

# MAKING OFCOM WORK FOR **EVERYONE**

## OFCOM'S DIVERSITY AND INCLUSION STRATEGY PROGRESS UPDATE 2021/22



**PUBLISHED 21 JULY 2022**

Diversity at Ofcom 2021/22 – [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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The Prince's Responsible Business Network  
Race at Work Charter signatory



## MELANIE'S FOREWORD



Workforce diversity has long been a passion of mine, and it has never mattered more to Ofcom.

We regulate vibrant, diverse industries that are undergoing a technological revolution. Telecoms and online services are converging. Social media and streamers are challenging traditional media. Change is everywhere in our sectors, and as a regulator we cannot stand still.

Ofcom's job is to serve each communications customer in the UK – every phone and broadband customer, postal user, viewer and listener. Each has different needs, attitudes and expectations of the services they use to communicate, participate and keep informed. And we know these can vary according to personal factors such as age, location, social background, sexual orientation, ethnicity or disability.

To really understand those perspectives, we need a workforce that draws from different sections of society and parts of the country – a regulator for the whole of the UK and its nations. We also want to play our part in making some of the professions we draw on, such as economics and engineering, more open to talented people from a range of backgrounds.

And as we take on new duties around cybersecurity and online safety, we need colleagues with diverse skills to make us a modern, forward-thinking organisation that can meet the challenges of the 21st century.

This is a continual process, so I'm really pleased we have made strong progress on our diversity and inclusion strategy since we launched it twelve months ago, achieving all our year-one goals. Today, Ofcom's workforce very broadly reflects the make up of the UK's population.

We have made positive strides towards our 2026 workforce targets on gender and ethnicity representation at senior levels, on disabled people across Ofcom, and on making Ofcom's Boards and statutory Advisory Committees representative of the UK. But in all these areas, we have further to go.

I said in our strategy that I want Ofcom to be a confident and connected organisation where everyone's skills and contributions are valued and respected, and where everyone can develop their career. We have laid much of the groundwork for the next few years by changing how we work, both as an employer and as a regulator, so that our policies and processes are fair and equitable.

This is about more than just targets and characteristics. We are also encouraging diversity of thought in its widest sense, and a culture that is inclusive of everyone. We are setting up our leaders to better support colleagues in their careers and to be at their best in the workplace. And we continue to build stronger connections with the communities we serve, increasing our presence in the Nations and opening a new office in Manchester.

I'm looking forward to building on this year's progress and continuing our work to make Ofcom a place where people of all characteristics and backgrounds can thrive.

## WHAT'S IN OUR REPORT

### We want to make communications work for everyone

This is our first progress report since publishing our diversity and inclusion strategy for 2021-26. It includes our gender, ethnicity and disability pay gap report for 2022.

### Our 2021-26 diversity and inclusion focus areas

We have four areas of focus:

- **Workforce goals** – stretching targets to make our workforce more representative of the UK population by 2026.
- **Transforming our processes and systems** – making sure our people processes – from recruitment to promotion and including the way we make decisions inside the organisation are fair and equitable.
- **Enhancing our culture and leadership** – so that everyone feels valued and has a voice.
- **Governance** – holding ourselves to account for progress with clear measurement and reporting.

### In our first year of delivery against our new strategy we have:

- increased the representation of disabled people across our workforce and representation of disabled people in our boards, advisory committees and panels.
- increased gender and ethnic diversity in senior leadership roles, meeting our year-one gender targets and exceeding our year-one ethnicity target.
- reduced our mean pay gaps for ethnicity, disability, and gender.
- strengthened our inclusive recruitment processes, increasing our capacity to recruit the diverse skills and backgrounds we need.
- overhauled our performance management approach, streamlined our management structures and created new career and performance manager roles to coach and inspire.
- engaged our directors and line managers in learning and development on inclusive leadership.
- set out local goals in each professional Group that support our strategic vision for diversity and inclusion.
- delivered an impactful wellbeing programme for the benefit of all our colleagues
- strengthened our processes in our regulatory work and continued to review the impact of our work.
- increased our geographical footprint with a new Manchester Hub.
- focused on socio-economic diversity, LGBT+ inclusion and refreshed priorities for improving the experiences and representation of Black colleagues.
- been recognised by a number of external benchmarks for our work on inclusion.

# OVERVIEW

## Our vision

### WE TAKE PERSONAL RESPONSIBILITY

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

### WE ARE TRULY DIVERSE

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

### OUR LEADERS ARE ROLE MODELS

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



### WE ARE CONNECTED TO COMMUNITIES

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

### WE ARE NATURALLY INCLUSIVE

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

### WE ARE FAIR BY DESIGN

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

Our diversity and inclusion principles guide our work and establish expectations of all colleagues.

**Ofcom has 1,189 colleagues from a wide range of diverse professions, experiences and backgrounds.** Eighty percent of our colleagues use London as their primary base and we also have offices in Warrington, Edinburgh, Baldock, Birmingham, Cardiff, and more recently, Manchester.

Overall, **our teams are broadly reflective of the diversity of the UK population** with 52% female colleagues, 23% from minority ethnic communities, 13% disabled and 6% identifying as LGB. In addition, we are taking action on areas where more work is needed. We set goals to increase the representation of disabled people at Ofcom, and prioritised work to increase ethnic diversity and gender balance within our most senior leadership roles by 2026. In 2021-22 we met or exceeded our year one targets for progress towards all these goals.

**Our recruitment strategy** is central to success, and we are partnering with specialists to build consideration of inclusion into every stage of the recruitment experience. We're improving our candidate outreach, supporting hiring managers to ensure our job vacancies are fair and accessible and using data to monitor the fairness of outcomes.

This year we took steps to **overhaul performance management**, creating new career and performance managers to coach and inspire colleagues. We undertook extensive feedback and engagement to ensure our managers have the knowledge and skills to lead highly effective and inclusive teams. We also upgraded our bonus and recognition scheme so that it is a simple, transparent and fair reflection of team contributions.

**Joining Ofcom means being part of a team committed to making a difference.** As part of that commitment, we want everyone to feel they belong and make a valuable contribution to our work. We continued to champion our employee voices, with eight staff networks that provide an important vehicle for allyship and connection across the organisation. Being 'treated with fairness

and respect' is consistently one of the highest scoring questions in our annual staff engagement survey (84% positive in 2021) and for people of different backgrounds. We sought to capture this by adding a fifth value, Respect, to our organisational values in 2021.

We are **redesigning our systems and processes** to ensure that they are scrupulously fair and provide opportunity for everyone regardless of their background.

**We will continue to monitor the outcomes of our work** using data to understand and identify gaps in our approach. We will measure socio-economic diversity; increased UK-wide presence; LGBT+ inclusion; senior gender representation and improving the representation and experiences of minority ethnic staff and particularly our Black employees. In addition, we will review our data on age.

**We use external benchmarks to help us learn where there may be opportunities for growth.** We are a Times Top 50 Employer for Women for the third consecutive year; a Stonewall Workplace Equality Index gold employer in 2022<sup>1</sup>; a recipient of 'Advanced Employer' status by Investing in Ethnicity; and this we year rose 19 places in the Social Mobility Foundation Index. Alongside these we are a Carer Confident Accomplished employer by Carers UK and Employers for Carers.

The collective voices of our networks, colleague forum and union representatives will remain an important way that we can understand what it is to work at Ofcom. Their activities create a sense of community and provide feedback on areas where we can work together to do more and better.

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<sup>1</sup> While Ofcom stepped back from Stonewall's Diversity Champions programme in 2021, we maintained our entry in its Workplace Equality Index, which benchmarks our approach to LGBT+ engagement against other employers.

# 1. OUR WORKFORCE

## DIVERSITY GOALS

### A workforce that reflects the diverse stakeholders and sectors we serve

We have met or exceeded our year-one targets for ethnic and gender diversity in senior leadership roles and have increased the representation of disabled people

Ofcom's workforce broadly reflects the make-up of the UK's population. But we are not sufficiently representative at the most senior level. Last year we set goals for increasing ethnic and gender diversity in senior leadership roles, and overall representation of disabled people by 2026. Our Senior Management Team then agreed yearly targets to help us track progress.

We achieved all our year one goals and exceeded them for senior ethnic representation (see Figure 1 below). We focused on our recruitment practices (see Transforming our systems and processes section) so that our people stay with us and thrive in our organisation.

**Figure 1: Ofcom targets – start position, year one end position and 2026 ambition**

	Start position (March 2021)	Target for year one (Min +1pp increase)	Year one end position (31 March 2022)	2026 target (by 31 March 2026)	UK population benchmark as at 2020/21
Senior gender	44%	45%	45% (met)	Equal balance	48% women in employment, UK
Senior ethnicity	11%	12%	13% (met)	16%	12% minority ethnic people in employment, UK
Disabled Ofcom-wide	12%	13%	13% (met)	15%	19% disabled people aged 16-64, UK.

*Senior means our top two job grades of principals and senior management and specialists. UK population data taken from ONS estimates at the time of setting the targets. Women and minority ethnic people based on those aged 16+.*

### We have met our ethnicity and disability diversity goals for our boards, advisory committees and panels

Our boards, advisory committees and the panels that we have recruitment control over should also have an equal gender balance and a membership that reflects the UK in ethnicity (10% minority ethnic ambition) and disability (15%) by 2026. Our goals were informed by both the UK adult population and the relevant adult populations for the UK nations our Committees represent.

We have already met two (minority ethnic and disability) of our three goals and look for opportunities to improve upon the current levels<sup>2</sup>.

**Figure 2: Targets for our Boards, committees and panels – start position, year one end position and 2026 ambition**

	March 2020	March 2021	Current position (March 2022)	2026 target (by 31 March 2026)
<b>Gender</b>	32% female	41% female	43% female	Approximately equal balance
<b>Ethnicity</b>	7% minority ethnic	11% minority ethnic	14% minority ethnic	10% minority ethnic
<b>Disability</b>	10% disabled	13% disabled	19% disabled	15% disabled

*Note: the question asked of NEDs is based on 'sex' with a separate question asked on gender identity. 2% of NEDs did not share their disability information in March 2021 and 2.4% in March 2022. 2% did not share their gender information in March 2021. All other datasets have complete data.*

### **An inclusive Ofcom culture where our colleagues can thrive and grow**

We are recognised as a Times Top 50 Employer for Women for the third consecutive year, awarded 'Advanced Employer' status from *Investing in Ethnicity*, received a Gold award from Stonewall's Workplace Equality Index and rose 19 places in the *Social Mobility Foundation Index*. We remain a Disability Confident Employer (level 2) and will work towards Level 3 accreditation.

We use external benchmarking to learn from others and to understand what good approaches to inclusion look like. Guidance we get from these different workplace benchmarking organisations is advisory only and a helpful tool in understanding what opportunities may be the best fit for Ofcom.

## **What we're doing next**

### **Towards our vision for 2026**

This year we will work to increase representation to 47% on senior gender, 14% on senior ethnicity and 14% on disability across the whole workforce. We will continue to focus on improving the diversity of our boards, panels and committees through widening the applicant pool and using a wide range of digital channels and networks to promote those opportunities.

<sup>2</sup> These targets exclude the Ofcom main Board, where non-executive roles are made by the UK Government and Governments of the devolved nations.



## 2. OUR PAY GAPS 2021-22

### Ensuring fairness in the way we pay and reward colleagues

We analyse pay to ensure all colleagues are fairly rewarded for their skills and contributions.

Gender pay gap reporting is required by law and we also publish our ethnicity (since 2018) and disability (since 2020) data. Our gender pay gap data is based on sex (assigned at birth and through legal change) captured in our people database. Data presented here is a year ahead of the mandatory pay gap reporting deadline and is based on 31 March 2022.

Our data includes all employees and pay elements, in line with government reporting requirements. Bonus pay gaps include all annual bonus payments and in the moment recognition payments. There were no annual bonus payments made to staff in 2021, so the reported bonus pay gap information includes only discretionary recognition payments and other one-off bonus payments. Therefore, the mean and the median bonus amounts for 2021 are lower when compared to the previous year. We have referenced last year's bonus gaps but comparisons to this year's result are not like for like.

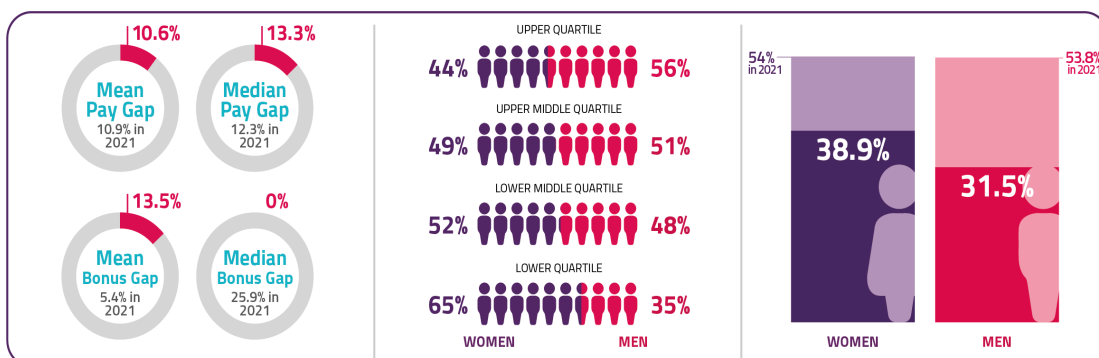
### Our headline results

We are below the national pay gap for gender, although our pay gap numbers fluctuate slightly year-on-year. This reflects the churn in our numbers as we grow the organisation to take on new regulatory responsibilities for telecoms security and online safety. A downward trend can also be observed for ethnicity and disability pay gaps.

#### Gender

- The average national gender pay gap across all industries is 12.9% (as reported on the UK Government gender pay gap service website).
- The mean gender pay gap narrowed slightly in 2022 (from 10.9% to 10.5%) and increased 1pp on the median (from 12.3% to 13.3%).
- The mean bonus gap has widened (from 5.4% to 13.5%) while the median bonus gap was zero.
- A higher proportion of women received a bonus (38.9%) than men (31.5%).

**Figure 3: 2022 Gender Pay and Bonus Gap (vs 2021), % of men and women by pay quartile and % of men and women receiving a bonus**



## Ethnicity

- **The ethnicity pay gap in March 2022 continued a narrowing trend on the mean since 2020.** It fell from 16.5% in 2021 to 13.0% and compares to 19.5% in 2020. The median has increased by 1.2pp since 2021 to 12.7%.
- While a lower proportion of minority ethnic colleagues received a bonus in 2022 (29.5% vs 37.4% for White ethnic colleagues) than in 2021, the bonus gap was zero on both the mean and the median.

**Figure 4: 2022 Ethnicity Pay and Bonus Gap (vs 2021), % of minority ethnic and White ethnic employees by pay quartile<sup>3</sup> and % of minority ethnic and White ethnic employees receiving a bonus**

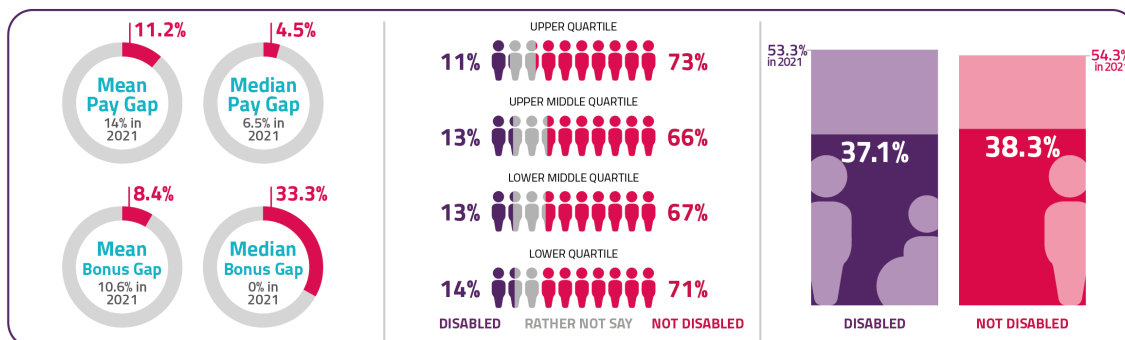


## Disability

- **There was a year-on-year reduction in both the mean and median disability pay gap** in our third year of reporting. At 31 March 2022 the mean pay gap was 11.2% compared to the 14.0% gap in 2021. It also narrowed on the median to 4.5% (vs 6.5% in 2021) and was the smallest gap since 2020 (5.6%).
- A slightly lower proportion of disabled colleagues received a bonus in 2022 (37.1%) and the mean bonus gap (8.4%) narrowed vs 2021 (10.6%). It was also at its lowest since we first started reporting it in 2020 (when it was 20.0%)
- The median bonus gap increased from 0.0% in 2021 to 33.3% in 2022.

<sup>3</sup> The pay quartile is calculated by listing all relevant employees in a list according to hourly rate of pay, in order of highest to lowest paid. This is then divided into four equal parts ('quarters') and the percentage of men and women, minority ethnic and non-minority ethnic and disabled and non-disabled in each of the four parts is calculated.

**Figure 4: 2022 Disability Pay and Bonus Gap (vs 2021), % of disabled and non-disabled employees by pay quartile and % of disabled and non-disabled employees receiving a bonus**



### The reasons for our pay gaps and actions we are taking

Although there has been an increase in the representation of women, minority ethnic and disabled people at Ofcom, there is still uneven distribution across pay quartiles with higher representation of those groups in the lower paid quartiles. The gender split within the organisation at the time of reporting is 52% women and 48% men but there is a higher proportion of men in the top two pay quartiles.

The rise in the median pay gaps is due to increasing diversity at junior levels. The highest proportion of colleagues recruited over the last year sit in the lower paid quartile – including apprentices and graduates - and two thirds of them are women which contributed to a significant increase of females in this pay quartile compared to last year. We expect to over time see a positive impact on diversity at higher paid quartiles as people in more junior roles progress through the organisation.

More generally, across all our staff there is higher representation of women than men in our more junior grades and higher representation of men than women in our more senior grades (see the [annex to this report](#)). The same pattern is seen for minority ethnic employees. Our workforce targets at senior levels are therefore key to us in closing our pay gaps.

### Next steps on reducing the pay gaps

- We will continue to work at increasing diversity at senior levels as we recruit new talent and we will use consistent benchmarking data for each role based on its skillsets, regardless of business unit, team and other factors.
- We have changed our approach to providing bonuses which will be a more fair and transparent reflection of team contributions, rather than individual performance.
- We will ensure that our new recognition scheme is fair, transparent and accessible to all colleagues across all teams and that the proposed design is inclusive and does not exacerbate bonus gaps. It will enable us to use a wider range of approaches to recognition (social recognition and experiences as well as appropriate monetary element) and to give colleagues more choice. An equality impact assessment will be conducted on the new system.

## 3. TRANSFORMING OUR PROCESSES AND SYSTEMS

### Our regulatory work

As the independent regulator of the communications sectors, we recognise the impact of the work that we do and the decisions we make. By understanding more about the different groups who will be affected by our work we can make it more effective.

Equality Impact Assessments (EIAs) consider the extent that policies and projects are fair by design and deliver proportionate outcomes for diverse groups. This year we refreshed our “Clarity from the Start” tool, which sets out the aims and purpose of a project, to include guidelines covering EIA principles.

### Amplifying consumer voices in our research

We use an extensive range of sources providing research and evidence to inform the range of sectors we regulate and to help us shape our policies. These include our audience and consumer tracking surveys – around 20 in total – industry sources to help us understand viewing behaviour (BARB), radio listening (RAJAR) and online activity (UKOM/IPSOS), as well as using other third-party sources and commissioning our own bespoke research as required. We audited the demographic information we obtained from our research sources to understand any differences in the way demographic data is collected. We were also able to identify any gaps in our datasets where we may need to consider additional steps to explore the experiences of particular groups further such as deep dives or sample boosts.

Our [Digital Exclusion Review](#) publication brings to life research which examines differences by diversity groups. The research provides evidence about disadvantaged groups, which will inform the policy and strategy work of Ofcom as well as external organisations. For example, our [research in the postal sector](#) found that disabled people are more likely to experience parcel delivery problems than most. We have therefore proposed new guidance requiring parcel firms to offer better protections for disabled customers.

### We continued to review the impact of our work

We continued to publish evaluations – such as on [end of contract notifications](#) – as one way to assess whether our policies really delivered what we set out to do. This programme of work helps us to understand the impact of our work on consumers and citizens. Where possible, we consider the impacts that our policy interventions have had on people with a range of backgrounds.

## What we're doing next in our regulatory work

### Build transparency into the way we work for the benefit of our diverse stakeholders/sectors

- Evaluate and test the performance of our policies and interventions for different community groups based on the initial equality impact assessments made.
- Use the insight we've gathered from our Consumer and Industry Research Audit to identify priorities for new research among minority groups.
- We open up our key policy proposals and corporate work plans to the general public for consultation and welcome and value the input, insights and challenge that people and organisations pose to us as we shape policies and interventions.

## Ofcom as an employer

### Bolstered our recruitment capacity and worked to increase diversity

We partnered with a specialist recruiter as we grow and take on new duties in online safety and telecoms security. We use this partnership to draw on, and keep on top of, best practice in recruitment. We receive regular data reporting so that we can adapt our approach accordingly.

We extended our reach to potential and future candidates through new partnerships and collaboration. These include organisations who have networks in science, technology, engineering and maths (STEM), those who connect with diverse talent, and social enterprise. We have received high candidate and hiring manager feedback scores and reduced time to hire, meaning we don't lose the best candidates to other organisations. There has also been improved perception among our staff that Ofcom hires people from a variety of different backgrounds: the positive scores increased to 68% in our June 2021 colleague survey, compared to 58% when we asked the same question in January 2021. And meeting our year one diversity goals (see page 6) demonstrates this felt impact.

### Took bold and innovative steps to overhaul our performance management approach

We want to attract great talent into Ofcom, but we also want to motivate and retain both new and existing colleagues so they can be their best and deliver high-quality work for our stakeholders. We launched, and are starting to embed, our new approach to performance management. This reflects the values we hold and the leadership principles we are pursuing.

Our management approach is founded on high-quality, two-way conversations, mutual feedback, performance coaching and wellbeing, with a new Career and Performance Manager for every colleague at its heart. We removed our nine-box performance grading system and replaced it with individually defined goals for each colleague which are monitored through the year. This approach is grounded in extensive feedback, engagement with staff, and a comprehensive equality impact assessment to mitigate unintentional barriers to protected groups and to make our approach as fair as possible.

And we've brought in a new approach to awarding bonuses, based on contribution to collective, organisational performance rather than individual performance.

## **Inspired people through positive action to help boost careers**

We want all our people to be able to develop their careers at Ofcom.

Following its success in 2020, we once again put forward mentors and mentees to Mission Include's mentoring programme in November 2021. The nine-month programme, which includes a series of masterclasses and events with high-profile speakers, has received positive feedback from our colleagues.

Members from Rise, our targeted career development programme for under-represented people at Ofcom, have pursued professional qualifications such as an MBA, as well as leadership development programmes. We support them to towards more senior roles e.g. through interview coaching or in crafting their development plans.

## **What we're doing next**

### **We will continue to communicate our offering to future candidates**

We want to reach a broad range of potential applicants that reflect the diverse skills required to deliver our work. We will:

- launch a revised careers website, communicate our employer offering and increase our use of social media platforms to tell our stories about who we are and what we do.
- review our recruitment assessment and selection approach to ensure it is appropriate and fair.
- use candidate feedback on recruitment and onboarding to create an even better experience.
- continue to act on feedback and insight from our diversity and inclusion partnerships and benchmarks.

### **An investment in everyone's careers at Ofcom across all grades, professions and roles**

We will:

- shape our approach to managing all our talent and in ensuring as much career mobility as possible inside and outside Ofcom.
- provide training that equips our colleagues with the skills to manage with inclusion in mind.
- enhance opportunities for professional skills and career development, including those linked to the delivery of our new duties in online safety and network security.
- modernise reward and recognition.

## 4. ENHANCING OUR CULTURE AND LEADERSHIP

### An inclusive culture

#### Listening to our people

We aim to foster a culture in which everyone feels they are valued and can be themselves at work. This doesn't mean that 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 measure inclusion through an Inclusion Index, and wellbeing through a monthly wellbeing survey. These results are shared with senior leaders to shape the culture and workplace of Ofcom. "I am treated with fairness and respect as an individual" is consistently one of the highest-scoring statements in our annual staff engagement survey (84% positive in 2021) and for people of different backgrounds. That's why we added the fifth value of Respect to our organisation's values, to embed this in our day-to-day interactions.

And, in the last year our 70+ directors and 200+ line managers have engaged in learning and development on inclusive leadership.

We continued to review engagement levels of colleagues in our annual staff survey. For the first time we introduced a series of diversity and inclusion questions mapped to our strategy goals. There were high scores for statements on being valued and that Ofcom hires people from a variety of different backgrounds. We are taking action on the areas colleagues feel less confident on and placed them as focus areas for year two of our strategy.

#### Promoting staff wellbeing

We launched our Thrive@Ofcom wellbeing strategy, focused on mental health, a few years ago. Our colleague survey results show people accessing our wide range of wellbeing and health support services, and attending our wellbeing events. We've increased the numbers of trained mental health first aiders to 80 available across all our office locations in the UK, and we've made sure that they reflect the diversity of our workforce.

#### Staff forums at Ofcom

Our elected Colleague Forum made up of staff from our professional groups, and our trade union, have a central role in ensuring Ofcom stays sighted on its values.

In addition Ofcom has eight staff networks which also play a role in supporting inclusion. They are created and managed on a voluntary basis by our staff, open to everyone to join, and are each supported by a senior management team champion. These staff-led networks support their members personally and professionally, host community focused events and represent the views and needs of their members to the organisation.

Highlights from the networks include collaborating on events and activities like film and book clubs and hosting a wide range of discussion, awareness raising and celebration and learning opportunities such as for LGBT+ History Month, Black History Month, International Day of People with Disabilities, International Women's Day and Carers Week and launching a peer-to-peer mentoring programme to promote progression.

## **What we're doing next**

### **Continued focus on ensuring our people feel valued, that they belong and have a voice**

We will:

- continue to track colleague engagement and culture through our colleague surveys.
- bring clarity to the roles, responsibilities and accountabilities of all our D&I stakeholders through a new D&I Engagement Framework and harness our collective passion in the optimal way.
- launch and embed our refreshed wellbeing strategy, Thrive@Ofcom.
- raise awareness of a wide range of perspectives and experiences through events and learning opportunities.



## 5. BEING ACCOUNTABLE

### **We are accountable and transparent for our progress on inclusion**

Every colleague plays a part in making Ofcom an inclusive place to work, but we are also supported by formal oversight for delivery and measurement of our progress along the way.

Our strategy was approved by the Ofcom Board and is overseen by our Chief Executive, Dame Melanie Dawes and the rest of our Senior Management Team. Ofcom's Board and People Committee hold our Senior Management Team to account for progress in delivering the strategy. They are presented with progress updates against our strategy twice a year.

Everyone at Ofcom is accountable for implementing the strategy within their Groups, informed by data evidence and supported with expertise in inclusion and diversity from our People team. Each Group has contributed to a workforce diversity and inclusion plan setting out their goals and ambitions for year one of the strategy which they will further refine in year two.

Senior champions, drawn from our SMT, support the networks in their work.

We built a D&I Strategy Hub page on our intranet to better support colleagues, sharing updates and information which we will enhance in the coming year.

As the UK's independent communications regulator, it is important that we are neutral, independent and objective, including in our external partnerships and associations. With support from expert teams across the organisation, we routinely review paid memberships and unpaid associations, including with diversity and inclusion linked organisations, to ensure they remain useful and value for money. Where we identify a conflict or risk of perceived bias we take appropriate steps, including ending associations as necessary. This policy complements other policies and guidance including on employee conflict of interests.

### **What we're doing next**

#### **Promote inclusion, embed our re-designed processes and effect change**

- Our senior management team will continue to promote and embed our D&I ambitions locally and corporately, informed by our data.
- We will increase transparency and share our progress more frequently with employees by increasing our internal data reporting.
- We will continue to keep abreast of innovation and best practice through external D&I benchmarking and accreditation (such as the Disability Confident Scheme).
- We will interrogate relationships with our D&I partnerships and associations to ensure we maintain our independent position at all times.
- We will report externally on our progress.

## 6. OTHER FOCUS AREAS

While we did not set targets for these areas, we identified them as important areas of focus in our five-year strategy.

### **Increased UK wide presence**

Our new Manchester Hub has increased our geographical footprint – as well as our presence among the tech community, whom we want to reach as we take on new duties in non-traditional media. We have supported the local community through partnership with the EY Foundation's Smart Futures programme work to give young people the skills, experiences, and support in readiness to help secure the roles they really want and connect employers to talented young people across the UK. We supported 20 young people (16+) from low-income backgrounds in Manchester to gain a variety of transferable skills that will give them a head start in their career in our industry.

### **Socio-economic diversity**

Since we asked staff additional questions about their background in late 2020, completion rates are now 47% and our ambition is to increase this to 75% in 2022/23 to ensure we can helpfully analyse our data. A new strategic partnership with a specialist social mobility partner will scale up our ambitions around early careers. We will build transparency and support to experienced applicants across our recruitment, which will particularly benefit those from lower socio-economic backgrounds. We continued to work with schools and institutions such as Career Ready, Speakers for Schools and Bright Networks, connecting with over 100 young people in the last year to offer work experience, mentoring or jobs with us.

### **LGBT+ inclusion**

We have developed a corporate LGBT+ plan with focus areas informed by our data evidence including our colleague survey results. It will promote career progression, inclusive performance management, learning and development and visible commitment to LGBT+ inclusion.

### **Improving the representation and experiences of Black employees**

We have enhanced our anti-racism plan which was initially launched in June 2021 with refreshed priority areas, informed by our data. The plan focuses on career progression, mental wellness, increasing engagement and sense of belonging and internal and external community outreach.

We've partnered with the 10,000 Black Interns programme and have taken on 13 students in higher education – more than the eight we had originally planned as the calibre of applicants was so high. We aspire to convert the internships into permanent hires at some point in the future.