
Diversity at Ofcom 2018/19

26 July 2019

Overview

This is our annual statistical report on the diversity of our colleagues. It looks at diversity across our organisation overall as well in specific areas such as in

- recruitment,
- job level,
- performance ratings,
- promotions,
- completion of training and development programmes,
- grievances, and
- leavers.

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

It complements our *Diversity and inclusion programme update* report published at the same time as this report. The progress report looks at our diversity and inclusion achievements to date, where we haven't done as well, and what actions we will focus on in the coming year.

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.

- **We are doing better on some of our workforce targets than others.** We met our target for 40% of senior roles to be held by women last year (2017/18) and exceeded it to reach 43% at the end of March this year. Our progress against our other targets has been slower and we will take a more targeted approach to achieve them by the end of 2020. 11% of our senior roles are held by minority ethnic colleagues, the same as last year and 2pp short of our 13% ambition. We want a 50% gender balance in our workforce and currently we are at 47% women and 53% men.
- **We must reduce our colleague 'no data' gaps.** We have more work to do to reduce our data gaps. This is particularly true of disability, sexual orientation and religion or belief which can be less visible. Having gaps makes it difficult to identify under-representation in these areas and to take the right action to address them. While we still have a way to go, our no-data gaps are much improved from the data used in our reporting period. We will continue to encourage and to help colleagues feel more comfortable sharing their diversity information with us and will work closely with our diversity networks to do this. A focus towards a more inclusive culture where inclusion and diversity can thrive should also help with this.

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Why diversity matters to us

Our commitment to diversity and inclusion

Ofcom aims to make communications work for everyone across the UK. To do this effectively, we need people from diverse backgrounds to help us reflect and represent the different perspectives within society. A range of voices, thinking styles and ideas mean we make better decisions and produce better outcomes for the people that we serve. Valuing, promoting and encouraging diversity creates a more engaged, satisfied and effective workforce. To this end, we are working to increase the diversity of our organisation. We have set clear targets and we regularly monitor our progress against them.

We collect and report on our colleague diversity data every year. This helps us to ensure diversity and inclusion are prominent at all levels of our organisation, and helping to embed our values: excellence; collaboration; agility; and empowerment.

We aim to treat all our colleagues with dignity and respect in an inclusive and fair working environment. Our current four-year diversity and inclusion programme published in March 2018 set out three main aims which encourage and promote diversity and inclusion.

They cover the make-up of our staff to better reflect the UK population we serve; the way that we work and do things; and the work that we do as the UK's communications regulator to make communications work for everyone.

This report complements our *Diversity and inclusion programme update 2018/19* report which evaluates progress against our objectives. In particular this report focuses on the make-up of our staff, building on the evaluation of our actions in our progress report. It aims to understand how diversity and equality of opportunity is operating throughout the colleague journey, from joining us to leaving us. It helps us to track the outcomes of action we take in our diversity and inclusion programme, though we recognise that a lot of those actions will take time to embed and won't be immediately apparent in our datasets.

As well as doing all we can to promote diversity and inclusion in our organisation, we also encourage the wider sectors we regulate to do the same. We hold broadcasters to account through our diversity in broadcasting programme where we track the diversity of staff across the UK based television and radio industries annually¹.

¹ Our second [diversity and equal opportunities in television](#) report was published in September 2018 and our first [diversity](#)

[and equal opportunities in radio](#) report was published in June 2018.



About our data

The data we collect

The diversity monitoring data used in this report covers the period 1 April 2018 to 31 March 2019, unless stated otherwise.

At the end of March 2019, there were 922 colleagues at Ofcom. 121 joined the organisation in the previous twelve months and 101 left us.

When colleagues join us, we ask them to share their diversity information with us by completing a new starter form. We ask colleagues to review their diversity data annually or when there may be changes to make. We also ask candidates to complete a diversity monitoring form when applying for jobs with us.

Our ethnicity and religion and belief data are classified according to the criteria used in the 2011 Census. For reporting purposes, we have grouped the classifications into minority ethnic and white ethnic and religious and non-religious.

We want to understand to what extent particular groups of colleagues are represented within different areas, such as within job levels or within performance ratings.

To help us know whether they are over- or under-represented in these areas, we compare their overall distribution, or profile, across Ofcom as a whole.

In 2015, we set ourselves three workforce targets which we aim to achieve by 2020. The next section sets out our progress against these.

This report provides information on most of the protected characteristics under the Equality Act 2010, except for gender identity, pregnancy and maternity and marriage and civil partnership². We do not have enough information on these areas to report robust analysis.

When we ask colleagues to share their diversity information with us, we always offer the option of 'prefer not to say'. This is reflected in our reported datasets. But we also have data gaps where we don't know the diversity information of our colleagues. These data gaps – or 'no data' are included in our report. Where there are high levels of 'no data', the representation of colleagues could be higher or lower than stated.

² The Equality Act 2010 replaced three previous reporting duties on ethnicity, disability and gender, bringing them together as a single duty which was extended to cover nine protected characteristics. The nine protected characteristics are: age; disability; race; sex; gender identity (gender

reassignment in the Act); marriage and civil partnership; pregnancy and maternity; religion or belief and sexual orientation.

We recognise that we have more work to do to reduce our data gaps to further improve the standard and quality of our data. This is particularly true of disability, sexual orientation and religion or belief, which can be less visible.

We continue to work on closing our gaps and since our reporting period, have narrowed our gaps further. Our no-data gaps are now 11% for disability (from 24% at the end of March 2019), and 10% for sexual orientation (was 17%) and religion or belief (was 18%)³.

While we still have work to do, our data gaps are much improved and we expect to make further progress with this activity.

In reporting our findings, we have been careful not to include any percentages which include fewer than ten employees to protect confidentiality. We have aggregated data in these cases, so some data points will be different for some characteristics compared to others. This also means that we are unable to report on some specific subgroups where the sample sizes are low.



³ These changes will impact the distribution of the information that are shown in this report. For example, the decrease in no data for disability could mean that there are increases in

colleagues saying they are disabled, or not disabled or that they prefer not to say.



What have we found?

Diversity and equality at Ofcom

Organisational portrait

53% of our colleagues are male and 47% are female. Colleagues from a minority ethnic background account for a fifth (20%) of our organisation, of which over half (12% of the 20%) are Asian (Indian, Pakistani, Bengali, Other Asian or Chinese). Six percent of colleagues have told us that they are disabled and 3% have shared that they are lesbian, gay or bisexual (LGB). Six in ten (59%) colleagues in our organisation are aged between 30 and 49 years old.

41% say they are not religious (while 35% say they are). Of colleagues who told us their religious background, 27% say they are Christian, 3% that they are Muslim, 2% that they are Hindu and 3% that they are of other faiths.

Most of our colleagues work full-time and of the 89% that do, 57% are men and 43% women. Of the 11% that work part time, 88% are women.

Our workforce targets

We set ourselves the following gender and ethnicity targets in 2015. We aim to reach our targets by the end of 2020:

Equal gender balance Women to make up 50% of staff across Ofcom.

More women at senior level Women to make up at least 40% of staff at senior level (principals and senior management and specialists).

Senior ethnic diversity 13% of colleagues at a senior level to be from a minority ethnic background.

We have continued to make positive progress against our senior gender target, achieving it ahead of time (43% at the end of March 2019 from 31% in 2015). The proportion of female colleagues across Ofcom continued to increase to reach 47% (from 41% in 2015). Separately we have narrowed our gender pay gap, with progress on our senior gender target helping to achieve this. The gender pay gap is the difference between the average salaries of all men (of all roles) and the average salaries of all women.

We continually audit our gender pay so men and women doing equal or similar work are paid consistently.

Movement towards our senior minority ethnic target has been slower, and has been static in the last two years at 11%. Our mean ethnicity pay gap also continued to widen (from 13.6% in 2017 to 14.6% to 2018, though it reduced on the median from 15.4% to 12.3%) because of lower minority ethnic representation at senior levels or in higher paid professional groups. As part of our work in the last year to

look at the overall experience of our minority ethnic colleagues, we are taking targeted action in recruitment, development and succession planning across 2019/2020 to increase the ethnic balance at senior levels.

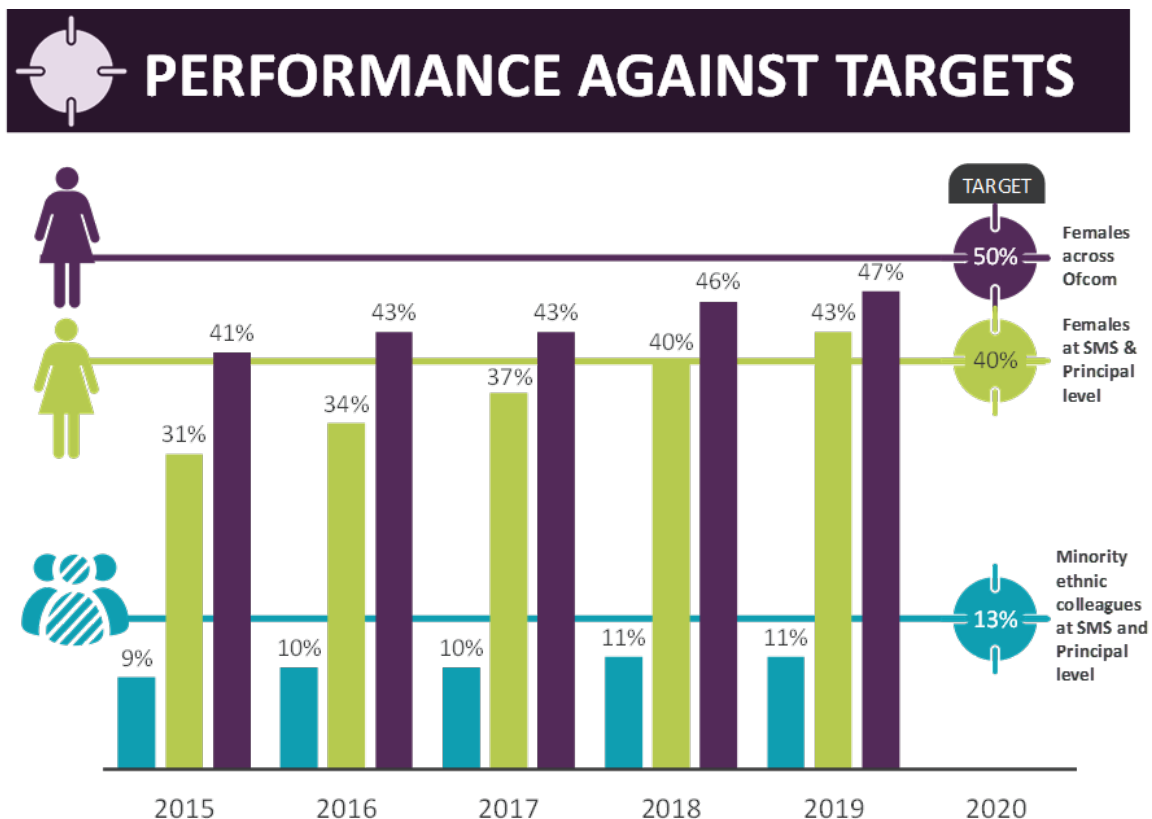
In the next year we will decide on a new set of workforce targets to 2025. These will take into account our commitment to evaluate targets on disability, sexual orientation, religion and social mobility in 2019/2020. Our new targets will consider our forward-looking organisational talent and people strategies which are being developed.

Our ambition is to report on the pay gap between our disabled and non-disabled colleagues. This sits alongside our

commitment across 2019/2020 to focus our efforts on making better how disabled colleagues, and those with long-term conditions or impairments, experience Ofcom. Starting with a complete refresh of our workplace adjustments policy and process, we will also focus on the accessibility of our premises, our technology and a review of our processes and policies.

While not a protected characteristic, we collected information on the social and economic diversity of our colleagues for the first time in 2018. It showed that colleagues from lower socio-economic groups (C2DE) are under-represented in our organisation overall and have lower representation at our senior levels⁴.

Progress against our diversity targets⁵



⁴ There are six socio-economic categories and we are referring to C2 and DE groupings here as categorised by research industry's source of social grade data the [National Readership](#)

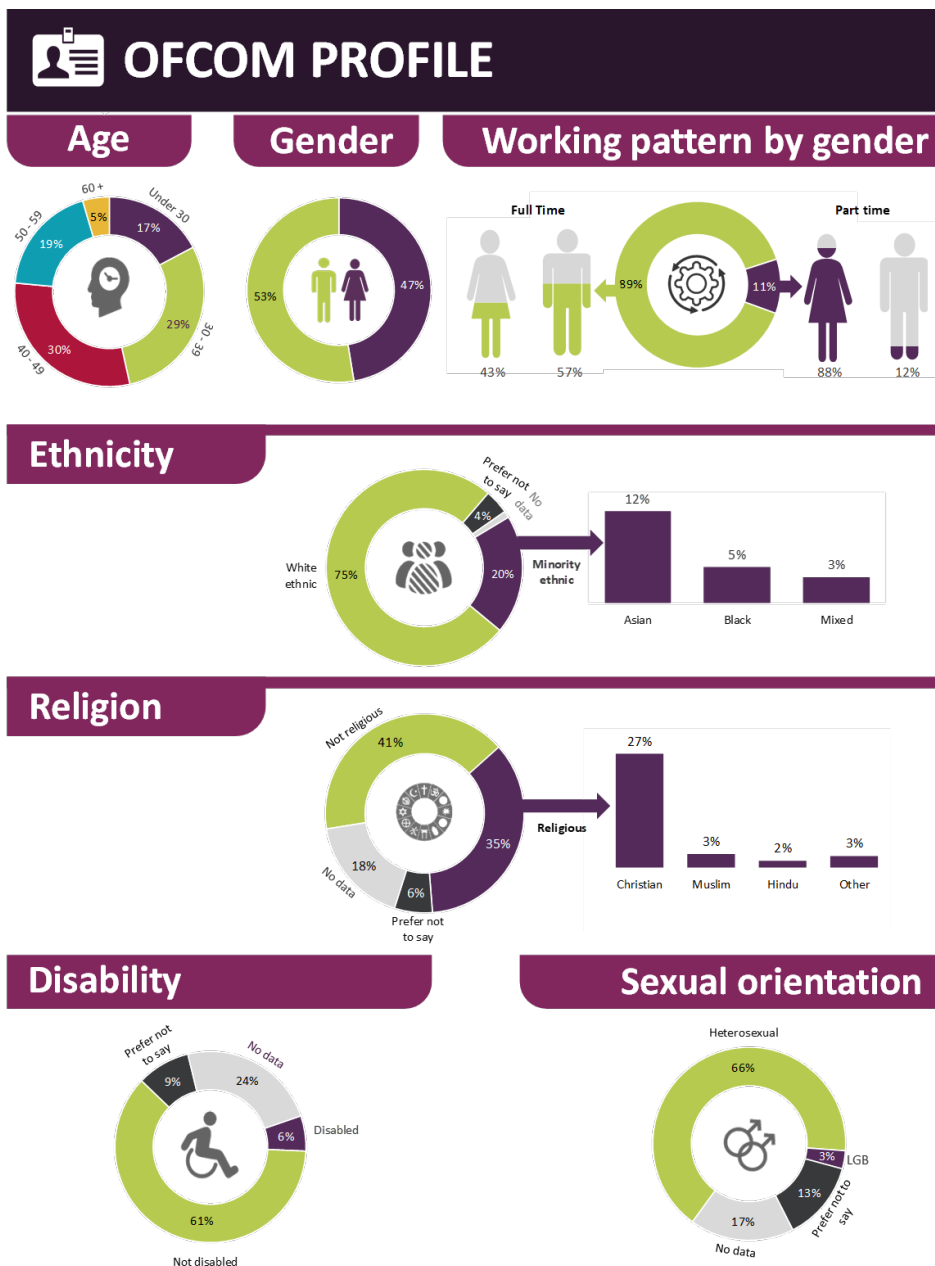
[Survey](#) (or NRS, now The Publishers Audience Measurement Company Ltd (PAMCo)).

⁵ Base: all Ofcom colleagues at the end of March in each year.

We are early on our journey in this area and one of our first steps was to create a Social Mobility Working Group with a dedicated sponsor (and later a senior management champion), and to enter the Social Mobility Foundation's Social Mobility Index 2018. Feedback from the index has helped inform our internal activities and our Working Group has recently established a socio-economic

diversity and social mobility action plan for the year ahead. In the future we aim to add a question on socio-economic background to our people system like we do for the other characteristics in this report. This will enable us to match this information to the measures contained in this report.

Ofcom's organisational portrait⁶



⁶ Base: all Ofcom colleagues at 31 March 2019 (n =922).
Note: 'Other' religion includes Sikh, Buddhist, Jewish and 'other' faith.

Recruitment

What we've done

Our applicant tracking system allows us to manage our recruitment process and to collate and analyse the diversity data at each stage of the recruitment journey. This has previously been optional, but we now make it compulsory for applicants to provide their diversity information (they can tell us that they 'prefer not to say').

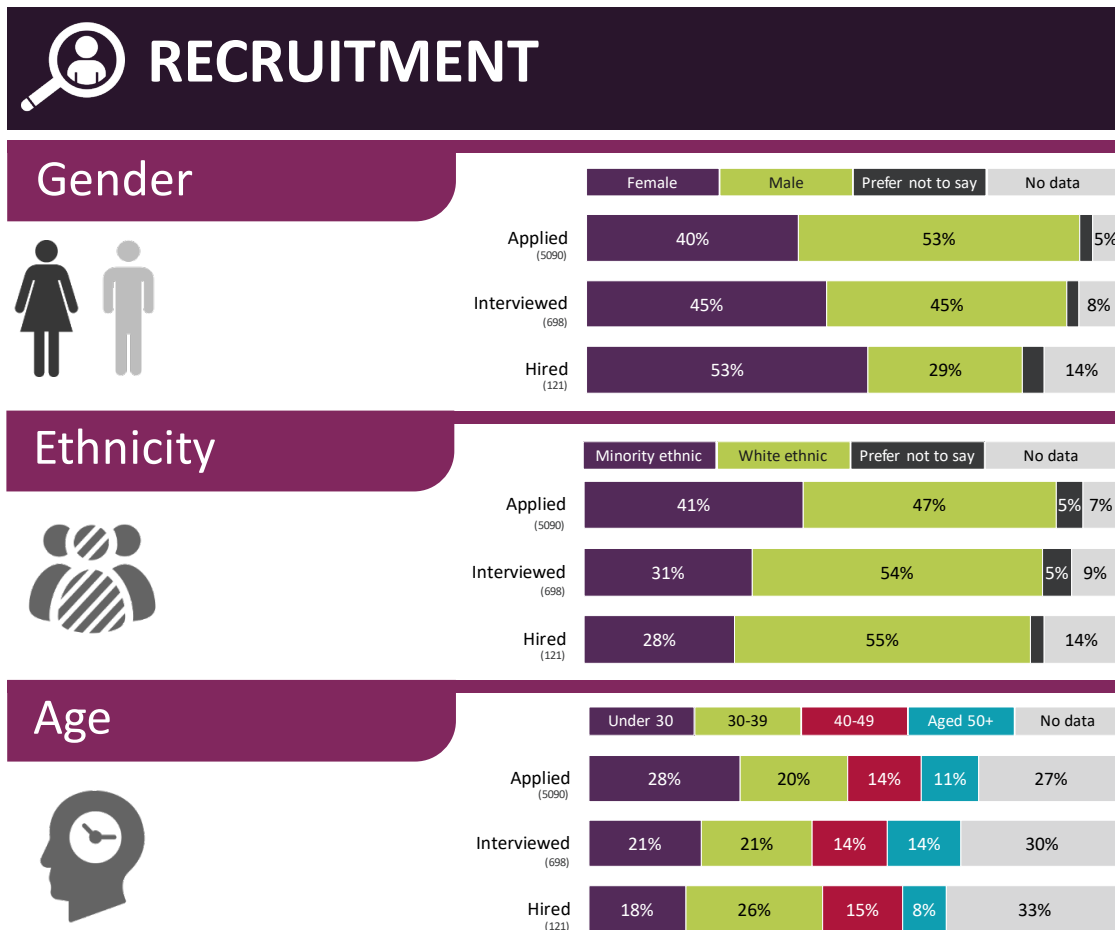
What our data tells us

A similar proportion of women applied for positions at Ofcom this year as the year before (41% of applicants in 2017/18). But the

proportion of women applicants who accepted jobs with us rose from 45% in 2017/18 to 53% at the end of March 2019, helping us towards our gender targets.

We attracted a higher proportion of minority ethnic applicants this year, accounting for 41% of candidates (compared to 38% last year). There has also been an increase in minority ethnic people being hired into our organisation, up three percentage points to 28%. But our 2018/19 data highlights a drop in the representation of minority ethnic candidates as they go through our recruitment process. It drops from the initial application stage to interviews and drops again when we offer jobs.

Diversity profile throughout recruitment⁷



⁷ Base: all candidates who applied for a position at Ofcom between 1 April 2018 and 31 March 2019 (n=5,090); who were interviewed (n=698) and who were hired (n=121).

Job level

We have five job levels within Ofcom ranging from administrator to senior management and specialists (SMS). The job levels cover a wide range of roles from business support to policy to line management and leadership positions. Most of our colleagues are in our third band of senior associates (39%) followed by associates (30% - our second band). 8% of colleagues are in our most senior positions of SMS and 19% are in the principal band just below SMS. Administrators make up 4% of our workforce.

By gender, female colleagues are over-represented at the administrator level (76% female vs 47% female at Ofcom overall). This is in part driven by our pool of personal and executive assistants to directors, at this level. Representation at associate and senior associate levels are consistent with the organisation-wide female profile, while it reduces slightly at principal and SMS levels (we reached our 40% gender target at principal or SMS roles across 2017/18).

Minority ethnic representation at administrator/associate levels (27%) are above the Ofcom average (20%). Senior associate representation is similar to our overall profile at around a fifth, which then roughly halves at principal/SMS levels (11%). Our ambition is 13% minority ethnic representation at principal or SMS levels.

There is broad representation of disabled colleagues at our job levels. The highest over-representation is at senior associate (8%). Representation at administrator/associate and principal/SMS levels are 5% respectively, similar to our 6% profile of disabled colleagues.

There is 3% representation of LGB colleagues at all levels that we were able to report on compared to the LGB Ofcom-wide profile of 3%.

On religion and belief, the proportion of colleagues who follow a religion (Christian, Muslim, Hindu, Sikh, Buddhist, Jewish, or other religion) is highest at administrator level (49%) and gradually narrows in each level up to Principal (28%). Around a third of colleagues at SMS level say they are religious, consistent with the overall proportion of Ofcom colleagues who say they are. 41% of our colleagues tell us that they do not follow a religion. They are well represented at administrator and associate roles and under-represented at principal and SMS levels. The highest distribution of non-religious colleagues is at our senior associate level, above our organisational wide profile.

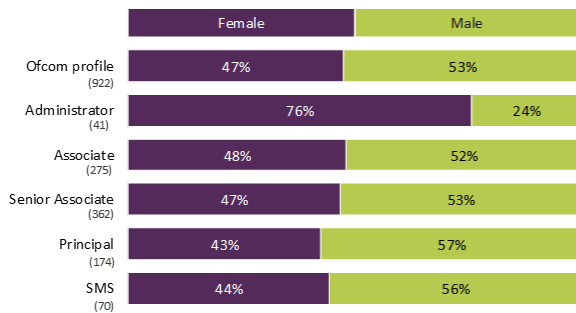
Reflecting the career journey of our colleagues, our youngest colleagues (aged under 30 years) are most represented in our administrator/associate roles (40%). Our new graduates sit in the associate level and our apprentices are generally in the administrator band when they first join us. At principal/SMS levels, the largest proportion of colleagues fall within the 40-49 age bracket at half, above their representation Ofcom-wide (30%).

Data on our job levels is on the following page.

Diversity by job level⁸

JOB LEVEL

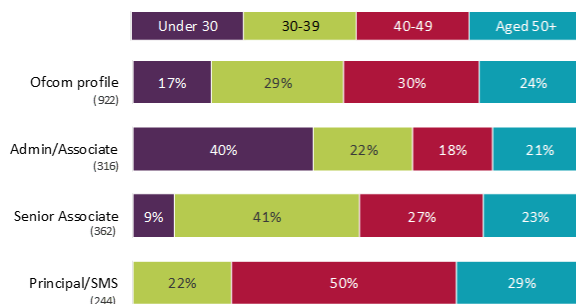
Gender



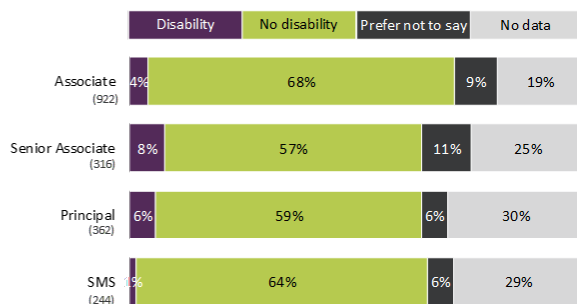
Ethnicity



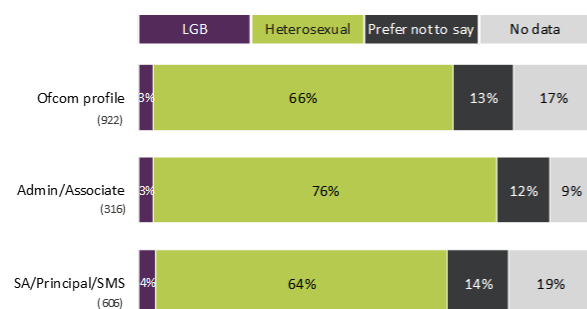
Age



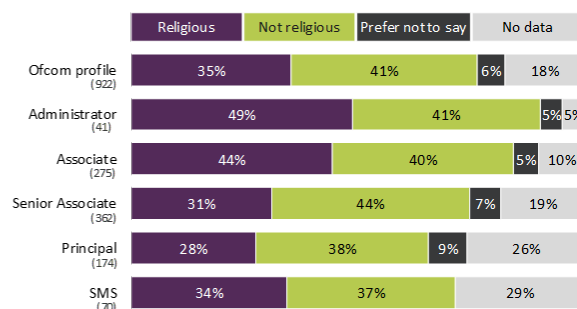
Disability



Sexual orientation



Religion



⁸ Base: all colleagues as of 31 March 2019. There were 41 Administrators; 275 Associates; 362 senior Associates; 174 Principals and 70 Senior Managers and Specialists (SMS).

Training and development

This data includes diversity information about colleagues who have attended training and development courses which are recorded on our learning database. It focuses on learning and development courses that are not compliance based (such as health and safety, security and GDPR) and on the number of training sessions attended rather than a count of colleagues. It includes face-to-face training as well as self-serve e-learning courses.

Across 2018/19, 1175 learning and development courses were undertaken by colleagues. 53% of these were received by female colleagues, above the Ofcom average female profile of 47%. The proportions

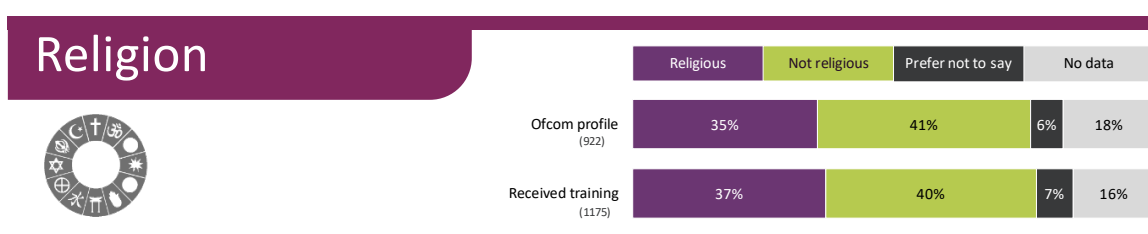
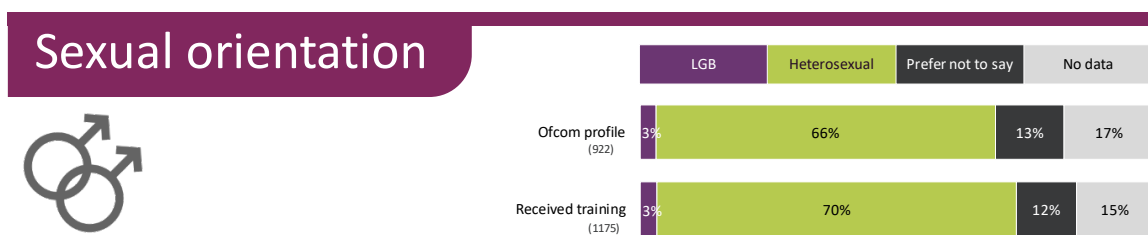
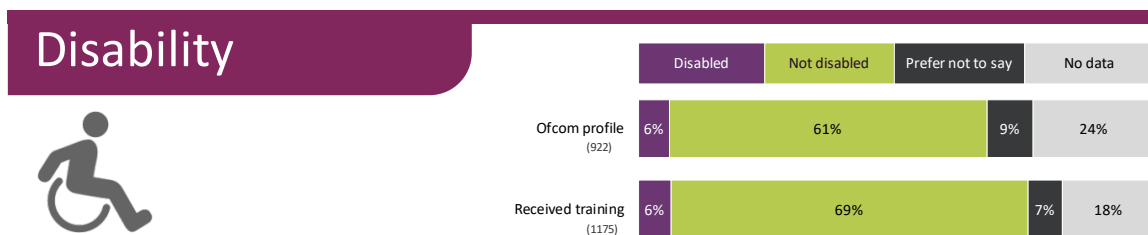
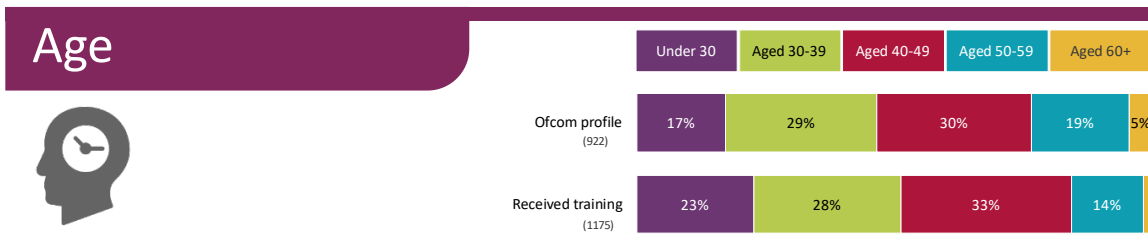
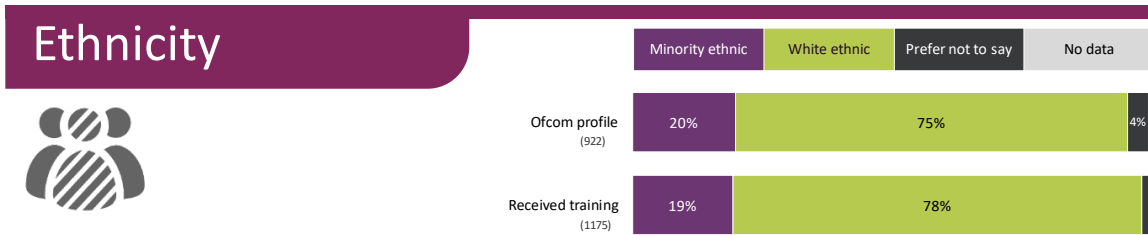
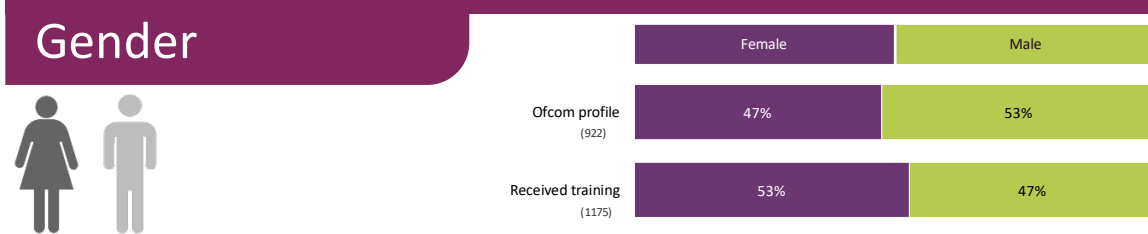
accounted for by minority ethnic (19%), disabled (6%) and LGB colleagues (3%) were all consistent with their overall Ofcom profile, showing equality of access to our training programmes.

By age, the highest proportion of training courses were taken by colleagues aged under 30 and those aged between 40 and 49. These were above their overall Ofcom profile. Lower levels of learning and development opportunities were taken by colleagues aged 50 and over, and below their representation across Ofcom overall.

Data on diversity in training and development is on the following page.

Diversity in training and development⁹

TRAINING



⁹ Base: all training and development activity undertaken by colleagues (excluding compliance training such as Health and Safety, GDPR, Information Security etc) between 1 April 2018 and 31 March 2019 (1,175 sessions). These figures relate to the number of training sessions attended/undertaken rather than the number of individual colleagues who attended some training.

Performance

Since April 2016, colleagues are now assessed equally on what they have achieved against their 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 'exceeding'.

Our people and transformation team brought more rigour and challenge to our annual performance evaluation process in April 2018. They now report on the distribution of performance ratings in the moderation process, in real time as decisions are made about colleagues, to ensure fairness.

This year, as last year, the outcomes for female colleagues compared to male colleagues on exceeding their objectives were higher. The proportion that were rated developing was also higher than the proportion of male colleagues who received that rating.

Equal proportions of minority ethnic colleagues were also rated as exceeding their objectives compared to non-minority ethnic

colleagues. Higher proportions received a "developing" rating than white ethnic colleagues.

By age, 41% of colleagues aged under 30 received an 'exceeding' rating, in line with the proportion of all colleagues who received one. The percentage of colleagues who received this grade increased slightly in each subsequent age bracket to age 49 years old. Those that exceeded their objectives was lowest among the 50+ age group (31%) where the majority were rated as performing well in their roles.

The outcomes for colleagues in administrator/associate roles on exceeding their objectives were in line with those in senior associate/principal/SMS roles and the Ofcom average. Possibly because many of the roles in the administrator/associate bands are by colleagues early in their career (such as graduates and apprentices), they were more likely than other grades to receive a 'developing' rating, as they grow in their roles.

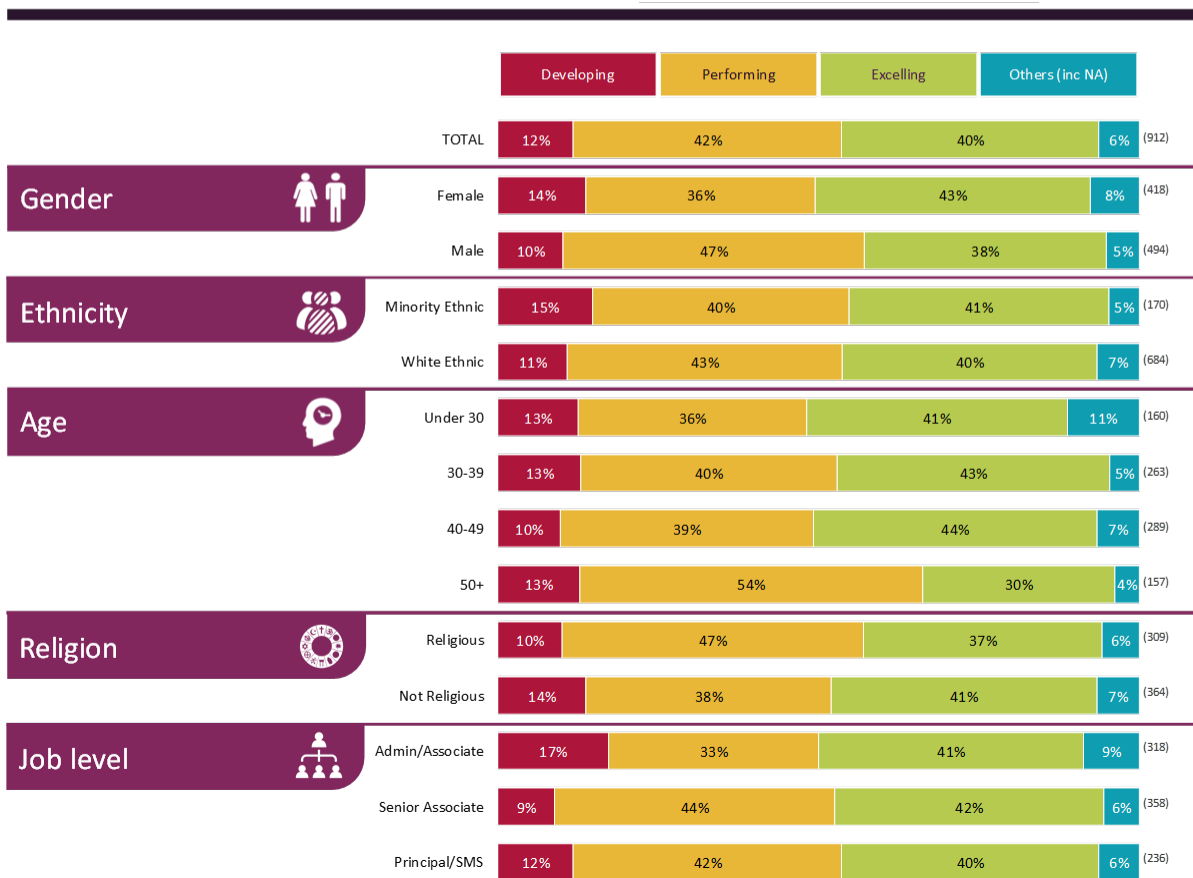
Data on diversity in performance ratings is on the following page.

Performance ratings by diverse groups¹⁰

PERFORMANCE

PERFORMANCE GRID

| | | | |
|------------------------|---|---|--|
| | D.E Outcomes must improve, exceed behaviours standard | P.E Good outcomes, exceed behaviours standard | E.E Exceeds outcomes, exceeds behaviours standard |
| EXCELLING | | | |
| | 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 |
| PERFORMING WELL | | | |
| | D.D Improvement required in outcomes and behaviours | P.D Good outcomes, behaviours must improve | E.D Exceeds outcomes, behaviours must improve |
| DEVELOPING | | | |
| | D.D | P.D | E.D |
| | DEVELOPING | PERFORMING WELL | EXCELLING |



¹⁰ Base: all Ofcom colleagues who took part in performance appraisals between 1 April 2018 and 31 March 2019 (n=912).

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 colleagues who are new in role, or where standards of work have dipped below of that expected of their job role or grade or in their behaviours.

Promotion

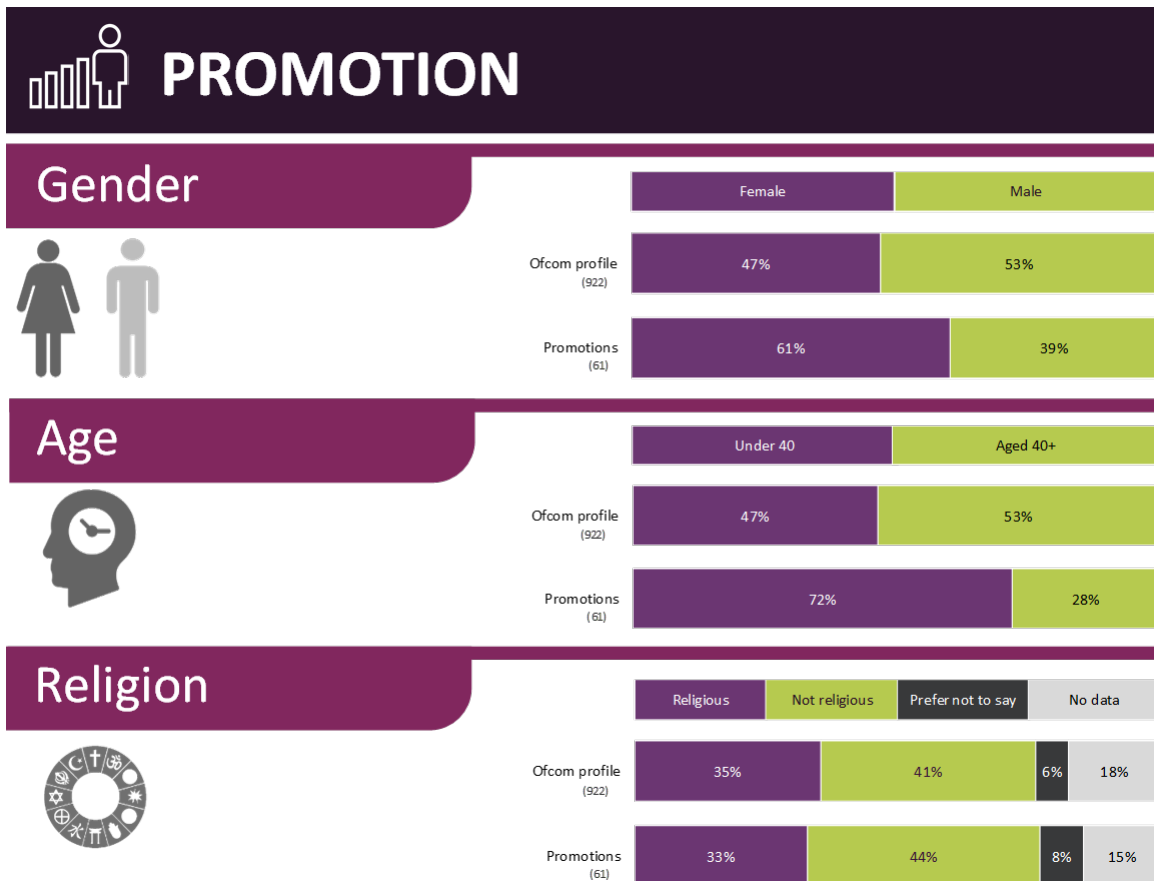
61 colleagues were promoted across 2018/19, either through our internal promotions process¹¹ or by successfully applying for positions at a higher level which are more widely advertised, including externally.

Across our analysis period, 61% of promoted colleagues were women, up from 47% in 2017/18 and above the female Ofcom profile of 47%.

72% of colleagues promoted were aged under 40 years old, notably higher than the 47% Ofcom-wide profile. There was good representation of colleagues who said they had a religious faith and those that said they didn't compared to their representation Ofcom wide.

Colleagues who said they are not religious had slightly higher representation in promotions last year than those who said they were not religious.

Diversity in promotions¹²



¹¹ Colleagues are nominated or are endorsed for promotion by their line manager from Administrator to Senior Associate levels.

¹² Base: All Ofcom colleagues promoted between 1 April 2018 and 31 March 2019 (n=61)

Leavers

101 colleagues left Ofcom last year. To give the leavers data context, we compare the proportions of leavers for each diverse group with their overall Ofcom profile to assess retention. We also compare the data to 2017/18 and the percentage of new hires they accounted for. The proportion of female leavers (58%) was significantly higher than our overall Ofcom female profile while a higher proportion of them joined us than men. The proportion of female leavers increased compared to 2017/18 when it was 38%.

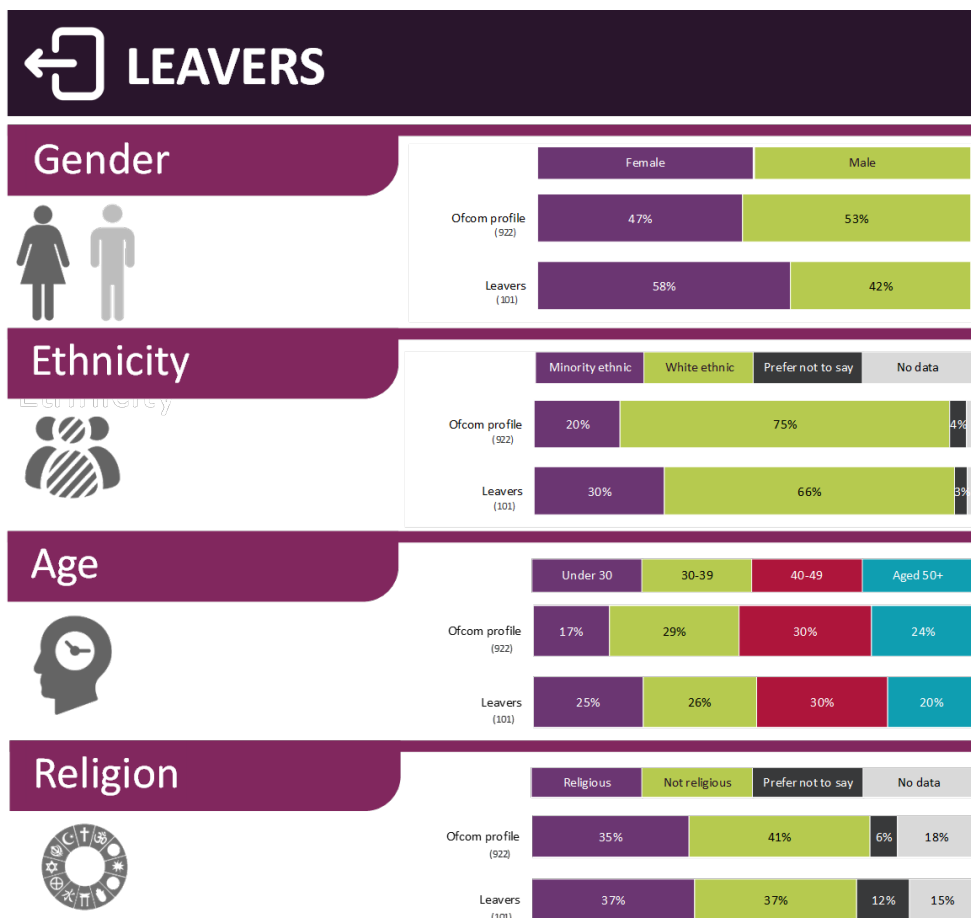
The picture was similar for colleagues from a minority ethnic background; around a third (30%) of colleagues who left us last year were

from a minority ethnic background, higher than our 20% minority ethnic profile, and an increase from 17% in 2017/18. They accounted for 28% of all our new hires.

By age, the largest proportion of leavers were in the 40-49 age band, the same as their overall profile (30%). Compared to the Ofcom average, proportionately higher rates of leavers were aged under 30 and proportionately lower rates of leavers were aged 50+.

Colleagues who told us that they have a religious faith were marginally more likely to leave us compared to our overall profile, while those who said they were not religious were less likely to leave.

Diversity profile of leavers¹³



¹³ Base: all Ofcom leavers between 1 April 2018 and 31 March 2019 (n=101).

Grievances

During the reporting year, two grievances were raised related to bullying, harassment or discrimination. They were thoroughly investigated, and neither were upheld.

Conclusions and next steps

The data in this statistical report has informed our priority areas for the coming year. These are set out in our *Diversity and inclusion programme update 2018/19* report. They are based on what we think will make the most difference and have the strongest impact on our diversity and inclusion aspirations.