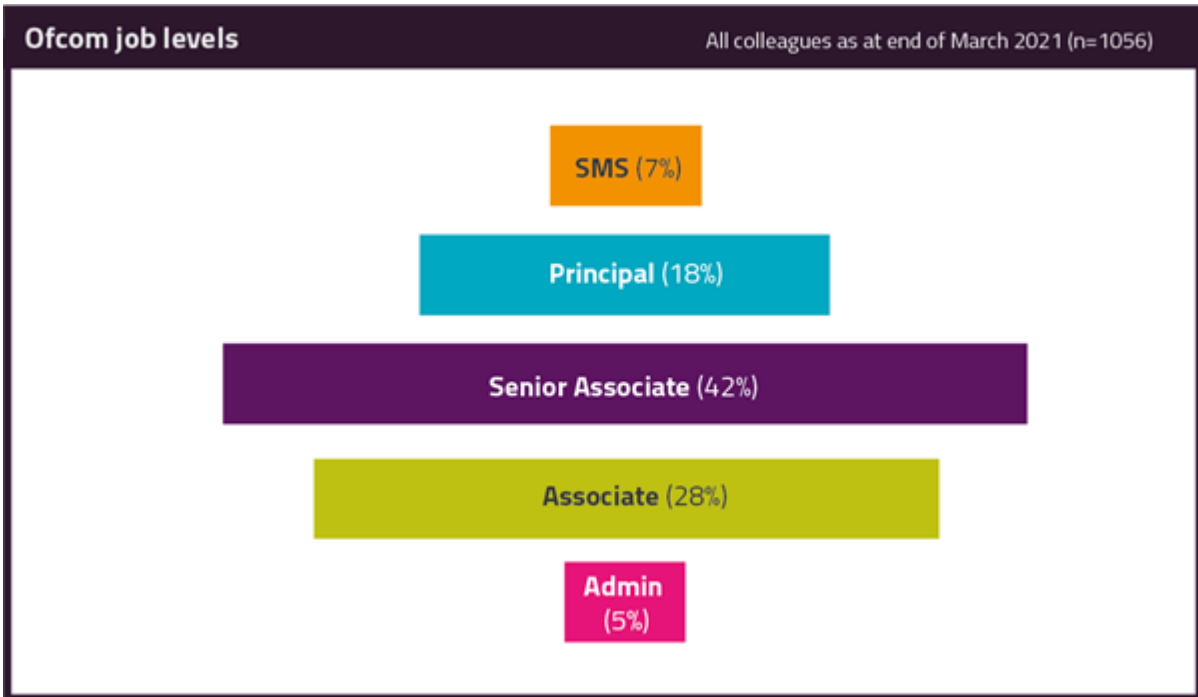
Base: all Ofcom as at the end of March 2021 (n=1056)

OFCOM PROFILE

All colleagues 31 March 2021 (n=1056)

Age

- 50-59: 19%
- 60+: 5%
- <30: 19%
- 40-49: 26%
- 30-39: 31%

Gender

- Male: 50%
- Female: 50%

Working pattern by gender

- Full time: 91%
  - Male: 53%
  - Female: 47%
- Part time: 9%
  - Male: 17%
  - Female: 83%

Ethnicity

- White ethnic: 73%
- Prefer not to say: 5%
- Minority ethnic: 21%
  - Asian: 12%
  - Black: 6%
  - Mixed: 3%

Religion

- Prefer not to say: 8%
- No data: 7%
- Not religious: 45%
- Religious: 41%
  - Christian: 29%
  - Muslim: 5%
  - Hindu: 3%
  - Jewish: 2%
  - Other: 3%

Disability

- Prefer not to say: 10%
- No data: 7%
- Disabled: 12%
- Not disabled: 71%

Sexual orientation

- Heterosexual: 77%
- Prefer not to say: 11%
- No data: 7%
- LGB: 6%

White ethnic = White British, Irish, Gypsy or Irish traveller and any other White ethnic background. Religious = Christian, Muslim, Hindu, Sikh, Jewish, Buddhist, other religion/faith.

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Our workforce diversity

Gender

Fifty per cent of our workforce are women, broadly comparable to the UK working age population of 48% (ONS, May 2021). Looking at each grade and the gender split within each grade, women make up over half in Administrator (61%) and Associate roles (57%) and under half in principal (45%) and SMS (41%) jobs. There is a closer balance in the Senior Associate band where women make up just under half (48%).

Ethnicity

Twenty one per cent of our colleagues are from minority ethnic backgrounds, above the working age population of 12% across the UK (ONS, May 2021). Of this 21%, people from Asian backgrounds make up the largest proportion at 12% followed by Black people (6%) and people from mixed heritage backgrounds (3%). Looking at the breakdown of these groups further, of Asian people at Ofcom 5% are of Indian heritage, 2% are Pakistani and 2% are of other Asian backgrounds. People from a Chinese or Bangladeshi backgrounds each account for 1%. Among the 6% Black employees at Ofcom, those of African heritage make up 4% while 2% are of Caribbean heritage (and a very small proportion from other Black backgrounds).

As with gender, our data shows that our minority ethnic population is not evenly spread across our organisation. There is above-average representation in Administrator (25%) and Associate roles (27%) relative to the Ofcom average representation of 21%, and below-average presence in our most senior roles of principals and SMS combined (11%). However, representation in Senior Associate jobs (22%) is in line with the Ofcom average.

Disability

Just over a tenth (12%) of our staff have told us they are disabled. This is below the working age population of 19%, which is why this is a priority area of focus for us in the next five years, supported by our new workforce target on disability. We think that an ambition of 15% disabled representation Ofcom wide is a stretching yet realistic aspiration, which we hope to achieve through our organisational growth as well as creating a culture in which people feel comfortable and safe to tell us they are disabled. Our new disability colleague network, SOUND, aims to support all disabled staff, including developing the understanding of all employees to have an open conversation about disability, long-term conditions and neurodiversity. We have introduced a question asking our disabled colleagues to share with us which category of disability or long-term condition applies to them. This will help us to understand and identify where we can offer more, or better, targeted support.

Sexual orientation

Six percent of our workforce have told us they are lesbian, gay or bi (LGB). In March 2020 this was 4%. Six percent is above adult population trends (ONS 2019 cites that 3% of the adult population identify as LGB in their Annual Population Survey), but others think that the figure might be closer to

6-7%. Creating a culture of inclusion and belonging will be key for us to maintain representation of LGB colleagues across Ofcom.

Religion or belief

Forty one per cent of our staff say they are religious and 45% say they are not. Of those that say they have a faith, the majority (29%) are Christian, 5% are Muslim, 3% are Hindu, 2% are Jewish and 3% are from a combination of other religions/faiths.

Our 'religious' statistic is below the Census 2011 figure of 75% for adults in England and Wales and our 'not religious' statistic is above the 25% stated in the Census. The biggest variant in the distribution of people by the established faiths is in the proportion who say they are Christian – 59% in the Census 2011 compared to 29% at Ofcom. Given that the Census is now a decade old we can draw on more recent population estimates on religion/belief from research by the National Centre for Social Research in its British Social Attitudes (BSA) report. Its 2019 report suggests that 47% of Britain in 2018 identity as religious with 38% of this figure saying they are Christian and 9% that they are non-Christian (Muslim, Jewish and other non-Christian). 52% of people in Britain say they do not regard themselves as belonging to any religion according to their research. We will evaluate our religion/belief profile once Census 2021 data is made available.

Age and working patterns

By age, a quarter (24%) of employees are aged 50 years and above (compared to 33% of the working age population being 50+ according to latest ONS estimates), of which 5% are aged 60 years and above. Nineteen percent are below 30 years old. The highest concentration of colleagues is in the 30-39 age bracket (31%), followed by 40-49 (26%), accounting for a combined 56% of our workforce. These trends are very similar to last year.

People who work part-time make up 9% of Ofcom and of this 9%, 83% are women.

Job level

We have five job levels across Ofcom; Administrator, Associate, Senior Associate, Principal and SMS.

Job level by gender — All colleagues as at end of March 2021 (n=1056)

	Female	Male	(n=)
Ofcom profile	50%	50%	(1056)
Administrator	61%	39%	(51)
Associate	57%	43%	(298)
Senior Associate	48%	52%	(442)
Principal	45%	55%	(195)
SMS	41%	59%	(70)
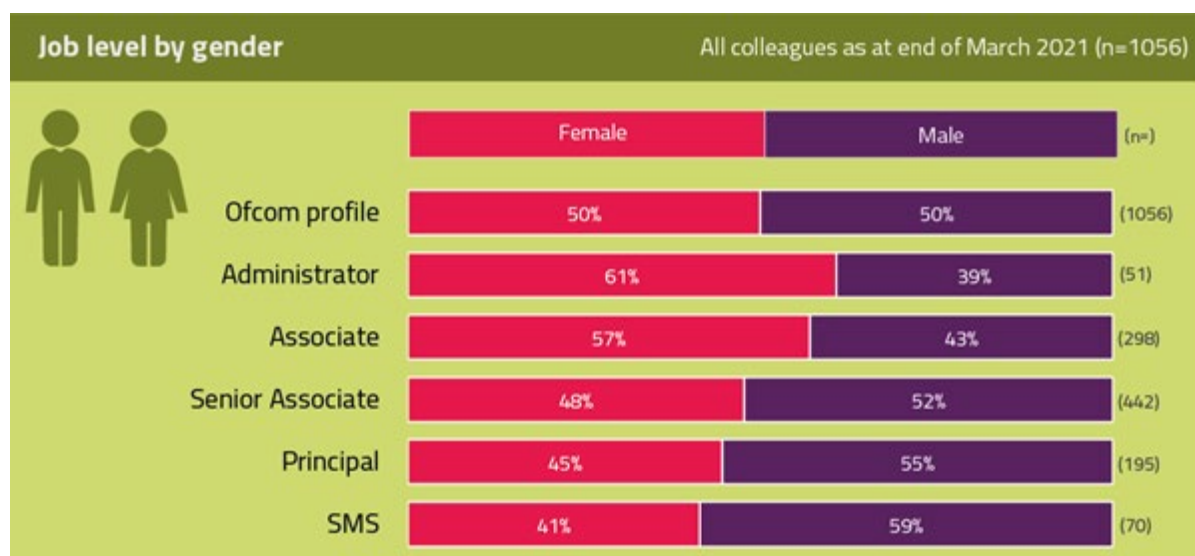
Compared to our overall gender profile of 50%, women make up an above-average proportion in our Administrator roles and Associate roles. Representation begins to fall below average at our Senior Associate, Principal, and SMS levels.

Job level by ethnicity — All colleagues as at end of March 2021 (n=1056)

	Minority ethnic	White ethnic	Prefer not to say	No data	(n=)
Ofcom profile	21%	73%	5%		(1056)
Administrator	25%	75%			(51)
Associate	27%	68%	5%		(298)
Senior Associate	22%	71%	6%		(442)
Senior level (Principals & SMS)	12%	83%	5%		(265)
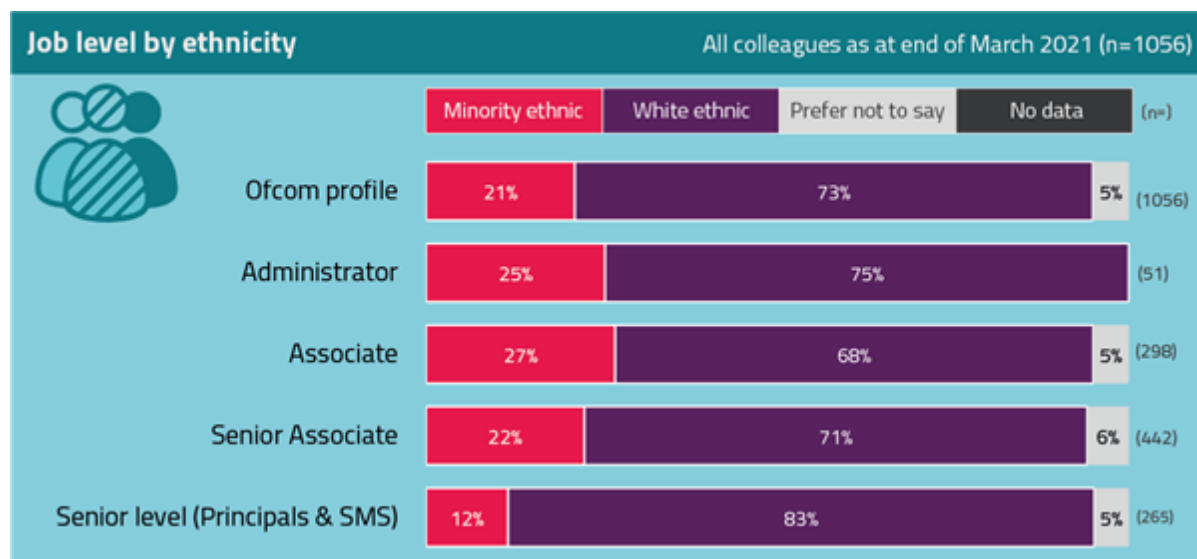
A higher-than-average proportion of our minority ethnic workforce is in our two grades of Administrator and Associate. The proportion of minority ethnic staff at Senior Associate grade is consistent with the Ofcom average, while the proportion of minority ethnic people is below the Ofcom average in our two highest grades combined.

Job level by disability — All colleagues as at end of March 2021 (n=1056)

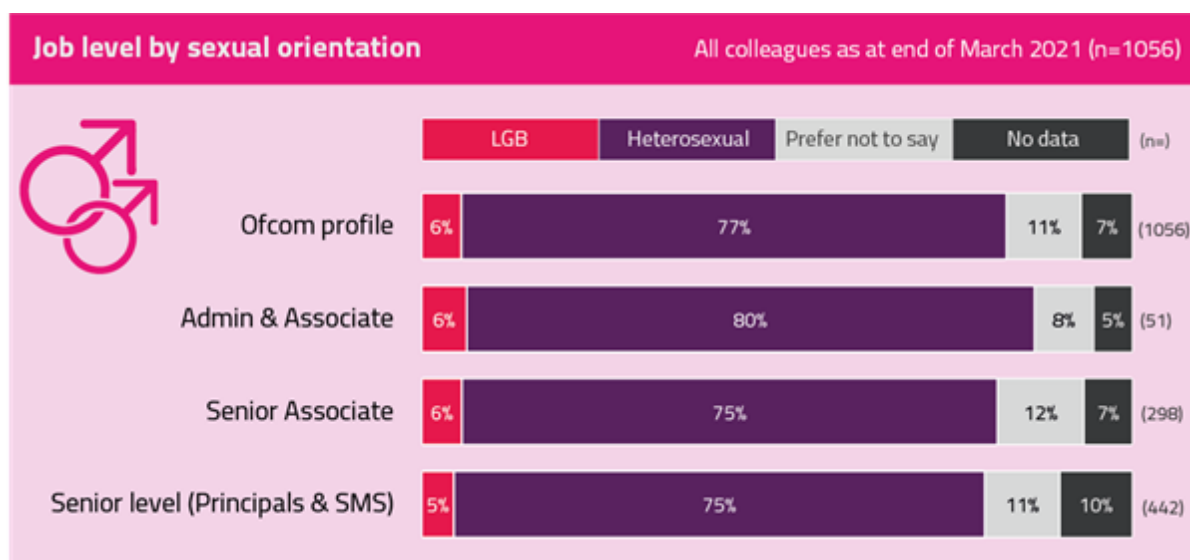|	Disabled	Not disabled	Prefer not to say	No data	(n=)
Ofcom profile	12%	71%	10%	7%	(1056)
Administrator	25%	65%	8%		(51)
Associate	12%	71%	10%	6%	(298)
Senior Associate	13%	69%	10%	8%	(442)
Senior level (Principals & SMS)	9%	73%	9%	9%	(265)
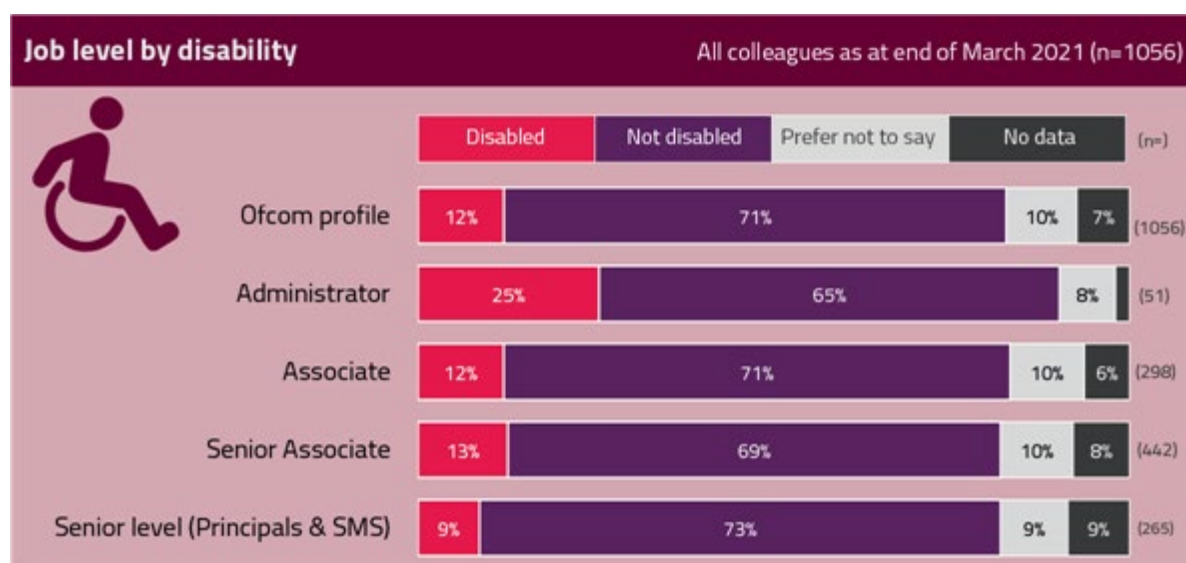
Disabled representation at Associate and Senior Associate grades are broadly consistent with our average disability profile of 12%. However, at more than double the Ofcom average, 25% of people in Administrator roles are disabled. Disabled representation in our top two bands at 9% is below the Ofcom average.

Job level by sexual orientation — All colleagues as at end of March 2021 (n=1056)

	LGB	Heterosexual	Prefer not to say	No data	(n=)
Ofcom profile	6%	77%	11%	7%	(1056)
Admin & Associate	6%	80%	8%	5%	(51)
Senior Associate	6%	75%	12%	7%	(298)
Senior level (Principals & SMS)	5%	75%	11%	10%	(442)

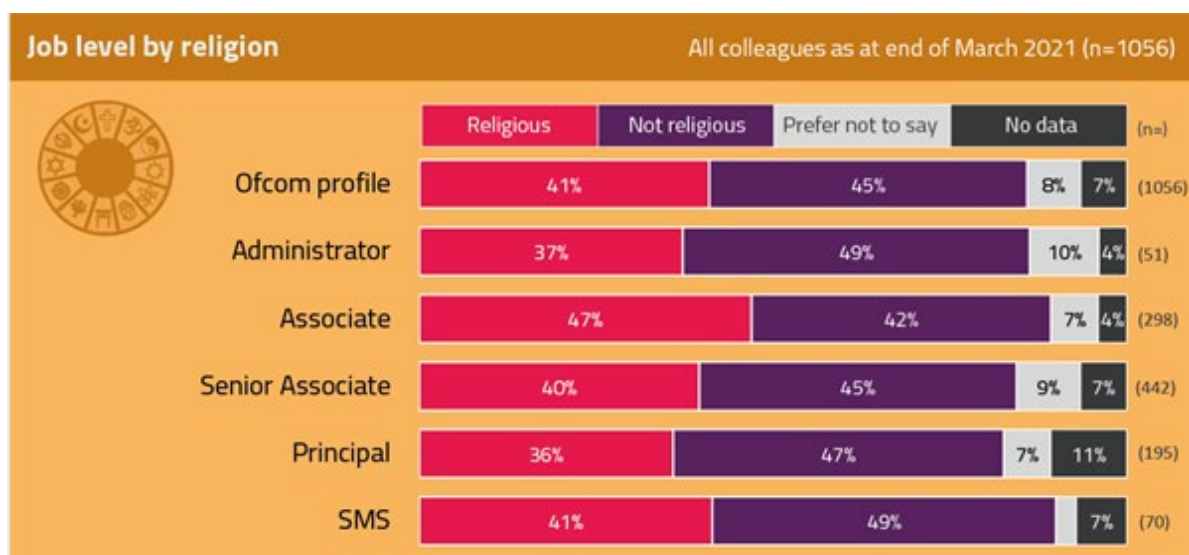LGB representation is consistent across our grades and with the Ofcom LGB profile, though some job levels have needed to be aggregated due to our minimum data reporting cut off.

Job level by age — All colleagues as at end of March 2021 (n=1056)

	Under 30	30-39	40-49	50+	(n=)
Ofcom profile	19%	31%	26%	24%	(1056)
Admin & Associate	46%	23%	11%	19%	(349)
Senior Associate	10%	40%	28%	23%	(442)
Senior level (Principals & SMS)		25%	41%	34%	(265)
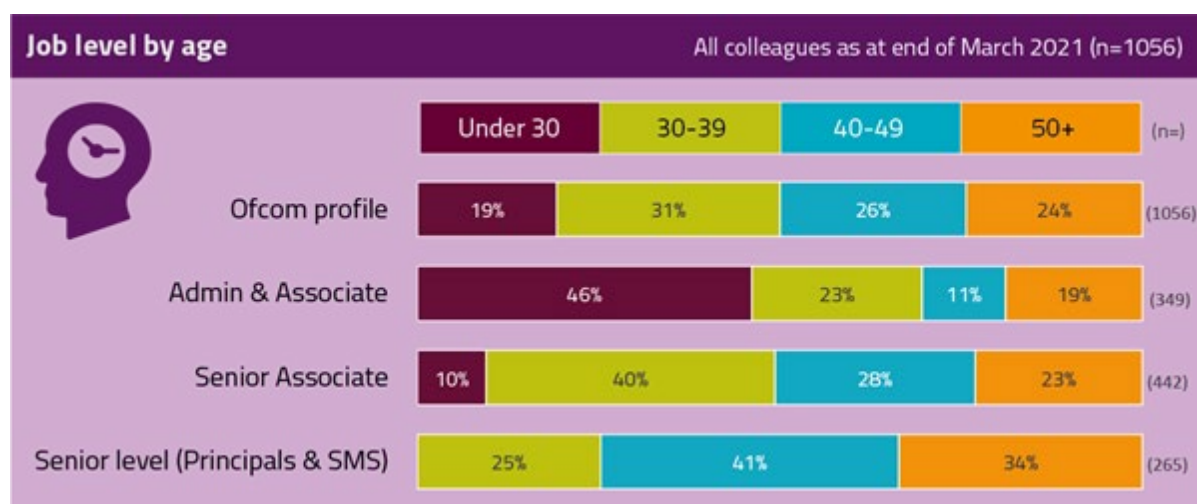
While Administrators and Associates make up a fifth (19%) of Ofcom colleagues, by age almost half (46%) of our youngest employees (under 30) are in our most junior Administrator and Associate grades combined with none in our most senior positions. Most of this will be driven by our graduate and apprentice cohorts who are at the start of their careers. At Senior Associate level, the largest proportion of people (40%) are aged 30-39 while the largest proportion of staff in our top two job bands are in the next age bracket up of 40-49 (41%). The proportion of colleagues aged 50+ at Senior Associate level is consistent with their Ofcom average profile (24%) but increases to above average in our two most senior bands and decreases in our most junior band of Administrators and Associates.

Job level by religion				All colleagues as at end of March 2021 (n=1056)	

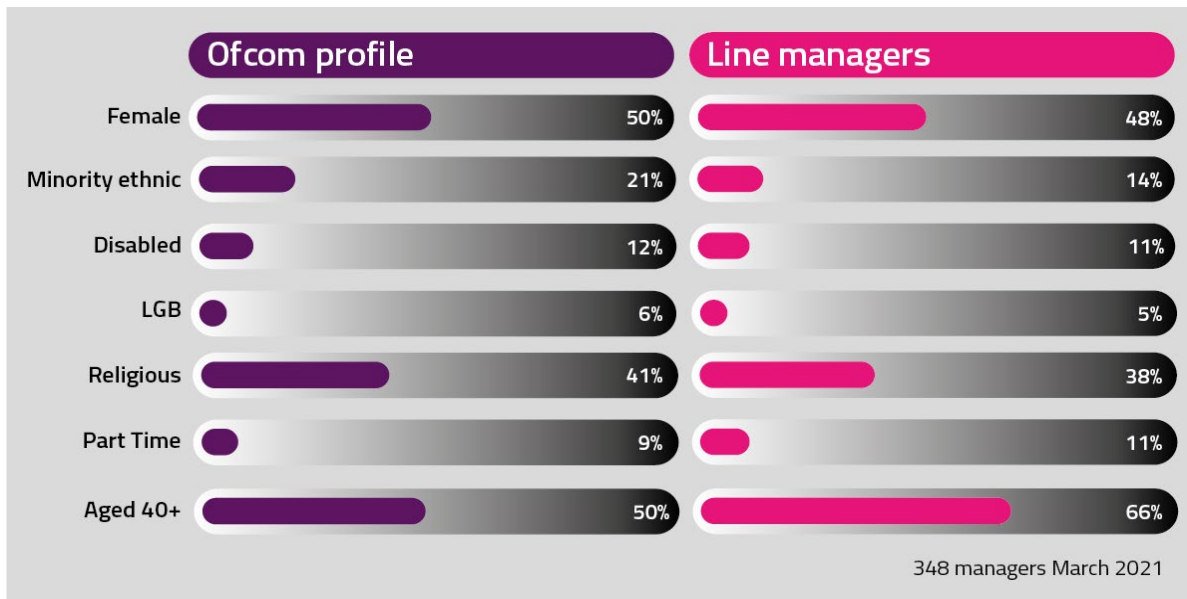|	Religious	Not religious	Prefer not to say	No data	(n=)
Ofcom profile	41%	45%	8%	7%	(1056)
Administrator	37%	49%	10%	4%	(51)
Associate	47%	42%	7%	4%	(298)
Senior Associate	40%	45%	9%	7%	(442)
Principal	36%	47%	7%	11%	(195)
SMS	41%	49%	7%		(70)

The balance between colleagues who have a faith and those that say they have no religion across each of our grades varies. Staff who are not religious make up a higher proportion in Administrator, SMS and Principal roles (each above our average profile of 45%), while the highest proportion of people who say they are religious are Associates (47%), above the overall average of 41%. The remaining grades have the same or are broadly in line with our overall religious population.

Line managers

A third (33%) of employees at Ofcom have line management responsibility.

Women make up 48% of our colleagues who have line management responsibility (44% in March 2020). There is lower representation of minority ethnic line managers at 14% compared to the 21% minority ethnic average profile at Ofcom, although this proportion has increased from 12% in 2020. Representation of disabled and LGB line management staff is broadly reflective of their Ofcom profile, while there is a marginally lower proportion of colleagues of faith compared to the Ofcom average and higher proportion of line managers work part-time compared to the Ofcom average. There is a higher proportion than average of line managers in the 40+ age bracket at 66% (against their 50% representation Ofcom-wide).

	Ofcom profile	Line managers
Female	50%	48%
Minority ethnic	21%	14%
Disabled	12%	11%
LGB	6%	5%
Religious	41%	38%
Part Time	9%	11%
Aged 40+	50%	66%

348 managers March 2021

Recruitment

Our recruitment information is taken from our online recruitment system and from our recruitment partners. When people apply for jobs with us, we ask them to fill in a diversity monitoring form. We have a lot more work to do to encourage people to share their information with us, particularly applicants coming through our external recruitment partners. We will continue to focus on this in the coming year so that we can have a fuller and clearer picture of diversity at every stage of our recruitment process.

Our data looks at each stage of the recruitment process by demographic group. From application to shortlisting (following an exercise to evaluate legal eligibility as well as suitability against the advertised job description), to those invited for interviews through to an offer being accepted.

Stage of recruitment by gender

	Male	Female	Prefer not to say/ No data (n=)
Applied	51%	46%	4%
Shortlisted	55%	41%	4%
Interviewed	45%	48%	8%
Offer Accepted	39%	52%	9%

Of applicants, a slightly lower proportion of women (46%) applied for jobs with us than men and while their proportion fell during shortlisting (to 41%), the proportion subsequently increased during interviews and ending at 52% of eventual job offers accepted.
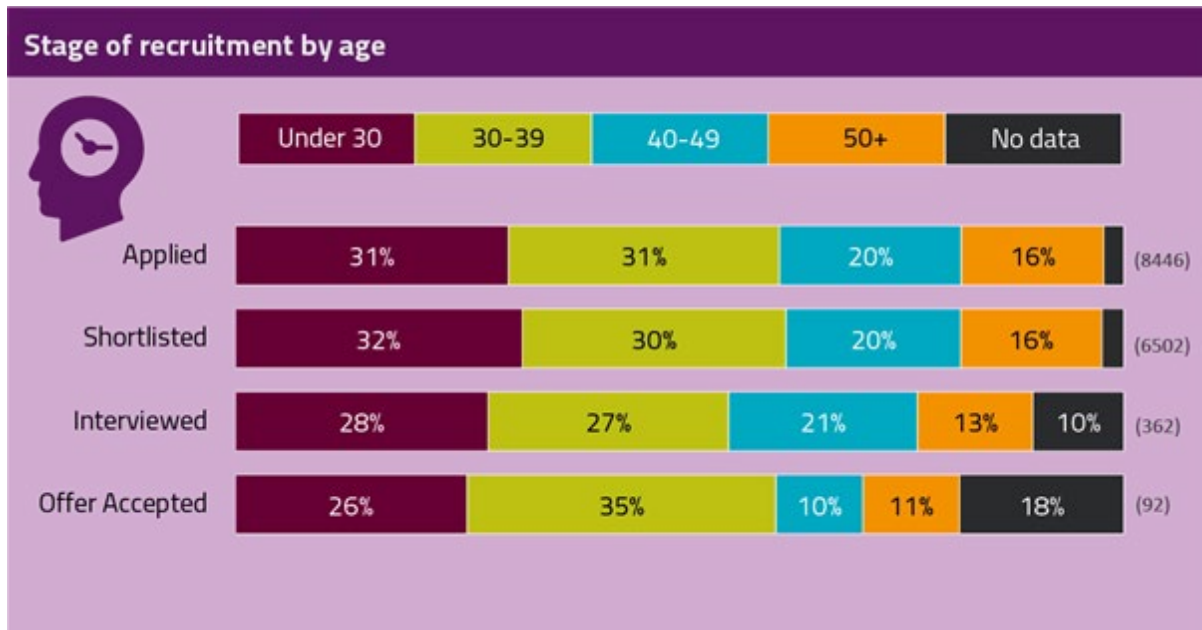
Stage of recruitment by ethnicity

	White ethnic	Minority ethnic	Prefer not to say/ No data	(n=)
Applied	54%	39%	7%	(8446)
Shortlisted	53%	40%	7%	(6502)
Interviewed	59%	31%	10%	(362)
Offer Accepted	57%	33%	11%	(92)

On ethnicity, four in 10 (39%) applicants were from minority ethnic backgrounds. The proportion who were shortlisted stayed consistent (40%) but tailed off at the interview stages before accounting for a third (33%) of hires.

Looking at the data in more detail by individual ethnic groups shows that the proportion of Black ethnic candidates throughout each four stages of recruitment stayed consistent at 11-12% apart from at interview, where the proportion dipped to 9%. Nonetheless, the proportion who accepted jobs with us (12%) was virtually the same as the proportion who applied and who were shortlisted for interview. 12% is double the proportion of Black people at Ofcom (6%).

Asian ethnic applicants accounted for a fifth (around 20%) at application and shortlisted stages but this dropped off to 14% at the last two stages of recruitment respectively, slightly above the figure of (12%) of our existing Asian employees.
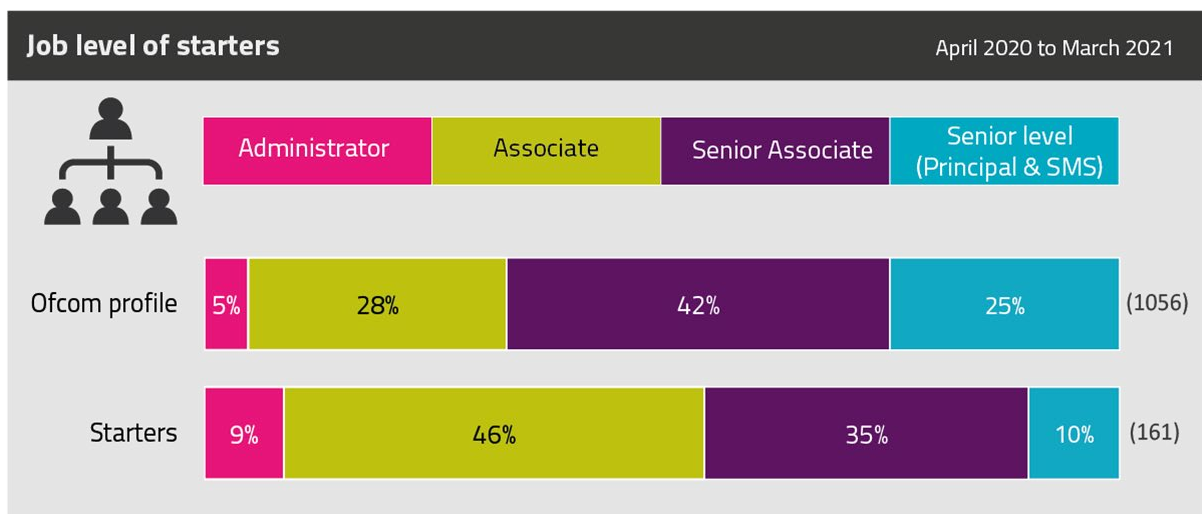
White ethnic people made up over just over half of applicants and shortlisted candidates. This proportion increased to 1 in 6 of interviewed candidates before accounting for 57% of job offers that were accepted. White ethnic colleagues make up 73% of all Ofcom employees.

Stage of recruitment by age

	Under 30	30-39	40-49	50+	No data	
Applied	31%	31%	20%	16%		(8446)
Shortlisted	32%	30%	20%	16%		(6502)
Interviewed	28%	27%	21%	13%	10%	(362)
Offer Accepted	26%	35%	10%	11%	18%	(92)

By age, around a third of applicants were aged under 30 and 30-39 respectively. The proportion of each of these age groups stayed broadly consistent from application to shortlist but dipped at the interviews stage. While the proportion who accepted jobs with us slightly dipped again for under 30s, it increased for those aged between 30-39 years. Representation from those aged 40-49 years stayed constant at a fifth (20-21%) during application, shortlist and interviews but the proportion who accepted job offers halved (10%). People aged 50+ years accounted for 16% of applicants and of those shortlisted but dipped between interviews and acceptance of a job (11%).
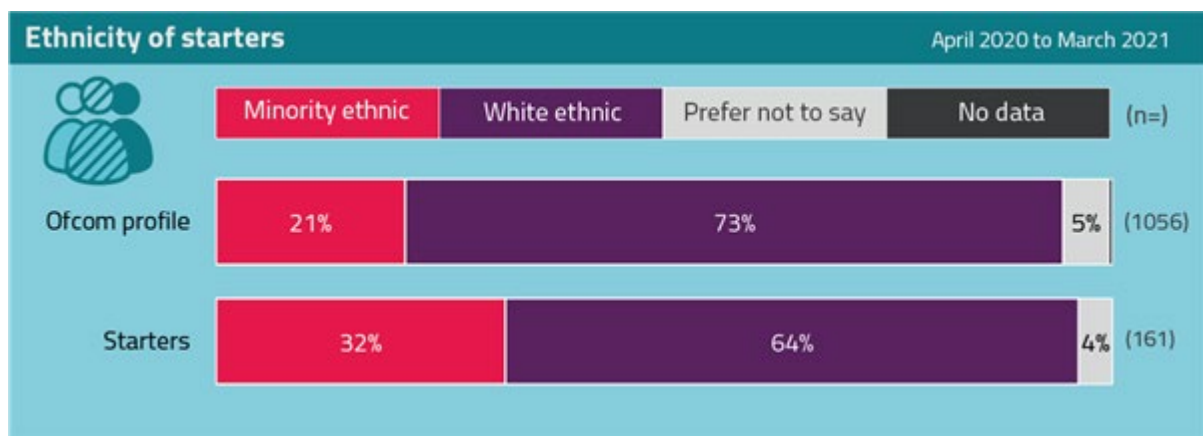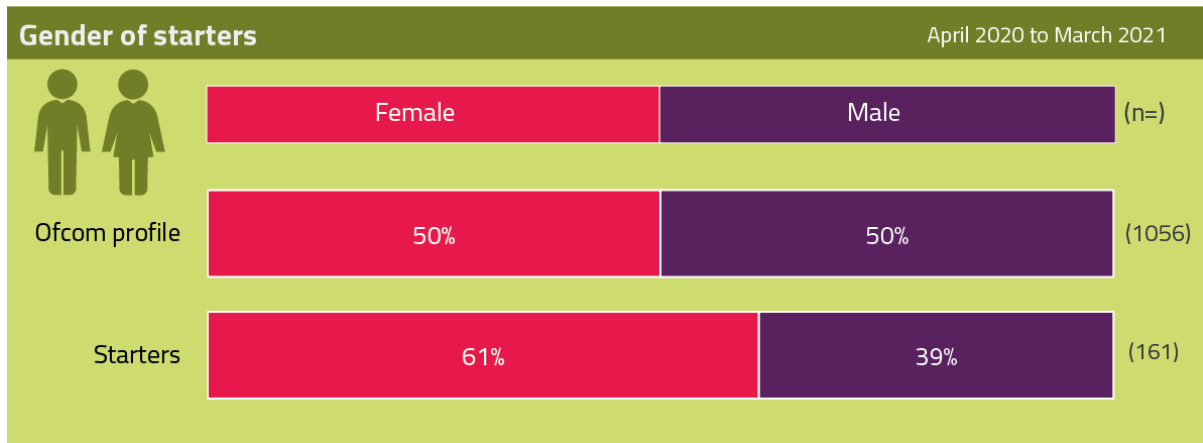
Starters

In the last year 161 people joined Ofcom as we continued hiring during the pandemic. Once colleagues start jobs with us, they are asked to fill in a new employee diversity form. They are also able to check and update their diversity information at any time through a self-service online database.

Job level of starters
April 2020 to March 2021

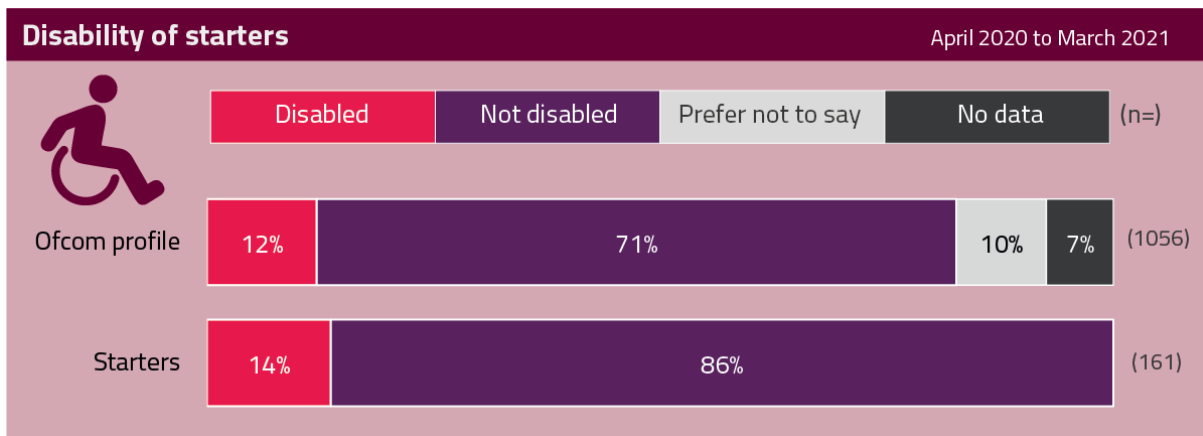|	Administrator	Associate	Senior Associate	Senior level (Principal & SMS)	
Ofcom profile	5%	28%	42%	25%	(1056)
Starters	9%	46%	35%	10%	(161)

Most of our intake were into the Associate grade (46%) followed by Senior Associate (35%). The

combined proportion of people joining us in Administrator and Associate roles was 55%, reflecting our early careers strategy. Ten percent of new joiners took up jobs in principal and SMS roles.

Gender of starters — April 2020 to March 2021

	Female	Male	(n=)
Ofcom profile	50%	50%	(1056)
Starters	61%	39%	(161)

Ethnicity of starters — April 2020 to March 2021

	Minority ethnic	White ethnic	Prefer not to say	No data	(n=)
Ofcom profile	21%	73%		5%	(1056)
Starters	32%	64%		4%	(161)

Sixty-one per cent of starters were women and around a third of starters (32%) were from minority ethnic backgrounds – above our average female and minority ethnic profiles (50% and 21% respectively).

Disability of starters — April 2020 to March 2021

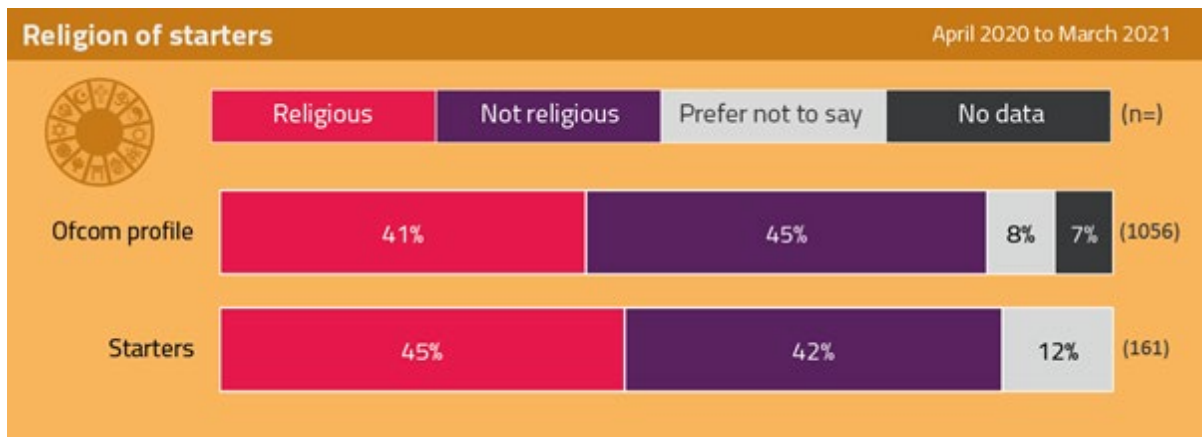|	Disabled	Not disabled	Prefer not to say	No data	(n=)
Ofcom profile	12%	71%	10%	7%	(1056)
Starters	14%	86%			(161)

Disabled people accounted for 14% of new starters, two percentage points higher than our 12% Ofcom profile. Ofcom supports the Disability Confident Scheme which provides, where practicable, disabled applicants with a first stage interview if the minimum criteria are reached. Given our move into digital recruitment practices this can be a video presentation, video interview or panel interview.
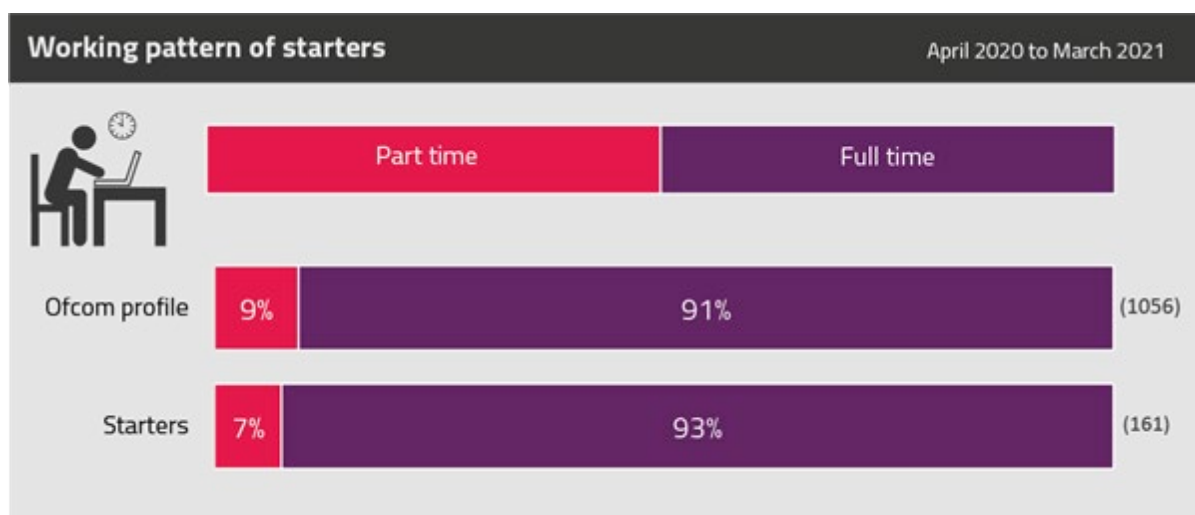
Sexual orientation of starters — April 2020 to March 2021

	LGB	Heterosexual	Prefer not to say	No data	(n=)
Ofcom profile	6%	77%	11%	7%	(1056)
Starters	9%	83%		7%	(161)

Nine percent of new starters were LGB, higher than our average LGB representation of 6%.

Age of starters — April 2020 to March 2021

	Under 30	30-39	40-49	50+	(n=)
Ofcom profile	19%	31%	26%	24%	(1056)
Starters	35%	37%	22%	6%	(161)

By age, the highest proportion of new starters were aged 30-39 (37%) followed by those under 30 (35%). These new starter rates were respectively above their average representation across Ofcom. We recruited much lower proportions of people in the 50+ years age bracket, relative to their average representation at Ofcom and recruitment was also lower for people aged 40-49.

Religion of starters — April 2020 to March 2021

	Religious	Not religious	Prefer not to say	No data	(n=)
Ofcom profile	41%	45%	8%	7%	(1056)
Starters	45%	42%	12%		(161)

A slightly higher proportion of people who joined us said they were religious (45%) compared to the Ofcom average (41%), while the proportion of new starters who said they were not religious (42%) was generally consistent with the Ofcom-wide picture (45%).

Working pattern of starters — April 2020 to March 2021

	Part time	Full time	
Ofcom profile	9%	91%	(1056)
Starters	7%	93%	(161)

Seven percent of new starters joining our organisation had part-time working hours, compared to 9% of Ofcom colleagues who do.
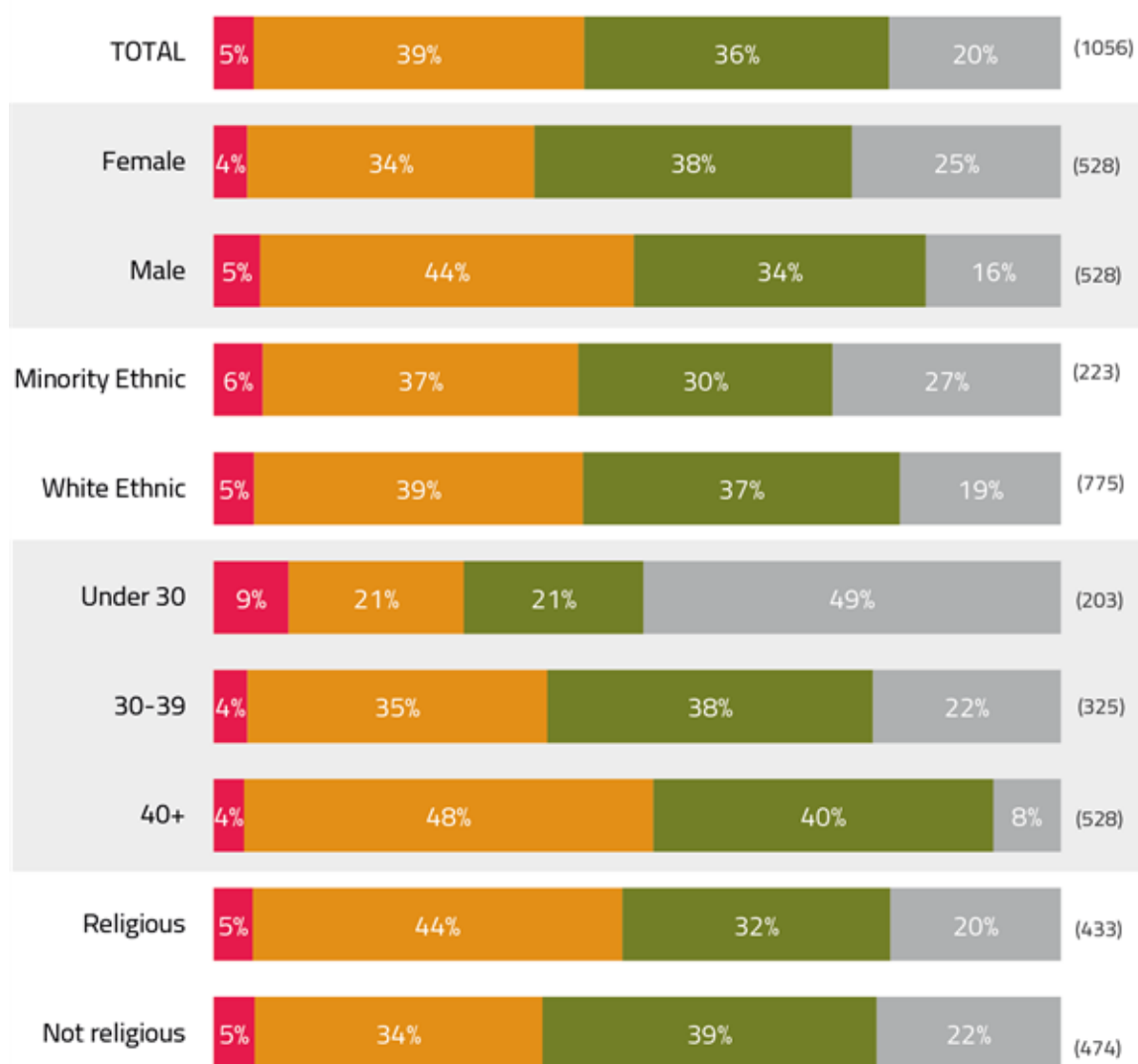
Performance

We're changing how we manage and measure performance through 2021/22, ready for a new approach in 2022. Currently, we evaluate colleagues' performance with equal emphasis on what they have achieved against their development objectives and how well their behaviour has reflected our values. This approach results in a double letter assessment reflecting the what and the how. The ratings are 'developing', 'performing well' and 'excelling', as well as 'other' when staff are too early to rate or their rating does not naturally fit into the three former distinct categories (for example those who are excelling on either behaviours or delivery, but also developing in one of the other areas). It's important to note that 'developing' doesn't always indicate lower standard of performance as it can also indicate someone is new in their role.

Our people and transformation team brought more rigour and challenge to our annual performance evaluation process in April 2018. They now report in real time on the distribution of performance ratings by diversity in the moderation process, as decisions are made about employees, to ensure challenge and fairness. Any outliers and anomalies are investigated further by our HR team.

PERFORMANCE

April 2020 - March 2021 (n=1056)

	Developing	Performing well	Excelling
Excelling	**D.E** Outcomes must improve, exceed behaviours standard	**P. E** Good outcomes, exceed behaviours standard	**E.E** Exceeds outcomes, exceeds behaviours standard
Performing well	**D.P** Outcomes must improve, behaviours of a good standard	**P.P** Good outcomes, behaviours of a good standard	**E.P** Exceeds outcomes, behaviours of a good standard
Developing	**D.D** Improvement required in outcomes and behaviours	**P.D** Good outcomes, behaviours must improve	**E.D** Exceeds outcomes, behaviours must improve

Developing	Performing	Excelling	Others (inc.NA)

	Developing	Performing	Excelling	Others	
TOTAL	5%	39%	36%	20%	(1056)
Female	4%	34%	38%	25%	(528)
Male	5%	44%	34%	16%	(528)
Minority Ethnic	6%	37%	30%	27%	(223)
White Ethnic	5%	39%	37%	19%	(775)
Under 30	9%	21%	21%	49%	(203)
30-39	4%	35%	38%	22%	(325)
40+	4%	48%	40%	8%	(528)
Religious	5%	44%	32%	20%	(433)
Not religious	5%	34%	39%	22%	(474)

23

Base: all colleagues eligible for a performance rating. Excelling = exceeded objectives and the expectations for the job role and job grade throughout the year, as evidenced by feedback. Performing = performing well. Meeting objectives and expectations of the job role and job grade, are delivering good outcomes and living our values. Developing = recognises development needs to reach the required level of the job role and/or grade and does not automatically indicate under-performance. Examples include people who are new in their role, or where standards of work have dipped below of that expected of their job role or grade or in their behaviours. Others = includes graduates who do not receive ratings during their programme, people who have been rated as DE or ED or who are too early in role to be formally rate (for example, in the role for less than six months).

For performance year 2019/20, a slightly higher proportion of women (38%) received an 'excelling' rating compared to men (34%), while a lower proportion received a 'performing well' assessment (34% vs 44% of men). A comparable proportion (5%) received a 'developing' assessment compared to men (4%).

The distribution of 'performing well' ratings for minority ethnic colleagues and White ethnic colleagues were similar at 37% and 39% respectively. Thirty per cent of minority ethnic employees were assessed as 'excelling' compared to 37% of White ethnic employees, and the proportions rated 'developing' were similar for both groups.

The data suggests that the award of 'excelling' ratings increases with age and seniority. Although we've had to aggregate all age groups from age 40+ upwards which can skew the results, data from last year's report supports this pattern. A lower proportion of under-30s received an 'excelling' rating or a 'performing well' rating compared to those in the next age bracket of 30-39. Forty-nine percent of under-30s received an 'other' rating which is largely due to being new starters or new in role, including graduates and apprentices, who do not receive ratings while they are on their programme and too early to rate during the analysis period.

A lower proportion of colleagues of faith were awarded an 'excelling' rating (32%) compared to those who are not religious (39%) while a higher proportion (44%) were assessed as 'performing well' (34% for non-religious employees). The same proportion (5%) of each group were assessed as 'developing' in their role.

Although not shown in the infographic above, the proportion of disabled staff assessed as 'excelling' was lower at 32% compared to non-disabled staff (37%), while a higher proportion were rated as 'performing well' (41% vs 35% for non-disabled people). It's not possible to show the breakdown for 'developing' and 'other' ratings separately due to low numbers of people in them and so we have combined them. It shows that a similar proportion of disabled (27%) and non-disabled people (28%) were in this combined category and that most of this was driven by an 'other' assessment.

The proportion of LGB colleagues assessed as 'excelling' was slightly lower at 32% compared to 36% of heterosexual staff and the distribution for 'performing well' was also similar at 31% for LGB employees and 37% for heterosexual colleagues. 37% of LGB employees received a combined 'developing' and 'other' assessment with the majority of this in the 'other' category. It was 27% for heterosexual employees.

Similar proportions of people who work part-time and people who work full-time were assessed as 'excelling' in role (36% and 38% respectively). A higher proportion of employees who work part-time were rated as 'performing well' (47% vs 38% for those who work full time) and a notably lower

proportion (14%) were assessed as 'developing' or 'other' compared to people who work full time (26%).
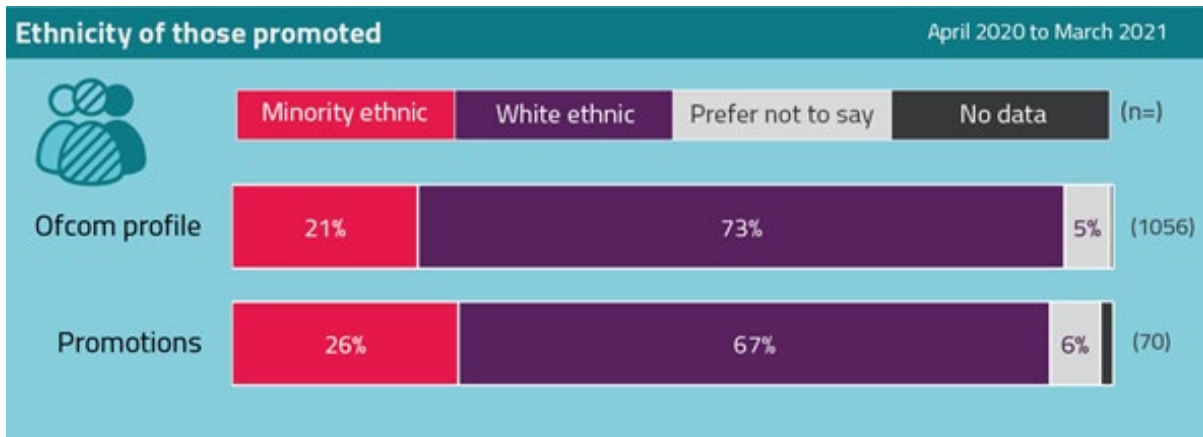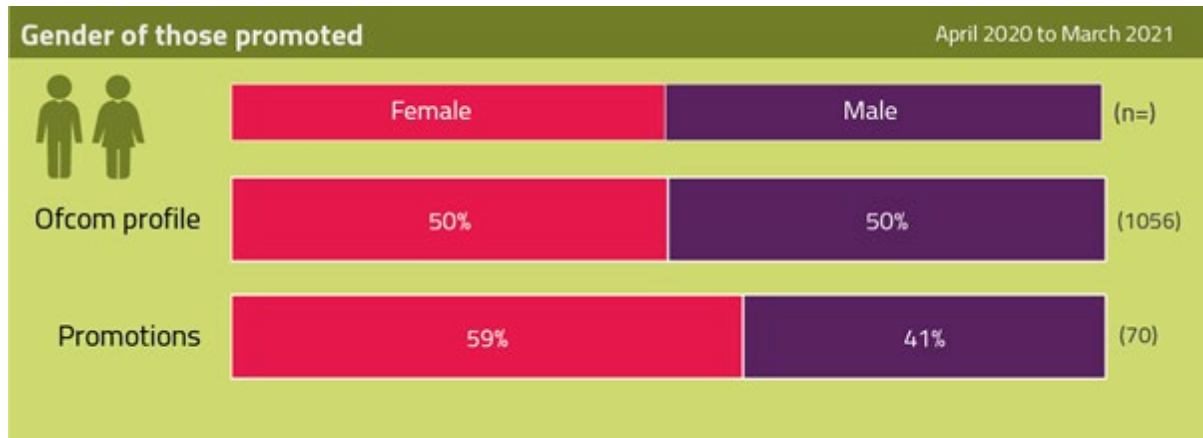
Promotion

Seventy Ofcom employees were promoted between March 2019 and March 2020, similar to the 65 people that were promoted the previous year. Promotions take place as part of our internal promotion process or by colleagues successfully applying for positions at a higher level which are widely advertised internally and externally. In-role promotions are open to Administrators and Associates, allowing them to gain promotion to the level above. Their application is endorsed by their line manager if there is evidence they have increased the responsibilities of their job, have consistently excelled at their objectives and have demonstrated the competencies/skill level required of the grade above.
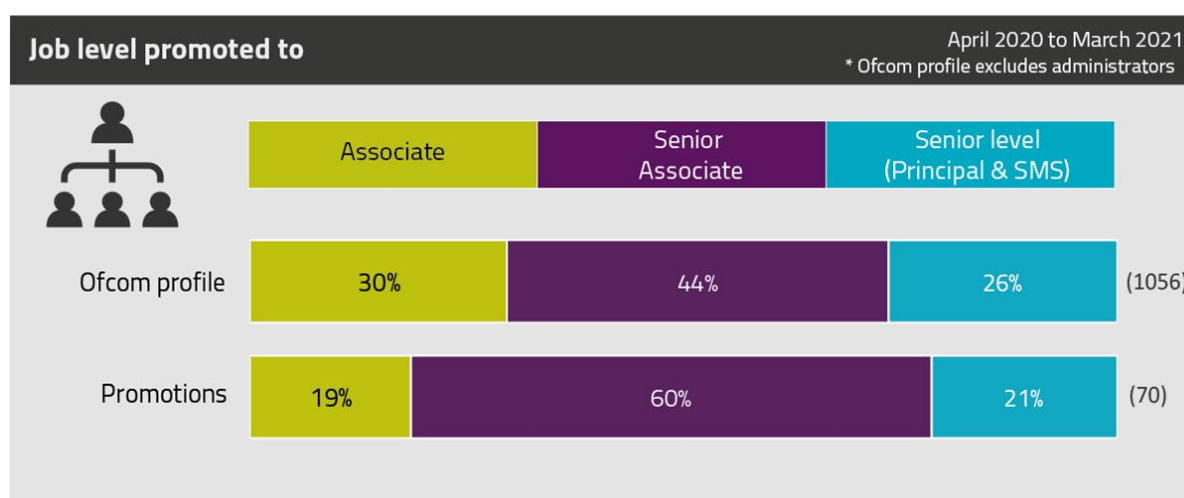
The grades shown are those that a colleague is promoted to. Associates were formerly Administrators, Senior Associates were Associates, Principals were Senior Associates and SMS were formerly Principals. Base = Associate levels upwards only (n=1005) therefore the Ofcom grade profiles here will be different to the proportions shown for the full base of 1056 staff.

Across the last year, the majority (60%) of promotions were into a Senior Associate role. A fifth (21%) were into our top two most senior positions, compared to 34% last year, while 19% were into Associate grade.

Gender of those promoted
April 2020 to March 2021

	Female	Male	(n=)
Ofcom profile	50%	50%	(1056)
Promotions	59%	41%	(70)

Ethnicity of those promoted
April 2020 to March 2021

	Minority ethnic	White ethnic	Prefer not to say	No data	(n=)
Ofcom profile	21%	73%	5%		(1056)
Promotions	26%	67%	6%		(70)

Fifty-nine per cent of promotions were to women, above the Ofcom female profile of 50%, and 26% were to minority ethnic staff (compared to 21% Ofcom profile).

Age of those promoted
April 2020 to March 2021

	Under 30	30-39	40+	(n=)
Ofcom profile	19%	31%	50%	(1056)
Promotions	39%	29%	33%	(70)

67% of promotions were to those aged below 40 (against 50% under 40's across Ofcom) reflecting the notably younger age skew of staff in Administrator and Associate roles. Much of this (39% of the 67%) was driven by the under-30 age group. A third (33%) of those promoted were aged 40+, below their average representation of 50%.
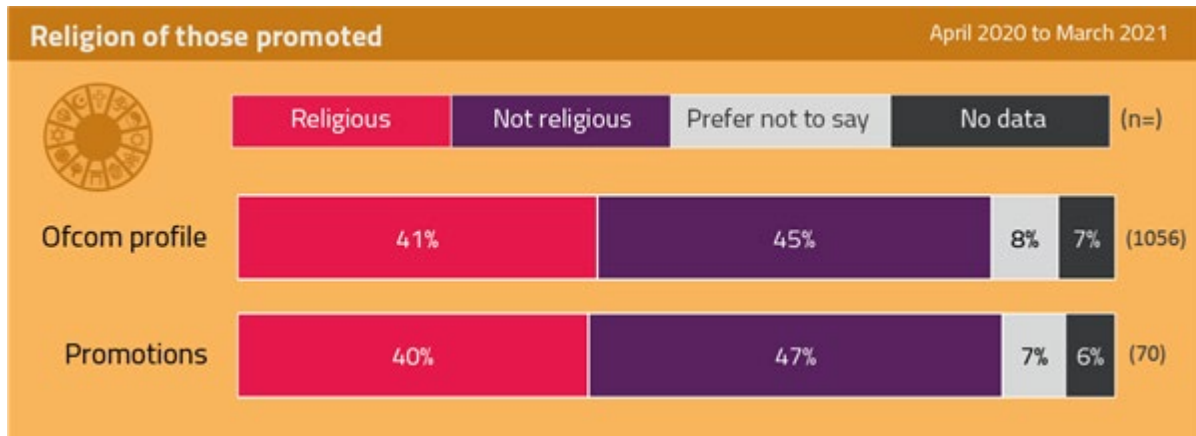
The proportions of people who said they are religious or non-religious and who were promoted were broadly in line with their representation across the organisation as a whole.

Leavers

Seventy-six people left Ofcom across 2019/2020, 20 people fewer than last year, as the pandemic took hold from March 2020. To give context to the leavers rate, we compare the statistics for each demographic against their organisational profile. The bigger the proportion of leavers relative to their profile, the lower the retention rate.
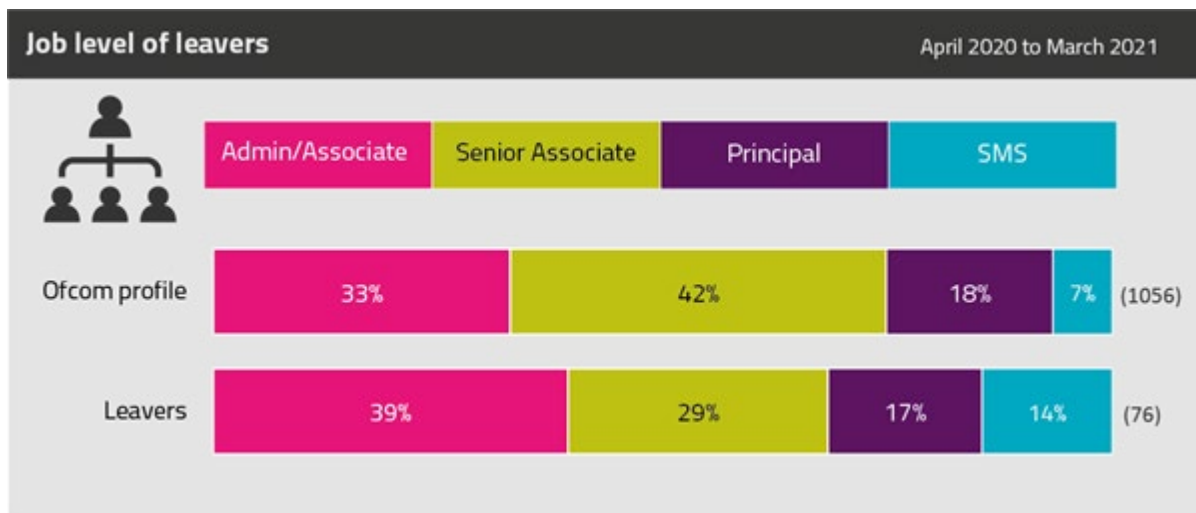
Thirty-nine percent of people leaving us were in Administrator and Associate roles, higher than the combined 33% they represent across Ofcom. Most of this total was driven by Associates.

The leavers rate for Principals (17%) was in line with their organisational profile, while it was higher than average for those in SMS positions (14%). Of all grades, the variance between the leavers rate and the profile for Administrators and then Senior Associates shows that retention was highest at these grades this year. This is compared to principal and SMS roles showing higher retention last year.

Gender of leavers   April 2020 to March 2021

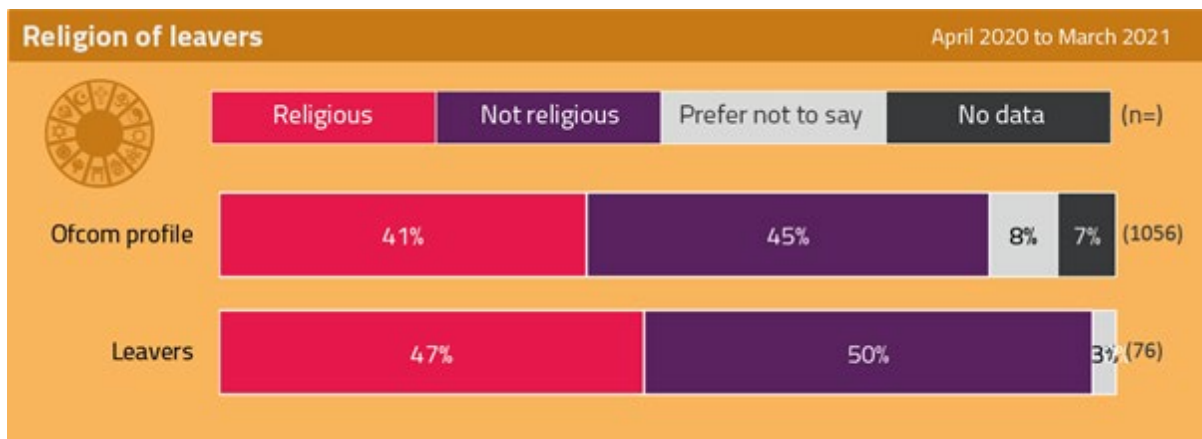|	Female	Male	(n=)
Ofcom profile	50%	50%	(1056)
Leavers	39%	61%	(76)

The leavers rate for women was 39%, relative to an Ofcom female profile of 50%. The opposite pattern was seen among men, who accounted for 61% of leavers. This contrasts with 2019-2020 where the proportion of male and female colleagues who left us was almost identical to the proportions they represented Ofcom-wide. Our range of Covid-19-specific policies and wrap around support for all our colleagues, some of which are arguably more critical for women, might explain these leavers patterns this year. We created an enhanced, paid dependant leave policy for staff who were home schooling or caring for others. We also made it flexible, so this time could be taken in hourly, half-day or whole-day increments as needed. And we adopted a 'families first' and 'maximum flexibility' approach, giving flexibility on working hours and patterns for all employees. As women continue to be primary caregivers for children and for families and loved ones, they've been able to continue working and to blend work and life commitments in a much more agile way. We have also been fortunate not to have furloughed any employees or to have made any redundancies. We continue to support colleagues with our range of Covid-19 support and these measures are outlined in more detail in our Annual Report and Accounts 2021-21, page 95.

Ethnicity of leavers   April 2020 to March 2021

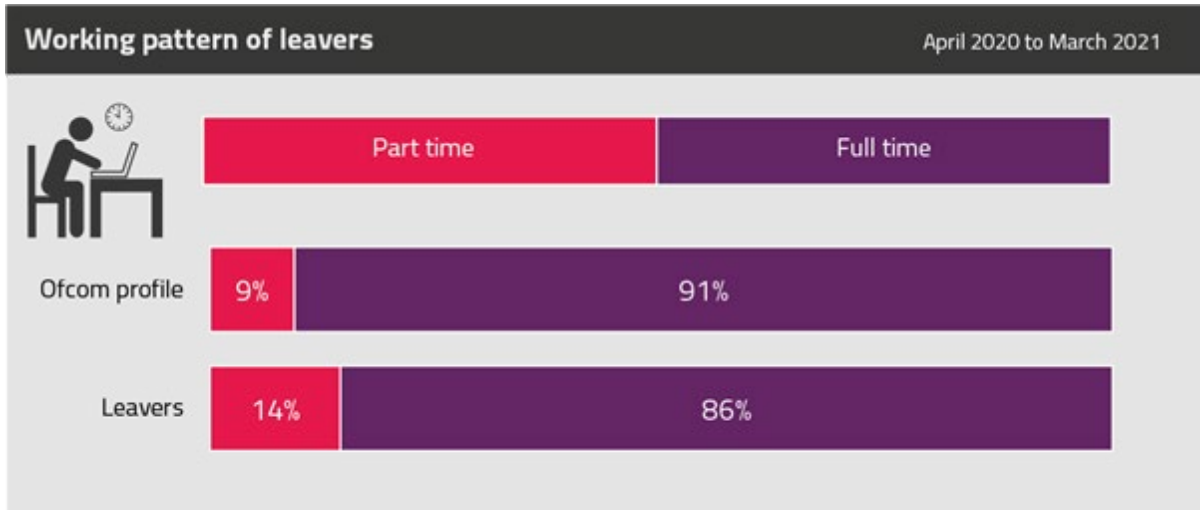|	Minority ethnic	White ethnic	Prefer not to say	No data	(n=)
Ofcom profile	21%	73%		5%	(1056)
Leavers	21%	75%		4%	(76)

By ethnicity, the proportion of minority ethnic colleagues who left us was the same as their representation across Ofcom (21%). It was higher than the average last year.

Age of leavers				April 2020 to March 2021
	Under 30	30-39	40-49	50+	(n=)
Ofcom profile	19%	31%	26%	24%	(1056)
Leavers	24%	26%	24%	26%	(76)

The highest proportions of leavers were in the 30-39 and 50+ age brackets, accounting for 26% of leavers each, a figure that isn't too different from their respective Ofcom profiles. The largest variance between the leavers rate relative to their Ofcom profile was among those aged under 30 – 24% of leavers were in this age group against their 19% representation Ofcom-wide. Overall, however, the proportions of leavers by age group were fairly similar to their average profile, showing good levels of retention.

Religion of leavers				April 2020 to March 2021
	Religious	Not religious	Prefer not to say	No data	(n=)
Ofcom profile	41%	45%	8%	7%	(1056)
Leavers	47%	50%	3%		(76)

The proportion of religious and non-religious colleagues who left us were both above their representation at Ofcom overall, and of similar variance. However, it should be noted that there is a much higher proportion of people where we don't hold data on their religion or belief or who prefer not to share this information with us. This can skew the picture.

Working pattern of leavers — April 2020 to March 2021

	Part time	Full time
Ofcom profile	9%	91%
Leavers	14%	86%

The proportion of leavers (14%) who worked part-time was notably higher than their average representation of 9% at Ofcom.

5. Pay gap report

Introduction

Pay gaps are not the same as equal pay and are an equality measure based on the pay of people across an organisation as a whole, regardless of the job they do. They compare the salaries of one characteristic with another – such as women with men – and the 'gap' is the difference between the two. (The pay gap does not show differences in pay for comparable jobs, something which is against the law.) Pay gaps are influenced by the make-up of the organisation based on the characteristic in question (such as gender, ethnicity or disability), and where particular types of jobs are concentrated. We have also continued to audit equal pay at Ofcom, including that of disabled colleagues, and we provide an update on this.

As a public sector organisation, Ofcom reports its gender pay gap information under regulations that came into force in April 2017. However, since 2004 we have gone beyond these requirements by publishing gender pay data as part of our equal pay audit. Since 2018 we have also published our ethnicity pay gap, and last year we published our disability pay gap information for the first time and will continue to do so.

Although we are making progress in some areas, such as making sure we have greater levels of diversity in our graduate and apprenticeship population, we know that the impact of these decisions will take time to come to fruition. Our gender pay gap has increased slightly compared to the previous year so we are looking at the reasons for this and will feed insights into our programme of work. We take a long-term view of the pay gap challenge and will make sure any decisions we take will help to meet our goals not just now, but in five years' time.

Overview

We report the following pay gap statistics each year as at 31 March.

We report on the following for gender, ethnicity and disability:

- mean (average) pay gap;
- median pay gap;
- percentage of men and women, white ethnic and minority ethnic and disabled and non-disabled in each pay quartile;
- mean (average) bonus gap; and
- median bonus gap.

For this report, our data is taken as at **31 March 2021** and includes all employees and pay elements, in line with government reporting requirements.

Ofcom's bonus gap is made up of our annual bonus scheme and our recognition awards, which are given to colleagues who deliver beyond expectations while also working in a way that demonstrates our organisational values. In 2021 no colleague received a pay rise (except those earning under

£24,000) due to the ongoing impact of the pandemic. No annual bonus was paid this year and this will be captured in the report for July 2022.
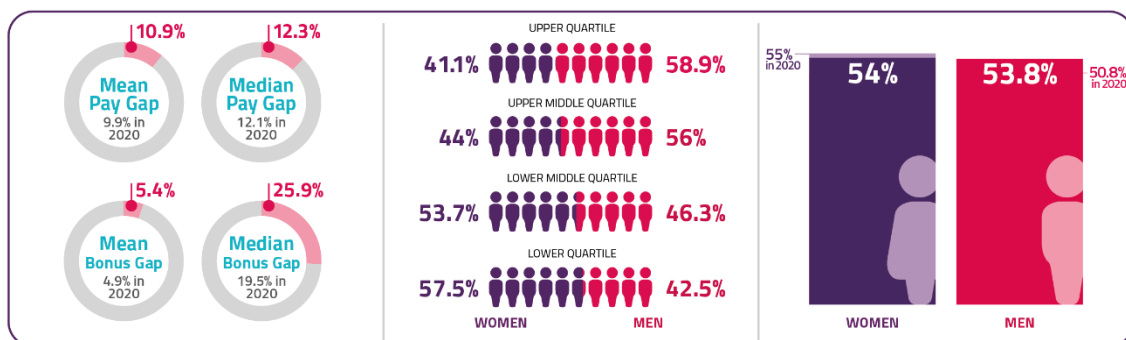
Figure 1: Ofcom employee make-up. Data as of 31 March 2021.

How we are doing

Gender

**Figure 2: Gender Pay and Bonus Gap, % of employees by quartile and % of employees receiving a bonus**

Between March 2020 and March 2021, Ofcom's gender pay gaps (mean and median) showed an increase of 1 percentage point to 10.9% in the mean pay gap and 0.2 percentage points increase to 12.3% in the median pay gap.

Bonus gaps have increased for gender (from 4.9% to 5.4% mean and from 19.5% to 25.9% median). There was the same proportion of women receiving a bonus (54.0%) as men (53.8%).

Ethnicity

Figure 3: Ethnicity Pay and Bonus Gap, % of employees by quartile and % of employees receiving a bonus
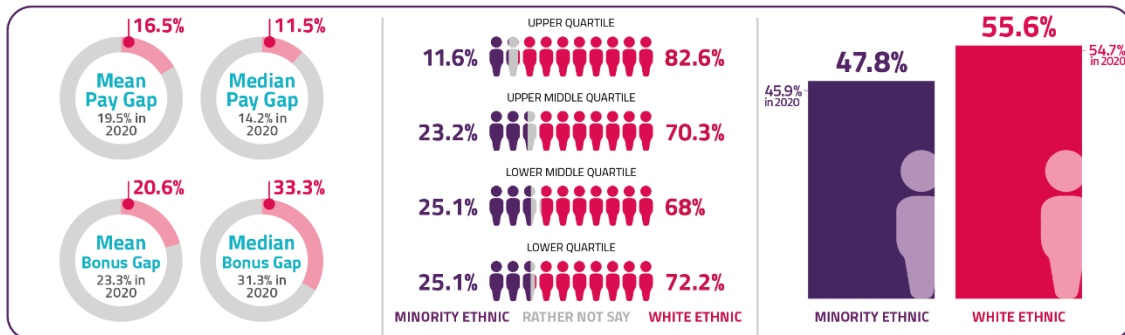

For ethnicity, the pay gap decreased by 3 percentage points to 16.5% for mean and by 2.7 percentage points to 11.5% for median.

The percentage of minority ethnic employees receiving a bonus increased by 1.9 percentage points to 47.8% in 2021 and increased for White ethnic employees by 0.9 percentage points to 55.6%. As a result, the ethnicity bonus gaps decreased last year in mean to 20.6%, and increased in median to 33.3%.

Disability

Figure 4: Disability Pay and Bonus Gap, % of employees by quartile and % of employees receiving a bonus
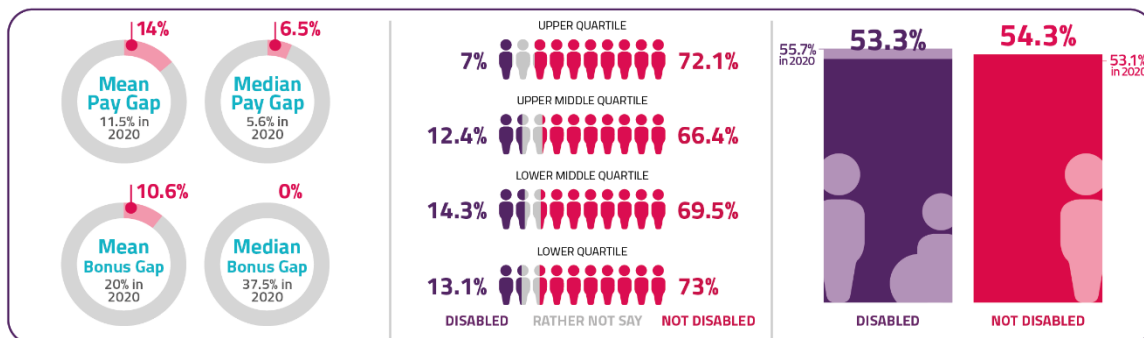
In the second year of reviewing our disability pay, the data shows there are gaps in mean and median pay which have increased. The median gap has risen by 0.9 percentage points to 6.5%, and the mean by 3 percentage points to 14%. The bonus gaps have dropped substantially to 10.6% mean (from 20.0%) and 0% median (from 37.5%).

Analysis

As a relatively small organisation of just over 1,000 people, staff movements can make a significant difference to Ofcom's pay gaps as the mean and median can move quite materially. For example, relatively small changes in the number of women in the upper quartile (in the top quarter when listing all employees according to hourly rate of pay, in order of highest to lowest paid, and splitting

it into four equally sized parts), has had a direct impact on the size of our gender pay gap. We are looking to understand the root causes of increase in our gender pay gap and we will feed it into our programme of work.

Similarly, as we increase the gender and ethnicity diversity of our graduate cohort, we have seen this have a negative effect on our pay gap as it contributes to the proportion of our workforce that is lower paid – but potentially has a positive effect on our future senior diversity. As we make progress on our diversity and inclusion programme, we acknowledge that this might affect our pay gaps in the short term. We will continue to monitor the effectiveness of the programme to make sure it brings about the results we need, both for our workforce targets and for reducing our pay gaps.

What we are doing

Diversity and inclusion strategy

As part of our diversity and inclusion strategy 2021- 2026 we're focusing on transforming three main areas: recruitment; career progression; and performance management; all of which can positively impact our pay gap. In recruitment, how we set pay for new joiners and considering relativities in pay for our existing staff is important, as is setting up a reward framework to support our new performance management approach and how we support colleagues to progress their careers and boost their pay.

Recruitment

In our diversity and inclusion strategy, we committed to improving our recruitment practices to create better opportunities for hiring more diverse talent. Hand in hand with this must be fair pay practices such as transparency of salaries when advertising roles and in deciding pay offers for candidates, while remaining competitive in the labour market. We have already started to work through our current processes.

Careers

To support our work in developing a pipeline of diverse leaders, in 2019 we launched Rise, our targeted development programme for high-performing individuals from under-represented groups. We will build on this by looking at our career frameworks to support people in progressing, how we allocate our work, and how we create career paths for both technical and management roles. This framework will also be supported by a promotion pay structure that encourages movement of colleagues across teams.

Performance management

Performance management and reward are inextricably linked. Having the right tools available to managers is essential to embedding a performance culture where everyone can do their best. During 2021 we are undertaking a full review of our performance management processes, considering how they affect everybody and could help us to reduce pay gaps. We will make changes from 2022 onwards.