
Annex: Ofcom diversity and inclusion strategy progress update 2021-22

Diversity at Ofcom

Contents

Section

Background	2
Organisational portrait	3
The colleague lifecycle	6
About our data	21

Background

This report looks at 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.

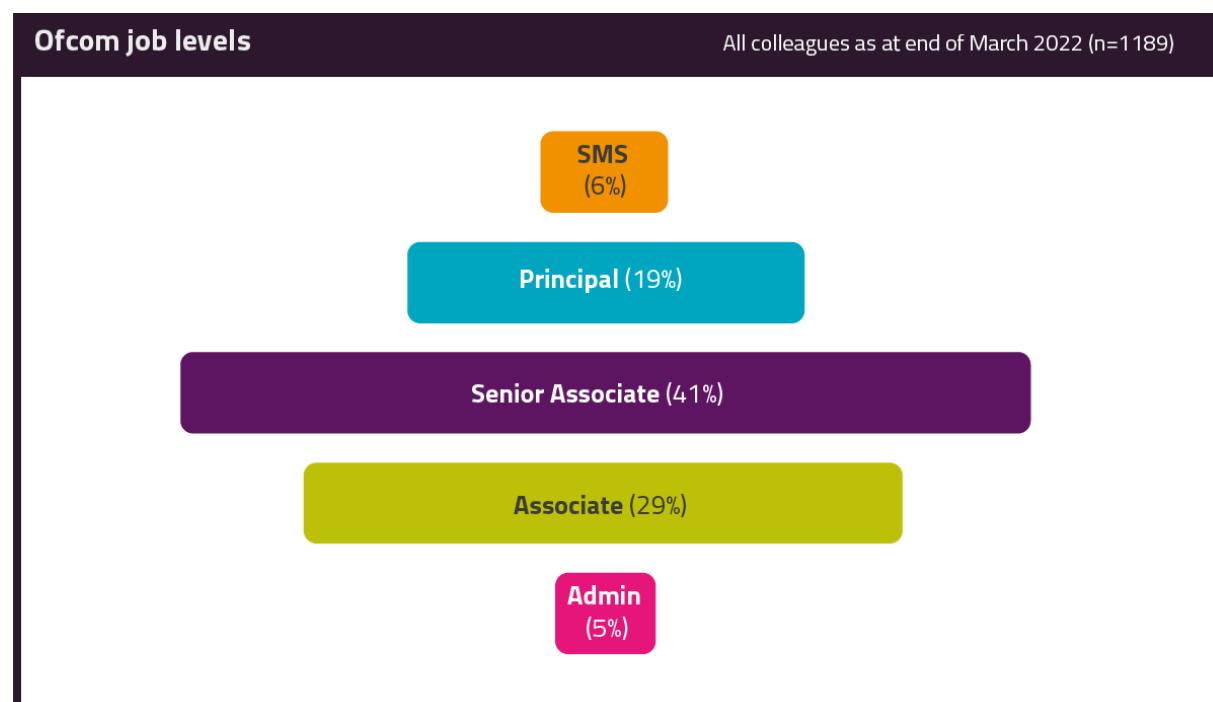
This report fulfils part of our duties under the Equality Act 2010 and helps to inform our approach to equality, diversity and inclusion at Ofcom.

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

Organisational portrait

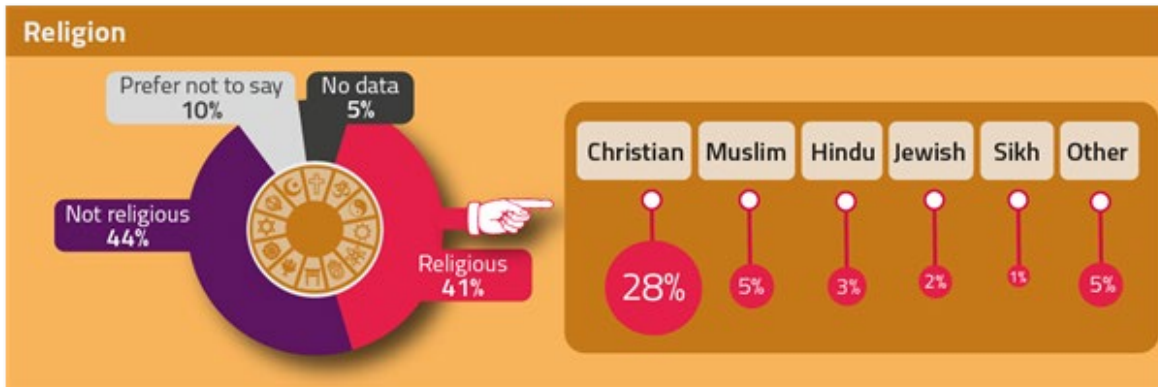
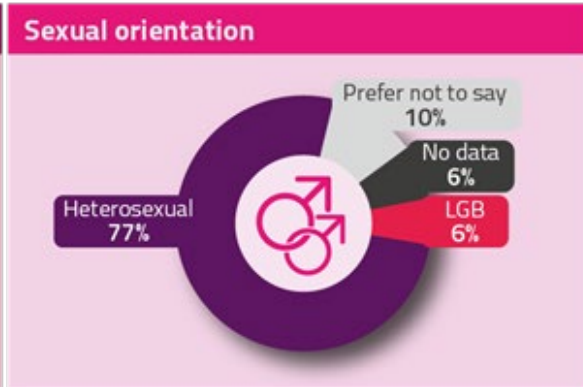
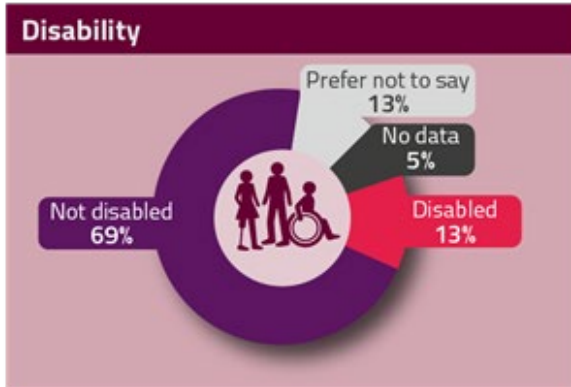
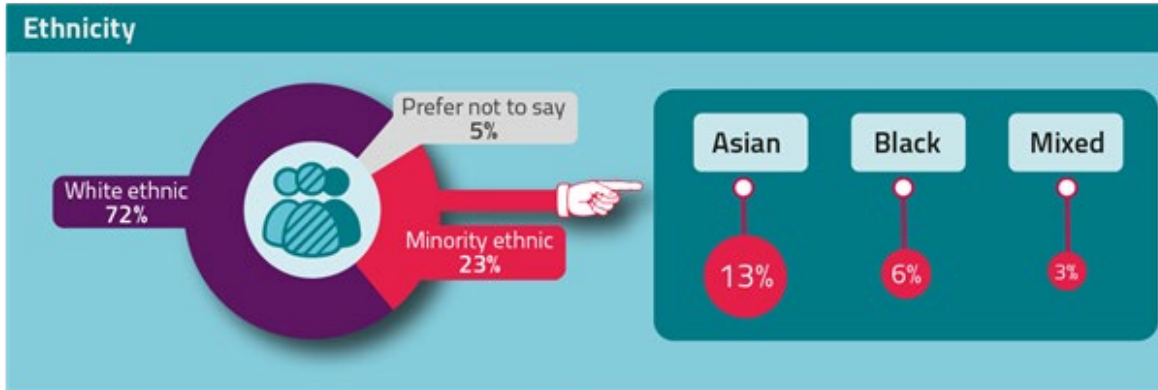
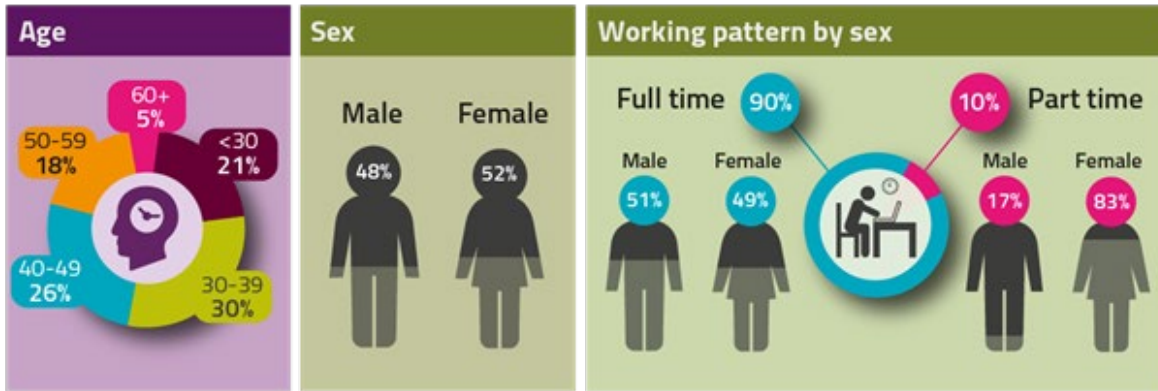
Ofcom has over 1,000 people with a wide range of expertise, professions and jobs ranging from policy makers, economists, technologists, market researchers, contact centre workers, broadcast specialists, people and finance specialists, lawyers and spectrum engineers – with many more besides. We have offices across the UK. Eighty per cent of our workforce use London as their primary base and 19% are based outside of London with Warrington (5%), Edinburgh (4%) and Baldock (4%) making up most of this. We also have offices in Birmingham, Cardiff, Belfast and our newly opened Manchester office now has 26 staff (accounting for 2% of our staff base). We expect to further grow to around 100 people in Manchester in the next year. 2% of our staff are permanent home workers.

There are five grades across Ofcom ranging from Administrator to Senior Managers and Specialists (‘SMS’ – director level). The largest proportion of employees are Senior Associates who make up two-fifths of our organisation (41%) followed by Associates (29%). There are broadly similar proportions of SMS (6%) and Administrators (5%) and close to a fifth (19%) are Principals.



OFCOM PROFILE

All colleagues 31 March 2022 (n=1189)



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

Sex

Fifty two percent of our total workforce are women, representing over half of staff for the first time. This is slightly higher than the UK population of adult women (aged 16+) in employment (48%) according to the ONS in May 2022.

Ethnicity

Just over a quarter (23%) of all our staff are from minority ethnic backgrounds, comparing favourably to the 13% of minority ethnic people who are in work across the UK. Thirteen percent of minority ethnic staff are of Asian heritage, 6% from a Black background and 3% are of dual/multiple heritage. In London 26% of our staff are from minority ethnic backgrounds, lower than the minority ethnic London population of 36% who are in work.

Disability

Thirteen percent of our staff have told us they are disabled. This is below the population of 21% disabled 16-64 people in the UK and the 15% of disabled people 16-64 who are employed. Increasing our workforce representation for disabled people is a core focus for us in the next five years, supported by our new workforce target on disability and a new corporate disability plan to embed inclusion and equity in all that we do.

Sexual orientation

Six percent of our workforce have told us they are lesbian, gay or bi (LGB). Six percent is above adult population trends (ONS 2020 cites that 3% of the adult population identify as LGB in their Annual Population Survey). Creating a culture of inclusion and belonging will be key for us to maintain representation of LGB colleagues across Ofcom. Alongside sexual orientation we also capture gender identity including non-binary identity and will work to increase completion rates.

Religion or belief

Forty one percent of our people say they are religious and 44% said they are not. Of those that said they were religious, the largest proportion were Christian (28%). Five percent are Muslim with Hindu (3%), Jewish (2%), Sikh (1%) and other faiths (5%) making up the rest. Research by the National Centre for Social Research in 2019 suggested that 47% of Britain in 2018 identified 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. Official estimates from the Census 2021 for religion and belief are released in October or November 2022, but this is a provisional date.

Age and working patterns

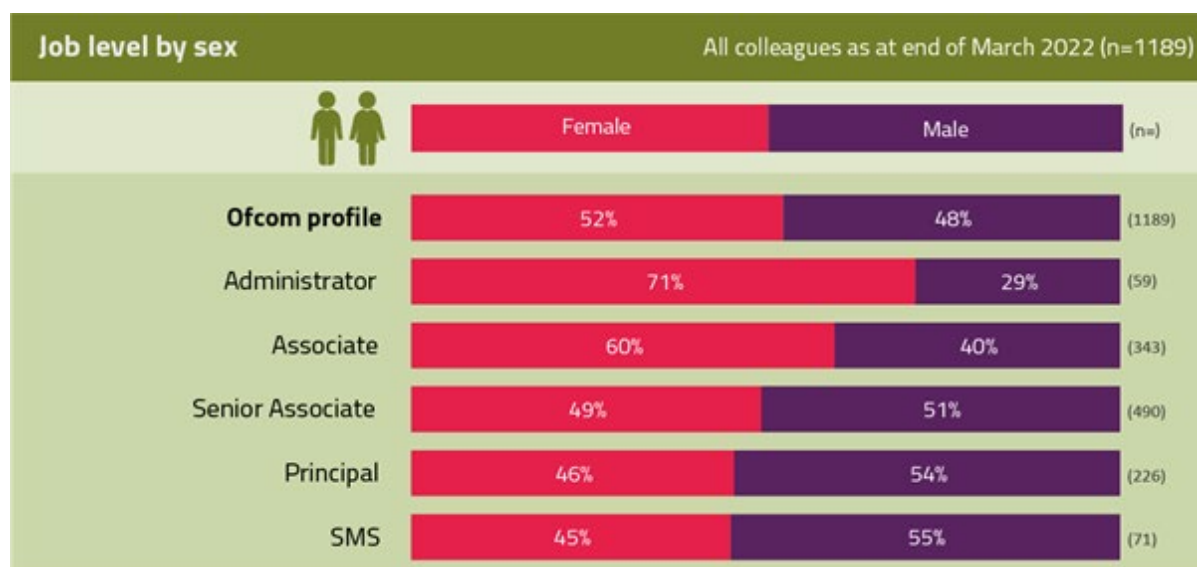
Just over a fifth (23%) of employees are aged 50 years and above (compared to 32% of the 50+ population in work according to latest ONS estimates), of which 5% are aged 60 years and above. Twenty one percent are below 30 years old, and a broadly similar proportion are aged between 40-

49 years. The highest concentration of colleagues is in the 30-39 age bracket (30%), followed by 40-49 (26%), accounting for a combined 56% of our workforce. These trends are similar to last year. Staff who work part-time make up 10% of our workforce and of this 10%, 84% are women.

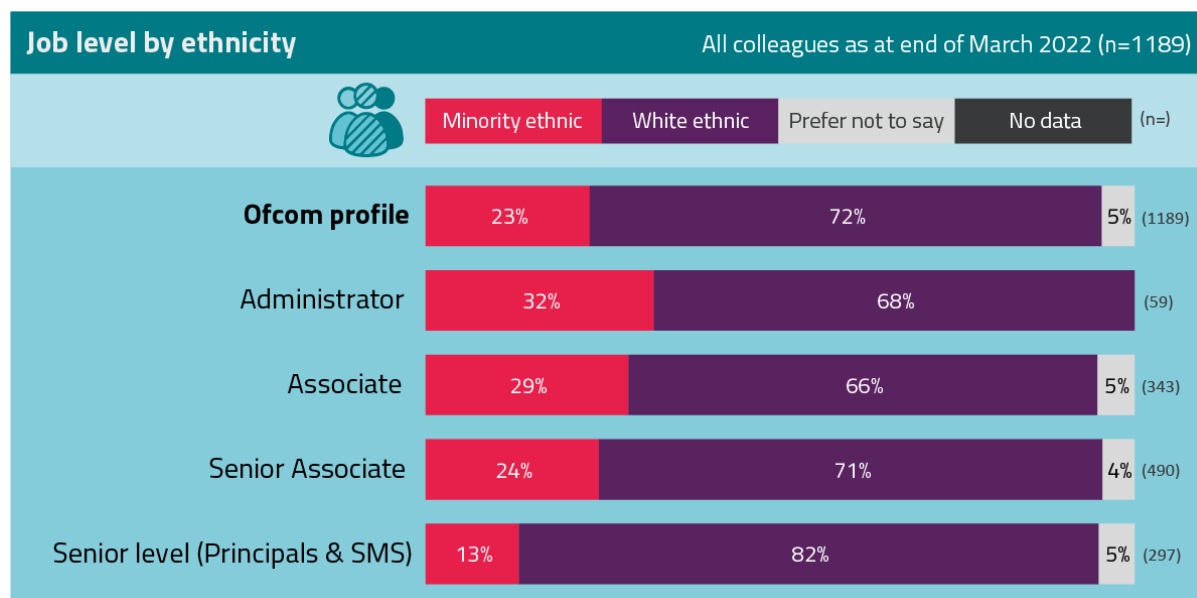
The colleague lifecycle

Job levels

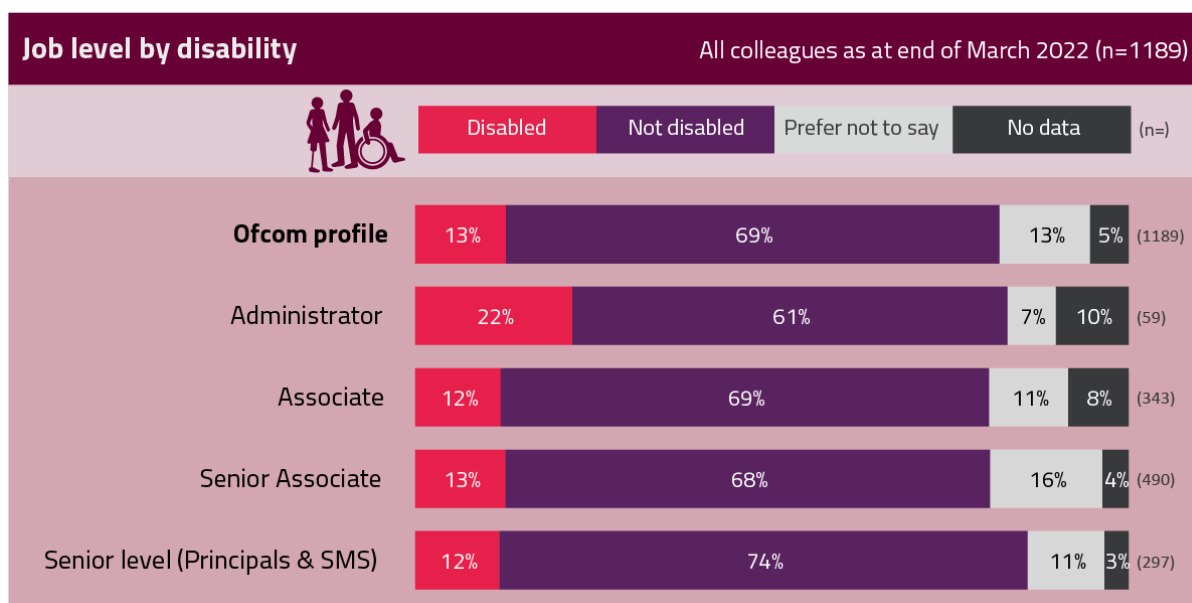
We have five job levels across Ofcom; Administrator, Associate, Senior Associate, Principal and Senior Manager and Specialists (SMS).



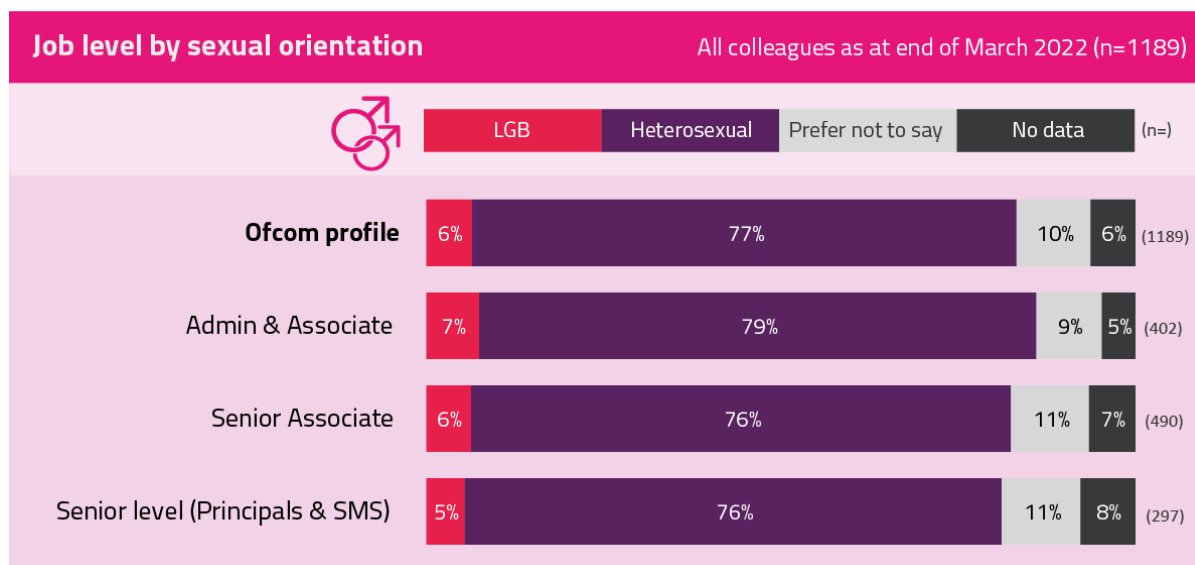
Compared the Ofcom average profile of 52%, women make up above average proportions in Administrator (71%) and Associate jobs (60%). These have increased since last year driven by the increase in roles we’ve needed as we take on new powers in online safety and telecoms security. We are moving closer towards parity in our more senior roles with similar proportions of women at Principal (46%) and SMS jobs (45%), and a broadly even split at Senior Associate level (49%).



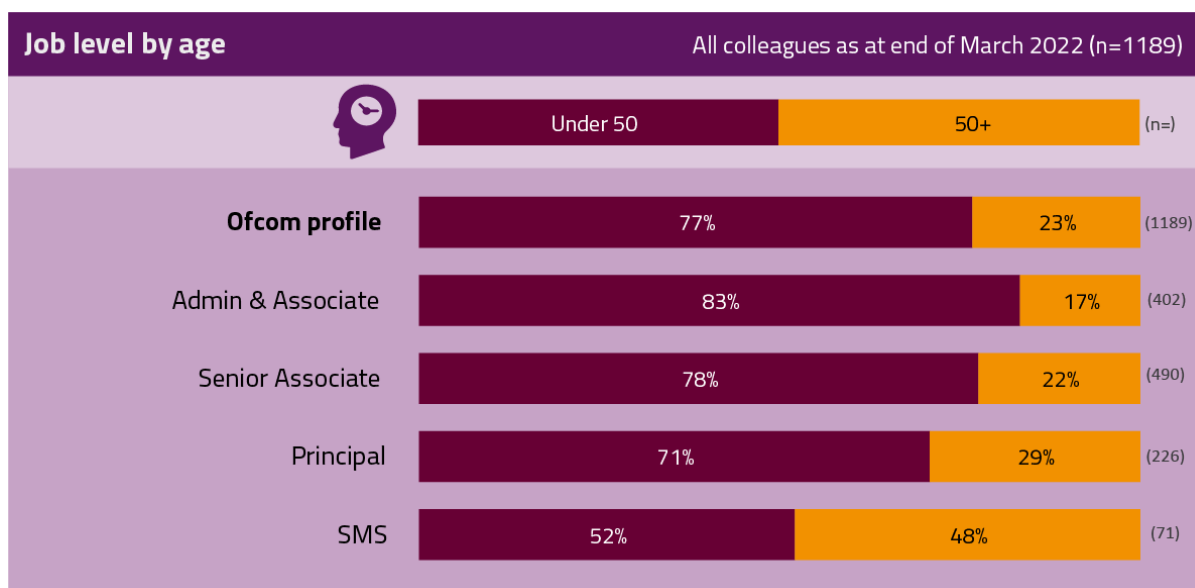
The overall representation of minority ethnic colleagues (23%) is higher than the UK working age population. We are doing more to strengthen our pipeline of talented colleagues from Admin and associate roles (where minority ethnic staff have above average representation) towards Principals and SMS positions (which at 13% has below average representation). Our diversity monitoring tracks the ethnicity breakdown within our senior levels, and we will continue to drive inclusion that supports greater Black representation, a focus area in our strategy.



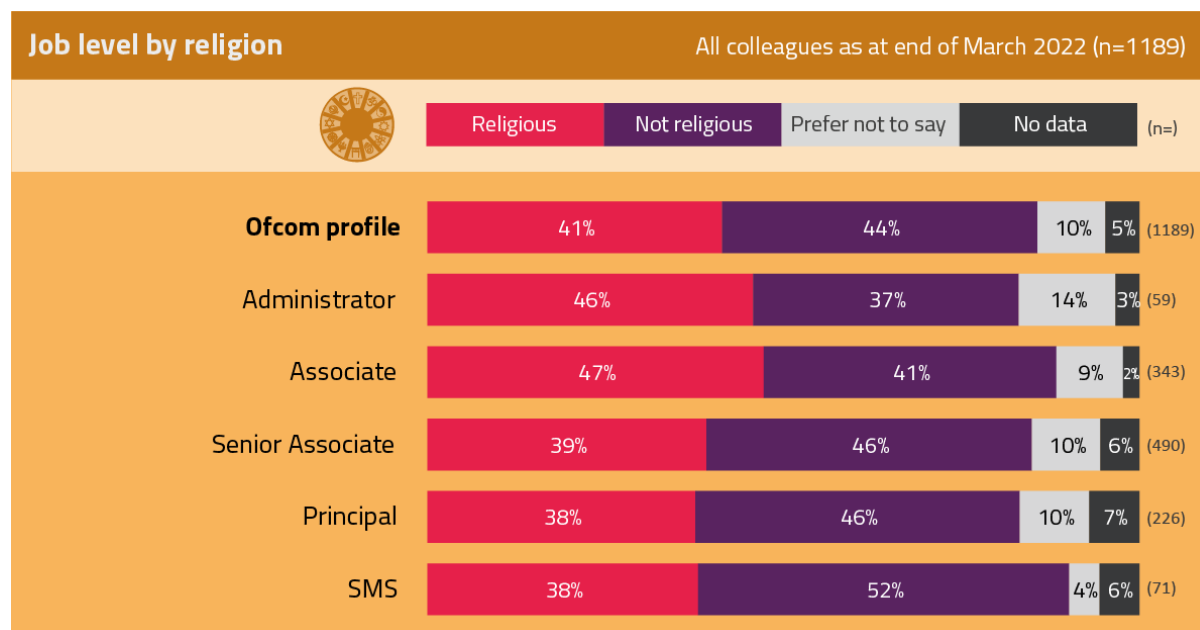
Representation among our Associate, Senior Associate and Principals and SMS roles combined are consistent with Ofcom’s average disabled profile of 13%. There is above representation at Administrator level which stood at around a fifth (22%).



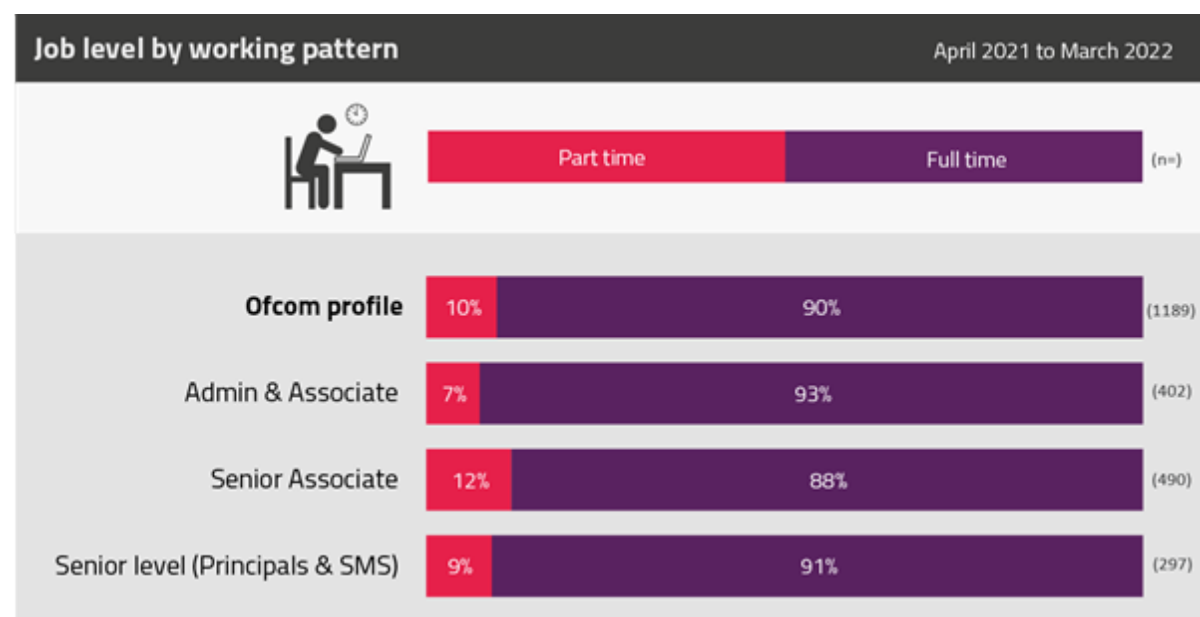
LGB representation at Ofcom (6%) is above LGB population estimates of 3% and LGB colleagues are consistently reflected at every grade. Representation ranged between 5% (for Principals and SMS) and 7% (for Administrator and Associate levels) though we’ve had to group up some job levels to meet our confidentiality data threshold of at least 10 people.



Seventy-seven percent of colleagues are under 50, of which a higher-than-average proportion are in Admin and Associate grades combined (83%). Most of this will be driven by our graduate and apprentice cohorts who are at the start of their careers. The representation of under 50s was consistent with our average profile at Senior Associate level and gradually decreases at the top two senior levels. Conversely, representation of those over 50 years old increases with seniority, reflecting people’s career growth either in their time with us at Ofcom or from coming to us from other organisations.

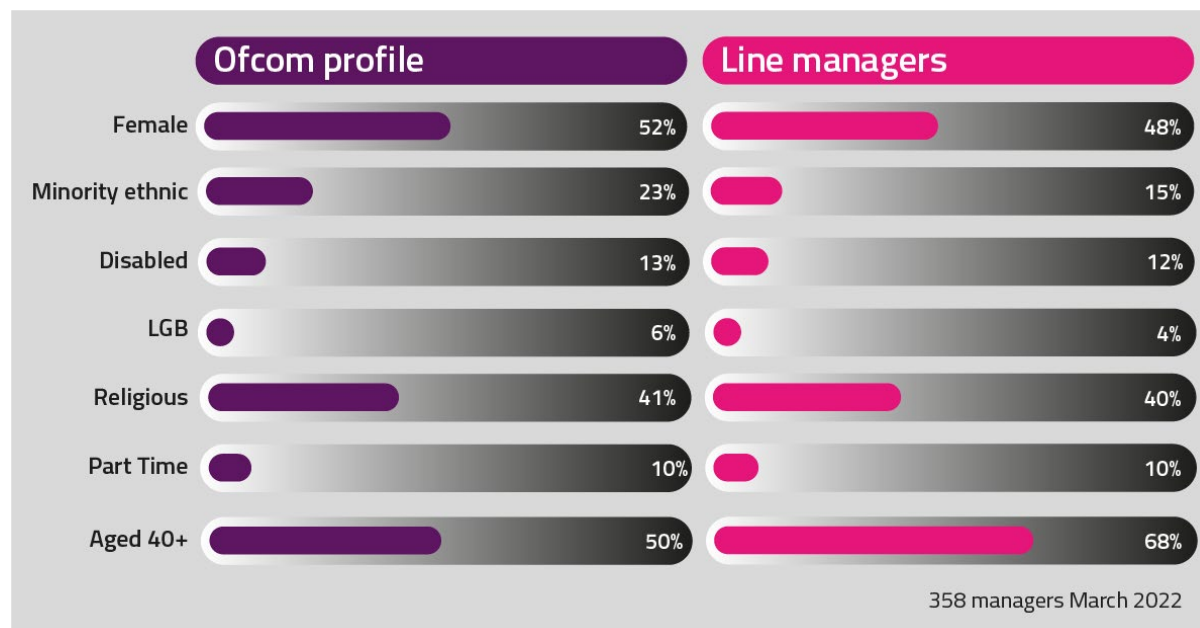


The balance between colleagues who have, or do not have, religious beliefs vary across each of our grades. Staff who are not religious make up a higher proportion in Senior Associate, Principal and SMS roles (each above our average profile of 44%) with Principals having greatest representation at 52%. The highest proportion of people who say they are religious are Administrators (46%) and Associates (47%), above the overall average of 41%.



Of all grades, the largest proportion of employees that work part-time are in the Senior Associate grade (12%) and above the Ofcom average of 10%. There is below average representation of part-time workers in the Administrator and Associate grades combined (7%), and comparable representation at senior levels (9%).

Line managers



Around a third (30%) of our staff have line management responsibility. Of these, 10% work part-time, on a par with the Ofcom average, and the largest proportion of line managers (49%) are in the Principal grade. This is followed by Senior Associates (31%) and 18% are in SMS roles.

The proportion of line managers that are disabled (12%), religious (40%) and who work part-time (10%) are consistent with their representation at Ofcom overall. There is higher than average representation of those aged 40+ years (68% vs 50% Ofcom-wide) while there is lower than average representation for those from minority ethnic backgrounds (8 percentage points (pp) less than Ofcom’s average minority ethnic representation), women (4pp less) and LGB colleagues (2pp less).

Recruitment

We use diversity monitoring forms to understand the extent to which we are delivering fair and inclusive recruitment to our colleagues. We have made improvements in encouraging people to share their information with us, particularly applicants coming through our external recruitment partners, but we have a bit more work to do to close some of the gaps.

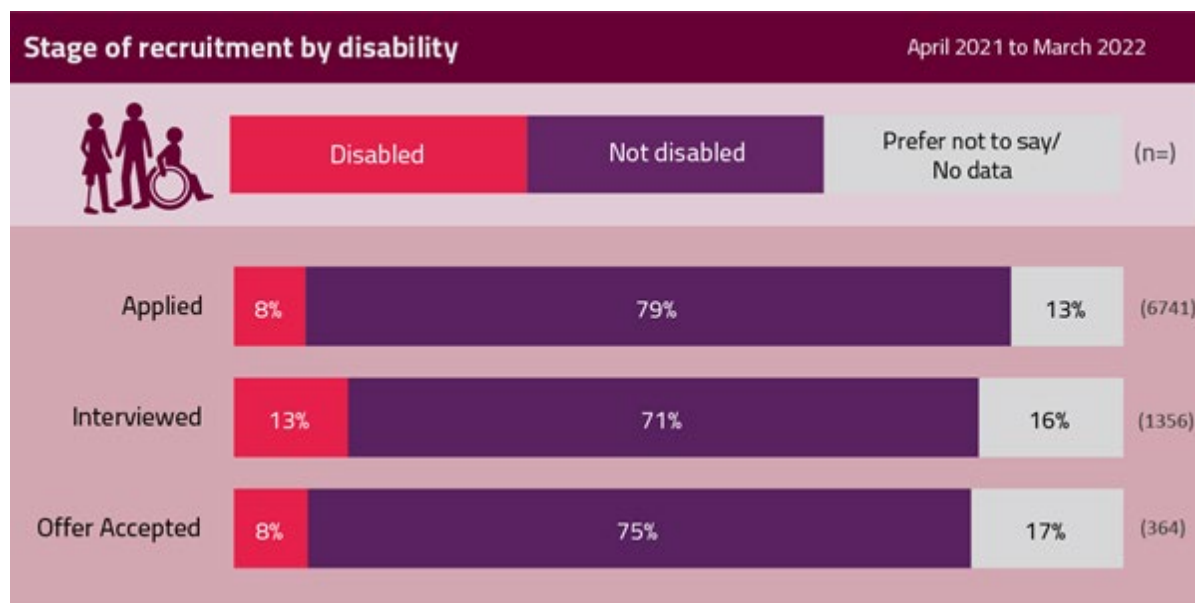
Our data looks at each stage of the recruitment process by demographic group. From application to shortlisting, to those invited for interviews through to an offer being accepted.



There was a consistent proportion of female candidates (43-44%) from application to interviewed through to accepting job offers with us.



There was a drop in the proportion of people from minority ethnic backgrounds between the application (36%) and interviewed (28%) stages with 37% accepting job offers



Eight percent of applicants said they were disabled, increasing to 13% at the interview stages and resulting in 8% of those who accepted jobs.

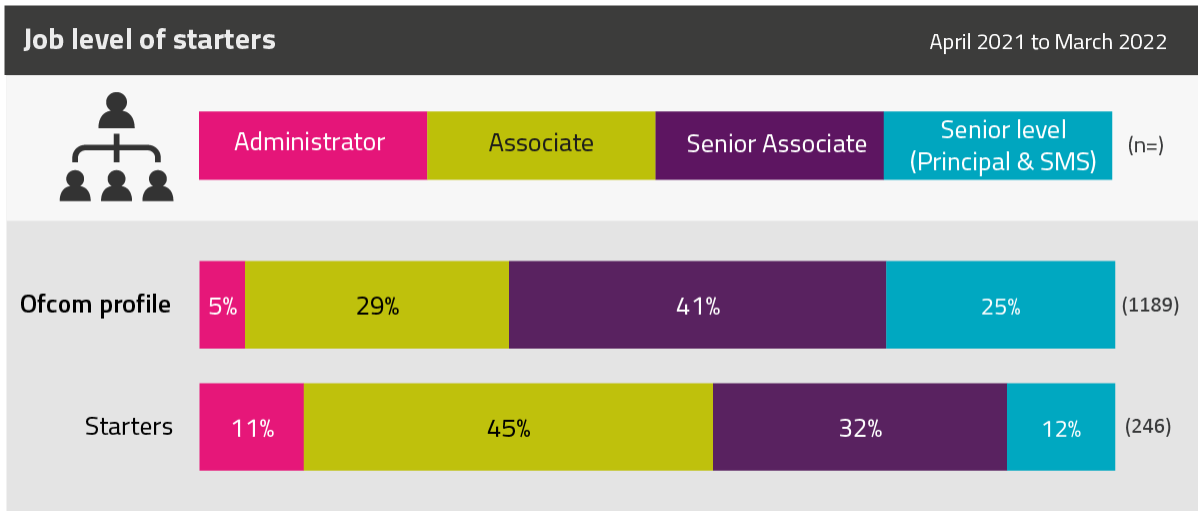


At 7% the proportion of people who told us they are LGB was the same at application and interviewed stages which translated to 5% of those who took up job offers.

Starters

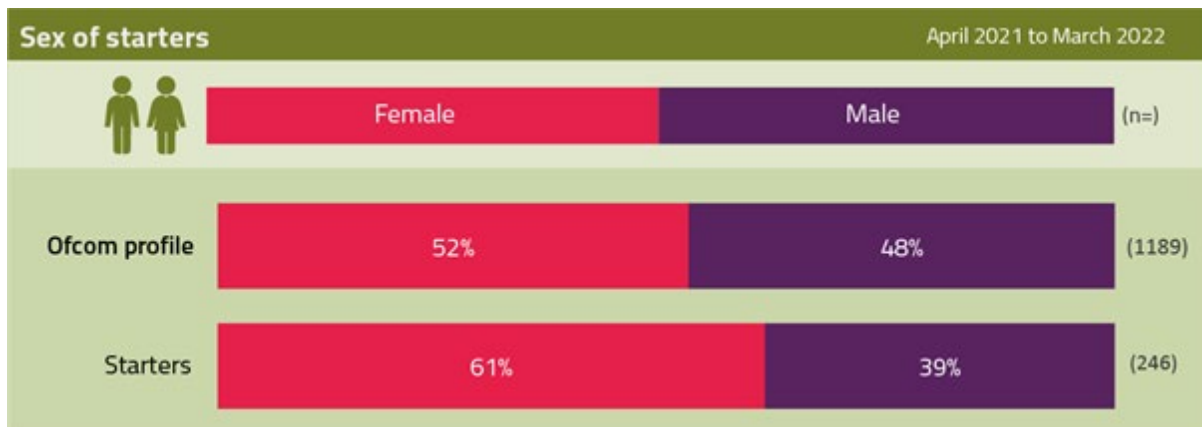
246 people joined Ofcom in the last year as we continued to recruit during the pandemic and to grow the organisation as we take on new regulatory duties for online safety and telecoms security.

Our goal is to use the growth opportunity to diversify our workforce in the key areas of senior women, senior minority ethnic, and disability across all of Ofcom, as well as more generally.



The largest proportion of our new roles were in Associate (45%) and Senior Associate jobs (32%). The large intake of Associates roles also reflects our early careers strategy to build our talent pipeline which includes the annual hiring of graduates and apprentices.

A similar proportion of new starters were in Administrator and senior grades (11% and 12% respectively).

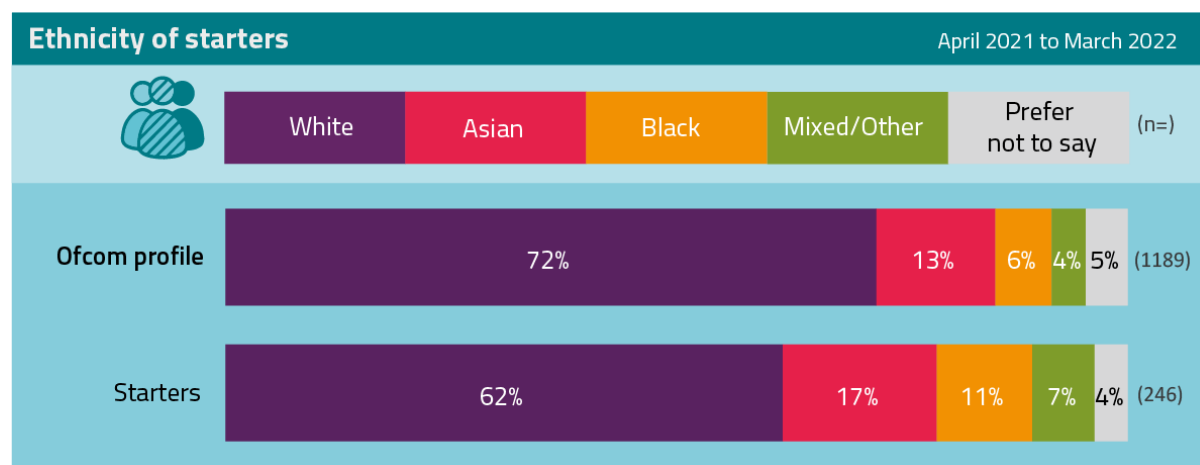


Sixty one percent of new starters into Ofcom were women, contributing to our 52% women representation Ofcom-wide.

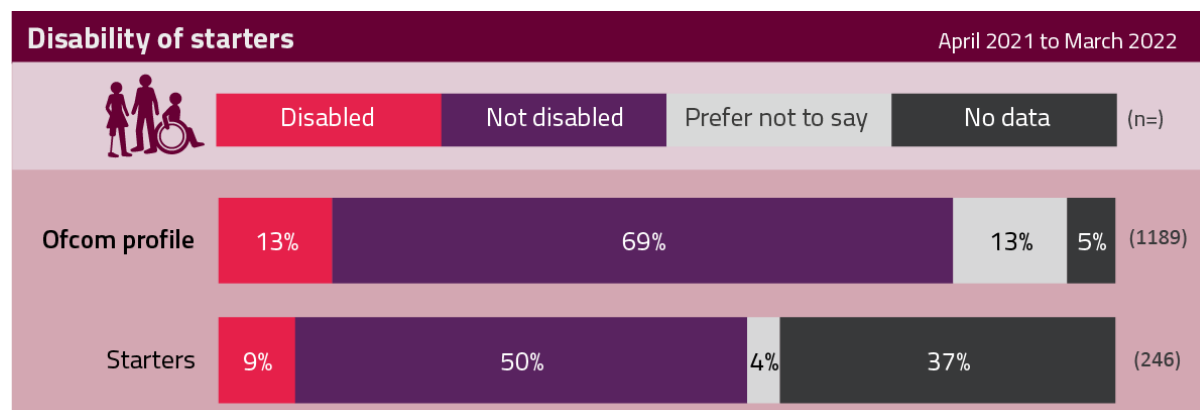


Diversity at Ofcom: Ofcom’s diversity and inclusion strategy progress update 2021-22

A higher proportion of minority ethnic people started with Ofcom (35%) relative to our staff minority ethnic profile (23%).

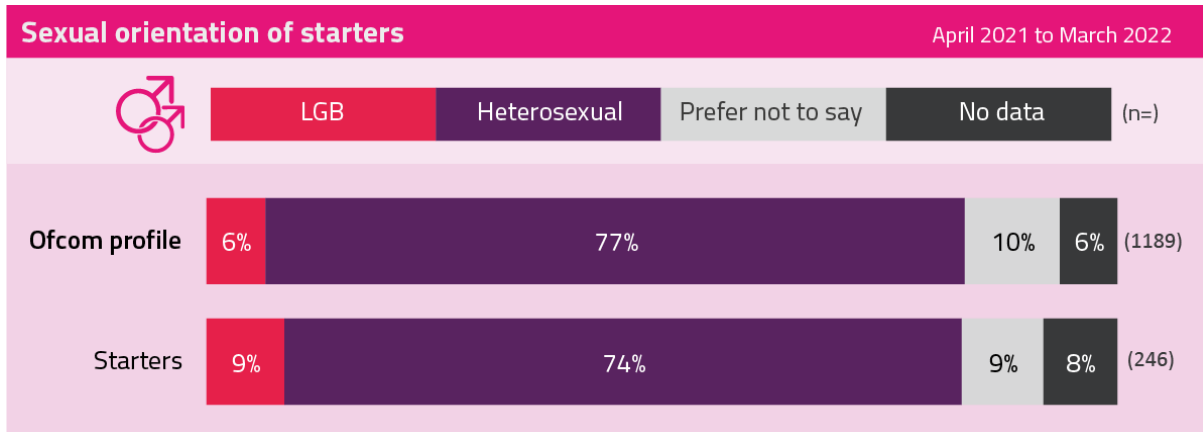


More granular analysis of the minority ethnic category shows that the proportions of each of Asian (17%), Black (11%) and those from dual or multiple backgrounds and other ethnic backgrounds combined (7%) were higher relative to their Ofcom representation. The biggest variance between their Ofcom profile and new starter rate was among Black people (5pp higher than average).

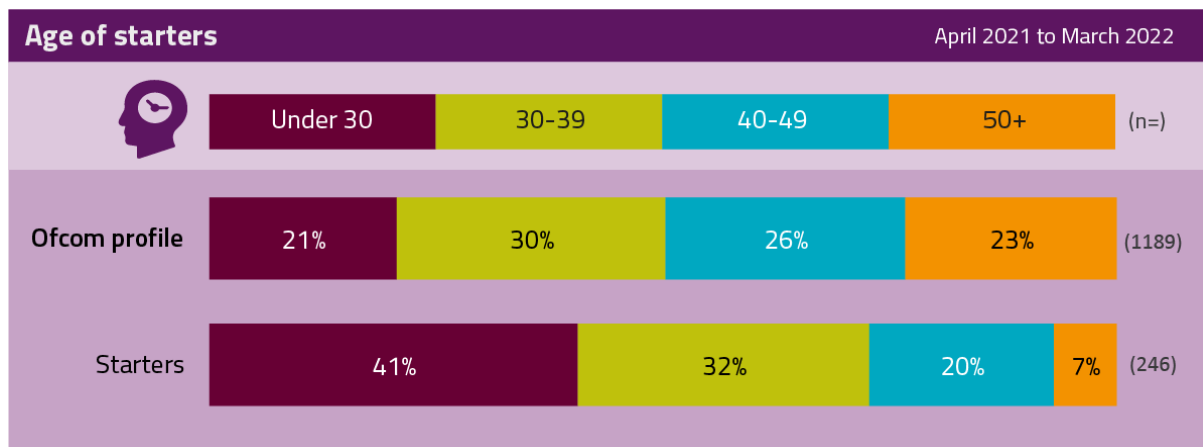


Nine percent of new joiners said they were disabled, lower than the proportion of disabled people at Ofcom (13%). However, it should be noted that we had no data for a larger than average proportion of new starters (37% no data vs 5% no data for existing staff) this year due to a temporary technical issue during the reporting period. We are actively working towards a resolution and to drive up reporting.

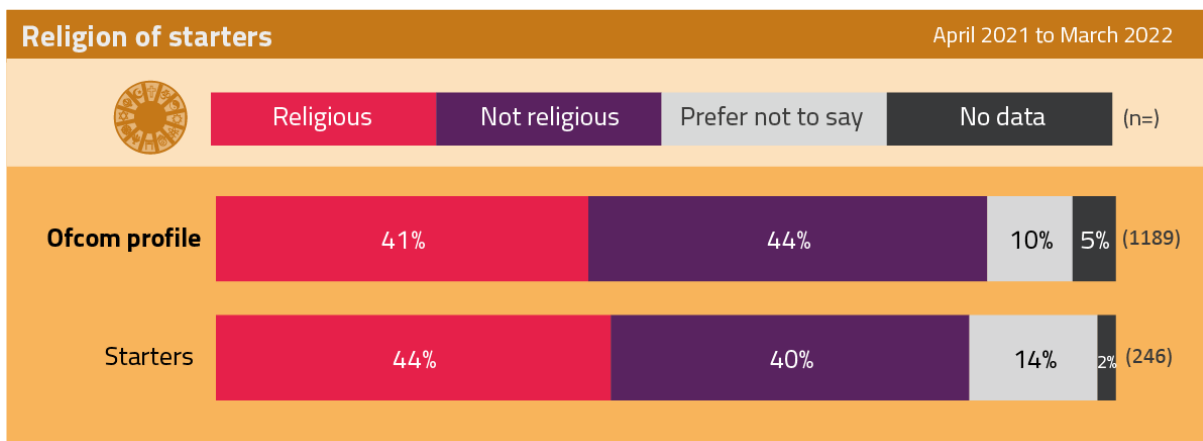
Ofcom is a Disability Confident Level 2 Employer and our ambition is to attain level 3 accreditation. We support the government’s Disability Confident scheme offering a guaranteed first stage interview to disabled applicants who meet the minimum criteria of a role, wherever practicable, and have experience of using the Access to Work service for our staff. Given our move into digital recruitment practices first stage interview can be a video presentation, video interview or panel interview



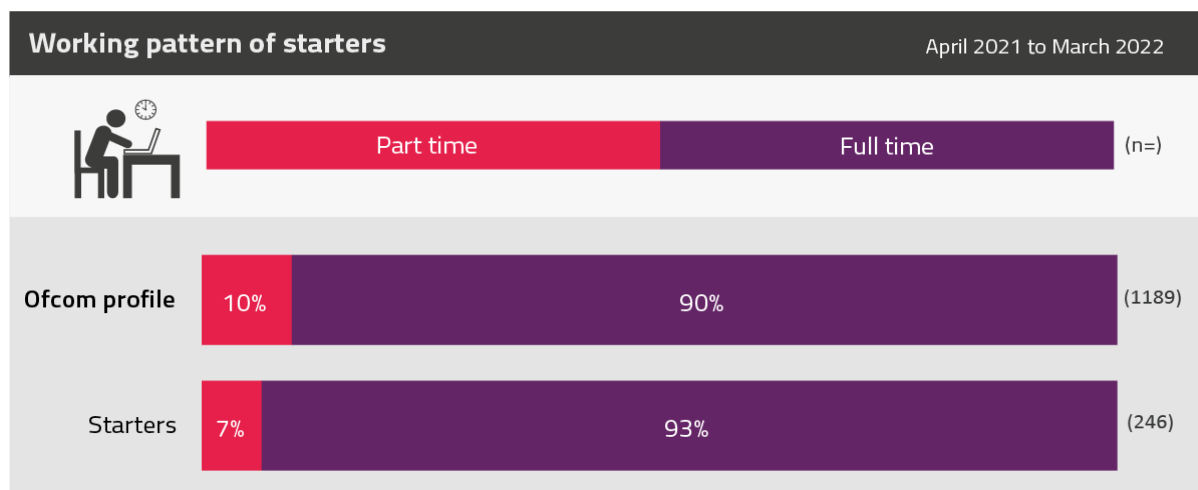
Nine percent of new starters said they were LGB, higher than our average LGB representation of 6%.



By age, 4 in 10 (41%) of new starters were aged under 30, reflective of our intake being highest in Associate roles. A third (32%) of new joiners were aged 30-39, similar to our Ofcom staff profile for the same age bracket, while 20% were aged 40-49. We recruited much lower proportions of people in the 50+ years age bracket, relative to their average representation at Ofcom.



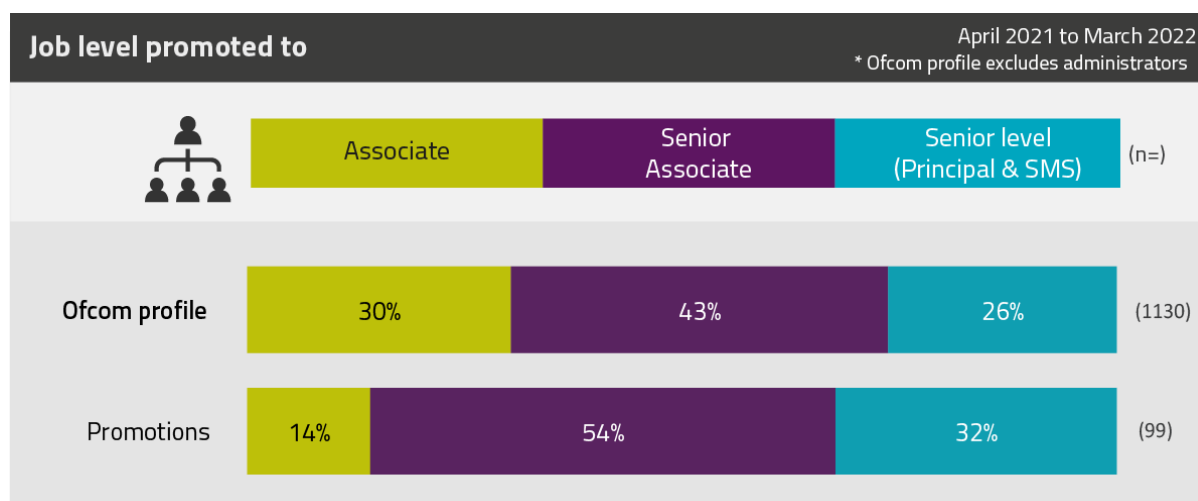
A slightly higher proportion of our new recruits (44%) considered themselves religious compared to the Ofcom average (41%) while a lower proportion (40%) said they were not religious compared to the Ofcom-wide picture of 44%.



Seven percent of people who joined us took up part-time working hours (less than 35 hours a week), lower than the 10% of staff at Ofcom who work part-time. Our jobs offer flexible working, which includes part-time working, wherever and as much as is possible for the role.

Promotions

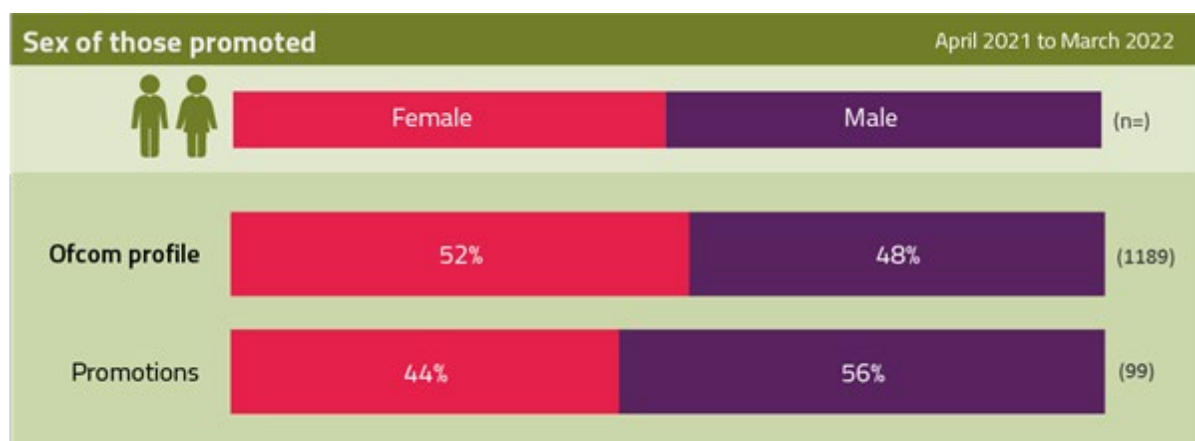
In the last year 99 Ofcom employees were promoted, higher than the 70 people that were promoted the previous year. Promotions take place as part of our internal promotion process or by colleagues successfully applying for positions at a higher level which are advertised internally and externally. In-role 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.



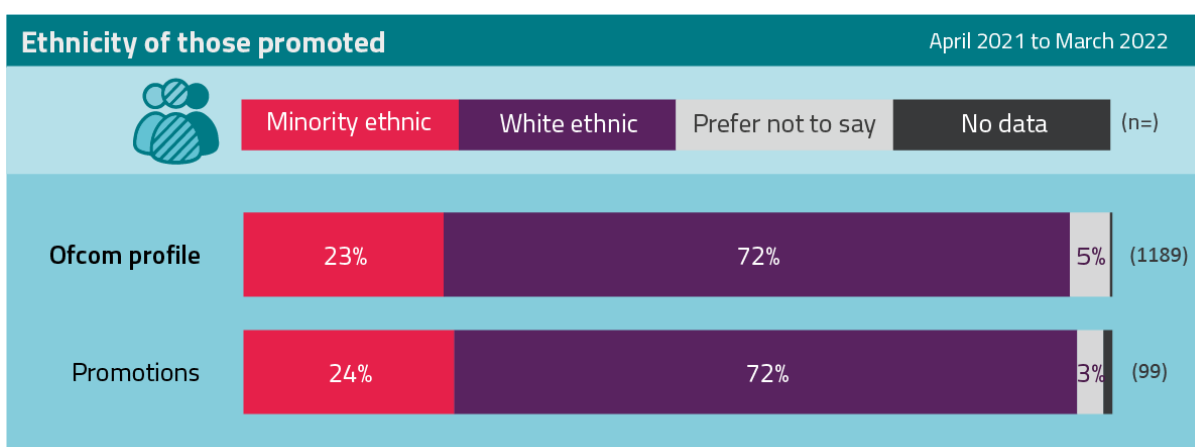
The grades shown are those that a colleague is promoted to. Associates were formerly Administrators, Senior Associates were Associates, Principals were Senior Associates and SMS were formerly Principals. Base = Associate levels upwards only (n=1130) therefore the Ofcom grade profiles here will be different to the proportions shown for the full base of 1189 staff.

Diversity at Ofcom: Ofcom’s diversity and inclusion strategy progress update 2021-22

Across April 2021 to March 2022 the largest source of promotions was from Associate into Senior Associate roles (54%). Reflecting the relatively small pool of Administrators at Ofcom (they make up 5% of roles at the organisation) promotion levels into Associate roles were smallest at 14%. There is no in-role promotion for roles above Senior Associates and the third (32%) of promotions into Principal and SMS levels were secured through a competitive process by existing staff. This above average proportion relative to their 26% profile at Ofcom reflects our strategy to also build our senior talent from within.



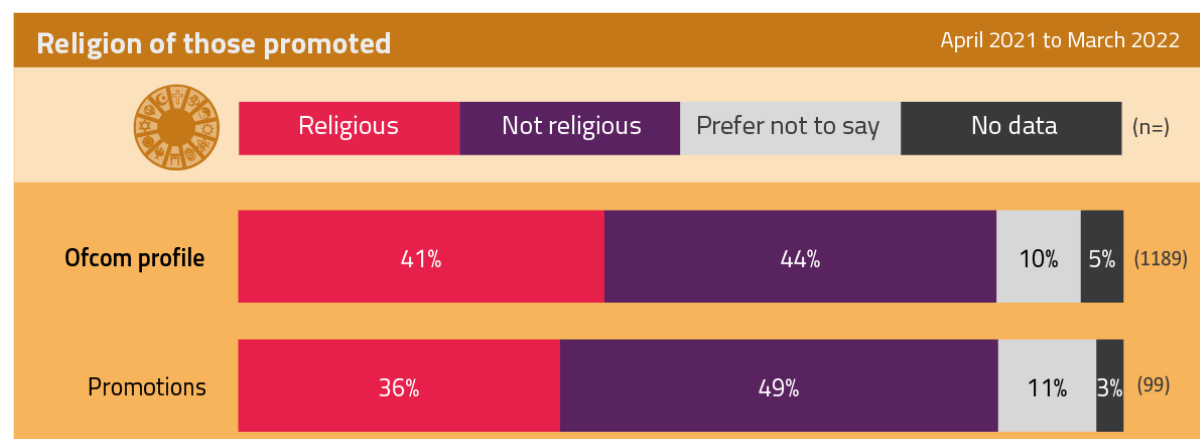
Forty four percent of promotions were awarded to women, lower than the Ofcom average profile for women (52%).



The proportions of minority ethnic (24%) and White ethnic (72%) employees who were promoted were the same as their representation at Ofcom as whole.

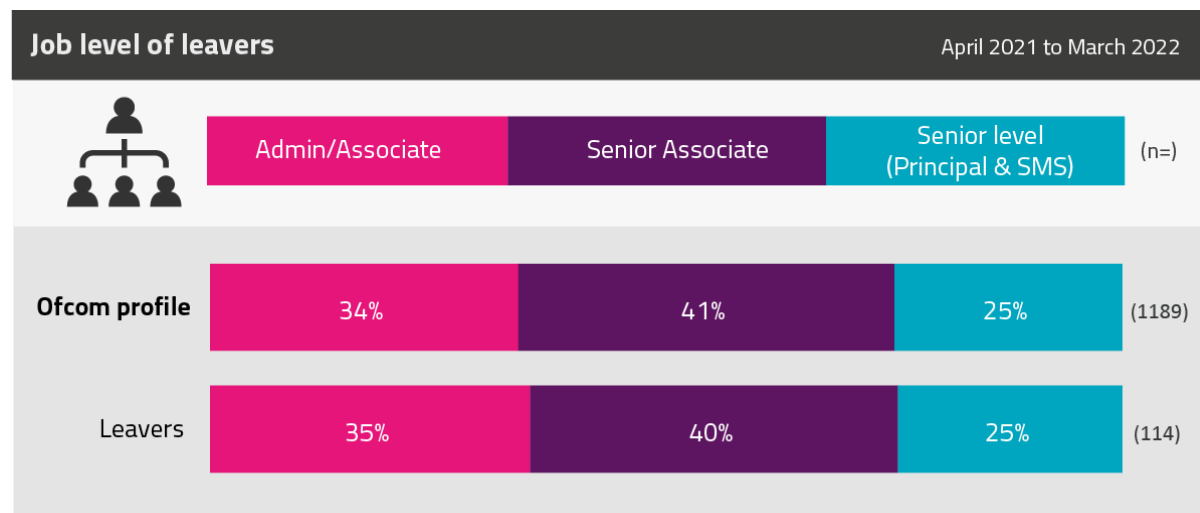


By age group the majority of promotions were to those aged under 30 years (40%), reflecting the notably younger skew in our Administrator and Associate roles. A third (33%) of those promoted were aged between 30-39, broadly similar to their representation at Ofcom (30%), while lower proportions of people aged 40-49 (15%) and 50+ (11%) were promoted relative to their profile across Ofcom (26% and 23% respectively). This is because the largest numbers of staff in these age brackets are Senior Associates and Principals already and the vacancies for Principals and SMS are naturally lower than other grades and must be advertised through a competitive process.

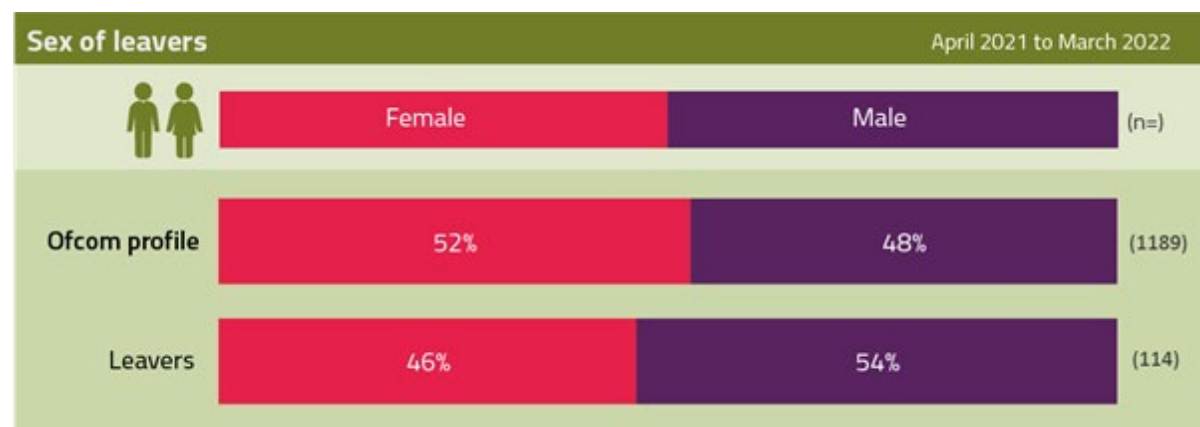


A lower proportion of religious staff (36%) were promoted compared to non-religious staff (49%) and compared against their Ofcom representation (41%).

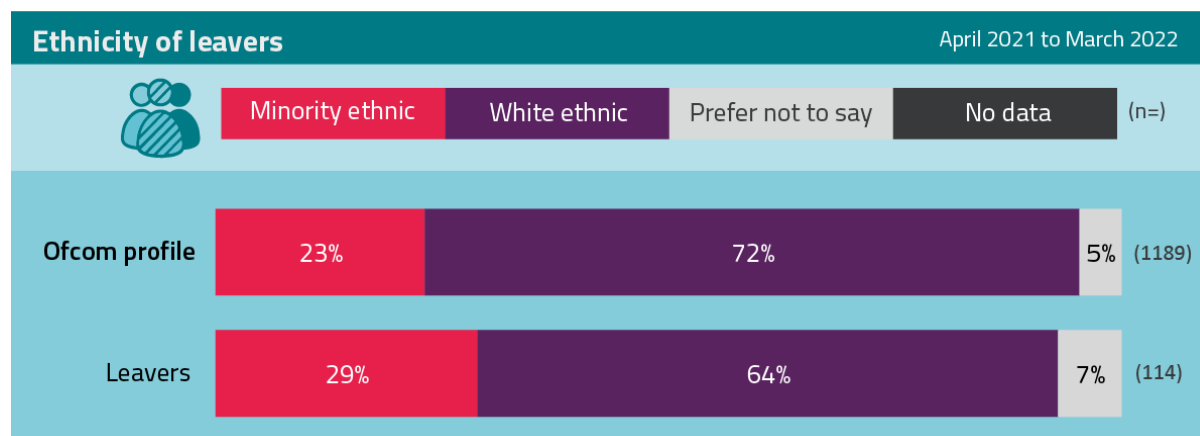
Leavers



The grade distribution of leavers was all in line with their representation at Ofcom in contrast to the distribution of new starters which were skewed towards Administrators and Associates (56% combined), and which was lower among Senior Associates and Principals and SMS.

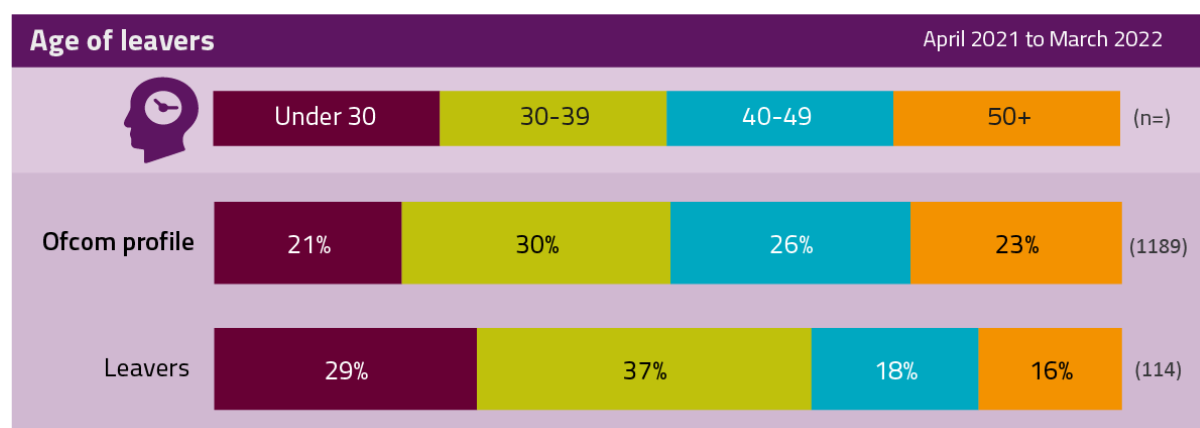


Lower proportions of women (46%) moved on from Ofcom compared to their Ofcom representation (52%). This compares to 39% of women leavers across 2020/21 (against a female profile of 50%) and 49% in 2019/2020 (against a female profile of 48%). These trends demonstrate the impact of COVID-19 on the job market more generally as well as the positive impact of our wide-ranging employee support during the pandemic. These included enhanced or new COVID specific policies to enable people to be given maximum flexibility and to put families first during a unique and uncertain set of circumstances, which arguably affected women most as they tend to assume most of the caring responsibilities.

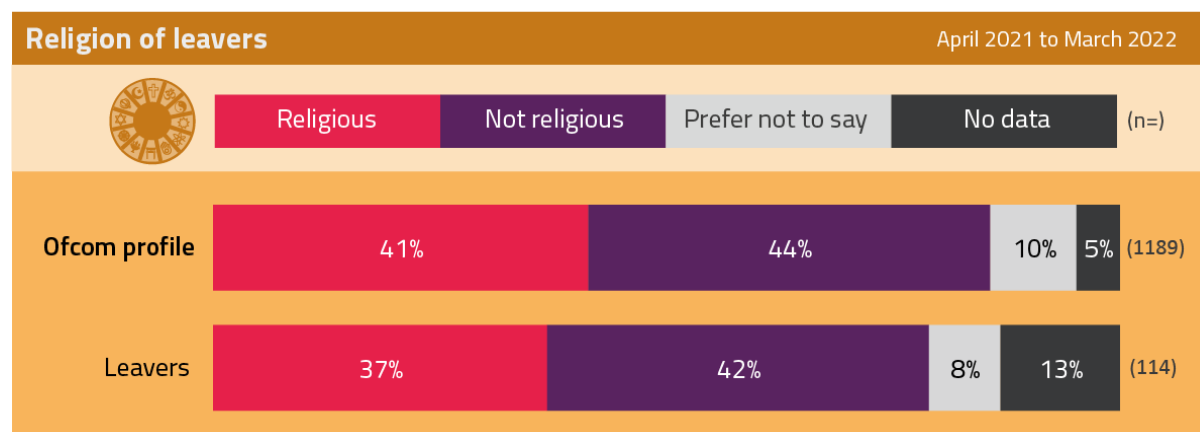


Twenty-nine percent of leavers were from minority ethnic backgrounds and 64% were from White ethnic backgrounds. The leavers rate for minority ethnic people was higher than their 23% profile at Ofcom while it was lower for staff from a White ethnic background (72% at Ofcom).

Breaking the ethnicity down further, the data shows that of minority ethnic employees who moved on from Ofcom, a larger proportion were from Black ethnic backgrounds (11%) compared to their Ofcom profile (6%) while the leavers rate for Asian staff was the same as their Ofcom average profile (13%).



The leavers rate by age group was highest among the under 30s (29%) and 30-39 year olds (37%) accounting for 66% of people who left us in the last year. These rates are higher than the Ofcom average representation for these age groups (51% combined). This is likely to be reflective of people wanting to move on as they explore career options – our more junior grades tend to be younger.



The proportion of religious and non-religious colleagues who left us were both below their representation at Ofcom overall. 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.

About our data

The diversity questions we ask

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.

We monitor the diversity of all our people processes to ensure fairness for all. When people apply for jobs at Ofcom and 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.

We encourage our staff to share their information with us but people are free to decide not to answer the questions and to choose ‘prefer not to say’. We also have some ‘no data’ gaps where people have chosen not to provide any information at all. Both sets of data are included in our reporting. These no data gaps are largely from our legacy HR systems and from people who have been with us for a longer time. We have worked hard to close them from internal communications campaigns with success – we previously had no data gaps of around a quarter to a fifth for disability and sexual orientation and these are currently at 5% and 6% respectively. We will continue to work towards closing our gaps by explaining why we ask for the data and how we use it and by creating an environment in which people feel comfortable and safe to do so.

Only data that covers at least 10 people is captured in this report, to protect people’s private information and make sure they are not identifiable. This means there will be some data points where we either group up data or where we don’t show any data at all. Wherever possible, we have

shared more granular cuts of data – such for ethnicity – when we are able to meet our data threshold.

Population benchmarking data

Gender	ONS Labour market statistics A09: Labour market status by ethnic group (average of Apr-Jun 21, Jul-Sep 21, Oct-Dec 21, Jan-Mar 2022). All employed males and females aged 16+ (employees and self-employed) in the UK.
Race/ethnicity	ONS Labour market statistics A09: Labour market status by ethnic group (average of Apr-Jun 21, Jul-Sep 21, Oct-Dec 21, Jan-Mar 2022). All employed minority ethnic people aged 16+ (employees and self-employed) in the UK. For London we use ONS Annual Population Survey Jan 21 – Dec 21 – NomisWeb Table T05 Economic activity by ethnic group and nationality. Proportion in employment, aged 16-64 in London.
Disability	ONS Labour market statistics A08: Labour market status of disabled people (average of Apr-Jun 21, Jul-Sep 21, Oct-Dec 21, Jan-Mar 2022). Proportion of all 16-64 who are ‘Harmonised Standard Definition Disabled’ and proportion of all 16-64 who are ‘Harmonised Standard Definition Disabled’ in employment across the UK.
Sexual orientation	ONS Sexual identity, UK: 2020 - Percentage of UK population who identify themselves as LGB
Religion/belief	National Centre for Social Research British Social Attitudes 2019 report
Age	ONS Labour market statistics Table A05: Labour market by age group : People by economic activity and age (seasonally adjusted) (average of Apr-Jun 21, Jul-Sep 21, Oct-Dec 21, Jan-Mar 2022). All employed people