making communications work
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Five-year review:

Diversity and equal opportunities in UK broadcasting

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Executive summary

When we began our Diversity in Broadcasting work in 2016, we could not have imagined how the world would change so drastically in just five years. Political, environmental and social justice movements have dominated headlines, putting diversity and inclusion issues firmly on the agenda. The pace of technological change, alongside the rise of streaming services and a rapid shift in audience behaviours is reshaping the UK's broadcasting sector. Covid-19 has challenged us in ways we could not have imagined a few years ago. But, as we continue to live with the many obstacles that the long tail of the pandemic throws up, we are also looking at opportunities to adapt and how we may live and work differently in the future.

This is a landmark moment for diversity and our broadcasting sector. For five years, Ofcom has been collecting data from TV and Radio broadcasters on the diversity of their workforces. For the first time, this data is being brought together, so in this pivotal review we take stock of the progress that has been made in that time and look forward to what the broadcasting sector may look like in years to come. Drawing on our own analysis and specially commissioned research, we set out our vision for an inclusive broadcasting sector and what we will do to support and drive progress.

The last 5 years: what have we learned?

We know more than ever about the makeup of the broadcasting sector. Our monitoring programme has increased transparency and narrowed the diversity data gap. For example, in 2016/17 we had no disability information on almost a third of broadcaster employees. We are now able to see the disability status of 76% of the TV workforce and of 85% of radio employees.

But there remain gaps in our knowledge in some areas where broadcasters provide us with information on a voluntary basis (e.g. religion, sexual orientation, socio-economic background) and others where we have not yet established data collection practices (e.g. geographic location, gender identity, intersectional data on where different characteristics combine).

There is a general trend towards an industry which is more representative of the UK working population, particularly in terms of ethnicity. Where minority ethnic groups ("MEGs") were particularly underrepresented in 2017/18, they are less so now across the workforce as a whole. Radio has typically started from a lower base than TV but in some areas (race, religion) it has made more rapid progress. For example, people from MEGs made up 6% of the radio workforce in 2017/18 but are now at 10% (compared with 12% of the UK working age population).

But we are not confident that this trend is sustainable for all groups as the increases are generally very small, and since the pandemic we are seeing for the first time the number of people leaving the industry outweigh the number joining it. Women in particular are disproportionately represented in those leavers. **Projections suggest that if we continue on the same path, the proportion of TV employees who are disabled will <u>fall</u> over the next five years**, and so will that of radio employees who are female.

There is a woeful lack of diversity within senior positions and key decision makers. In fact, in the case of disabled employees and those from MEGs the gap between overall diversity and diversity amongst senior managers has **actually widened over the last few years** in Radio and has not improved in TV**.** This may in some cases be influenced by a relative lack of representation in those colleagues who get promoted, with disabled colleagues across TV and radio less likely to move up the ranks. There is more promising news on promotion of minority ethnic colleagues in TV, who make up nearly a fifth of all those promoted, although we do not currently know if these colleagues are being promoted into senior management positions.

Broadcasters appear to have focused on entry-level recruitment at the expense of retaining diverse staff and enabling them to progress. Overall gains in representation appear to be disproportionately due to entry level hiring and this is consistent with our impression that initiatives have often focused on recruitment and early careers. Neither is there evidence of progress towards an industry which retains older colleagues – only 16% of women in the TV workforce are aged 50+

(compared with 22% of men and 32% of the working age population).

Across some underrepresented groups, retaining staff would have a bigger effect on future diversity than increasing recruitment alone Our commissioned projections suggest that across Radio just a 1% decrease in the proportion of disabled and minority ethnic people leaving the industry would boost representation more over the next five years than a similar increase in recruitment alone. Across both Radio and TV it is the combined effect of recruiting and retaining staff which has the greatest impact on increasing representation. So, recruitment and retention must go hand in hand.

The next 5 years: what is our vision?

We believe now is the time for there to be a collective focus on fostering inclusion. Our research gives us a clear direction and the ongoing pandemic is providing companies with an opportunity to reimagine how they work and interact with their employees.

We want to see a broadcasting sector which not only recruits diverse staff but retains them and enables them to progress to senior levels.

We want to see an industry committed to transparency, collecting and acting on more detailed data in order to target workforce initiatives effectively.

We envisage wider collaboration both within the broadcasting sector and across others, to share effective practice on building an inclusive workforce and to work together to provide opportunities for all underrepresented groups.

Our recommendations for broadcasters

Broadcasters should refocus on retention, progression and senior recruitment in order to diversify the sector sustainably at all levels. This will require them to encourage and promote systemic and cultural change that **builds inclusion into the core of their organisations.**

Broadcasters should consider setting retention targets in addition to any targets relating to recruitment or overall workforce makeup.

Data collection needs to be improved both in quantity and in quality. In the next five years, we want to see broadcasters continue to close the data gap in areas where collection is not currently mandatory and remains low (or non-existent) such as socioeconomic background and geographic location, along with sexual orientation and religion/belief. Broadcasters also need to begin providing us with intersectional data to help build an understanding of how disadvantages associated with particular characteristics interact and thereby better target inclusion strategies. We also need more specific data on promotions to let us see who is moving into senior decision-making roles in areas such as commissioning.

We need broadcasters to be more transparent in their reporting of successes and failures in order to move forwards as an industry. Although there has been a concerted effort by the sector to improve diversity, the impact has been limited. We repeat here our previous calls for broadcasters to evaluate their work to truly understand whether the programmes in place are having their desired impact.

We want broadcasters to listen to the voices of experience in their organisations and continue to engage with their internal staff networks. Broadcasters need to ensure that there are effective routes for employees to share concerns safely.

We repeat our message that diversity and inclusion should be a collaborative activity not a competitive sport. Broadcasters should share effective practice and collaborate across the broadest range of industry players – including their production partners – to create a more inclusive sector for everyone.

How will Ofcom support and drive change?

After five years of monitoring, it's time for us to take stock of what we do – and how we do it. We will double down on our efforts to work with industry to support a fully inclusive, sustainably diverse broadcasting sector.

We will launch a call for inputs regarding the information we collect from broadcasters, in order to review and provide updated guidance on what data to collect and how to collect it. This will include the opportunity to comment on:

- how we move towards greater consistency in the data collected by different bodies across the sector and the practical implications of possible standardisation;
- updated language and advice on definitions, including around sex/gender
- a new question on geographic location, in order to understand diversity by nation and region of the UK;
- a request for intersectional data (on, for example, the number of black women in senior management positions);
- a more detailed approach to data on promotions, to see who is making it to senior positions; and
- a request for more specific information on training opportunities.

This will allow us to set clear expectations of broadcasters, and we will continue to push broadcasters to set clear targets for themselves and their production partners. It will also allow us to provide more consistent and comparable individual feedback for larger broadcasters.

We will redouble our efforts to bring the industry together, building on our existing role as a facilitator of collaboration and information sharing. Our five-year event, '*ALL IN: Diversity In Broadcasting 2021*', will kickstart more opportunity for the sharing of effective practices for the broadest range of broadcasters and other industry stakeholders. In addition to our quarterly roundtable for larger broadcasters, and our continuous bilateral engagement, we will look to hold a D&I Forum for the broadcasting sector, to which we could also invite other relevant stakeholders, for a broader programme of collaboration.

We will continue to look to the future of broadcasting, working with Government and others to consider the value of equal opportunities obligations for related sectors, such as video on-demand services, and the possible extension of pay gap reporting beyond gender to characteristics such as race.

For Ofcom, this review has offered unprecedented insight into the ways in which the broadcasting workforce has changed in the last half decade. Perhaps more importantly, it has given us a clear steer on what the industry could look like in the future. As we take on new duties as the online harms regulator, diversity and inclusion across the UK media sector have never been more important. We are determined to ensure that broadcasting leads the way in creating an inclusive working culture that not only benefits its employees, but ultimately results in programming that authentically reflects audiences across the UK.

Background

The last five years

In 2016/17, Ofcom began a programme of work requiring television broadcasters to provide us with information on the people they employ. We wanted to find out whether their workforces were representative of the UK working population when it came to characteristics such as race, gender and disability. Even more importantly, we wanted *broadcasters* to find this out; to know their workforces and to take action to promote equality of opportunity for all. The following year we extended our monitoring programme to radio broadcasters. We asked questions about the numbers of people working in organisations, and also about steps broadcasters have taken to make their workforces more representative. This review is the culmination of those five years of TV monitoring and four years for radio.

These last five years have been a time of unprecedented change in the UK-based broadcasting sector. Changes to the global market, the rise of streaming/subscription video-on-demand services ("SVoDs") and the impacts of the pandemic are reshaping the sector as we currently know it. At the same time, diversity and inclusion issues have been brought into sharp relief by global events and the resulting social justice movements.

As we've developed our programme of work, we have worked hard to encourage and support collaboration across the industry. Over these five years we have met with hundreds of people who have an interest in this area – from broadcasters to independent producers, freelancers, CEOs, academics, unions, commentators and others working in front and behind the scenes right across the creative industries. We have provided guidance and held workshops on best practice, and more recently established a quarterly roundtable where TV and Radio broadcasters can share information on best practice and establish joint projects.

This review

This review presents our key findings over the last five years across both the TV and radio UK-based industries. As in previous years, this year we required broadcasters to provide data on the three protected characteristics[1] where we have legal powers to do so: men and women; racial group; and disability.[2] In addition, we requested that broadcasters provide information voluntarily on other protected characteristics outlined in the Equality Act 2010: religion or belief; age; and sexual orientation. For the past three years we've also asked broadcasters to tell us about the social and economic diversity of their workforce. In this section we have described some key features of our methodology, which are relevant to how we have conducted this review.

[1] Protected characteristics are also referred to as characteristics in this report, alongside other characteristics such as socio-economic background.
[2] The data were collected via a questionnaire sent to all broadcasters and are based on broadcasters' own reporting systems. As such, there may be some variation in how categories of data are defined.

To develop further our understanding of our data, we commissioned research from the consultancy *Included*[3] which is published alongside this report. *Included* conducted a deep dive into our data to identify trends and built predictive models, using the data we have collected from broadcasters over the last five years to extrapolate and model potential scenarios for the next five years. *Included* also conducted interviews with people working across the sector to help contextualise our quantitative data and better understand the issues being faced by broadcasters. Quotations included within this report are from these interviews.

The key purpose of this review is to identify key trends and areas in need of progress across the TV and radio industries as a whole. In the Annex to this review we provide more detailed information on the main TV and radio broadcasters and their individual progress. The review is also accompanied by two interactive data tools through which our collected datasets can be explored. A third tool provides the qualitative information broadcasters gave us this year about the relevant initiatives they've recently undertaken. We are also publishing in full the research report produced for us by *Included* which is referenced throughout this review.

Our approach

The full methodology applied to this year's data collection and analysis is available in a separate document.

Comparable data

Unlike our previous reports, this review reflects on diversity and inclusion over a period of five years for TV and four for radio. However, we generally comment throughout on the progress made over the latest four annual reporting periods. This not only enables a closer comparison between the progress of each industry, but also covers all periods for which the same methodology has been applied to our data collection and analysis. Nevertheless, we have also included graphically the data collected for TV's first reporting period, to provide a complete picture. However, as the methodology applied for that period was different from the current approach, its data are not directly comparable and have not therefore been included in any analysis undertaken for the purposes of this report.

Reporting periods

The following table shows: the periods referenced in this report; the reporting period of each industry to which they refer; and the corresponding year of our published report(s).

Period referenced in this report	TV data reporting period (12 months)	Radio data reporting period (12 months)	Year report(s) published by Ofcom
2016/17	1 Jan 2016 – 31 Dec 2016	N/A	2017
2017/18	1 Apr 2017 – 31 Mar 2018	1 Jan 2017 – 31 Dec 2017	2018

[3] https://www.included.com/

2018/19	1 Apr 2018 – 31 Mar 2019	1 Jan 2018 – 31 Dec 2018	2019
2019/20	1 Apr 2019 – 31 Mar 2020	1 Apr 2019 – 31 Mar 2020	2020
2020/21	1 Apr 2020 – 31 Mar 2021	1 Apr 2020 – 31 Mar 2021	2021

Data comparison

Throughout this report we compare data provided by broadcasters with their relevant 'UK benchmark'. As detailed in the full methodology document, this benchmark generally refers to:

- corresponding data of the Office of National Statistics:
  - in relation to the UK labour market (with reference to Gender, Racial Group, Disability or Age); or
  - in 'Sexual orientation, UK: 2019' (in relation to Sexual Orientation); or
- the NatCen Social Attitudes Survey 36 (in relation to Religion or belief).

Data visibility

In this report we refer to 'data gap', 'no data' or data 'not collected' where:

- an employer has not requested data from an employee;
- an employee has not responded to their employer's request for data; or
- an employer has failed to provide data to Ofcom, without explanation.

Data is therefore invisible to Ofcom in such instances. Data is *also* invisible to Ofcom if:

- an employee has responded to their employer's request for data but not disclosed it; or
- an employee has disclosed data with their employer but has not consented to it being shared with Ofcom.

'Visible data' is therefore data that:

- an employer has requested from an employee;
- an employee has disclosed to their employer; and
- the employee has consented to share with Ofcom.

Terminology

In most cases the way in which we describe characteristics reflects the relevant legislation[4]. Where there are notable differences, we have discussed this below in the [data] section.

[4] Namely the Communications Act 2003 and the Equality Act 2010.

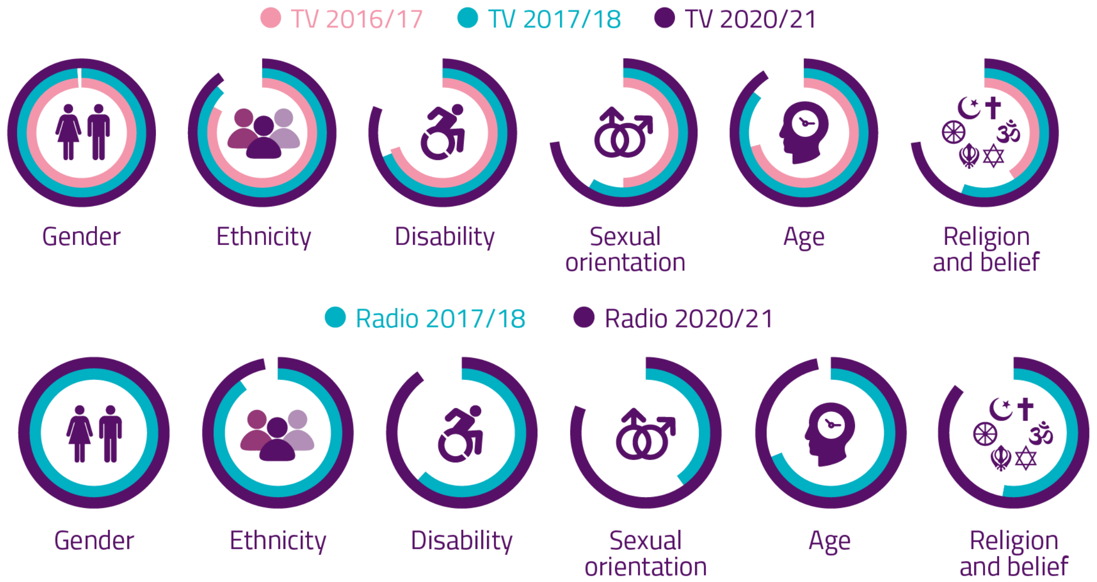
The UK-based industry – five years on

Here we look first at how much more data we now have on broadcaster workforces, and then at what that data is telling us about diversity and inclusion in the industry.

Data – how much do we know?

Mind the Gap…

Figure 1: The proportion of employee data disclosed by broadcasters to Ofcom over time



Without data on the industry workforce, useful observations on its diversity are extremely difficult to make – the more data collected by broadcasters and shared with Ofcom, the more accurate the picture. This not only enables broadcasters to know their workforces and act on their findings, but also makes our assessment of priorities and/or our recommendations more reliable.

Since the inception of our current methodology, in 2017/18, we have seen significant improvements in data collection. Ofcom welcomes the efforts broadcasters have made, which has provided a much fuller picture of the broadcasting workforce in terms of those representing protected characteristics, as illustrated above.

As part of our commissioned research, many participants said that the introduction of systematic reporting, data collection and measurement made a significant contribution to progress. This had helped the industry, and organisations within it, to identify where progress was and was not happening. Generally, our approach to data collection and the information we require or request has been viewed positively.

Where broadcasters are *required* to submit information to Ofcom, the greatest reduction in the data gap has been for disability, although that gap has itself always been larger than that for men and women and racial group.

Broadcasters are not obliged to collect data and provide them to Ofcom for other protected characteristics, but we *request* they do so voluntarily for: religion or belief; sexual orientation; and age. Of these, age has always had by far the smallest data gap.

We also request that broadcasters collect and provide data voluntarily in relation to the socio-economic background of their employees and on the freelancers they engage.

The following section considers progress made in data collection for each characteristic.

Disability

Since 2017/18, the disability data gap has reduced substantially across the broadcasting sector with visible data now available for over three quarters (76%) of TV employees and 85% of radio employees.

That said, issues remain with the collection of disability data. Establishing disability representation within the sector relies on employees self-identifying as disabled. Many people may choose to not do this despite having a condition that may make them eligible for reasonable adjustments and other support. This can be due to a number of reasons such as not feeling comfortable declaring themselves as disabled to their employer or simply not feeling as if the identity applies to them. This reticence to self-identify means that, although the data gap has reduced, data on disability may not always be reliable.

Some broadcasters have tried to solve this issue by changing their data collection method to include both a question asking staff if they identify as disabled and a question asking if the member of staff has a condition from a list provided by the employer. Another approach is that taken by the Office for National Statistics in the most recent census, asking about long-term illnesses and conditions and the extent to which they reduce a person's ability to carry out day to day activities. In the section 'Ofcom's Role' below, we discuss plans to obtain further information to inform any revisions to our questionnaire and advice in this area.

Racial group

Although starting from a solid base, we've seen significant progress since 2017/18 in both TV and Radio closing the data gap for racial groups, with data now available for the vast majority of the sector. There is now only a 10% data gap for TV and 3% for radio. This has allowed broadcasters to develop their understanding of minority ethnic group ("MEG") representation within broadcasting.

Gender

We can only *require* data relating to men and women, which can also be expressed as 'sex'.[5] We refer to 'gender' here because we also ask broadcasters voluntarily to provide information on employees under the category 'Other (e.g. intersex, non-binary). We have not to date asked broadcasters to provide quantitative information on the protected characteristic of "gender reassignment"although we have asked about arrangements broadcasters have in place to promote equality of opportunity in this respect.[6]

We are conscious that the way in which our questionnaire is currently labelled requires revision for greater clarity, but we have kept the current terminology in order to provide a consistent approach for the final stages of this five-year review. See 'Ofcom's role'below, for our plans to obtain input to inform revisions to our questionnaire and reporting.

In contrast to the other characteristics, data has been available on gender for the majority of the workforce from the outset of our monitoring programme.

Age

Across the radio industry the data gap has shrunk dramatically, by 28pp, and it now stands at only 3%.

For the TV industry the data gap has decreased over the period by only 5pp, to 9% in 2020/21, taking into account a 2pp increase in the gap over the last year. We certainly encourage broadcasters to gain even higher levels of data collection, but are aware that the Covid pandemic may have played some part in the last year's downturn in data.

Sexual Orientation

In referring to sexual orientation in this report we use the acronym "LGB" (Lesbian, Gay, Bisexual) rather than the "LGBT", "LGBTQ+" or other acronyms now commonly used. This follows the legal definition of sexual orientation as a protected characteristic in the Equality Act 2010[7] and we have continued to use this term in order to achieve consistency over the data period. We intend to revisit these descriptions as part of our broader revision of our data questionnaire. Transgender identities will be considered under gender (as above) rather than sexual orientation.

The radio industry has most recently reported a data gap for sexual orientation of 19%, down an impressive 41pp from 2017/18, when two of the three main broadcasters – Bauer and Global – were not even collecting such data. This is the greatest reduction in data gap across all six protected characteristics in each industry.

[5] This is because of the way our legal duties are expressed in the Communications Act 2003 which refers to equality of opportunity between men and women. In the Equality Act 2010 the protected characteristic of 'sex' is said to be a reference to the characteristic of being a man or a woman.
[6] Section 7 of the Equality Act 2010.
[7] Section 12 of the Equality Act 2010.

TV's data gap for sexual orientation was 41% in 2017/18. There has been substantial, steady progress in the industry to reduce this and it now stands at 27%. However, this compares with a gap of only 11% for the five main TV broadcasters, who have reduced it by 13pp.

Religion/belief

Since 2017/18, the data gap for religion or belief for both TV and Radio has steadily and substantially decreased. However, there is still some way to go before we have data available for the whole sector with over a third of the TV workforce and almost a quarter of the radio workforce remaining unaccounted for. Broadcasters should continue efforts to close this gap in the coming years so that they are able to understand the experiences of people with different religions and beliefs in the workplace.

Socio-economic background

While not a protected characteristic under the Equality Act 2010, understanding the make-up of the TV industry in terms of social and economic background of the workforce is vital.

We made a commitment when we started requesting this data to work with broadcasters to understand how they are moving forward on collecting information in this area and what challenges they've identified.

Information on socio-economic background is still lacking. We have visible data (on at least one measure of socio-economic background) for only 39% of Radio employees, and 44% for TV.Information is provided by only 12 broadcasters. The data gaps are so large that, for socio-economic background alone, we continue to report on figures as a percentage of those who provided information (rather than as a percentage of the relevant industry workforce as a whole). This may allow us to give a more accurate picture of the likely make-up of the industry, but provides only a partial view.

The freelance workforce

Though regulatory obligations under broadcasters' licence conditions only extend to promoting equal opportunities in relation to people employed by broadcasters, we cannot ignore the hugely significant role of freelance workers in the broadcasting sector. In addition to ongoing discussions on how best to support a diverse range of freelance talent, we have asked broadcasters to collect and provide data voluntarily – in relation to gender, racial group and disability – on the freelancers they have engaged in each reporting period.

In 2017/18 we reported data gaps across TV freelancers that ranged from 54% for gender to 83% for disability, while for radio, the gaps were smaller (though still large), ranging from 36% for gender to 63% for disability. In 2020/21, TV broadcasters have still failed to provide data on gender from half the freelancers it engaged and from around two thirds on both disability and racial group. The radio industry has reported freelancer data gaps for the same period of approximately half those for TV. These data gaps still need to be reduced, with data not collected by the radio industry on gender from just over a quarter of its freelancers and from around a third on both disability and racial group.

Unfortunately, progress in reducing the data gaps concerning freelancers has been slow, especially for TV, and there remains a long way to go before Ofcom can be certain that the data provided by broadcasters will produce an accurate breakdown of freelancer representation in relation to any of the three protected characteristics. This is compounded by the fact that the volume of data collected is also relatively small (unlike that collected under the Creative Diversity Network's Diamond project, discussed below). However, throughout this report, we have considered it appropriate to refer to the possible progress that has been made in relation to these three characteristics for radio freelancers, as the data gaps concerning them are substantially smaller than those for TV freelancers, as detailed above.

Many of the TV industry's vast number of freelancers work in independent production, which is why we support Diamond, which is the production monitoring system of the Creative Diversity Network

("CDN"). This system captures diversity and inclusion data and helps the TV industry share best practice, so helping "to ensure actions are undertaken for measurable progress"[8]. CDN members BBC, ITV, Channel 4, Sky, ViacomCBS and now UKTV[9],use this online system for the purpose of accessing diversity data on their programmes commissioned from independent production companies. CDN's latest report, The Fourth Cut, published earlier this year, shows response rates of between 28% and 31% across the broadcasters. However, given the diversity characteristics collected reflect 742,076 contributions from over 36,000 people working or appearing in UK television productions in 2019/20, CDN considers the figures it reported "can be thought of as estimates of the 'true' diversity characteristics of all contributions made to TV programmes shown that year."

We continue to encourage broadcasters to track and evaluate schemes aimed at freelancers. This is even more important as the Covid pandemic appears disproportionately to have affected freelancers from underrepresented groups (see "Five years of data – Ofcom's comment", below).

Representation – what do the data tell us?

From the increased amount of data available, we have been able to build a more reliable picture of representation across broadcasting than ever before. In this section we consider each protected characteristic and socio-economic background, to assess how much progress has been made towards the fair representation of each in the workforce.

Disability

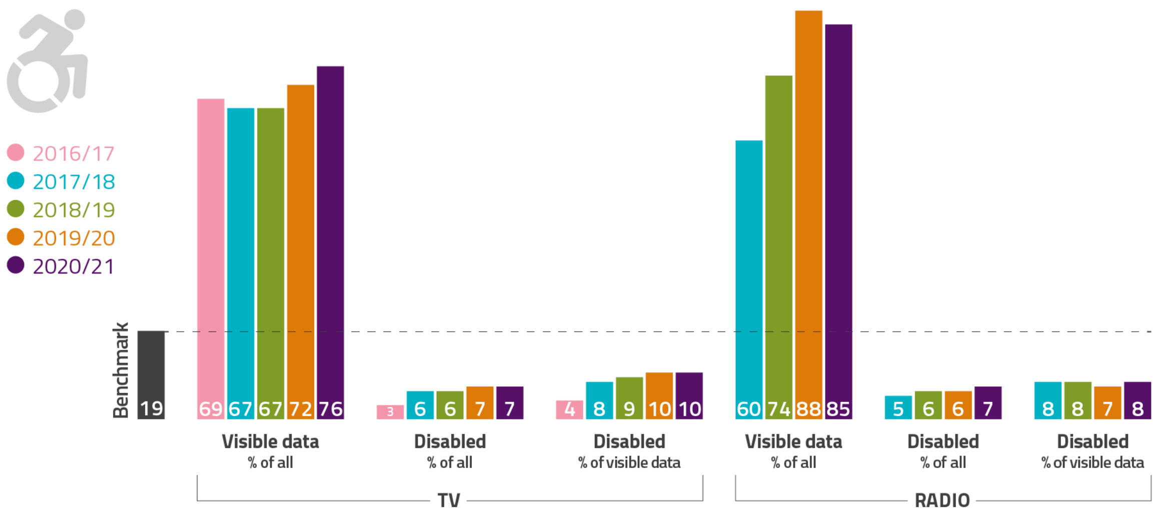
Over the last 5 years, it's been positive to see disability become a much greater focus for broadcasters, with collaborative initiatives such as Doubling Disability, the CDN project that aims to

[8] See CDN's website 'about us' pages

[9] In addition to the five main broadcasters and UKTV, S4C and ITN are also members of CDN, as are BAFTA, ScreenSkills and Pact.

double the percentage of disabled people working in UK broadcasting by the end of 2021[10]. However, despite renewed interest, there remains a long way to go before we see either UK TV or radio workforces representative of the UK's disabled population.

Figure 2: Representation of disabled people in TV and Radio workforces over the last 5 years



From the limited data available in 2017/18, disability representation was weak in both TV and Radio, at 7% and 5% of the workforce respectively, falling far short of the broader representation of disabled people in the UK aged 16-64 (which was 18% in 2017/18). Since then, improvement has been limited, with both TV and Radio still reporting industry-wide representation at less than half the UK benchmark of 19% in 2020/21.

Diamond data on TV freelancers echoes this lack of progress, with the representation of disabled people in off-screen TV production between 2017 and 2020 having risen just 0.9%, from 4.5% to 5.4%[11]. From limited data voluntarily submitted to Ofcom by radio broadcasters, disability representation in relation to radio freelancers appears likely to have fared no better, having more than doubled since 2017/18 but only to 5%, a little over a quarter of the UK benchmark.[12]

There is considerable variation between broadcasters in disability representation (see Annex 1), with some having improved more than others, but even the highest performing broadcasters have some way to go to meet the benchmark.

Broadcasters have launched initiatives to combat this, but these initiatives have not yet led to industry wide change. Over time, many broadcasters have appeared to concentrate on understanding disability, with the main broadcasters having focused in 2017/18 on understanding better the challenges facing its disabled workforce and putting in place appropriate workplace adjustments. For example, Sky set up its Ability Taskforce to improve its reasonable adjustment process, and ITV partnered with 'Microlink', to carry out specialised desk assessments, while in the

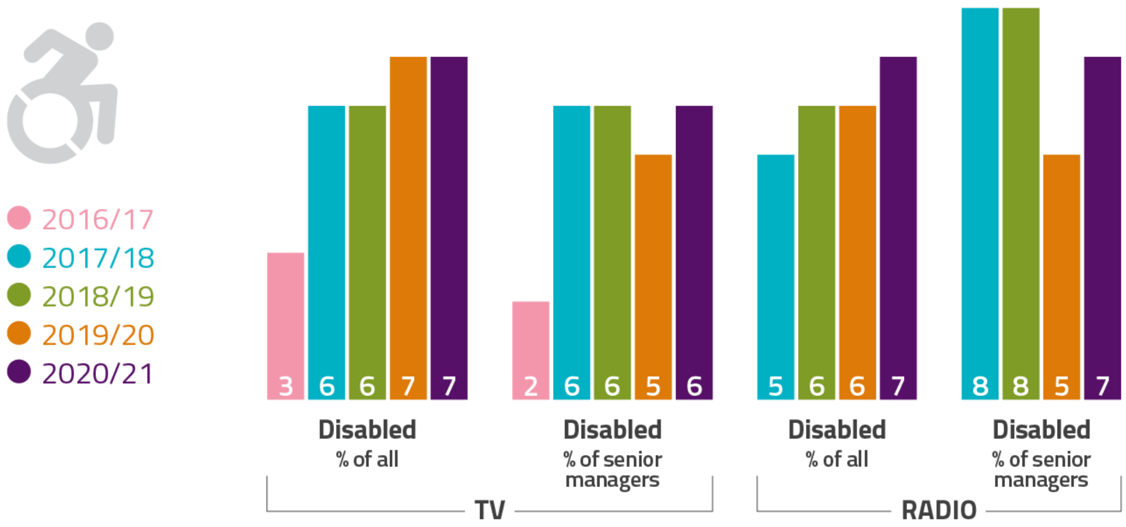
[10] For details see the Doubling Disability web pages.
[11] See the Interim Report on Doubling Disability
[12] Ofcom considers the amount of freelancer data it has received from TV broadcasters to be insufficient for reliable analysis (see 'The freelancer workforce', under 'Data – how much do we know?', above).

radio industry, Bauer engaged with MyPLUS and the British Disability Forum to understand more about 'non-visible' disabilities. Most recently, the BBC has recognised that it needs to improve its dialogue with its disabled workforce, its 12% disabled inclusion target having been deemed too low by its disabled staff, which the broadcaster attributes to inadequate communication.

We welcome the practical actions taken by broadcasters to improve their process for making reasonable adjustments, which are required under the Equality Act 2010. To address the shortfall in representation, however, we think it important for broadcasters to think more broadly about the creation of 'inclusive' working practices and culture for disabled colleagues.

To date, the lack of progress in achieving change has been particularly true at a senior level, where disability representation has failed to show any progress in meeting the UK benchmark at all and in the case of radio, has actually worsened. One explanation for this may be that diversity initiatives within the sector have often focused on entry level roles. As far back as 2016/17, some 50% of all Channel 4's apprenticeships and 35% of work experience placements were offered to disabled people, while the BBC looked to ensure that at least 10% of its apprenticeship places were taken up by disabled people. Our data suggests that hiring has disproportionately occurred at an entry level and that representation in more senior roles – those with editorial or strategic power – has remained critically low.

Figure 3: Representation of disabled people in senior management at TV and Radio broadcasters over the last 5 years



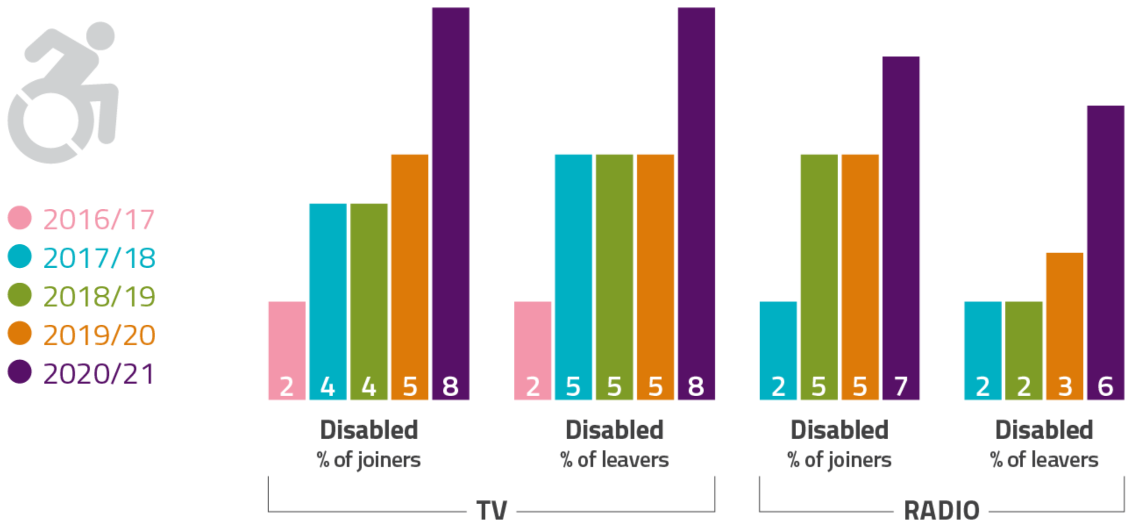
The lack of focus on underrepresented groups at senior levels was a theme several participants cited as part of *Included's* industry interviews. There was a feeling among a significant number of respondents that this may be tied to a perception of senior level appointments as a potential 'risk' rather than an 'opportunity'.

"Every appointment is a risk appointment. So do not apply that word when it comes to anything to do with diversity; that inflames me. It just makes me really angry." Included industry interviews - anon

For disabled and Black people in particular, *Included interviewees* felt that senior opportunities simply were not there or were not as open as they were to other groups. This is important because senior leaders have the potential to have an outsized positive influence on their organisations and the sector; *'it's the people in decision-making roles who create radical change'*, as *Included* was told by one industry leader. This sentiment is further highlighted through the quantitative analysis conducted by *Included*, which showed that the gap between disabled employees overall and that of senior management has widened in Radio and hasn't improved in TV.

The lack of improvement may also be due to an increase in the proportion of disabled staff amongst leavers. Although broadcasters have doubled the proportion of disabled people joining TV broadcasters and almost quadrupled the proportion of disabled joiners in radio over the last four years, there has also been a corresponding jump in the proportion of disabled staff leaving TV broadcasters. In the last year where the number of overall leavers in the industry far outstrips the number of joiners, this increase is particularly concerning. This apparent retention issue is likely having severe consequences for disabled representation overall.

Figure 4: Disabled people joining and leaving TV and Radio broadcasters over the last 5 years



Projections from *Included* (see figures 5 and 6) suggest that if the current trends hold over time, the proportion of disabled employees in TV is likely to **decrease** slightly. Across radio, if everything stays the same, then there is likely to be a marginal increase but stopping well short of the UK benchmark of 19% disabled employees. For both industries, representation at population levels can only be approached by combining an increase in disabled people joining broadcasters with a decrease in the number leaving.

Figure 5: Included's projections for disabled people in TV over the next 5 years

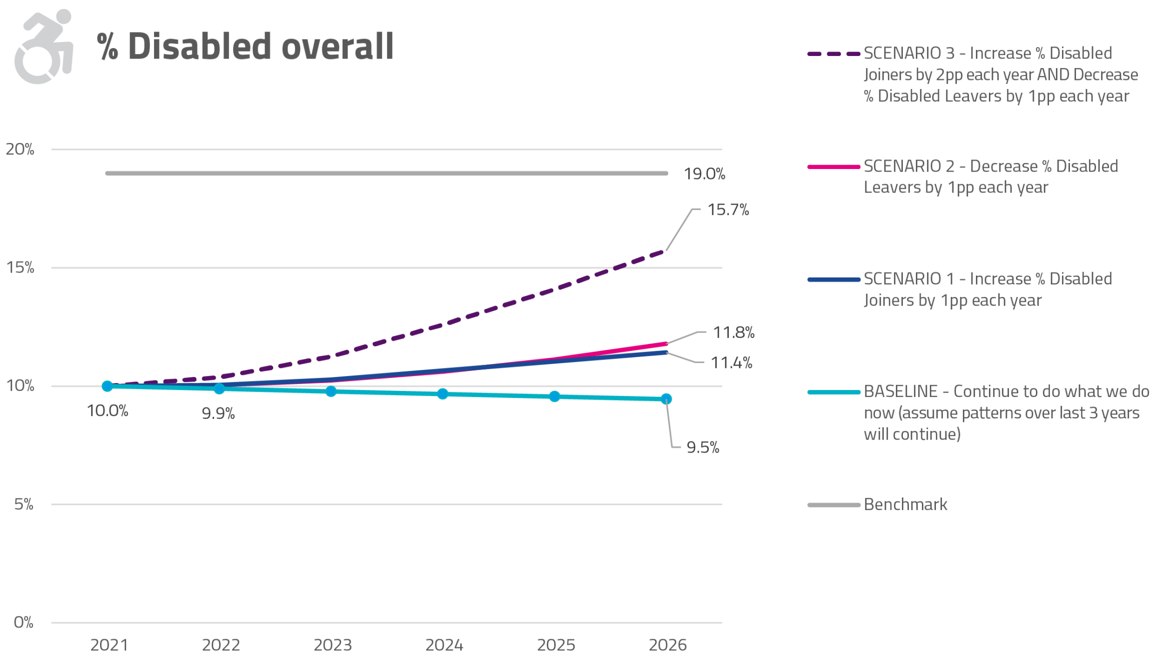
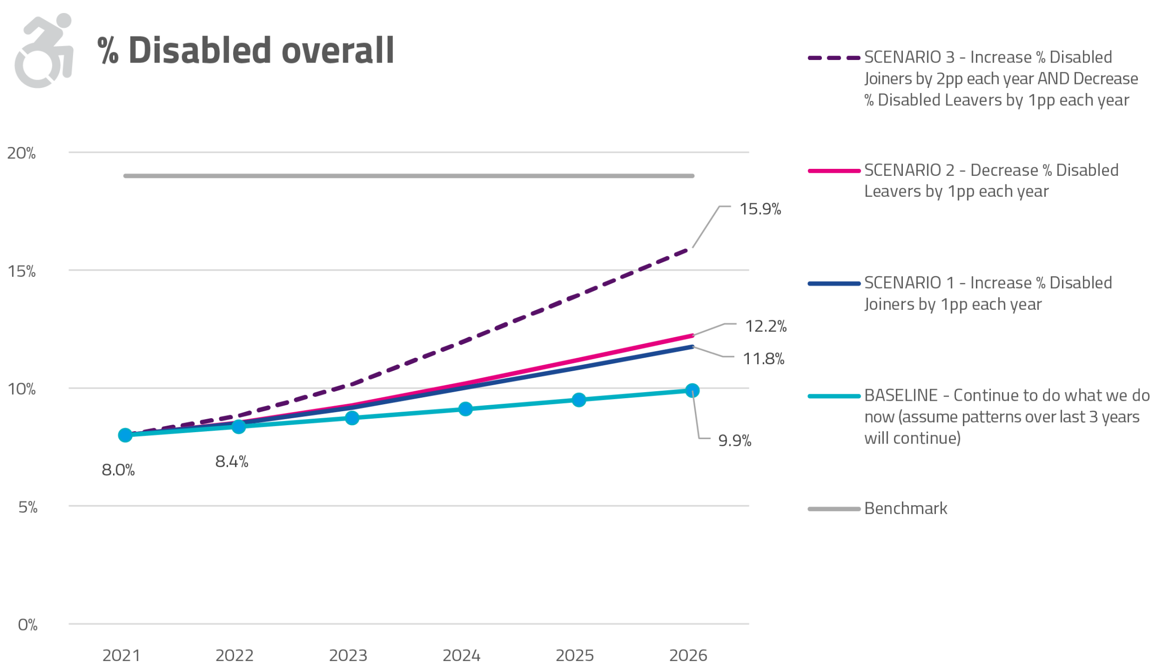


Figure 6: Included's projections for disabled people in Radio over the next 5 years



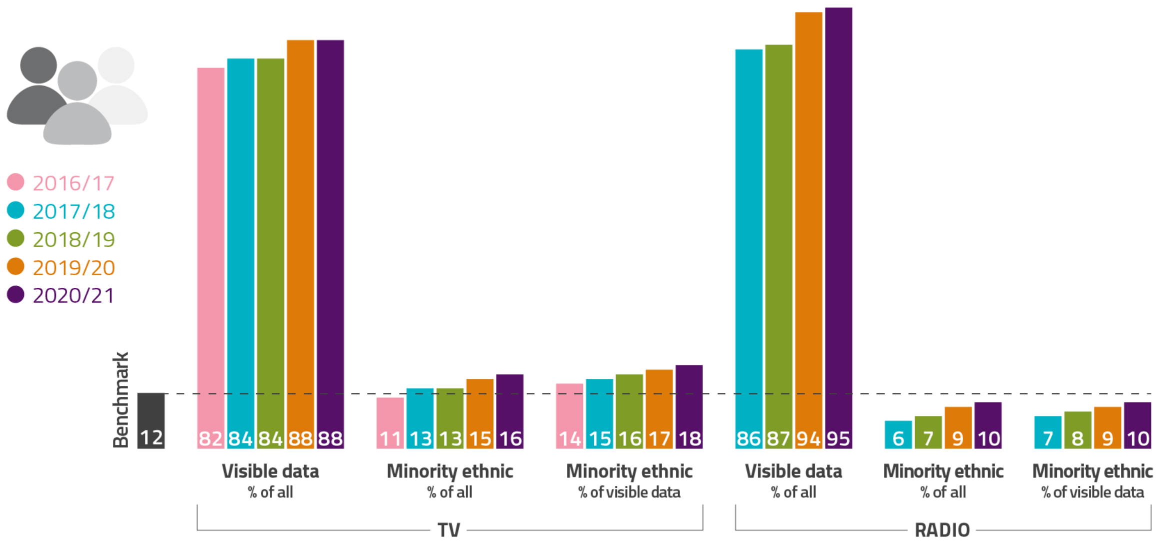
Racial Group

Following the tragic death of George Floyd last summer, global protest movements brought renewed focus on issues of racial justice in the media. Off screen, there has also been more reflection and action on racial justice with many working at broadcasters viewing these movements as a catalyst for addressing inequality and exclusion more broadly.

As part of *Included*'s industry interviews participants were asked what they felt had been the most impactful changes over the last five years. The most prominent cited change related to open discourse. Participants felt that there has been a dramatic, positive change in the number, nature, and depth of conversations – both public and private – about the representation and experiences of underrepresented and marginalised ethnic groups in broadcasting.

Many respondents commented on an increasingly open atmosphere of humility, authenticity, and recognition for action, and that colleagues are increasingly sharing experiences without the fear of retribution. Others noted that the language, vocabulary and level of discourse around topics, including race, has become more sophisticated. On an organisational level, this has manifested in highly visible public statements, such as anti-racism manifestos (see, for example, Channel 4) and action plans (see, for example, ITV) following the murder of George Floyd.

Figure 7: Representation of minority ethnic people in TV and Radio workforces over the last 5 years



In terms of the numbers, MEG representation in both TV and Radio has increased slightly since 2017/18. For TV, representation in the industry was initially reported above the UK working population benchmark of 12% in 2017/18 and some improvements have continued to be made between then and 2020/21. It is important to note that, within this industry-wide figure, there is considerable variation in performance between broadcasters with Sky and ViacomCBS reporting representation well above the industry average at 21% and other such as ITV reporting slightly below.

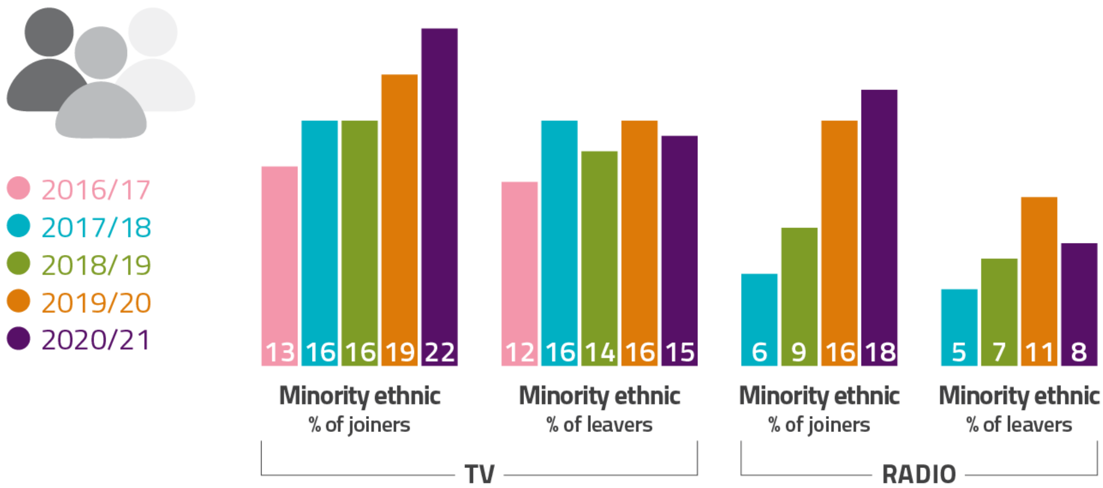
The industry average might initially read as a success for TV broadcasters. However, it is important to highlight that many of the main broadcasters – in both TV and radio – have a strong presence in major cities, such as London and Manchester, where the MEG population is higher, at 35% and 31% respectively. Given such local population demographics, many broadcasters could be considered to have disproportionately low MEG representation despite reporting above the UK benchmark.

In order to reflect this, some broadcasters have set different MEG representation targets in their different locations, which depend on the diversity of the relevant local community. We are supportive of broadcasters setting themselves more nuanced individual targets, which take into account both the local workforce and the national audiences for their content..

For Radio, representation still trails behind TV. Despite improvements in recent years, representation has still failed to reach the UK benchmark let alone reflect more diverse local populations. Again, much like TV, the industry-wide figure masks variation between broadcasters. In 2020/21, Global is now reporting MEG representation slightly above the UK benchmark at 13% after having more than doubled it since 2017/18. By contrast, Bauer and BBC Radio have reported almost no improvement in the period and are still far below the UK benchmark. For all radio broadcasters, there remains some way to go before minority ethnic groups are fairly reflected in the workforce. This is also likely to be the case for radio freelancers, where the data voluntarily submitted by broadcasters shows MEG representation has doubled since 2017/18, from 5% to 10% (2pp below the UK benchmark).[13]

Increases in representation are consistent with the fact that since 2017/18, both TV and Radio have increased the proportion of joiners from minority ethnic groups. Radio, in particular, has tripled this proportion and has almost matched TV, despite starting from a much lower base. Minority ethnic groups overall do not appear to be disproportionately represented in those leaving the broadcasting sector.

Figure 8: Minority ethnic people joining and leaving TV and Radio broadcasters over the last 5 years



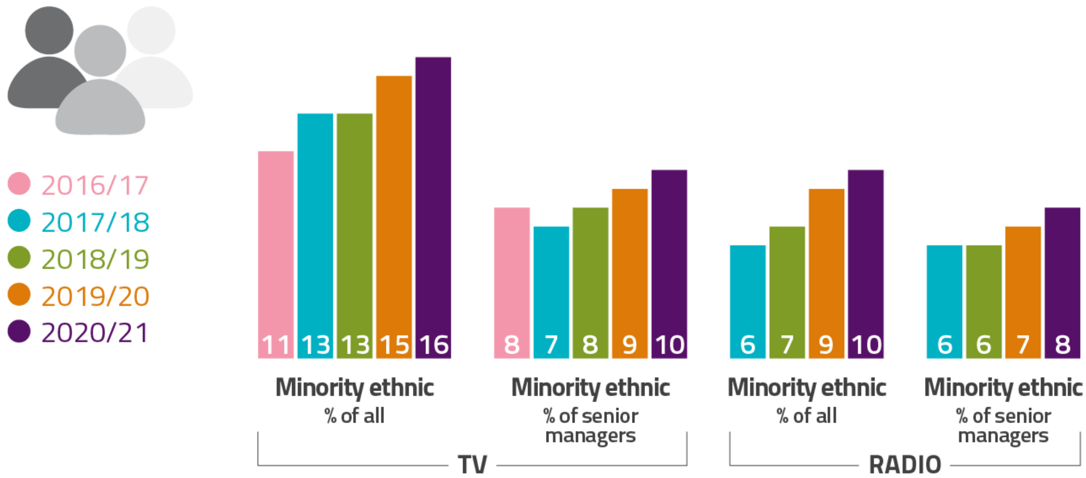
Ofcom welcomes the fact that all of the main broadcasters have made ethnic diversity a priority. We are also pleased to see that most of the main TV broadcasters have now established clear targets for

[13] Ofcom considers the amount of freelancer data it has received from TV broadcasters to be insufficient for reliable analysis (see 'The freelancer workforce', under 'Data – how much do we know?', above).

MEG workforce representation, with Sky also stating it is committing to a £10 million investment in racial equality.

However, a key focus must be progress in representation within senior management, which continues to lag behind the workforce as a whole.

Figure 9: Representation of minority ethnic people in senior management at TV and Radio broadcasters over the last 5 years



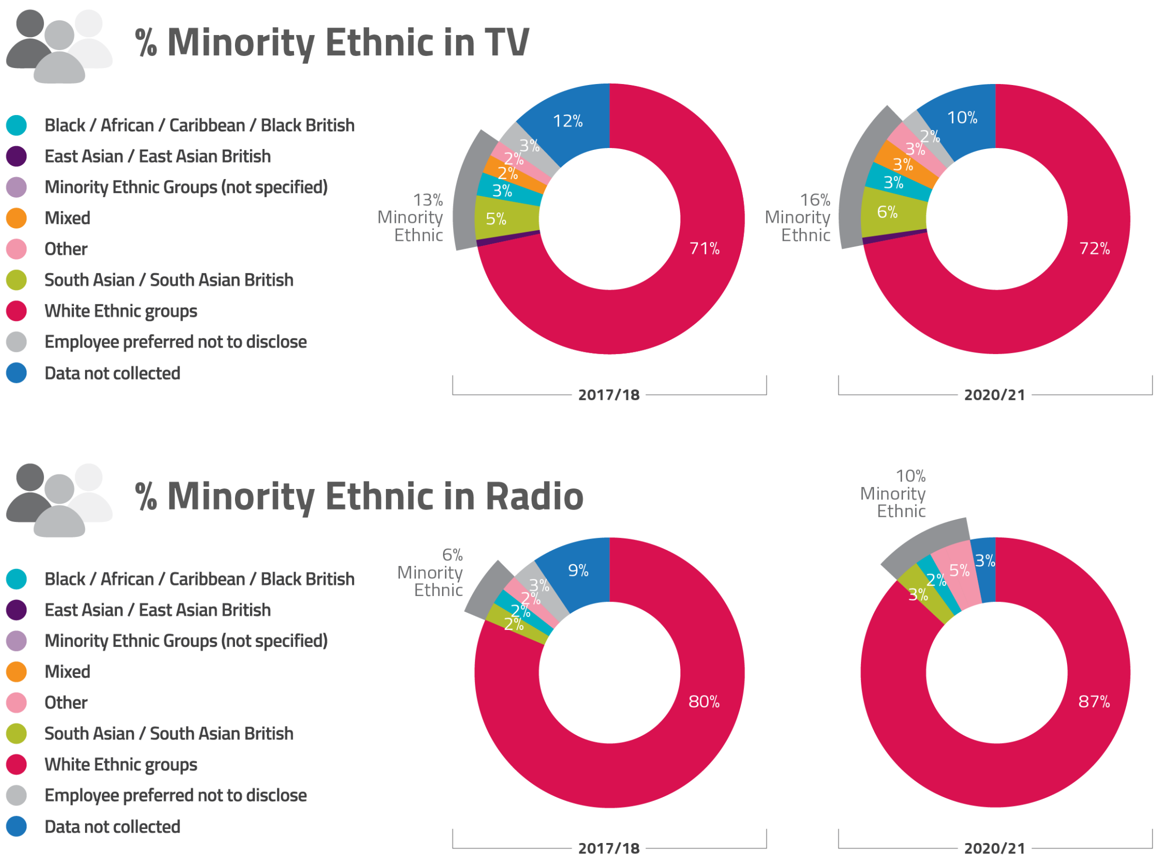
For both TV and Radio, MEG representation in senior management remains disproportionately low when compared to all employees and the UK benchmark. Analysis conducted by *Included* shows that the gap between overall racial diversity and that of senior management has increased in Radio and failed to improve in TV.

These discrepancies imply that the gains made in representation over the last five years have largely been at more junior levels, where there is less strategic input. We appreciate the attempt to invest long term in minority ethnic communities with these initiatives but would encourage broadcasters to ensure they also diversify senior management. In TV, the data on promotions is promising in this regard with nearly a fifth of all those promoted being from a minority ethnic group. If this promotion rate holds across all levels and is maintained, it may eventually be reflected in more diverse senior management. Ensuring a representative proportion of MEG employees in senior management positions not only relies on recruiting or promoting into these positions, it is also dependent on preventing a disproportionate number of more senior minority ethnic colleagues leaving organisations. This relies on a more complex set of actions, to foster an inclusive environment. A number of participants in *Included*'s industry interviews felt that the environment around senior roles was much less forgiving for underrepresented groups as they are subject to a higher/different standard compared to majority groups and suffer from a lack of support and sponsorship.

There have been some limited improvements since 2017/18 with regards to MEG representation at senior levels and a number of initiatives have been introduced to help achieve this. For example, in that year, the BBC focused on its RISE initiative, which aimed to mentor and progress MEG employees, while Global began a review of its 'Global Academy', which supported the development of its new minority ethnic talent. Further, the following year, most main TV broadcasters set clear targets for MEG representation at senior levels.

Of course the broad 'Minority Ethnic Group' category does not represent one homogenous experience. Our data across the five years have suggest that people from different racial groups have different experiences in the industry, and different experiences across TV and Radio.

Figure 10: Representation of different ethnic groups in TV and Radio 2020/21[14]



This picture has not changed dramatically over the last five years, other than incremental increases in representation which combine to increase MEG representation. Radio has maintained poorer representation of all racial groups. In TV, South Asian and Black colleagues are less likely to be employed in senior management positions, with Black colleagues particularly affected by this discrepancy. As we pointed out last year, this is a pattern we also see in CDN's Diamond data on the wider freelance industry[15].

Projecting forward over the next five years across both TV and radio, *Included* found that a number of different scenarios emerge with regards to increasing MEG representation.

[14] The 'other' category includes those who have indicated 'other' in their response plus any categories aggregating to <1%

[15] Racial and Ethnic Diversity: a deep-dive into Diamond data

Figure 11: Included's projections for minority ethnic groups in TV over the next 5 years

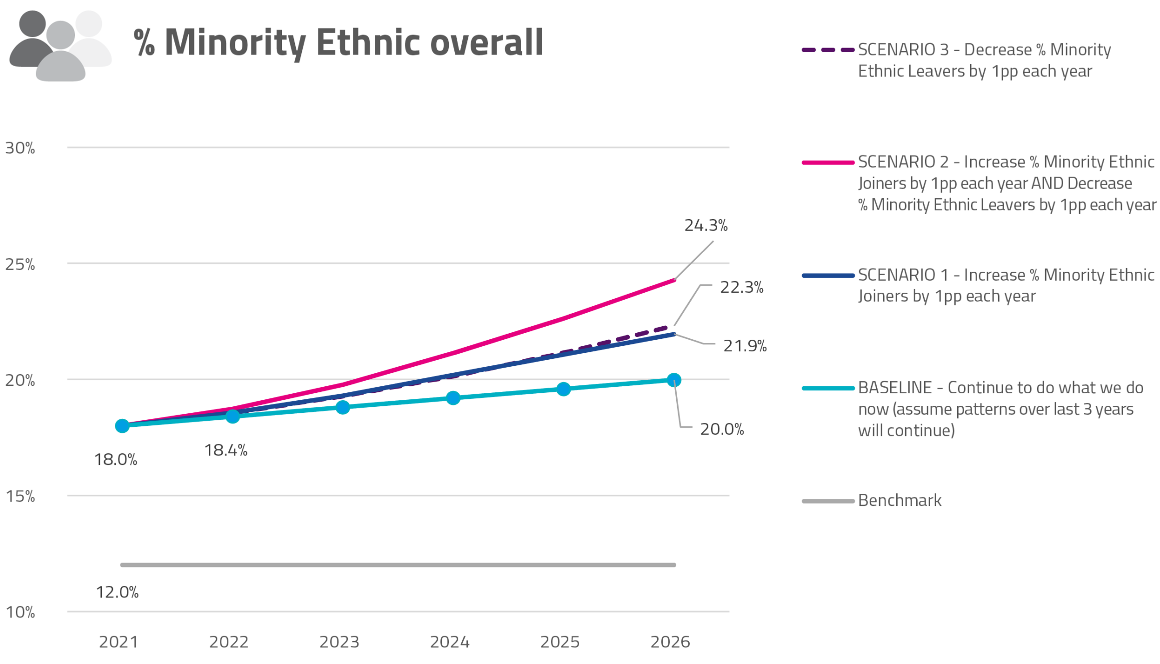
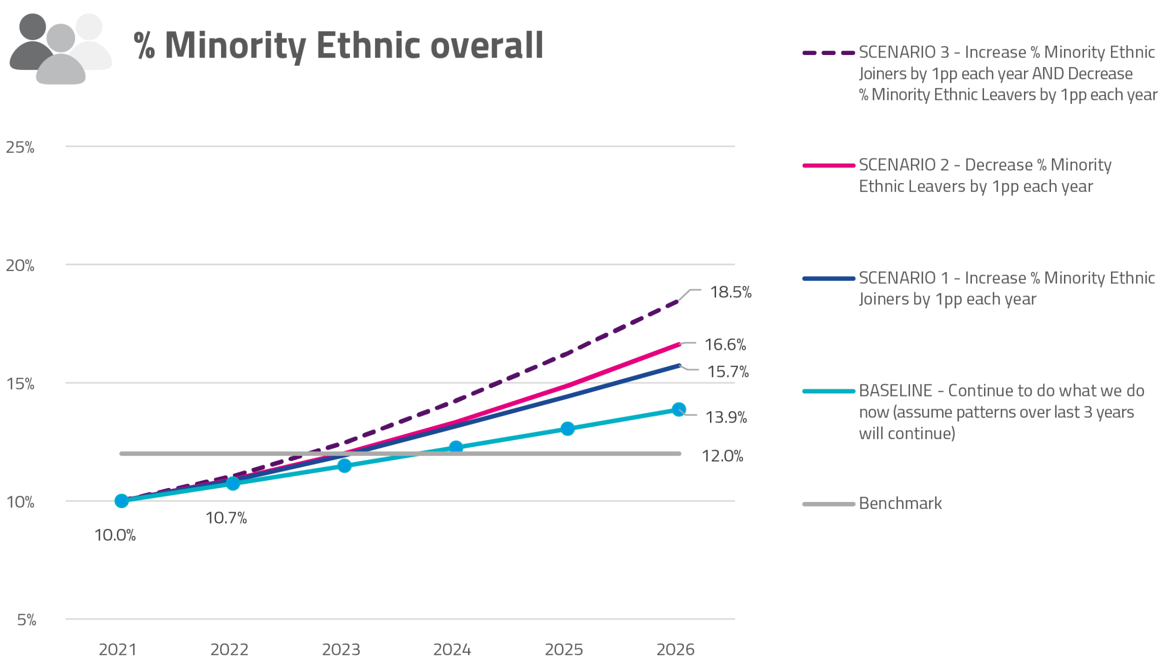


Figure 12: Included's projections for minority ethnic groups in Radio over the next 5 years



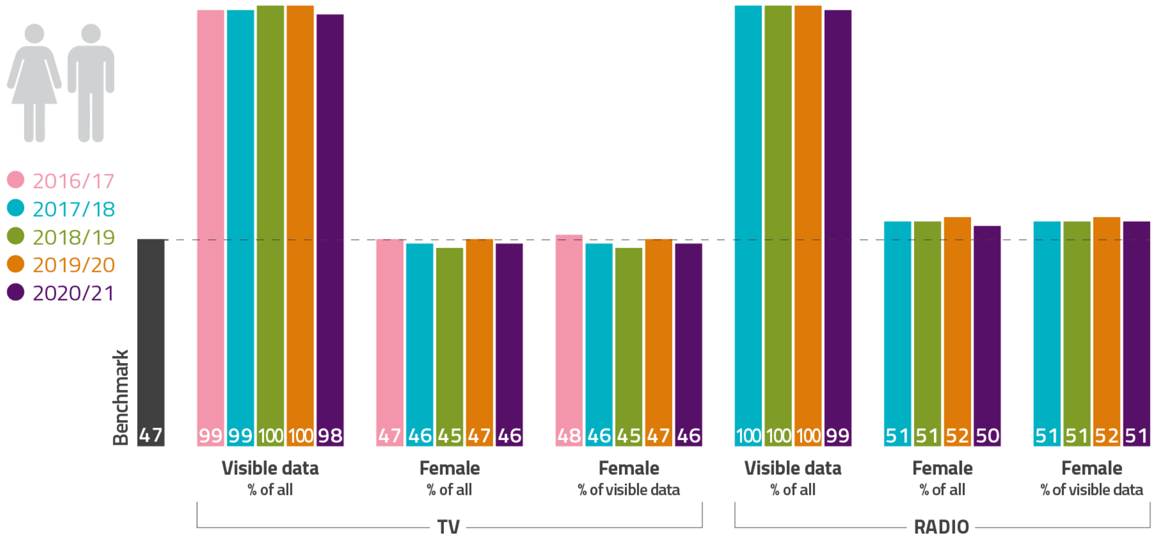
The proportion of employees from minority ethnic groups is likely to continue to increase steadily over time if current trends hold across TV and radio, with radio increasing more rapidly from a lower starting point. The projections show that TV and radio could reach 24% and 19% respectively by 2026 – in both cases focusing on retention alone has a slightly greater effect than focusing on recruitment alone, with a combined approach resulting in the biggest increases in representation. This would result in the broadcasting sector as a whole representing MEGs above the UK workforce average of 12%, but as we have highlighted above, this does not compare well with the higher MEG population in larger cities, where many broadcasters have a strong presence.

Gender

In the last five years, women's experience in the media has come under a harsh spotlight and Covid-19 has posed new challenges for women in the workplace. Nearly every interviewee who took part in *Included*'s research referenced the profound impact of social movements sparked by allegations against Harvey Weinstein in 2017. These social reckonings were unignorable and created powerful mandates for change. One CEO commented that it challenged the organisation to put its arms around its people and to 'feel their pain'.

We can see that broadcasters have responded to this. For example, this period has seen the BBC introduce "50:50 The Equality Project" which initially aimed at increasing female representation in BBC content and has since become a much broader initiative involving many other organisations and has expanded to cover representation of other characteristics[16].

Figure 13: Representation of women in TV and Radio workforces over the last 5 years



The data indicate that the representation of women in broadcaster workforces has remained largely consistent since 2017/18. For TV, representation has hovered at or just below the UK benchmark of 47%. For Radio, representation of women in the industry has similarly fluctuated but, unlike TV, has remained consistently above the UK benchmark, although this appears unlikely to be the case for radio freelancers, for which visible data has consistently shown female representation no higher than the UK benchmark[17].

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[16] To date, disability and ethnicity

[17] Ofcom considers the amount of freelancer data it has received from TV broadcasters to be insufficient for reliable analysis (see 'The freelancer workforce', under 'Data – how much do we know?', above).

However, in 2020/21, for both TV and Radio, the proportion of female leavers was higher than the proportion of female joiners. Potential reasons for this exodus include the Covid pandemic and its disproportionate effect on certain groups, such as working mothers, as highlighted in 'Locked Down and Locked Out', the recent report of the University of Nottingham's Institute for Screen Industries Research, which had surveyed over 500 mothers working in TV and online or branded content production. Its research showed that, among other things: nearly half of the respondents said they had been unable to accept work due to childcare related issues; almost 80% said they had been responsible for most home-schooling and childcare during the pandemic; and 61% said they had seriously considered leaving the industry.

Figure 14: Representation of women in promotions and senior management – TV

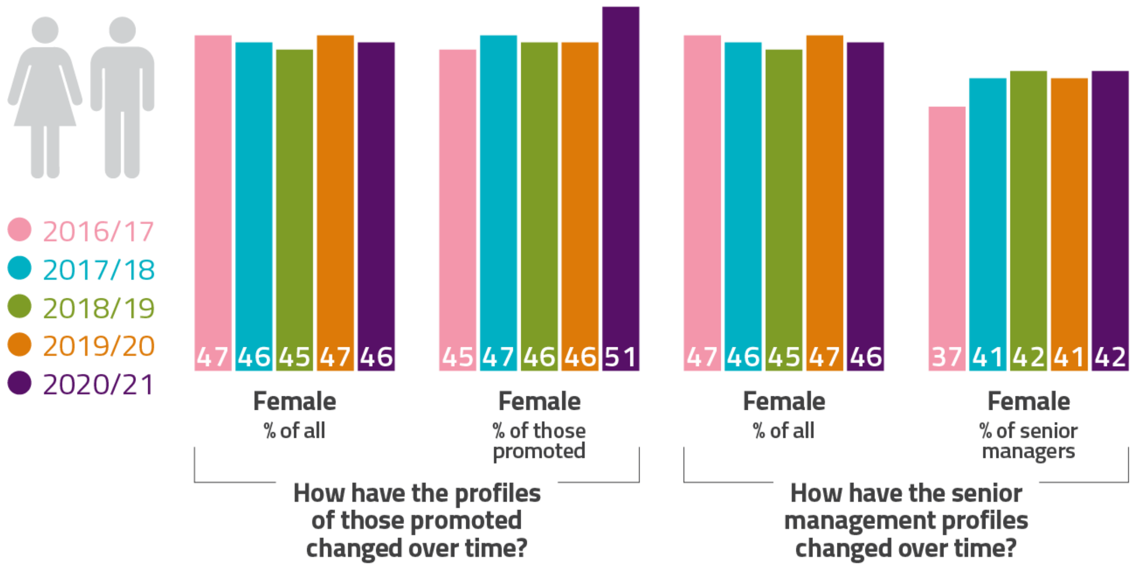
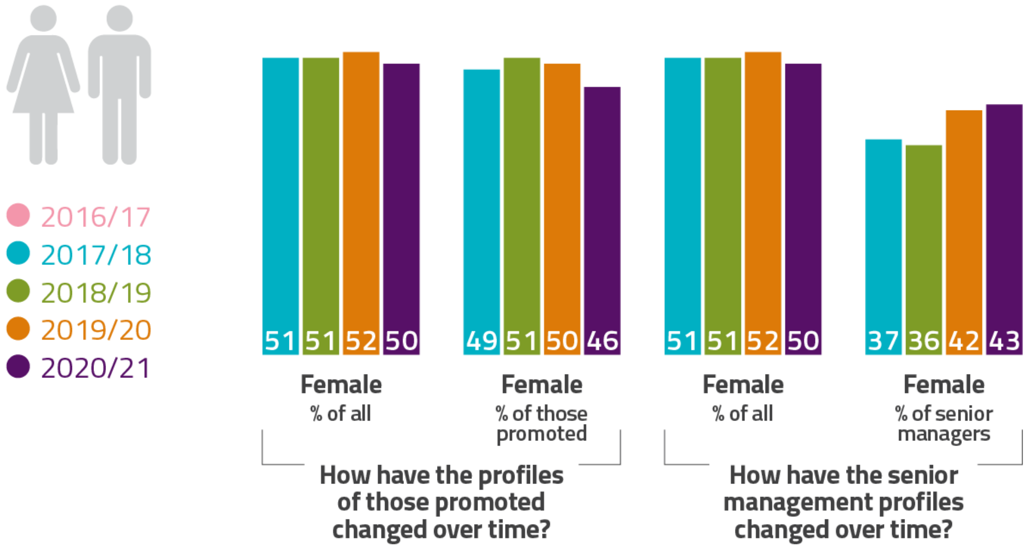


Figure 15: Representation of women in promotions and senior management – Radio



Last year we welcomed the fact that many broadcasters had considered their most successful initiatives to have concerned recruitment and progression, including in relation to improving the representation of women. We emphasised in particular the need for broadcasters to focus on retention of women and their progression to senior, decision making roles.

However, for TV, representation of women at senior levels has fluctuated over the last five years and fell below the benchmark in 2020/21. The gap between overall gender diversity and that of women in senior management positions has remained fairly consistent since 2018, at between 4-5%. One CEO interviewed as part of our research expressed concern that progress for women at executive levels was slipping; again the pandemic may have had a negative impact. Although this is disappointing, there has been a promising increase in the proportion of women who are being promoted. If this becomes a trend and holds at all levels, we may start to see an increase in women in senior management in the near future. We therefore welcome the fact that Sky, for example, has developed its 'Women in Leadership' programme since before 2016/17, and hope the 50/50 gender balance approach it currently operates for vacancy shortlists helps the organisation achieve its aim of equal representation between men and women in leadership. This was a target Sky, ITV, C4 and the BBC set themselves in 2018/19.

For radio, the proportion of women in senior management has increased and surpassed the figure for TV since 2017/18 but still falls short of reflecting women in the UK. Although these improvements in senior representation are promising, data on promotions shows a decrease in the proportion of women promoted since 2017/18. Although this has not yet had a negative impact on senior representation of women, radio broadcasters should ensure that the progression of women remains on the agenda in the coming years, if improvements are to continue and women are to be fairly represented at a senior level. We therefore welcome the fact that Global, for example, has recently carried out an end-to-end review of its recruitment and promotions processes and has now prioritised the launch of a new leadership development programme for female talent.

Below are the projection scenarios created by *Included* looking at how the proportion of women across the industry could change over the next five years.

Figure 16: Included's projections for women in TV over the next 5 years

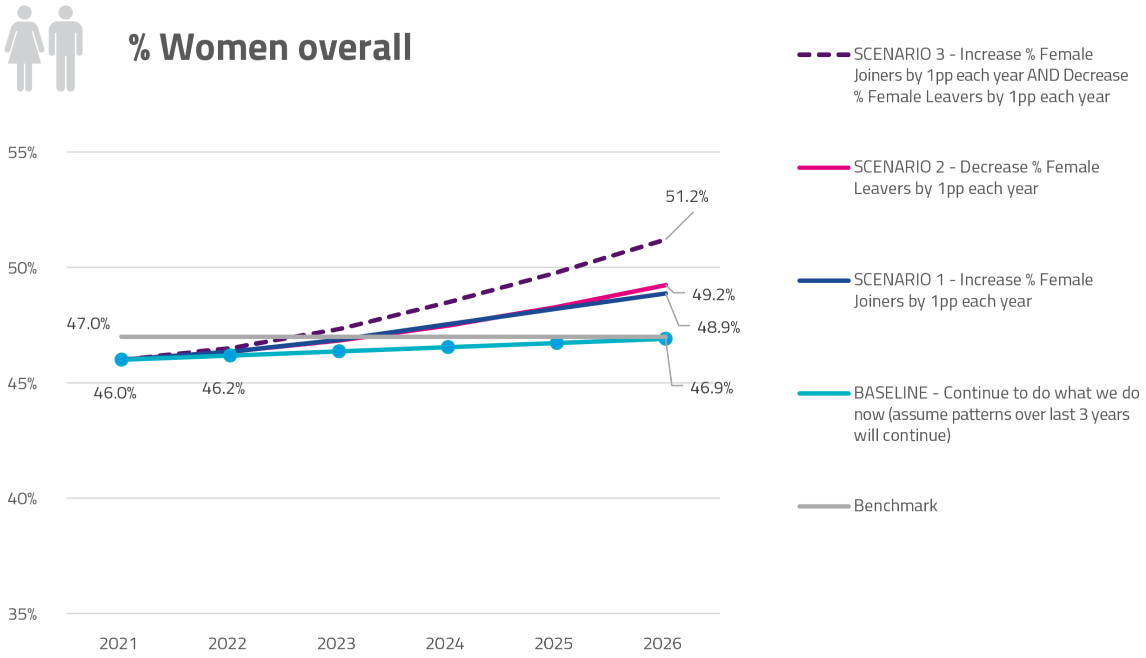
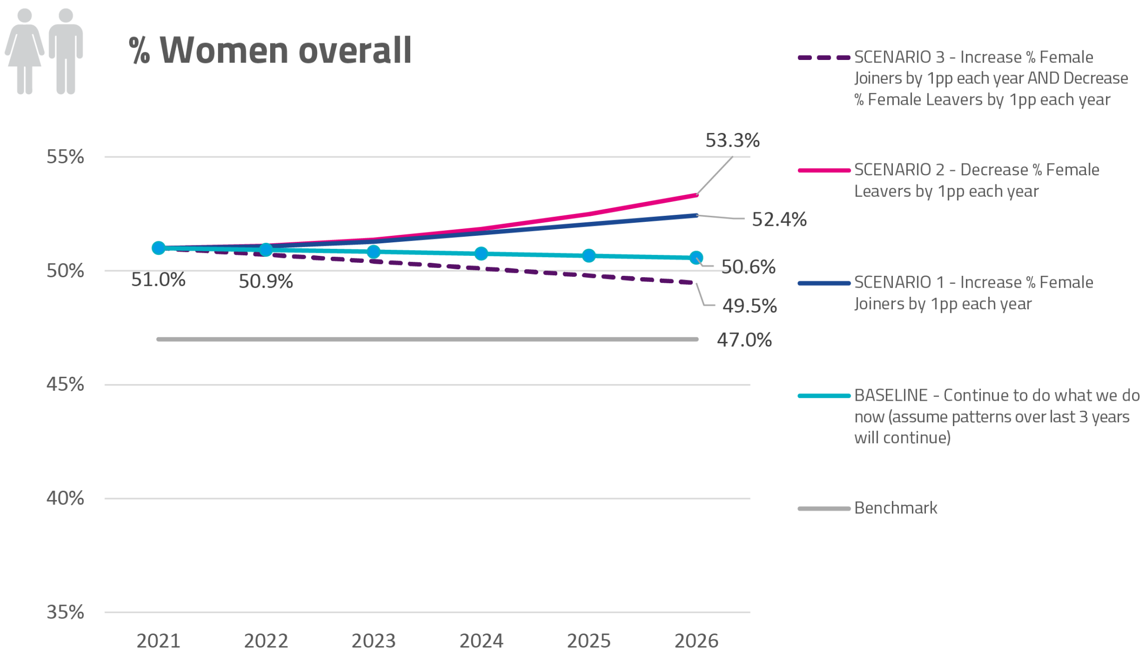


Figure 17: Included's projections for women in Radio over the next 5 years



While recruitment of women is still critical, the retention of women who are already there may be even more important to improve gender diversity long-term, particularly in TV. For radio the data show that setting a target of gender balanced recruitment and combining that with a focus on increased retention will maintain a gender balance while also creating a more inclusive workplace.

Age

While the age of on-screen and on-air presenters has in the past few years received some public scrutiny[18][19], the age of those working for broadcasters behind the scenes is less well explored. But as with the other characteristics explored in this report, we believe it is through a breadth of experience in the workforce that authentically diverse voices are brought to the programmes broadcast.

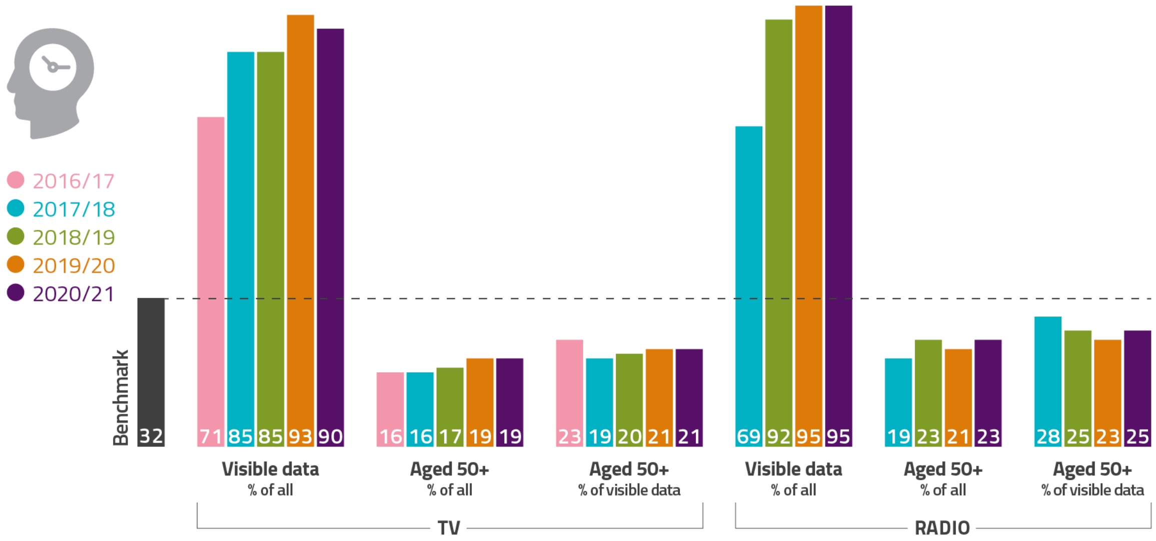


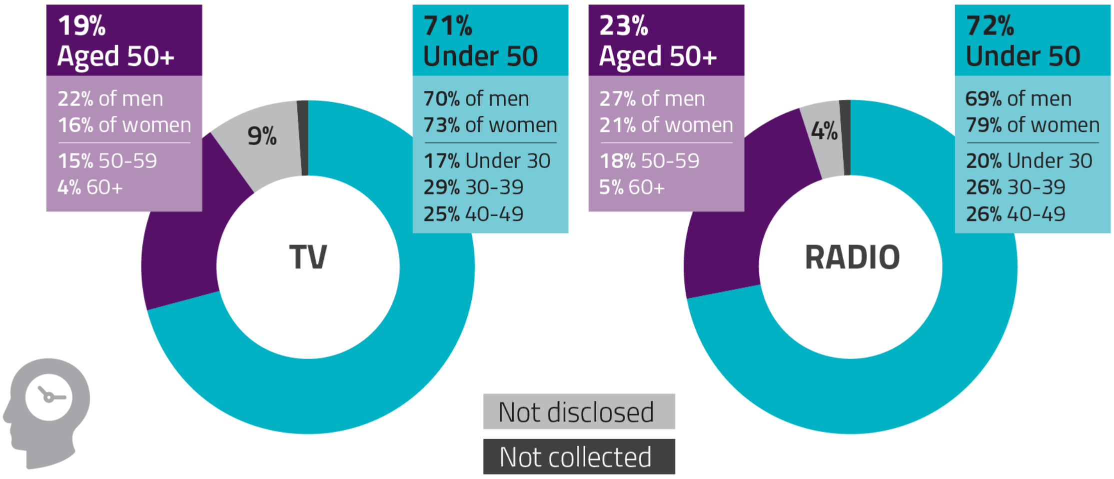
Figure 18: Representation of older people in TV and Radio workforces over the last 5 years

There has been little increase in representation of employees aged 50+ within the TV workforce since 2017/18.Then, their representation stood at 16% , having increased to only 19% in the latest reporting period and therefore falling far short of the UK benchmark of 32%. Further analysis by *Included* shows that age has the largest percentage point difference from the UK benchmark across the TV industry, and second only to disability across radio.

This is unsurprising given that broadcasters' reporting to Ofcom contains little reference to support for people in older age groups. In fact, nearly all initiatives that focused on specific age groups actually focused on young people. Broadcasters must re-examine their policies urgently to ensure they support their older employees, especially those aged 50+.

[18] See for example Ofcom's research into Representation and portrayal on BBC television which reported a widespread belief that older women are underrepresented on TV and conducted content analysis which supported this belief.
[19] Portrayal of Older People in News Media; report by the Older People's Commissioner for Wales.

Figure 19: Age by gender in 2020/21



In particular, more needs to be done to improve representation for women aged 50+. Only 16% of women in the TV workforce are aged 50+ compared to 22% of men and 32% of the labour market more generally (men and women). This is also true for those working in radio, where the proportion of men is 28% and for women it is much lower at 22%. When creating strategies to improve representation within the organisation, TV broadcasters must be mindful of this disparity and the need to ensure fair representation of older women.

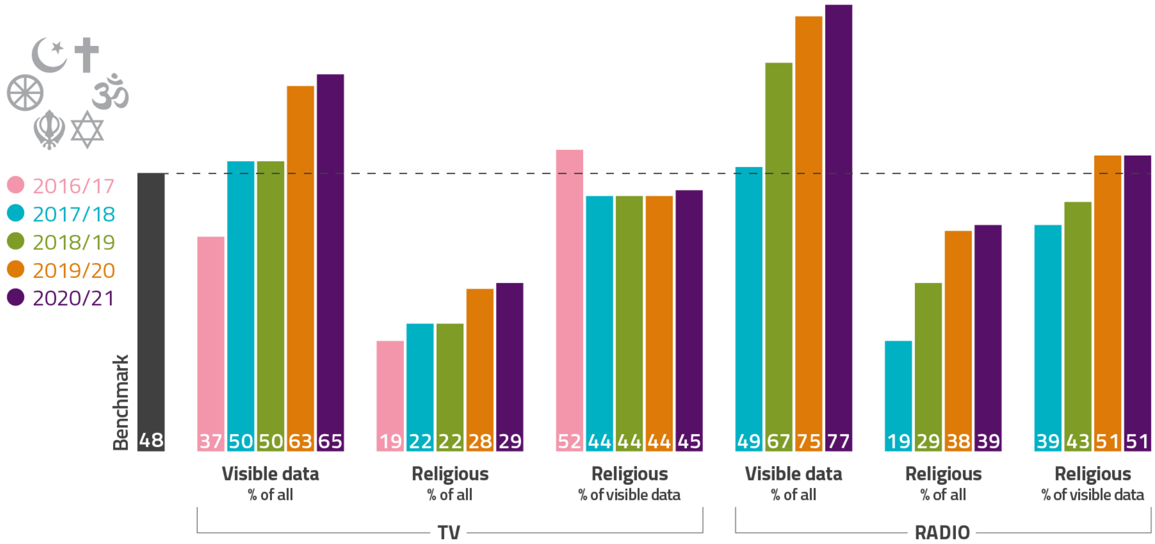
Religion or Belief

Attempts to understand the religion/belief of those working in broadcasting, or to draw conclusions, can be plagued by uncertainty. For one, enduring issues with data collection in this area call into question the accuracy of conclusions we may wish to draw. Likewise, there is some stark variance in UK population estimates in this area over the last two decades[20]. Nevertheless, we know that the reporting and portrayal of religion/belief in broadcasting can be hugely divisive.[21] So we believe that it is important for broadcasters' workforces to reflect the diverse population in this respect, to in turn reflect this authentic experience on-screen.

[20] Where the 2011 Census gave a religious/non-religious split of 67%/26%, the 2019 NatCen Social Attitudes Survey 36 has these figures at 48%/52%.

[21] See, for example, Ofcom's Audience expectations in a digital world.

Figure 20: Representation of religious people in TV and Radio workforces over the last 5 years



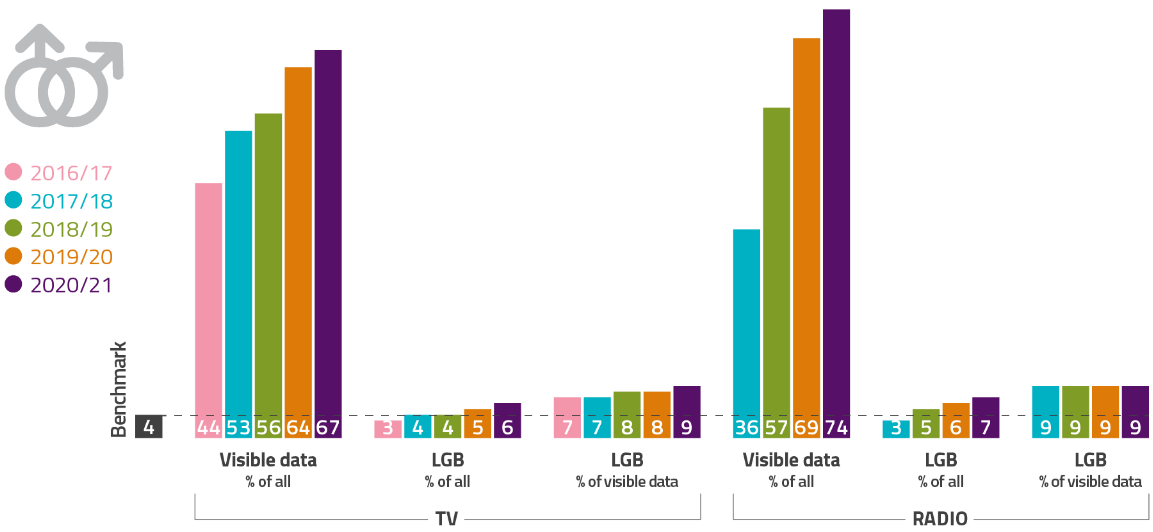
When we look at representation of those who consider themselves religious as a proportion of all employees, the figures (at only 29% and 34% for TV and radio employees respectively) fall far short of the UK benchmark of 48%. This is consistent with the qualitative data which also shows a distinct lack of initiatives compared to other characteristics to improve diversity. However, if we consider the number of religious staff as a percentage of visible data only, we find that the figure has remained consistently close to the UK benchmark for TV and, in the case of radio, has actually surpassed this figure since 2019/20. The discrepancies between these two figures coupled with the still large data gap means that we cannot make accurate conclusions about the state of religious/belief representation in broadcasting.

This highlights the need for robust data collection and disclosure when attempting to promote diversity and inclusion within broadcasting. Without full data, and without employee ‘buy-in’ (when they choose not to disclose information and/or refuse to give a broadcaster consent for their data to be shared with us) Ofcom is unable to assess with any confidence the true representation of that characteristic in broadcasting.

Sexual Orientation

Since the start of our data collection, discussion of the complexity of sexuality has extended far beyond ‘LGB’. Despite conversations on the topic becoming more developed, we still do not have a detailed picture of the position of LGBTQ+ people in the broadcasting sector.

Figure 21: Representation of LGB people in TV and Radio workforces over the last 5 years



As with religion/belief, our interpretation of data in relation to sexual orientation has to take into account relatively high data gaps.

Since 2017/18, we can see that there have been some increases in LGB representation across both the TV and Radio workforces. However, these increases could be due to increased and better quality data over time: when we look at representation as a proportion of visible data, there is a less marked increase over time but LGB representation in 2020/21 stands at more than double the UK benchmark across both industries. This benchmark is based on ONS data of people who have self-identified as LGB. Due to the difficulties and stigma associated with coming out as well as the complexities of sexuality, there are questions over how reliable this figure is, and together with the large data gap this means that we need better data to understand the varied experience of LGB people in broadcasting. As well as closing this data gap, it is important that broadcasters consider how effectively they use the more detailed data that they collect to ensure that all groups feel included.

When examining what actions broadcasters took in relation to sexual orientation, it appears that these positive changes were unlikely to be driven by broadcaster led initiatives. Although there are exceptions, the vast majority of actions around the LGB community were driven by staff themselves. Across the five-year diversity reporting period, LGBTQ+ staff networks or Employee Resource Groups led the charge by creating programmes of work to promote their own inclusion within the organisations. Although it is positive to see staff so engaged in this work, and we agree that it is important for employers to listen to the experiences of their staff (see "Recommendations for broadcasters" below), the burden should not be placed on staff to promote their own inclusion. Senior management need to support this work and resource it appropriately from the top down.

Social and economic background

Included's report to Ofcom concludes that the broadcasting sector is holding up the mirror to itself more closely than ever before. Both on an industry-wide and organisational level, and as has already been noted, recent years have seen a much clearer picture emerge on representation and the demographic makeup of broadcasters' workforces. But while many organisations are showing more of a 'true' picture and participating in a conversation about successes and challenges, there are still many gaps where data are missing, such as on socio-economic background. While not a protected characteristic under the Equality Act 2010, understanding the make-up of both TV and Radio in terms of the socio-economic background of their employees is vital to achieving a full understanding of inequalities in the industry.

Since Ofcom started requesting data, in 2018/19, on the socio-economic background of employees working in TV and Radio, we have been committed to working with broadcasters to understand how they are moving forward on collecting information in this area.. Socio-economic background cuts across a number of other characteristics. As a result, broadcasters have engaged with socio-economic background to a certain extent through initiatives in other areas, such as those targeted at improving representation of those from minority ethnic groups or those with a disability. However, we have also seen over the last couple of years a concerted effort from broadcasters to do more in this area and focus in on socio-economic background. Although there are no concrete trends at this early point, in terms of the type of work done, it is positive to see more focus on social mobility with efforts such as Channel 4's engagement with the local community in Leeds which has seen a rise in applications from working class people.

Figure 22: Socio-economic background in 2020/21 – TV

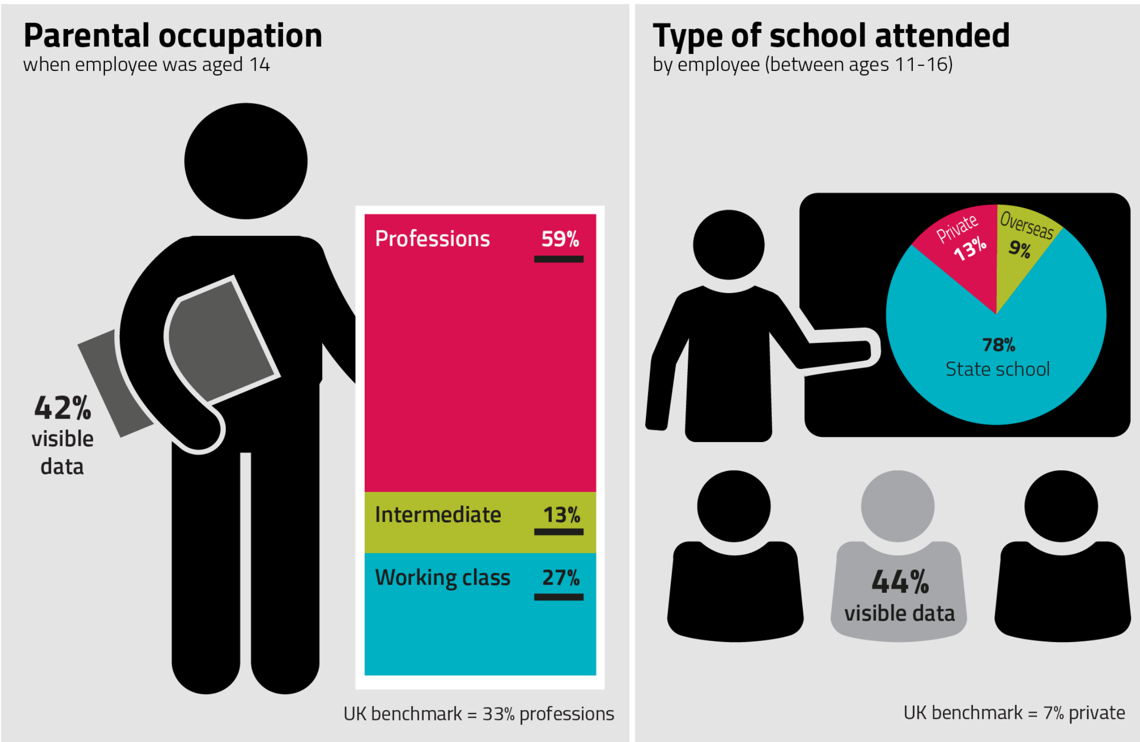
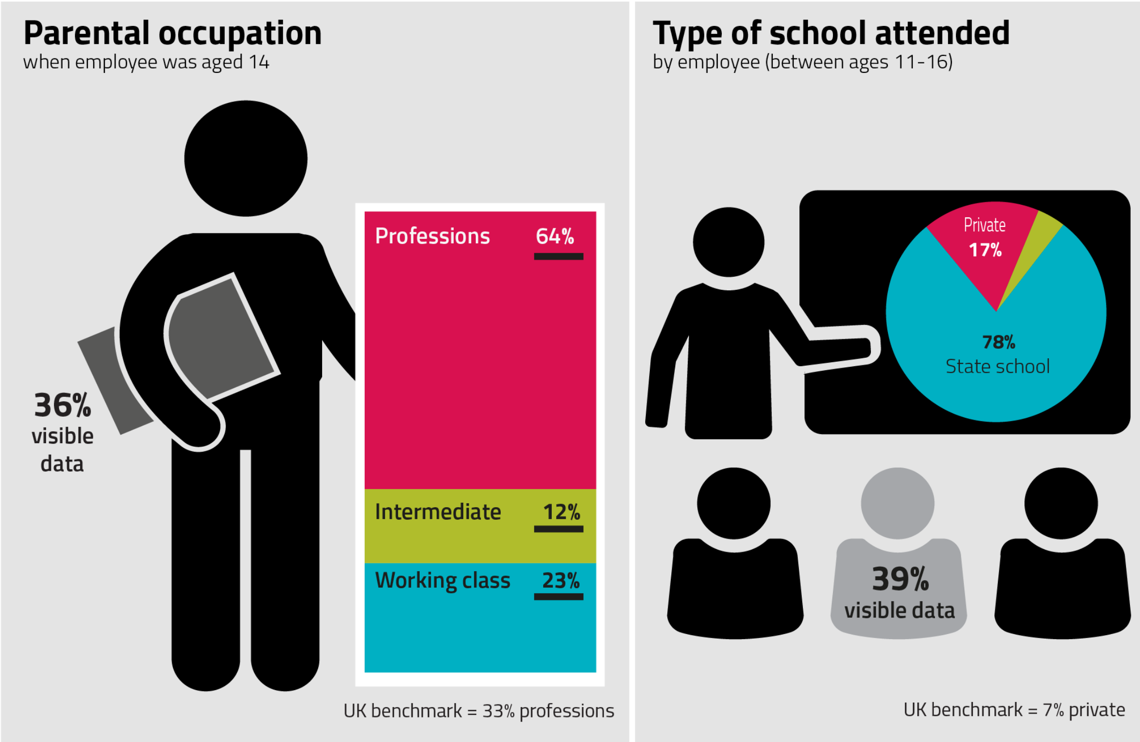


Figure 23: Socio-economic background in 2020/21 - Radio



In terms of our limited data, the picture has not significantly changed over three years of monitoring, and indicates a persistent underrepresentation of people from certain socio-economic backgrounds. In our latest data, 59% of employees in TV and 64% in Radio, when they were 14 had parents in professional occupations; around double the UK benchmark of 33%. This imbalance is similarly reflected in employee's school data. Our latest visible data shows that 13% of TV broadcasters and 17% of Radio employees attended private school, compared with the UK benchmark of seven per cent.

This imbalance appears similar to that concerning the creative industries more widely in 2020, as highlighted by recent research carried out by the Creative Industries Policy and Evidence Centre[22] (PEC), led by the charity, Nesta[23]. In, 'Social mobility in the Creative Economy – Rebuilding and levelling up?', the PEC reported that 52% of those working in the creative industries were from privileged[24] backgrounds – a proportion not only 14pp higher than that across all UK industries[25], but also highest of any sector category. It also reported that the creative industries were home to the lowest proportion of people from working class backgrounds, at only 26%, which is 12pp lower than that across all UK industries and shows a "deficit [that] is greater in scale than the size of the creative

[22] Funded by the Arts and Humanities Research Council as part of the UK Government's Industrial Strategy, PEC "provides independent research and policy recommendations for the UK's creative industries … and involves a UK-wide consortium of universities…"
[23] Nesta .
[24] 'Social mobility in the Creative Economy - Rebuilding and levelling up?' reports on people from "privileged", "intermediate" and "working class" backgrounds – class origins based on parental occupation aged 14 and coded to the NS-SEC, where Privileged = NS-SEC 1 and 2; Intermediate = NS-SEC 3 and 4; and Working Class = NS-SEC 5, 6, 7 or 8.
[25] ONS Labour Force Survey, July-September 2020.

workforce in Scotland, Wales and Northern Ireland combined…and only slightly less than the additional jobs created in the Creative Industries in the five years leading up to the pandemic…".

Five years of data - Ofcom's comment

From the increased available data, we can see that the broadcasting sector is making progress towards more fully representing the UK working age population. However, this progress has been slow and we are concerned that it may not be sustainable for all groups. When examining representation at different levels, it is clear that most increases have occurred at more junior levels, possibly due to one of the many entry level recruitment schemes launched. Whilst it is positive seeing broadcasters invest in young talent and try to build a more representative sector from the ground up, this is not enough. Research from *Included* as well as our own data indicates that it is vital for broadcasters to increase their efforts around 'inclusion', in order to retain their talent and help them progress into more senior roles. This will help build more sustainable change for the sector and create much larger improvements in representation.

As part of our commissioned research *Included* asked interviewees specifically about solutions in delivering diversity and inclusion moving forward. Several participants spoke about the importance of retaining talent and believed that if the benefits of diversity and inclusion were truly understood, talent would be nurtured and shared.

"We wouldn't have so many people moving to America, women leaving after a certain age, or people dropping out because their mental attitude can't take it." Included industry interviews - anon

"We need to do it for freelancers who would otherwise leave the industry." Included industry interviews - anon

In some areas, data collection still needs to improve before detailed conclusions can be drawn. There is an enduring lack of data in a number of key areas. Firstly, some characteristics, such as religion/belief, sexual orientation and socio-economic background, still have some way to go before a sufficient and reliable amount of visible data is collected. Secondly, aside from the joint effects of age and gender, we currently have no information on how characteristics intersect. As we said last year, people are not defined by a single characteristic and their equality of opportunity is influenced by multiple interacting factors.

Other areas still have no data at all. In previous reports, Ofcom has called, in particular, for data to be collected on geographic diversity. We have asked for this for two reasons: firstly to shed light on the spread of broadcasting staff across the UK, and secondly so that broadcasters can understand how the diversity of their workforce varies by nation and region within the UK. This has become more important than ever as broadcasters move more staff outside of the M25, and as we experience the rise of home working in many roles as a result of Covid, and the resulting potential for broadcasters to recruit from a broader geographic pool beyond their offices.

This also reflects the findings of a rapid evidence assessment conducted for Ofcom in May 2021, which suggested that, when considering research into diversity in public service broadcasting, more attention should be directed to diversity in the UK regions[26]

More broadly, the impact of Covid-19 has been mixed. As productions stopped and global lockdowns were introduced, the sector found itself in unchartered territory with the introduction of new working practices. As well as allowing for more geographic diversity, broadcaster responses to our questionnaire suggest that this has offered welcome flexibility for parents and carers in the sector as well as making some work more accessible to some disabled people. However, as well as progress in working practices, the pandemic has laid bare and exacerbated a number of existing inequalities. The home working model does not benefit everyone. Some employees (particularly those from lower socio-economic backgrounds) may not have adequate facilities at home such as good broadband provision or workspace, and this may in the long term impact their work. There are also concerns that those who choose to work from home more, may end up being passed over for promotions in favour of those who are more visible in the office. Given that home working and flexibility could be particularly suited to employees from some underrepresented groups, this could have serious implications for diversity and inclusion in the sector. Likewise, the financial instabilities associated with being a freelancer during the pandemic are likely to affect disproportionately those from underrepresented groups.

[26] Rapid Evidence Assessment of Diversity in Public Service Broadcasting

The next five years

In this final section we build on our analysis above to recommend **key actions for broadcasters** over the next five years. We believe that responsibility for change has to lie with the broadcasting sector itself, a position which was supported by industry figures interviewed by *Included.*

However, we also recognise that Ofcom is in a unique position to support progress. *Included's* interviewees differed in the type of regulatory approach they believed was necessary – from 'light-touch' to 'interventionist'. The methodology document accompanying this review sets out our current statutory powers in this area, and here we set out here the actions we plan to take to drive change in the immediate future.

Recommendations for broadcasters

Broadcasters should build on their work to increase 'diversity' by focusing on 'inclusion', concentrating on retention, progression and senior recruitment

"We do a lot of D and not enough I. We do a lot on representation, but not inclusion (authentic portrayal). We're so busy counting the numbers, that we're not thinking about their experience, their voice."
Included industry interviews - Babita Bahal, Head of Creative Diversity at Channel 4

Both our numerical data and information on broadcaster initiatives suggest that broadcasters have to date focused their efforts on outreach and recruitment in order to diversify the pool of people entering their workforce. This is an important step and has resulted in increasing diversity across many characteristics. But it means that progress appears to be confined to junior levels. We are also concerned that with greater numbers of people leaving the industry, progress will not be sustainable unless greater efforts are made to retain a diverse range of employees.

We believe that broadcasters must foster systemic and cultural change that builds **inclusion** into the core of their organisations. What that means in practice can range from better progression opportunities and better training for mid-career level employees, to senior recruitment drives. It also, importantly, includes looking again at internal practices and policies more generally to ensure that they are not unintentionally re-enforcing inequalities.

Broadcasters should also consider setting retention targets in addition to any targets relating to recruitment or overall workforce makeup. The projections produced for us by *Included* show the large effect that relatively small increases in retention are likely to have.

Data collection needs to be improved both in quantity and in quality

As we have highlighted, the continued lack of data in some areas is hindering our ability – and that of broadcasters – to get an accurate picture of workforce diversity. This particularly applies to religion/belief, sexual orientation, and socio-economic background, all of which, together with disability, were also recently identified as under-researched diversity categories by the LSE in its

Ofcom-commissioned Rapid Evidence Assessment of Diversity in Public Service Broadcasting. We also believe it vital to begin requesting information on the make-up of each workforce by geographic location (see 'Five years of data – Ofcom's comment', above).

We continue to urge broadcasters to provide this information on a voluntary basis, as these characteristics are not specified in Ofcom's equal opportunities duties and we cannot require the information. It is particularly important to obtain fuller information on these characteristics as we begin to take a more nuanced approach to the data: for example asking broadcasters to provide intersectional data which reveals the way in which some of the 'mandatory' characteristics (e.g. race) interact with other characteristics (e.g. socio-economic background). This aligns with our commissioned evidence assessment (see above), which recommended that future research "should adopt an intersectional approach to ensure that the challenges arising from complex identity categories (e.g. women of colour…) are understood."

There are other areas where we feel that the information we gather can be refined to be more useful. Principally, we would like to collect more detailed information on who is getting promoted, specifying the roles/levels are they are moving into.

In 'Ofcom's role', below, we describe how we will conduct a call for inputs, to ensure that we are asking for the best data in the best way and can help broadcasters achieve real change.

We need more transparent reporting of success and failure

It is no good getting data if it is not used effectively to inform actions that make a difference. We continue to call for broadcasters to evaluate their initiatives, to understand whether they are having the desired impact.

We are particular keen to learn about any actions that have taken account of the more detailed data collected. In relation to race, for example, broadcasters have data on different minority ethnic groups. We know that some groups are more underrepresented than others, and raise different challenges when addressing such matters as a shortage of job applicants or poor retention, for example.

Broadcasters need to collaborate both within and between organisations

From our experience over the last five years, collaboration has been an essential element of progress. Within organisations, during the pandemic period broadcasters have told us that they are more than ever engaging with staff via internal staff networks or 'Employee Resource Groups' (ERGs). These groups can be a valuable direct line to the experiences of underrepresented groups, and we think, if used properly, can be of huge help in ensuring that initiatives to improve diversity are really making a difference. We also believe that effective communication with employees includes having appropriate mechanisms in place for reporting bullying or harassment and routine exit interviews to determine why employees leave. This year we asked broadcasters a specific question about their anti-discrimination practices and their answers can be viewed.

Collaboration between broadcasters is also vital. Issues of under-representation are industry-wide and cannot be solved by broadcasters individually. Our quarterly roundtable meetings, over the last year and a half, have shown how effective practice can be shared and extended – for example: in relation to recruiting diverse talent, and the creation of a working group to explore potential pan-broadcaster use of 'disability passports'[27].

This point was expressed by several participants as part of *Included's* industry interviews. They referred to the importance of a cross-sector approach to issues such as diversity and inclusion. The belief was that joint enterprise could more readily move the dial than a range of discrete actions by individual organisations.

> *"I always said that this is one area of work that is NOT competitive. We need to refer talent, cross-promote talent." Included* industry interviews - Babita Bahal, Head of Creative Diversity at Channel 4

Throughout this review we have acknowledged that it does not and cannot cover a significant part of the broadcast industry in the form of the freelance workforce and independent production sector. What we can do is strongly encourage broadcasters to collaborate with their production partners, ensuring that diversity and inclusion are pre-requisites across the production process. For example, broadcasters who encourage such partners to impress on freelancers the importance of submitting responses to CDN's *Diamond* project requests for diversity data are likely to benefit from the fuller data and analysis that would result.

Ofcom's role

This is a pivotal moment for Ofcom's work on Diversity in Broadcasting. We have amassed a unique set of data over the last five years and it is time for us to take stock of what we do and how we do it. This review leads us to believe that a step change is needed towards 'inclusion', building on increasing 'diversity'; in this section we outline the key actions we will now take to do this and to support faster progress towards a sustainably diverse and inclusive broadcasting sector.

We will launch a call for inputs in order to review the information we collect from broadcasters

We agree with those *Included* interviewees who said that Ofcom should push for a more detailed and consistent approach to data collection and analysis. In 2022 we will suspend our usual reporting process to focus on refining our approach to data collection. Broadcasters will still be expected to collect the data as they have done to date (as in our most recent questionnaire) but we will collect and report on two years' data in 2023, when we will also revise our questionnaire. The call for inputs (expected to take place in Spring 2022) will include the opportunity to comment on:

- how we ensure greater consistency in the data collected by different bodies across the broadcasting sector and the practical implications of possible standardisation;
- updated language and advice on definitions, including around data on sex/gender;
- a new question on geographic location, in order to understand diversity by nation and region of the UK; and
- requests for:

[27] Following on from the BBC's Disability Passport scheme

- intersectional data (on the number of black women in senior management positions, for example);
- more detail on promoted employees, to see who is making it to senior positions; and
- more specific information on training opportunities.

This call for inputs will enable us to provide updated guidance to broadcasters on what data to collect and how to collect it. It will also allow us to set clear expectations of broadcasters, and to provide more consistent and comparable feedback for individual larger broadcasters. As we have said in previous years, we do not have legal powers to set and enforce diversity targets for broadcasters, and think individual broadcaster are best placed – and advised - to set clear, measurable targets for their own workforces (including at senior management level). As above, we want broadcasters now to consider applying ‘retention’ targets, which could be informed by our data.

We will push for broader, more ambitious collaboration across the broadcasting sector and others

Over the last five years we have brought industry together, through bilateral engagement and our quarterly industry roundtable. The value of Ofcom’s convening role was highlighted by *Included’s* interviewees, along with the associated sharing of best practice. We think that this is a crucial way in which we can support progress across a range of areas identified as important to an inclusive workplace. This includes, for example, processes for handling bullying, harassment and discrimination[28].

Our five-year event ‘*ALL IN: Diversity in Broadcasting 2021*’ will kickstart additional opportunities for the sharing of effective practice. Alongside our quarterly roundtable for larger broadcasters, and our continuous programme of bilateral engagement, we will look to add a diversity and incusion forum for the wider broadcasting sector.

We are also keen to involve other media stakeholders (in streaming services or social media, for example) for a broader programme of collaboration. Several *Included* interviewees pointed to the challenge from streaming services and other services who were perceived by these interviewees to be leading the way in representing minority audiences in innovative ways[29].

We will continue to look to the future of broadcasting

Working with Government and others, we will ensure that our focus takes into account the broader media industry. We will consider the value of equal opportunities obligations for sectors such as video on-demand services. We will also consider additional points that have arisen from *Included’*s conversations with key industry figures, such as the introduction of pay gap reporting for race and disability.

A number of *Included’s* interviewees highlighted the connection between diversity and inclusion issues and other areas in Ofcom’s remit, such as regional production quotas, or local radio acquisitions. While this is a stand-alone review of diversity in broadcasting, these issues permeate

[28] This year Ofcom asked broadcasters a specific question about these processes and we have published their responses.
[29] This seems to match the perception of some audiences. See for example Ofcom’s 2018 thematic review of Representation and portrayal on BBC television.

Ofcom's broader work with the media industry, from the future of public service media[30] and on-screen standards[31] to our new duties as the online harms regulator. We are in a unique position to ensure that the messages from this phase of our broadcast monitoring programme are heard across all these areas in future.

[30] Small Screen Big Debate
[31] Ofcom Broadcasting Code

A1. Annex 1 – Summary data tables

UK TV Industry overall

		REPORT YEAR							
		2021	2020	2019	2018	2017			
	UK labour market / population*	UK-based TV industry	UK-based TV industry	UK-based TV industry	UK-based TV industry	UK-based TV industry **	Percentage Point (PP) change year-on-year	Percentage Point (PP) change since 2018	Percentage Point (PP) change since 2017
Gender									
Men	53%	53%	53%	54%	54%	52%	-	-1pp	+1pp
Women	47%	46%	47%	45%	46%	47%	-1pp	-	-1pp
Not collected (Data gap)		0%	0%	0%	1%	1%	-	-1pp	-1pp
Women in senior management		42%	42%	42%	41%	38%	-	+1pp	+4pp
Racial group									
Minority Ethnic Groups (MEG)	12%	16%	15%	13%	13%	11%	+1pp	+3pp	+5pp
White Ethnic Groups (WEG)	88%	72%	73%	70%	71%	70%	-1pp	+1pp	+2pp
Not disclosed		3%	2%	5%	4%	2%	+1pp	-1pp	+1pp
Not collected (Data gap)		10%	10%	11%	12%	17%	-	-2pp	-7pp
MEG in senior management		10%	9%	8%	7%	8%	+1pp	+3pp	+2pp
Disability									
Those with a disability	19%	7%	7%	6%	6%	3%	-	+1pp	+4pp
No disability	81%	69%	65%	61%	62%	66%	+4pp	+7pp	+3pp
Not disclosed		4%	4%	4%	2%	1%	-	+2pp	+3pp
Not collected (Data gap)		19%	24%	29%	31%	30%	-5pp	-12pp	-11pp
Age									
Under 50 years old	68%	71%	73%	68%	69%	55%	-2pp	+2pp	+16pp
50+	32%	19%	19%	17%	16%	17%	-	+3pp	+2pp
Not disclosed		0%	0%	0%	0%	0%	-	-	-
No consent (to provide to Ofcom)		1%	0%	3%	1%	0%	+1pp	-	+1pp
Not collected/No data (Data gap)		9%	7%	12%	14%	29%	+2pp	-5pp	-20pp
Sexual Orientation									
Lesbian/Gay/Bisexual (LGB)	4%	6%	5%	4%	4%	3%	+1pp	+2pp	+3pp
Heterosexual	96%	61%	58%	52%	49%	41%	+3pp	+12pp	+20pp
Not disclosed		6%	6%	7%	5%	5%	-	+1pp	+1pp
No consent (to provide to Ofcom)		0%	0%	1%	1%	0%	-	-	-
Not collected/No data (Data gap)		27%	30%	35%	41%	51%	-3pp	-14pp	-23pp
Religion or belief									
Religious	48%	29%	27%	22%	22%	19%	+2pp	+7pp	+10pp
Non-religious	52%	36%	35%	28%	28%	18%	+1pp	+8pp	+18pp
Not disclosed		7%	7%	8%	5%	4%	-	+2pp	+3pp
No consent (to provide to Ofcom)		1%	0%	2%	1%	0%	+1pp	-	+1pp
Not collected/No data (Data gap)		27%	30%	41%	44%	59%	-3pp	-17pp	-32pp

Main TV Broadcasters[32]

		MAIN 5 UK BROADCASTERS, REPORT YEAR				
		2021	2021	2021	2021	2021
	UK labour market / population*	BBC	Channel 4	ITV	Sky	Viacom CBS
Gender						
Men	53%	52%	44%	46%	65%	46%
Women	47%	44%	56%	53%	35%	52%
Not collected (Data gap)		0%	0%	0%	0%	0%
Women in senior management		44%	46%	45%	37%	51%
Racial group						
Minority Ethnic Groups (MEG)	12%	15%	17%	12%	21%	21%
White Ethnic Groups (WEG)	88%	82%	77%	76%	64%	75%
Not disclosed		3%	1%	4%	3%	2%
Not collected (Data gap)		1%	5%	8%	13%	2%
MEG in senior management		9%	12%	10%	9%	17%
Disability						
Those with a disability	19%	10%	11%	10%	4%	10%
No disability	81%	85%	76%	76%	65%	64%
Not disclosed		4%	2%	8%	2%	4%
Not collected (Data gap)		2%	11%	6%	29%	22%
Age						
Under 50 years old	68%	71%	87%	80%	86%	88%
50+	32%	29%	13%	17%	14%	12%
Not disclosed		0%	0%	3%	0%	0%
No consent (to provide to Ofcom)		0%	0%	0%	0%	0%
Not collected/No data (Data gap)		0%	0%	0%	0%	0%
Sexual Orientation						
Lesbian/Gay/Bisexual (LGB)	4%	9%	9%	7%	4%	8%
Heterosexual	96%	77%	79%	77%	67%	79%
Not disclosed		8%	5%	7%	8%	8%
No consent (to provide to Ofcom)		0%	0%	0%	0%	0%
Not collected/No data (Data gap)		7%	8%	9%	21%	4%
Religion or belief						
Religious	48%	39%	43%	29%	34%	35%
Non-religious	52%	53%	42%	32%	34%	44%
Not disclosed		8%	7%	8%	11%	8%
No consent (to provide to Ofcom)		0%	0%	0%	0%	0%
Not collected/No data (Data gap)		0%	8%	30%	21%	13%

[32] By 'main TV broadcasters' we mean the TV broadcaster groups with the largest share of the UK audience: BBC, ITV, Channel 4, ViacomCBS and Sky (see the Barb Viewing Report 2020 page 29).

Public service TV broadcasters in the Nations

Please note that figures for S4C have not been provided as the low numbers involved mean we cannot present the information in a way that does not reveal personal data

		2021
	UK labour market / population*	STV
Gender		
Men	53%	48%
Women	47%	51%
Not collected (Data gap)		0%
Women in senior management		49%
Racial group		
Minority Ethnic Groups (MEG)	12%	5%
White Ethnic Groups (WEG)	88%	90%
Not disclosed		5%
Not collected (Data gap)		0%
MEG in senior management		***
Disability		
Those with a disability	19%	9%
No disability	81%	69%
Not disclosed		23%
Not collected (Data gap)		0%
Age		
Under 50 years old	68%	78%
50+	32%	22%
Not disclosed		0%
No consent (to provide to Ofcom)		0%
Not collected/No data (Data gap)		0%
Sexual Orientation		
Lesbian/Gay/Bisexual (LGB)	4%	8%
Heterosexual	96%	68%
Not disclosed		24%
No consent (to provide to Ofcom)		0%
Not collected/No data (Data gap)		0%
Religion or belief		
Religious	48%	26%
Non-religious	52%	48%
Not disclosed		25%
No consent (to provide to Ofcom)		0%
Not collected/No data (Data gap)		0%

1.1

UK Radio industry overall

	UK labour market / population*	REPORT YEAR 2021	2020	2019	2018	Percentage Point (PP) since 2020	Percentage Point (PP) change since 2018
		UK Radio Industry					
Gender							
Men	53%	48%	48%	49%	49%	-	-1pp
Women	47%	50%	52%	51%	51%	-2pp	-1pp
Not collected (DATA GAP)		0%	0%	0%	0%	-	-
Women in senior management		43%	42%	36%	37%	+1pp	+6pp
Racial group							
Minority Ethnic Groups (MEG)	12%	10%	9%	7%	6%	+1pp	+4pp
White Ethnic Groups (WEG)	88%	86%	85%	80%	80%	+1pp	+6pp
Not disclosed		2%	2%	3%	5%	-	-3pp
Not collected (DATA GAP)		3%	4%	10%	9%	-1pp	-6pp
MEG in senior management		8%	7%	6%	6%	+1pp	+2pp
Disability							
Those with a disability	19%	7%	6%	6%	5%	+1pp	+2pp
No disability	81%	79%	82%	68%	55%	-3pp	+24pp
Not disclosed		5%	5%	13%	2%	-	+3pp
Not collected (DATA GAP)		10%	8%	13%	38%	+2pp	-28pp
Age							
Under 50 years old	68%	72%	65%	69%	49%	+7pp	+23pp
50+	32%	24%	27%	23%	19%	-3pp	+5pp
Not disclosed		0%	0%	0%	0%	-	-
No consent (to provide to Ofcom)		1%	2%	3%	NA	-1pp	+1pp
Not collected/No response (DATA GAP)		3%	6%	5%	31%	-3pp	-28pp
Sexual Orientation							
Lesbian/Gay/Bisexual (LGB)	4%	7%	6%	5%	3%	+1pp	+4pp
Heterosexual	96%	67%	64%	52%	33%	+3pp	+34pp
Not disclosed		7%	6%	15%	3%	+1pp	+4pp
No consent (to provide to Ofcom)		0%	0%	12%	NA	-	-
Not collected/No response (DATA GAP)		19%	24%	15%	60%	-5pp	-41pp
Religion or belief							
Religious	48%	34%	32%	29%	19%	+7pp	+20pp
Non-religious	52%	43%	46%	38%	30%	-8pp	+8pp
Not disclosed		9%	8%	17%	4%	+1pp	+5pp
No consent (to provide to Ofcom)		0%	0%	1%	NA	-	-
Not collected/No response (DATA GAP)		14%	13%	15%	47%	+1pp	-33pp

Main Radio Broadcasters[33]

		MAIN 3 RADIO BROADCASTERS, REPORT YEAR		
		2021	2021	2021
	UK labour market / population*	BBC	Global	Bauer
Gender				
Men	53%	46%	49%	46%
Women	47%	51%	51%	54%
Not collected (DATA GAP)		0%	0%	0%
Women in senior management		44%	47%	40%
Racial group				
Minority Ethnic Groups (MEG)	12%	9%	13%	7%
White Ethnic Groups (WEG)	88%	88%	83%	87%
Not disclosed		2%	2%	0%
Not collected (DATA GAP)		1%	2%	6%
MEG in senior management		11%	10%	***
Disability				
Those with a disability	19%	8%	4%	9%
No disability	81%	86%	89%	56%
Not disclosed		4%	5%	3%
Not collected (DATA GAP)		2%	2%	32%
Age				
Under 50 years old	68%	64%	89%	83%
50+	32%	36%	11%	17%
Not disclosed		0%	0%	0%
No consent (to provide to Ofcom)		0%	0%	0%
Not collected/No response (DATA GAP)		0%	0%	0%
Sexual Orientation				
Lesbian/Gay/Bisexual (LGB)	4%	9%	7%	5%
Heterosexual	96%	72%	81%	58%
Not disclosed		7%	10%	3%
No consent (to provide to Ofcom)		0%	0%	0%
Not collected/No response (DATA GAP)		12%	2%	35%
Religion or belief				
Religious	48%	38%	41%	26%
Non-religious	52%	53%	42%	36%
Not disclosed		8%	14%	3%
No consent (to provide to Ofcom)		0%	0%	0%
Not collected/No response (DATA GAP)		0%	2%	35%

[33] By 'main Radio broadcasters' those broadcasters with the largest share of the UK audience: BBC, Global and Bauer Radio.

Notes on these tables

*Sources used for UK population figures:

- Gender = ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Mar 20). All employed males and females (employees and self-employed).
- Racial Group = ONS Labour market statistics A09: Labour market status by ethnic group (Average of Apr-Mar 20). All in employment.
- Disability = ONS Labour market statistics A08: Labour market status of disabled people (Average of Apr-Mar 20). Proportion of all 16-64 who are 'Harmonised Standard Definition Disabled'
- Sexual orientation = ONS Sexual identity, UK: 2019 - Percentage of UK population who identify themselves as LGB
- Age = ONS Labour market statistics Table A05: Labour market by age group: People by economic activity and age (seasonally adjusted) (Average of Apr-Mar 20). All employed people/women/men
- Religion = NatCen Social Attitudes Survey 36. Percentage of British population who identify themselves as belonging to a particular religion

**2017 data not directly comparable. UK-based TV industry defined as all employees from broadcasters with 98%+ UK-based employees (45 broadcasters in total)

***signifies where the number of employees is too low to report (<10) for data protection reasons