

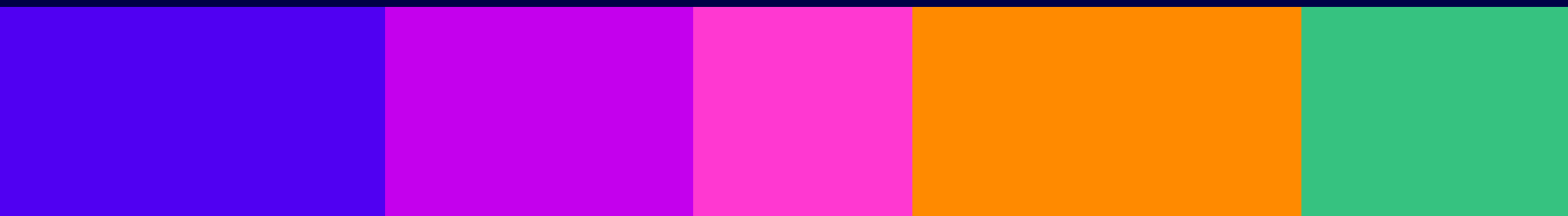


Making Ofcom Work for Everyone

Ofcom's Diversity and Inclusion
Progress Update 2022/23 and
Work Programme 2023/24

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Chief Executive's remarks

Ofcom has a clear mission: to make communications work for everyone. To be able to deliver on this, our organisation must reflect the diversity of background, experience, upbringing and thought that exists across the UK. That's why we set out an ambitious Diversity and Inclusion Strategy for ourselves in 2021.

We are now entering the third year of our five-year strategy and I am proud of the progress we have made so far. We have exceeded our target for the share of senior roles undertaken by people from minority ethnic communities, hitting 17% by the end of March 2023 compared to a target of 16%. Representation amongst disabled colleagues has risen from 11% to 13% over the past two years. In our latest colleague survey, run in June 2023, we benchmarked above comparable organisations for respect, wellbeing and belonging.

There is plenty more to do. In the coming year we will be pushing ourselves hard to further improve our data reporting, and to improve our offer for Black and disabled colleagues at Ofcom. We are also embedding our new management and career system, in its second year.

I am looking forward to building upon the progress we have made this year and to continuing our efforts to make Ofcom an organisation where individuals from all backgrounds can flourish.



Dame Melanie Dawes,
Chief Executive

Overview

Towards our 2026 vision

The Ofcom Diversity and Inclusion Strategy 2021–26 is at the heart of our wider One Ofcom transformation programme. This report reflects our commitment to be transparent about the progress we are making on the delivery of those strategic D&I goals. As an annual progress report, it outlines the impact of our activities during year two of our strategy from the period 1 April 2022 to 31 March 2023. It features an annex outlining the demographic profile of our organisation and provides further details on the information supplied in our Ofcom Annual Report.

It's an intentionally ambitious strategy, setting out a vision for Ofcom to better improve how we reflect the diversity of our stakeholders and communities. It also aims to be a role model for the value-driven leadership required to regulate sectors that face increasing change and complexity.

We take personal responsibility

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

We are truly diverse

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

Our leaders are role models

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



We are connected to communities

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

We are naturally inclusive

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

We are fair by design

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

We want Ofcom to have: a truly diverse workforce; a naturally inclusive culture; processes, systems and policies that are fair; colleagues who take personal responsibility for diversity and inclusion; leaders who are role models; and stronger connections with the communities we serve.

To achieve these goals, we are focusing for the long term on the following areas:

- We're setting targets that are stretching Ofcom to have a workforce that is more representative of the UK population by 2026.
- Ensuring our people processes and systems are equitable and fair – from recruitment promotion to methods of organisational decision-making.
- Enhancing our culture and leadership, so that everyone feels valued, unique and has a voice.
- Holding ourselves to account by committing to using clear measurements, ensuring transparency, and providing regular reports.

Every colleague has a role in making Ofcom an inclusive place to work, and these responsibilities are supported by the formal oversight for delivery and measurement of progress by our Chief Executive, Dame Melanie Dawes, alongside the Senior Management Team and People Committee.

Key areas of focus during 2022/23

In the second year of our strategy we:

- grew as an organisation to 1,384 colleagues at March 2023. Overall, 54% of colleagues are female, 25% from minority ethnic backgrounds, 13% are disabled and over 8% are LGBT++;
- exceeded our five-year senior ethnicity target three years early;
- narrowed our median pay gaps for gender (11.8%), ethnicity (9.9%) and disability (10.9%);
- strengthened our inclusive recruitment processes, creating an employer brand toolkit to help us widen our outreach to candidates with diverse skills and backgrounds;
- created a careers website to build awareness of who we are, what we do and reasons to work here;
- refreshed our wellbeing programme, with interventions focused on preventative and proactive approaches that benefit the inclusion of all our colleagues;
- conducted more in-depth analysis of our colleague experience, resulting in refreshed priorities for improving the experiences and representation of Black colleagues, and a refocused approach to disability inclusion;
- rolled out a leadership and skills development programme for all our Career and Performance Managers;
- leveraged our ongoing partnerships to identify ways to further embed socio-economic diversity, LGBT+ inclusion and gender inclusion; and
- became a Times Top 50 Employer for Women for the fourth consecutive year and received a Bronze accreditation from the Stonewall Workplace Equality Index.

Future focus – what's next

In the third year of our strategy, we will:

- Continue focus on inclusion at Ofcom for all employees, paying particular attention to our minoritised colleague experience.
- Provide greater internal data transparency through publication of data around progression, external recruitment and retention to fuel progress towards our targets.
- Support our networks to enable them to continue to be the voice of minoritised communities within Ofcom through their own lived experiences.
- Pay particular attention to the recruitment, careers and experience of inclusion for Black and disabled colleagues. We will do this by reviewing our processes, improving awareness, using data and extending future talent pipelines.
- Cement our preventative approach to wellbeing as part of our refreshed Thrive@work wellbeing programme.

Ofcom as an employer: a truly diverse workforce

Diversity goals

Ofcom is undertaking a rapid transformation. In the past year, we have welcomed 350 new joiners, and in March 2023 had a total 1,384 colleagues. Seventy-eight percent of colleagues are based in our London headquarters and 22% of colleagues are based in our regional offices: Warrington, Edinburgh, Baldock, Belfast, Birmingham, Cardiff, and Manchester. This national footprint is supported by our Connected Working framework, which empowers colleagues to work effectively and inclusively across office locations.

Our D&I strategy is rooted in our values and the understanding that a diverse workplace can deliver better outcomes for our customers and stakeholders. In the past year, Ofcom continued to attract colleagues who reflect a range of UK communities. The representation of colleagues identifying as female (54%), LGBT++(8%) and from minority ethnic backgrounds (25%) stands in line with, or above, the wider UK population. You can read more about the demographic profile of the organisation in [our D&I Data Annex](#).

We committed to increase the overall representation of disabled people in Ofcom from its starting position of 11% in 2021. Currently 13% of colleagues have a disability or long-term health condition. This means we are still on track for our 2026 goal of achieving 15% representation. We will be working with our D&I partners and across our organisation to deepen our understanding and actions towards disability inclusion in 2023, so that we can facilitate more rapid change in this area. You can read more about our diversity goals for overall disability and ethnicity and gender at senior levels in Section 3.

Systems and processes

Inclusive leaders who are role models

We are transforming our approach to performance and career management. We launched a future-focused cycle of ambitious and individualised performance and career conversations, coached and supported by our Career and Performance Managers (CPMs) and underpinned by honest feedback. Our kick-start conversations saw each colleague define with their CPM “what good looks like” for them in their role for the year ahead. They then set individualised performance ambitions which were revisited throughout the year and progress was assessed through candid, inclusive feedback. Our 2022 Colleague Survey highlighted that colleagues who had their kick-start conversation by the time of the survey were more engaged than those who had yet to have it (difference of nine percentage points). They were also more positive about Ofcom’s culture and had higher intent to stay.

We held training for both colleagues and CPMs ahead of each conversation in the performance cycle, equipping them with the tools, techniques, and mindsets to support them in getting the most out of these conversations. For our CPMs, this focused on delivering inclusive feedback, managing underperformance effectively and coaching, to enable high-performing teams. Our 360-feedback programme, which provides insight for self-development, showed that colleagues rated CPMs an

average of 4.4/5 across critical leadership areas of performance management, inclusion, empowerment, agility and self-awareness. Our managers meet every month to receive further training and support to deliver in their role.

Further updates to our [Workday](#) learning system have supported this training and our wider ambition to remain comprehensive and inclusive. We also refreshed our performance management approach and policies so that colleagues can better understand their responsibilities and highlight any barriers to accessing the appropriate support at the earliest opportunity, particularly around career progression opportunities.

We continued to leverage a strong network of inclusion partners to attract and retain a diverse range of colleagues. We developed our in-house partnership with a specialist inclusive recruiter to support us as we accelerated the growth of our organisation to meet increasing regulatory responsibilities around online safety and telecoms security. Our participation in the [DigitalHer](#) programme enabled us to help more young women across Greater Manchester consider careers in digital and technology through mentoring in their early careers. Our new partnership with [Women and Data](#) implemented by the launch of Data Analyst apprentice roles where 33% of candidates were female. We also worked with [Business in The Community](#) exploring the challenges associated with increasing the representation of women in the technology sector.

We refreshed our employer brand to reflect the true nature of our work, the values we care about, and the diverse range of skills, experiences and backgrounds that make up our workforce. Our new careers website, and increased use of social media platforms, is helping us share what we do, showcase the diverse people that work here and why Ofcom is a fantastic place to work. Our careers website also features a range of communication styles including videos, inclusive language and closed captions to attract talent from a range of diverse backgrounds. We continue to review our approach to assessment and selection and use candidate feedback on recruitment and onboarding to create an even better experience. Our colleagues recognise our commitment to inclusive recruitment, with 71% believing we hire from a variety of backgrounds.

Creating diverse pipelines of talent

Our partnership with [Visionpath](#) focuses on socio-economic diversity within Ofcom through our early careers programme. Our strategy of preparing candidates for success through mentoring and skills bootcamps before the assessment process has yielded positive results. In 2022, we successfully recruited 13 new apprentices, and we are now in the second year of the programme. We are actively engaging with schools to recruit 16 new apprentices in September 2023, building on our commitment to developing young talent and creating opportunities for career progression.

We have made significant contributions to the local Manchester community through our partnership with the [EY Foundation's Smart Futures](#) programme. 2022 marked the second year of participation in this initiative, which provides young people from low-income backgrounds with the skills, experiences and support necessary to secure roles in their desired field. We have supported 20 young people aged 16 and above to gain transferable skills that will give them a head start in their careers.

Our graduate programme continues to grow, through our partnerships with [Bright Network](#), [Career Ready](#) and [Speakers for Schools](#). We continue to strengthen our relationship with the [10,000 Black Intern programme](#) which offers students from Black African, Black Caribbean, Black British and mixed Black heritage backgrounds paid work experience. In 2022 we offered 16 internships which were accepted, with several interns going on to join Ofcom's graduate programme.

Culture and leadership

Wellbeing

We refreshed our Thrive@Ofcom programme to focus on proactive and preventative wellbeing activities. We led events to help build colleagues' understanding of the importance of mental health and wellbeing in the workplace, and we maintain a network of 80 trained mental health first aiders across all our office locations in the UK. We also partnered with [SelfSpace](#) to provide a more inclusive infrastructure of wellbeing information and support.

We developed a domestic abuse policy and rolled out training to a new group of allies in response to new legislation and research on the increasing impact of domestic abuse in the workplace. We began to review the support available to colleagues dealing with potentially distressing or harmful content, working alongside policy colleagues to identify the requirements for a more preventative safeguarding and wellbeing offer. Seventy-nine percent of colleagues said that Ofcom cares about their wellbeing, representing an 18 percentage point increase from last year.

Employee voice

At Ofcom, we have lots of opportunity to hear what's on colleagues' minds. Our Colleague Forum, a group of elected individuals across the organisation, alongside Prospect trade union, represent colleagues formally. This is complemented by seven colleague networks who provide vital, informed feedback across a diverse range of issues relevant to us as an employer. They support members personally and professionally, host community focused events and represent the diverse needs and interests of their members based on lived experience. Throughout the year, our networks have provided an engaging programme of awareness about many areas of interest. We stand behind our values that while not everyone will agree with everything, we will respect each other's point of view.

In addition to this we have opened up the channels to hear from colleagues including our new Ask SMT (Senior Management Team) and Ask Melanie open sessions. Colleagues can also give in-confidence feedback on their experiences at work through an annual colleague survey. In 2022, our overall Ofcom colleague engagement score was 72%, with an increase to 82% across our diversity and inclusion indicators – for example, 82% of respondents felt that they were treated with respect by others in Ofcom.

We work with colleagues to understand the feedback we receive and identify areas where action is needed. We also monitor work across our people systems and processes to ensure they are inclusive and provide opportunities for everyone regardless of their background. Being “treated with fairness and respect” remains one of the consistently highest scoring questions in our annual colleague engagement survey (87%).

Diversity goals

Our Executive Board agreed targets for increasing minority ethnic and female senior leadership representation at Principal level and above, as well as increases in the overall representation of disabled people in Ofcom by 2026. This long-term vision is supported by interim goals which we monitor regularly and review on an annual basis [see Table A below].

Our current representation of minority ethnic colleagues in senior leadership stands at 17%. This is higher than the target we set for 2026. We have set a revised target of 19% by 2026 to increase our ambition, and to ensure we stay focused on building a sustainable pipeline of ethnically diverse talent. The scale of growth in our colleague populations means that overall senior female representation has remained at 45% even though the actual number of females in senior leadership has increased. The proportion of colleagues declaring a disability has remained flat at 13%. Maintaining the current proportion has meant a significant growth in the number of disabled colleagues as part of the overall growth in our workforce over the past twelve months. In the coming year, we will continue to review progress and take steps to help us reach our 2026 target of 15%.

Table A: Diversity targets

Workforce goal	Start position (Mar 21)	Year 1 Position (31 Mar 22)	Year 2 Position (31 Mar 23)	Interim target to remain on track by 2024	2026 target (31 March 26)
Senior female	44%	45%	45%	47%	Equal balance
Senior minority ethnic	11%	13%	17%	17+%	19% (originally 16% at strategy launch)
Disabled Ofcom-wide	12.0%	13%	13%	14%	15%

Diversity data is collated through the use of self-identification on our Workday system.

Future focus – what’s next for our diversity goals

We will continue to monitor our progress against the diversity strategy targets set across the organisation, taking action on the feedback and information we get from our colleague survey data and via our colleague network engagement.

We will make even greater gains for inclusion by embedding inclusive recruitment and progression practices throughout our organisation. We will also analyse data to understand how we can tackle any barriers to specific minority ethnic, disabled and female colleagues at senior levels.

Our overall aim is to ensure Ofcom is reflective of the UK population. While these targets reflect the priority areas at the launch of our strategy, we conduct regular analysis to ensure our workplace is diverse and inclusive in other respects. In year two, 54% of colleagues were women, 8% identified as LGB+ and 25% were from minority ethnic backgrounds. This is in line with or exceeding the wider UK population. You can read more about the demographic profile of the organisation and the fairness of our people processes in [our D&I Data Annex](#).

We work with our colleague networks to ensure our D&I programme supports greater inclusion of all our people, particularly societally minoritised groups. In 2020, we introduced questions for new starters and existing colleagues to understand their socio-economic background. The completion rate in 2022 was 55%. Our ambition is to increase recording rates in 2023/24 to the 75% threshold advised by the Social Mobility Commission, so that we can draw meaningful conclusions from our data and review if a further target is needed in this area.

Inclusive Board leadership

We want our boards, advisory committees and panels over which we have recruitment control to have an equal gender balance, ethnic diversity (10% minority ethnic ambition) and disability inclusion (15% ambition) by 2026. Our goals were informed by both the UK adult population and the relevant adult populations for the UK nations. Our recruitment control does not include members of the Ofcom main Board, where non-executive appointments are made by the UK Government and parliaments, assemblies or executive bodies of the devolved nations.

We have met our ethnicity and disability diversity goals for the boards, advisory committees and panels over which we have recruitment control.

Narrowing our pay gaps 2022/23

Ensuring fairness in the way we pay and reward colleagues

Since April 2017, organisations employing more than 250 employees have had a legal requirement to calculate and report their gender pay gap each year. Gender pay gaps measure the differences between the average earnings of male and female colleagues.

The gender pay gap and equal pay both deal with pay disparity at work, but they are not the same. Equal pay means that men and women performing equal work, or work of equal value, must receive equal pay. It does not take into account people's roles or seniority. An employer with an effective equal pay policy can still have a gender pay gap. For example, this can happen if female colleagues make up the majority of people in lower-paid jobs.

Our data includes all employees and pay elements, in line with government reporting requirements. Bonus pay gaps include all annual bonus payments and in-year recognition payments. Pay gap numbers fluctuate slightly year-on-year. This reflects the churn in our numbers as we grow the organisation to take on new regulatory responsibilities for telecoms security and online safety.

In addition to analysing gender pay gaps, Ofcom chooses to go beyond its legal responsibilities by analysing its colleague pay and remuneration information for potential ethnicity and disability pay gaps. Ethnicity pay gaps measure differences in White and minority ethnic colleagues' pay. Disability pay compares colleagues who have a disability to those who do not.

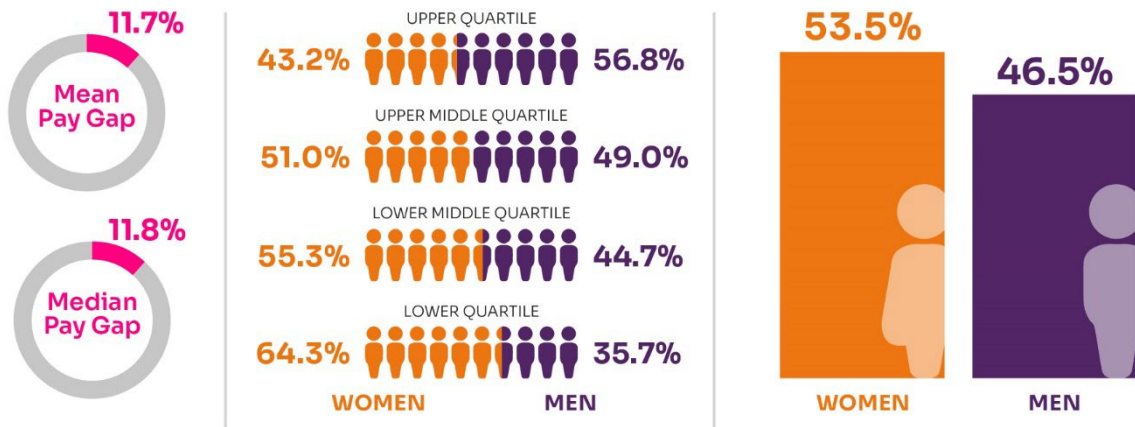
Our headline results

Our median race, gender and disability pay gaps continue to narrow and are below the pay gaps seen in the public sector. This year, we launched our *principles for pay and reward* with the aim of ensuring simple, transparent and fair outcomes for all our colleagues, and in 2023 we will take this further with our work on reward transparency.

The median gender pay gap is 11.8%, which is 1.5 percentage points less than last year. This position is below the median (14.9%) gender pay gap for the UK, below the public sector gender pay gap (15.8%) and closer to the Civil Service position (of 11.3%). Our mean pay gap increased by 1.2% to 11.7% in 2022.

The One Ofcom Bonus plan excluding impact awards has had a positive effect on the median bonus gap from a gender (0%) and disability (0%) perspective. Our ethnicity bonus gap is 12.6%, we are working to understand the reasons behind our ethnicity bonus gap, so we can identify the right actions to take. In year three, we will be taking forward new approaches to recognition as part of our pay and reward reforms.

Figure 1: Ofcom's Gender Pay Gap data (March 2023)



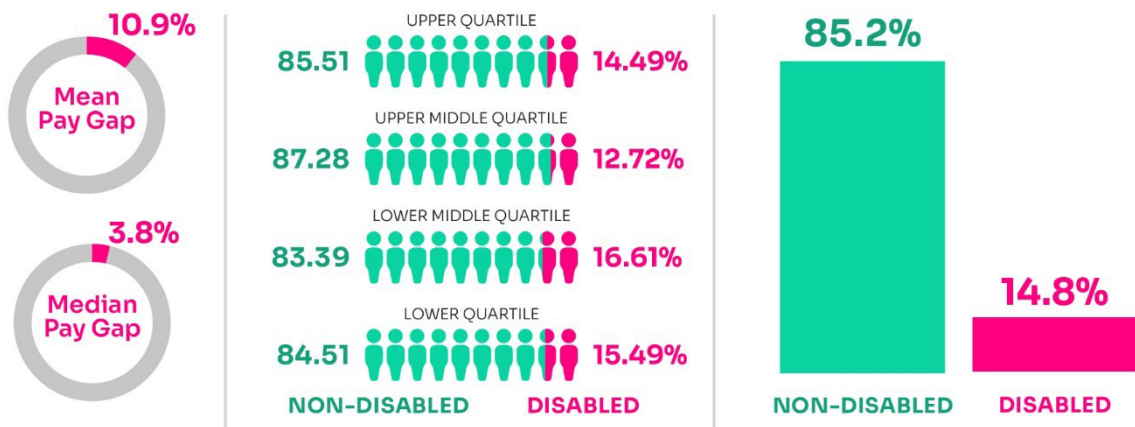
We saw further decreases to our ethnicity pay gap, March 2022, the mean ethnicity pay gap was 13% so it has fallen 1.7pp to 11.3% in 2023, and a 2.8pp year on year decrease in the median ethnicity pay gap to 9.9%.

Figure 2: Ofcom's Ethnicity Pay Gap data (March 2023)



The mean disability pay gap was 10.9 % in Ofcom. This is a decrease from our 2021 position of 11.2% and is lower than the UK disability pay gap, of 13.8% in 2021. The median disability pay gap has decreased from 4.5% in 2022 to 3.8%.

Figure 3: Ofcom's Disability Pay Gap data (March 2023)



Future focus – what’s next on pay and reward

We will continue to see fluctuations as we grow and diversify at all levels of Ofcom, yet the focus on these areas will ensure we continue to improve equity in our pay and performance approach.

We will:

- continue to reform our approach to pay and reward, raising awareness and understanding of our simple, transparent and fair pay principles across career and performance management populations;
- improve transparency through regular reporting at business group level; and
- provide greater D&I insights on our pay review recommendations, career progression and talent management work to support continuous improvement.

Our regulatory work

Ensuring a fair and transparent approach to regulation

As the independent regulator of the communications sectors, we recognise the impact of the work that we do and the decisions we make. By understanding more about the different groups who will be affected by our work, we can be more effective. Equality Impact Assessments (EIAs) consider the extent that policies and projects are fair by design and deliver proportionate outcomes for diverse groups. Last year we refreshed our “Clarity from the Start” tool, which sets out the aims and purpose of a project, to include guidelines covering EIA principles. This year we have been working with project teams across Ofcom to embed the changes to our project tools, and to develop our capability in assessing who is affected by our work, and how we should take account of their interests.

Amplifying consumer voices in our research

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

This year we initiated analysis of our consumer research evidence base, focused on specific demographic groups, drawing on our evidence base across the sectors we regulate. We have delivered internal workshops and briefings on the attitudes, behaviours and experiences of older people and low-income groups, ensuring that we can apply a thorough internal understanding of the needs of these groups to our work. We plan to continue this work as an ongoing programme, focused on different demographic groups.

We continued to review the impact of our work

We are consulting on changes to our guidance on impact assessments covering the following key changes:

- Recognising how our duties differ across an increasingly wide range of sectors.
- Maintaining our bias against intervention while clarifying that the law may require us to intervene.
- Updating how we present our EIAs to stakeholders.
- Increased recognition that qualitative impacts are an important part of assessing some policy decisions.
- Recognising that impact assessments are an important input for ex-post evaluations.
- Updating how we develop an EIA in light of new assessment approaches and resources.
- Updating the guidance to reference our current public sector equality duties and obligations in relation to the Welsh language.

Future focus – what’s next in our regulatory work

- We will continue to evaluate and test the performance of our policies and interventions for different community groups based on the initial EIAs undertaken. We are also developing our capability to reach stakeholders that may not ordinarily communicate with Ofcom to gain the benefit of their views.
- Using the insight we are gathering from our internal research audit to identify priorities for additional work with typically over-excluded groups.

Being accountable

We are accountable and transparent about our progress

Ofcom's Senior Management Team lead work on embedding our Diversity and Inclusion (D&I) strategy in the organisation and do so in two main ways:

- by leading their groups in an inclusive way towards more representation in line with our targets, and
- by championing inclusion and ensuring we actively support minoritised groups in Ofcom.

Our strategy is approved by the Ofcom Board. Ofcom's Board and People Committee hold the Senior Management Team to account for progress in delivering the strategy. They are presented with progress updates against our strategy twice a year.

Alongside this, every colleague plays a part in making Ofcom an inclusive place to work by acting in line with our values. This year we will launch new behaviours linked to being a more agile organisation and we will be supported by an updated *People and Transformation Hub* intranet page that provides greater transparency on the nature of our progress on diversity and inclusion and the key areas we are exploring.

In year three, we intend to go further by building greater data transparency into our work, so that senior leaders and their teams, can have a better understanding of the progress they are making during the year.

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

Future focus – what's next on accountability

- We will increase transparency and share our progress with employees by increasing our internal data reporting.
- We will continue to keep abreast of innovation and best practice through external D&I benchmarking and accreditation such as the Disability Confident Scheme.
- We will publish a new co-created engagement framework with our employee networks to strengthen their role and contributions in the organisation – alongside our Colleague Forum and trade union.
- We will make the most of our D&I partnerships and associations to ensure they support our inclusion ambitions as an employer while maintaining our independence as a regulator.
- We will continue to report externally on our progress.

A1. Diversity and inclusion data

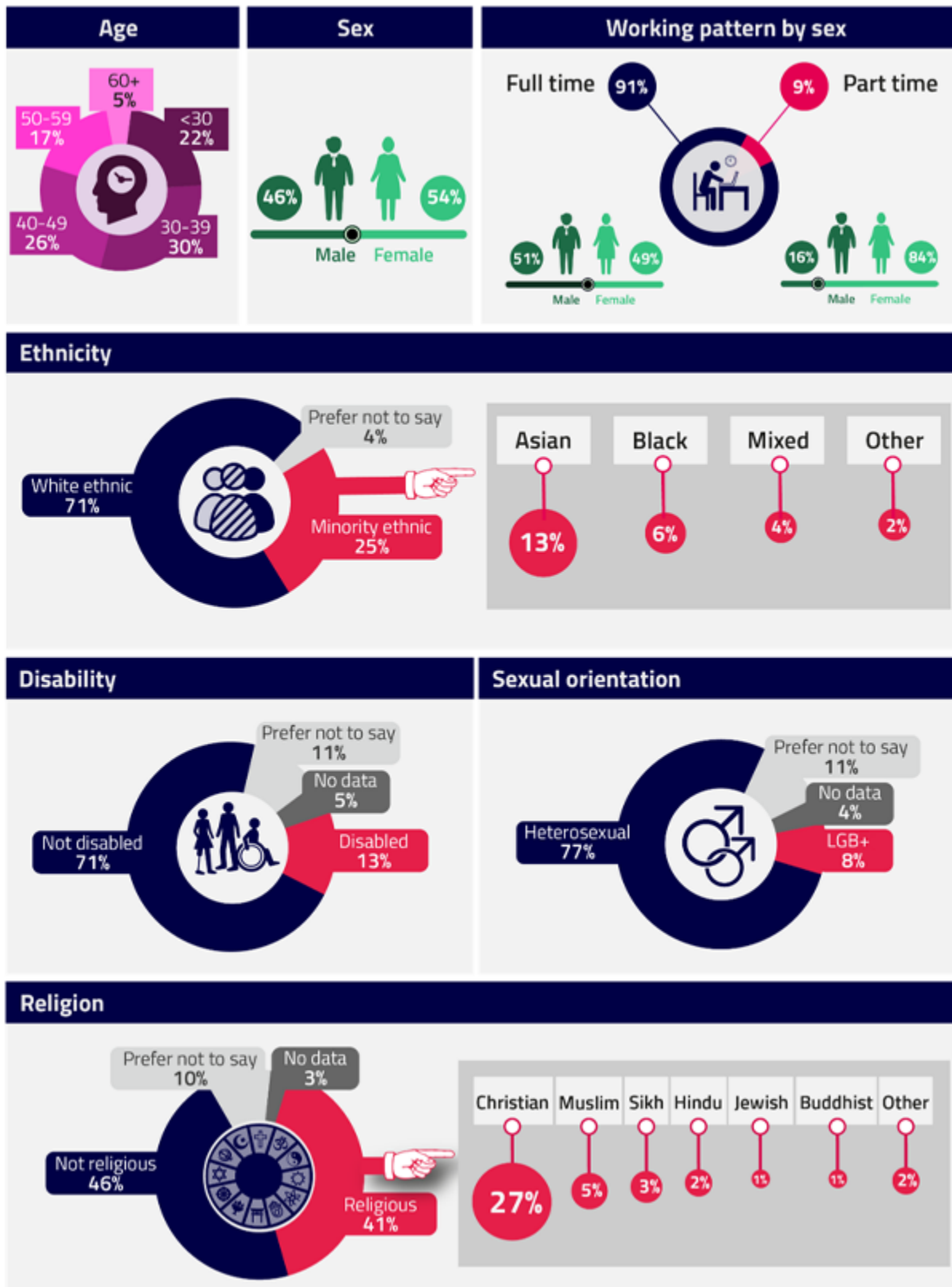
Reflecting diverse customers and communities

Ofcom has over 1,300 employees with a wide range of expertise, professions and jobs. Ofcom's people include policy makers, economists, data analysts, technologists, market researchers, contact centre workers, broadcast specialists, people and finance specialists, lawyers, and spectrum engineers – with many more besides. We have offices across the UK. Seventy-eight percent of our workforce use London as their primary base and 22% are based outside of London with Warrington (5%), Edinburgh (5%) and Manchester (5%) making up most of this. We also have offices in Birmingham, Cardiff, Belfast and Baldock that account for 7% of our workforce across the four offices. One percent of our staff are permanent home workers.

We measure inclusion through regular reporting across our diversity and inclusion indices. Employee Engagement is measured by calculating the overall average of the four Employee Engagement questions and the inclusion index is calculated as an average of the eight inclusion questions within the colleague survey. Our internal inclusion index, which is measured by an external company, went up by 5 percentage points to 71% since the last report. The results are shared with senior leaders to shape the culture and workplace of Ofcom. The overall Ofcom colleague engagement score in this reporting period was 72%, and at the most recent measure point in June 2023 has seen this grow further to 75%.

There are five grades across Ofcom ranging from Administrator to Senior Managers and Specialists (SMS). The largest proportion of employees are Senior Associates who make up over two-fifths of our organisation (42%) followed by Associates (29%). Close to a fifth (19%) are Principals and there are broadly similar proportions of SMS (6%) and Administrators (5%).

Figure 4: Ofcom overall staff profile (all colleagues 31 March 2023, n-1384)



Sex

Fifty-four percent of our total workforce are women, representing over half of our organisation.

Ethnicity

Twenty-five percent of all our staff are from minority ethnic backgrounds of which 13% of minority ethnic staff are of Asian heritage, 6% from a Black background and 6% are of dual/multiple or other heritage, which is above the ethnic working age population of 14.6%.

Disability

Thirteen percent of our staff have told us they are disabled. This is below the 22% working age population of disabled people (disabled people aged 16-64) in the UK. Increasing our workforce representation for disabled people is a core focus for us in the next five years, supported by our overall workforce target on disability and plan to embed inclusion and equity in all that we do.

Sexual orientation

Eight percent of colleagues have told us they are LGB+ (lesbian, gay, bi or other). Eight percent is above adult population trends (ONS 2021 Census cites that 3% of the adult population are LGB+). Creating a culture of inclusion and belonging will be key for us to maintain representation of LGB+ colleagues across Ofcom.

Religion or belief

Forty-one percent of our people say they hold religious beliefs and 46% said they do not. Of those that said they were religious; the largest proportion were Christian (27%). Five percent are Muslim with Sikh (3%), Hindu (2%), Jewish (1%), Buddhist (1%) and other faiths (2%) also reported.

Age and working patterns

Just over a fifth (22%) of employees are aged 50 years and above (compared to 32% of the 50+ population in work according to latest ONS estimates), of which 5% are aged 60 years and above. Twenty-two percent are below 30 years old. The highest concentration of colleagues is in the 30-39 age bracket (30%), followed by 40-49 (26%), accounting for a combined 56% of our workforce. These trends are similar to last year.

Gender and working patterns

Nine percent of staff work part-time, of which 84% are women.

The colleague lifecycle

Job levels

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

Figure 5: Job levels

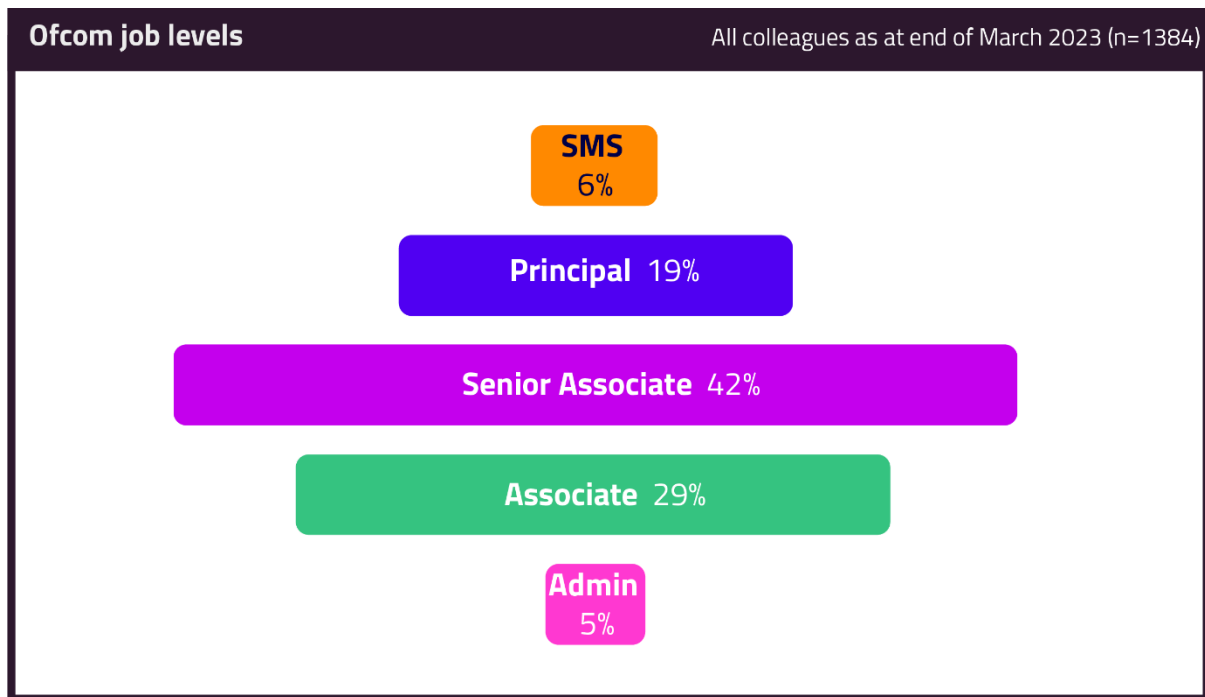
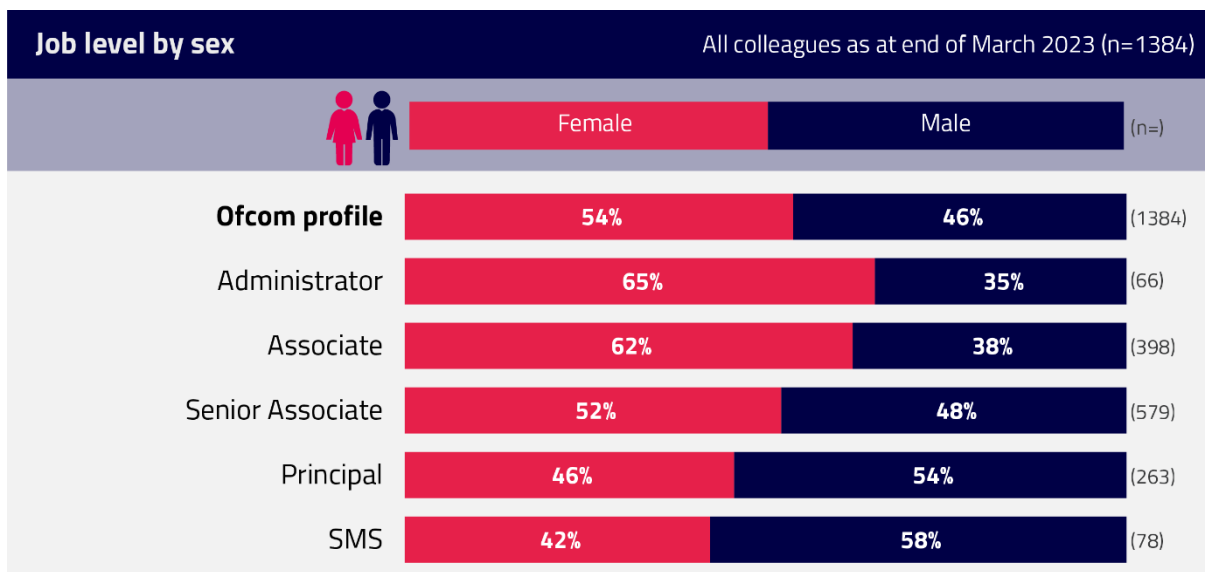
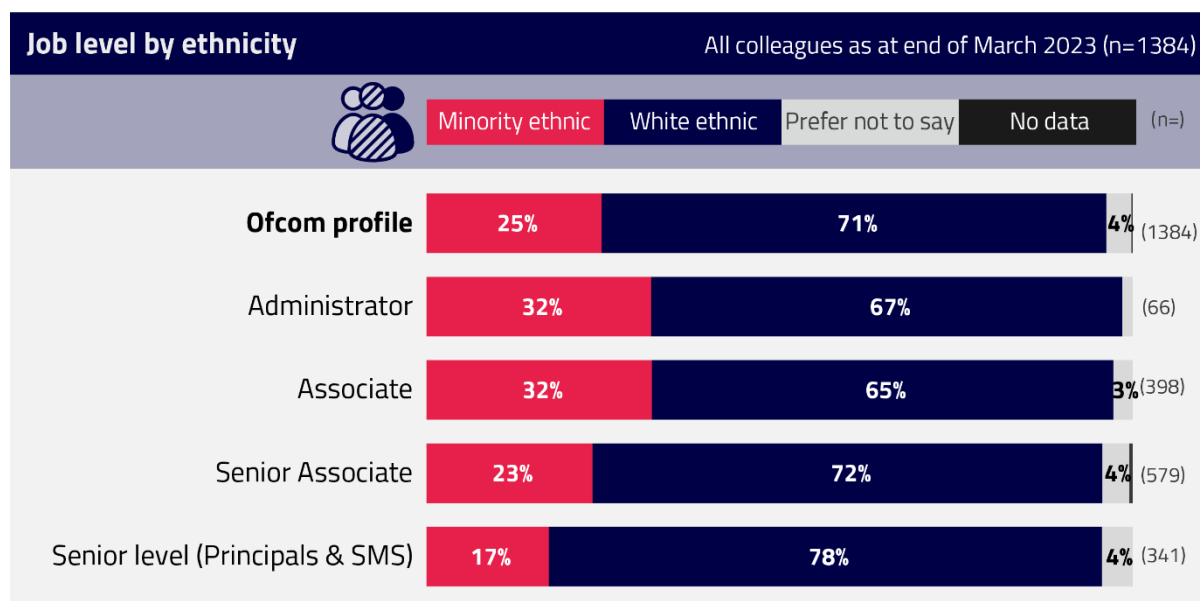


Figure 6: Job levels by sex



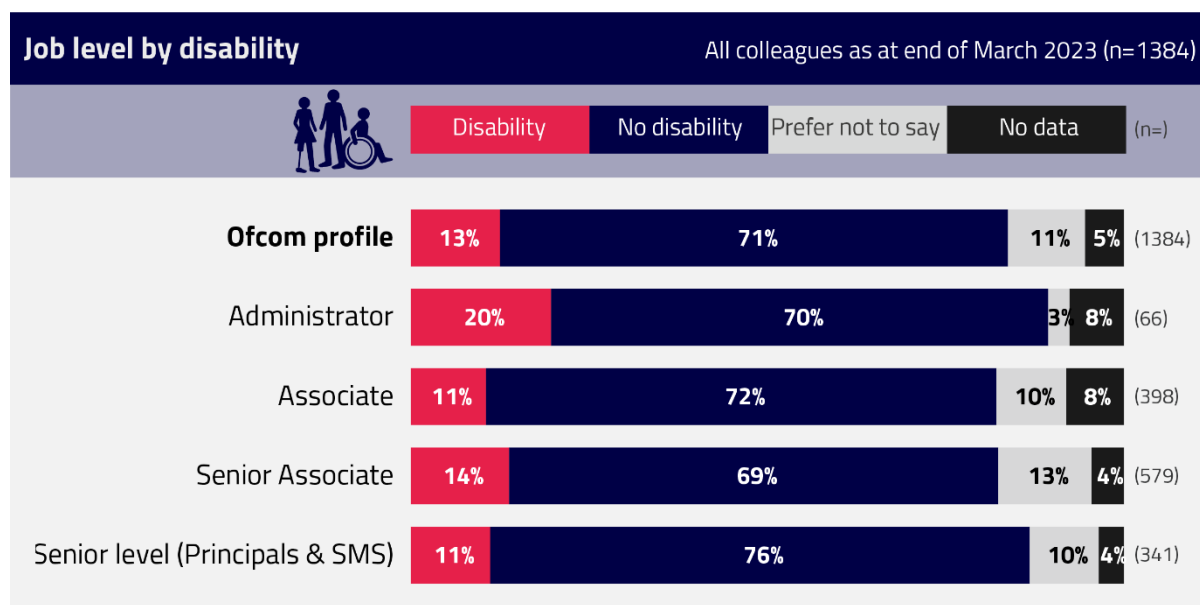
Women make up above average proportions in Administrator (65%) and Associate jobs (62%). We are moving closer towards parity in our more senior roles with similar proportions of women at Principal (46%) and SMS jobs (42%), and a broadly even split at Senior Associate level (52%).

Figure 7: Job levels by ethnicity



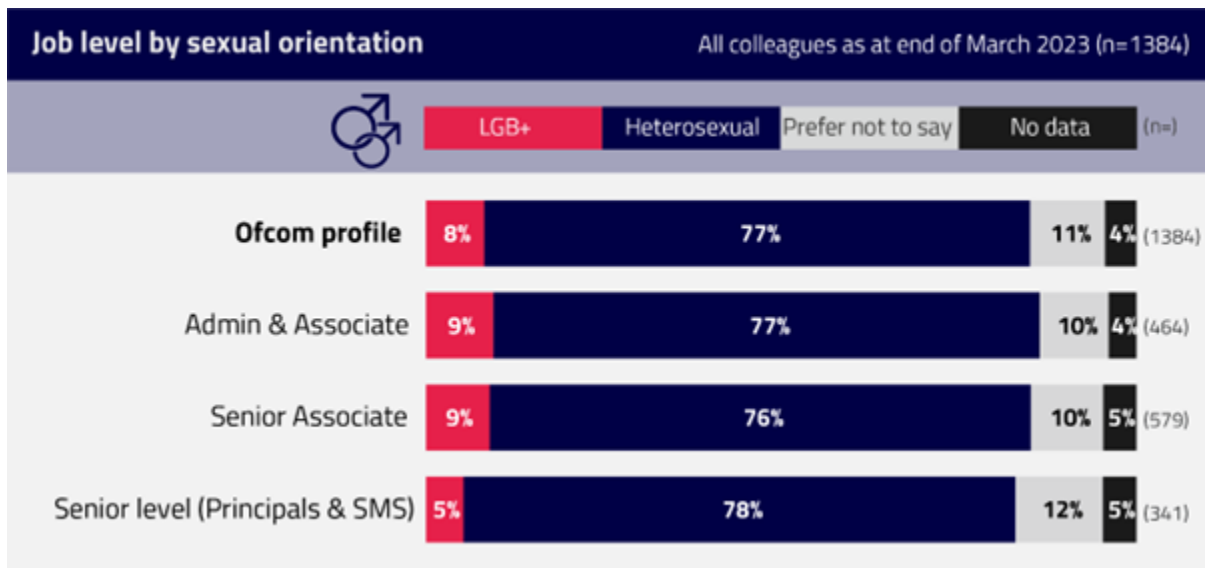
The overall representation of minority ethnic colleagues is 25%. We continue to strengthen the pipeline of talented colleagues from Administrator and Associate roles (where minority ethnic staff have above average representation) towards Principals and SMS positions (which at 17% has below average representation in comparison to the overall Ofcom profile). In 2022 our deeper analysis of the colleague experience identified the need to increase the action taken to support greater representation of Black colleagues in senior levels.

Figure 8: Job levels by disability



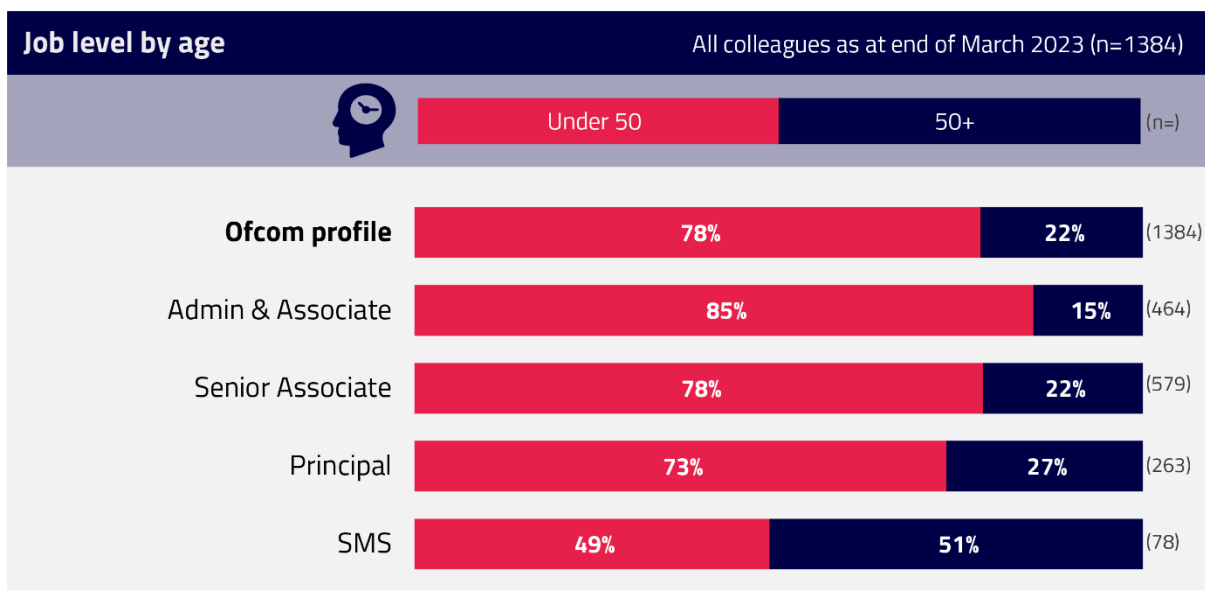
The representation of disabled people among our Associate, Senior Associate, Principal and SMS roles combined is consistent with Ofcom’s average disabled profile of 13%. There is above Ofcom average representation at Administrator level (20%), and disability representation amongst Associate, Principal and SMS level is on average 11%.

Figure 9: Job levels by sexual orientation



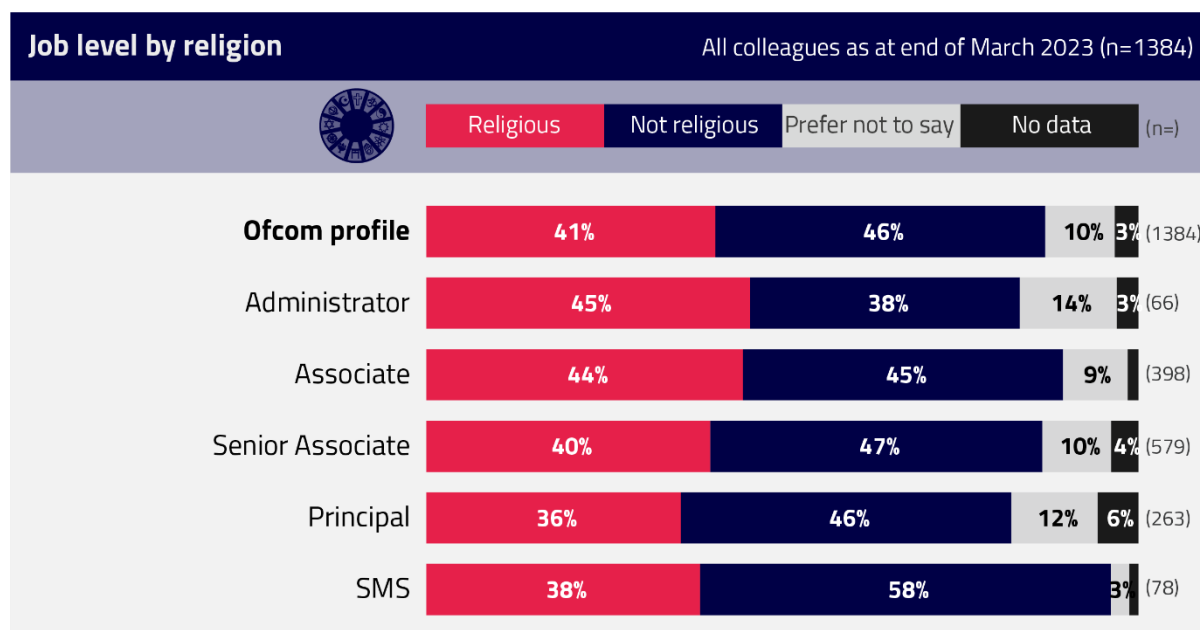
LGB+ representation at Ofcom (8%) is above the estimated LGB+ population of 3% and LGB+ Colleagues are consistently reflected at every grade. Representation ranged between 5% (for Principals and SMS) and 9% (for Administrator and Associate levels) though we've had to group some job levels to meet our confidentiality data threshold of at least ten people.

Figure 10: Job levels by age



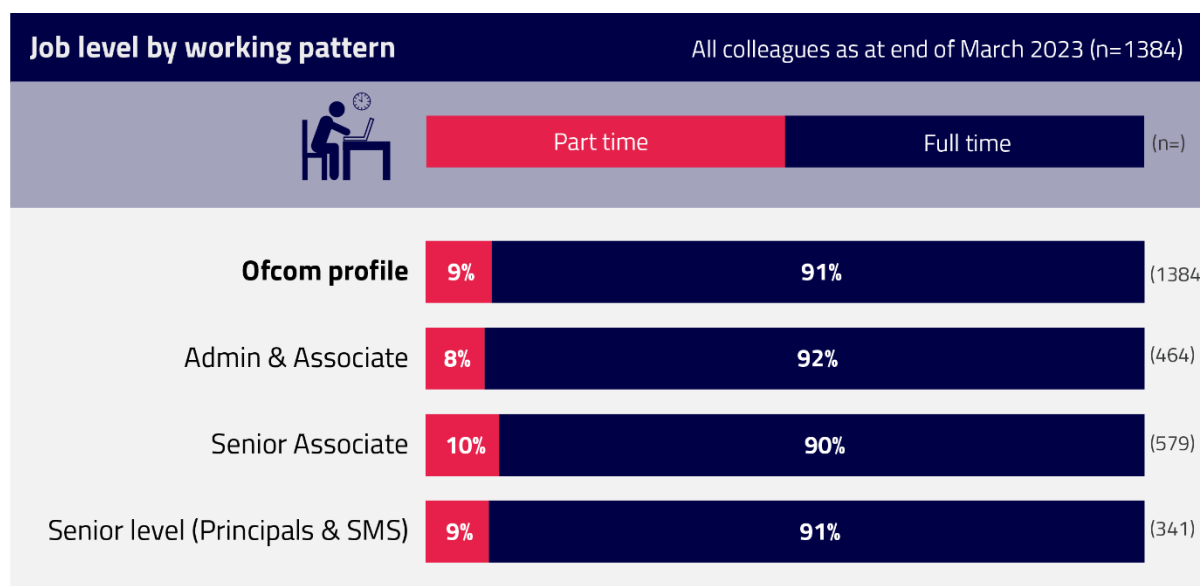
Seventy-eight percent of colleagues are under 50, of which a higher-than-average proportion (85%) are in Administrator and Associate grades. The representation of under 50s was consistent with our average profile at Senior Associate level and gradually decreases at the top two senior levels. Conversely, representation of those 50+ years old has begun to increase with seniority.

Figure 11: Job levels by religion



Forty-one percent of colleagues are religious. The balance between colleagues who have, or do not have, religious beliefs vary across each of our grades. Staff who are religious make up a lower proportion in Senior Associate, Principal and SMS roles with Administrator levels having greatest representation at 45%.

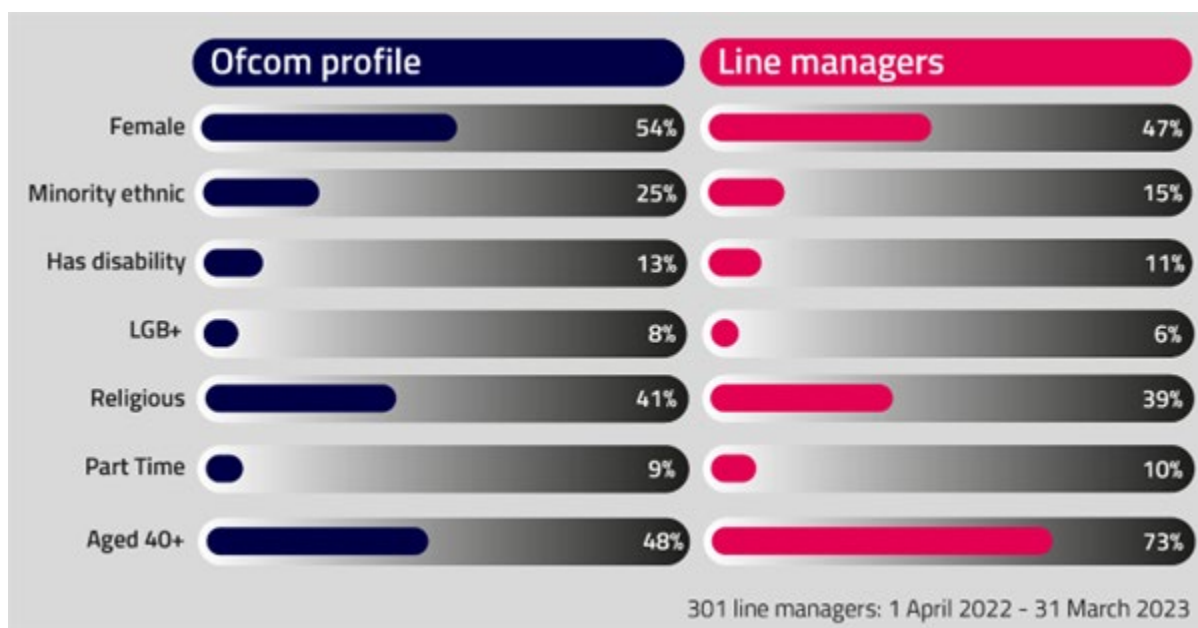
Figure 12: Job levels by working pattern



Of all grades, the largest proportion of employees that work part-time are in the Senior Associate grade (10%) and above the Ofcom average of 9%. Administrator and Associate grades combined (8%) match the Ofcom average and there is comparable representation at senior levels (9%).

People managers

Figure 13: People managers

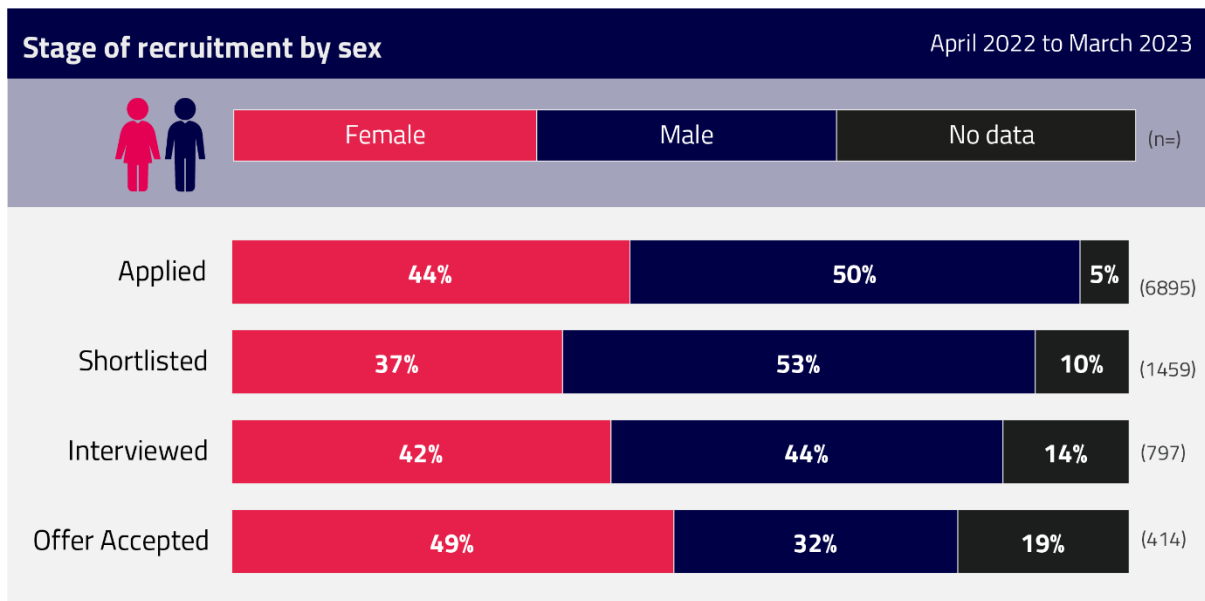


Around a fifth (22%) of our staff are Career and Performance Managers and have formal people management responsibility. Of these, 10% work part time, on par with the Ofcom average, and the largest proportion of people managers (63%) are in the Principal grade. This is followed by SMS (23%) and the remaining proportion are in Senior Associate roles. The proportion of line managers that are disabled is 11%, and 39% say they are religious. There is higher than average representation of those aged 40+ years (73% vs 48% Ofcom-wide) while there is lower than average representation for those from minority ethnic backgrounds (15%, which is 10 percentage points (pp) less than Ofcom's average minority ethnic representation). Forty-seven percent of people managers are women (7pp lower and 6% are LGB+ colleagues (2pp less)).

Recruitment

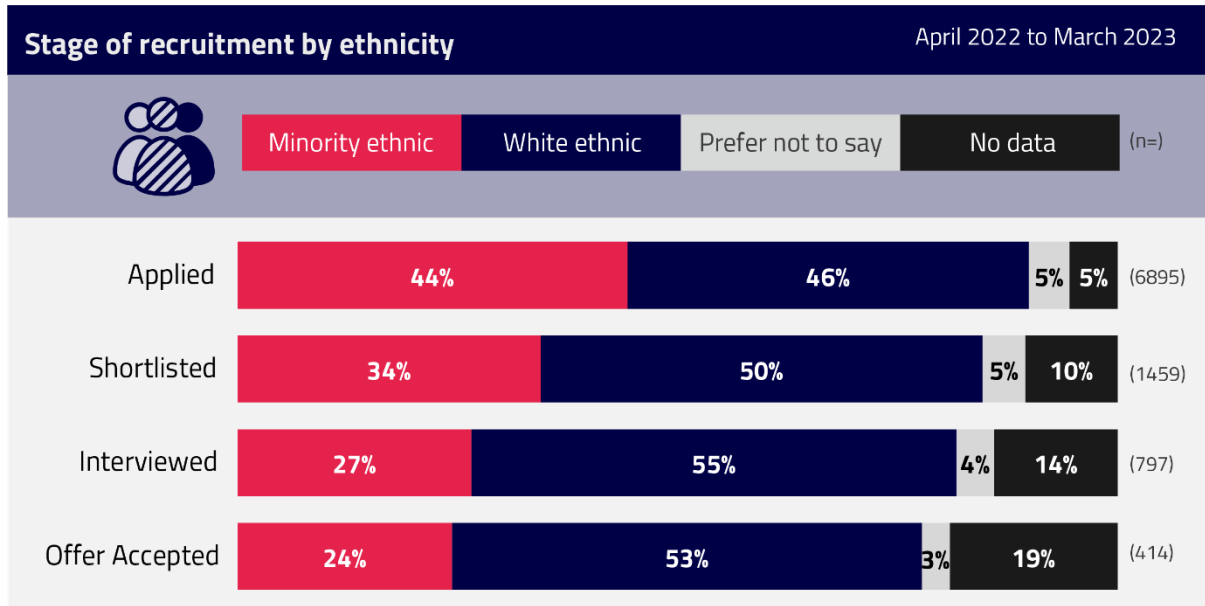
We use diversity monitoring forms to understand the extent to which we are delivering fair and inclusive recruitment to our colleagues. We have made improvements in encouraging people to share their information with us, particularly applicants coming through our external recruitment partners, but we have more work to do to close some of the data gaps. Our data looks at each stage of the recruitment process by demographic group, from application to shortlisting, to those invited for interviews through to an offer being accepted.

Figure 14: Stage of recruitment by sex



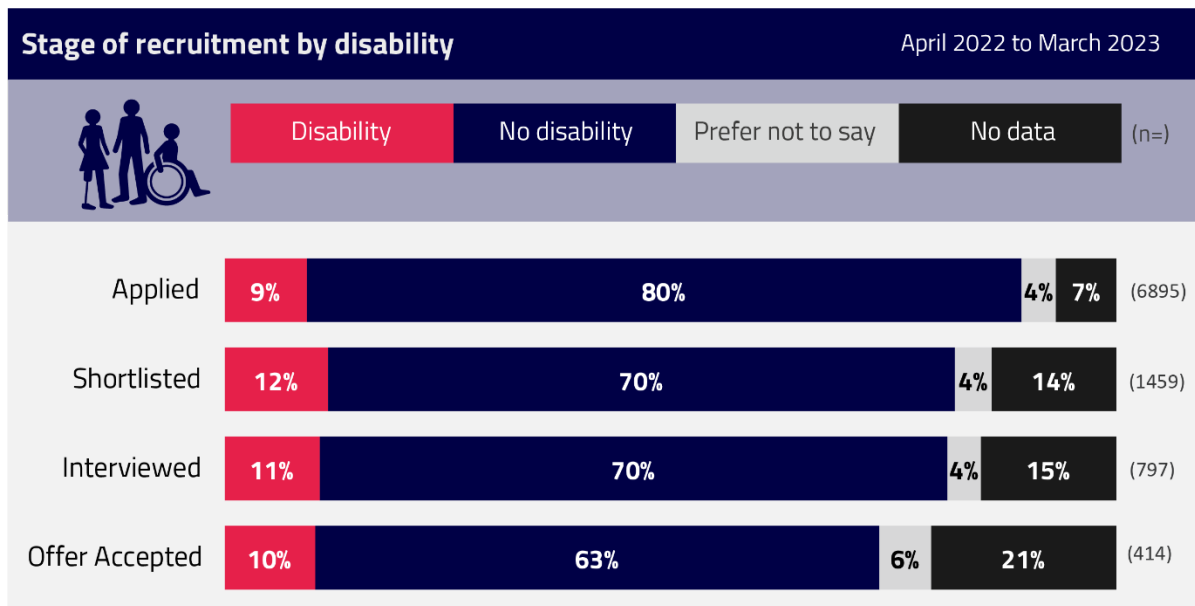
Forty-four percent of new applications were from women. We now include recruitment shortlist data of which 37% female and 53% male candidates were shortlisted. Of those who went on to be interviewed 42% were female. At the offer accepted stage 49% were female and 32% were male, with 19% of candidates who accepted a job offer preferred not to declare their sex.

Figure 15: Stage of recruitment by ethnicity



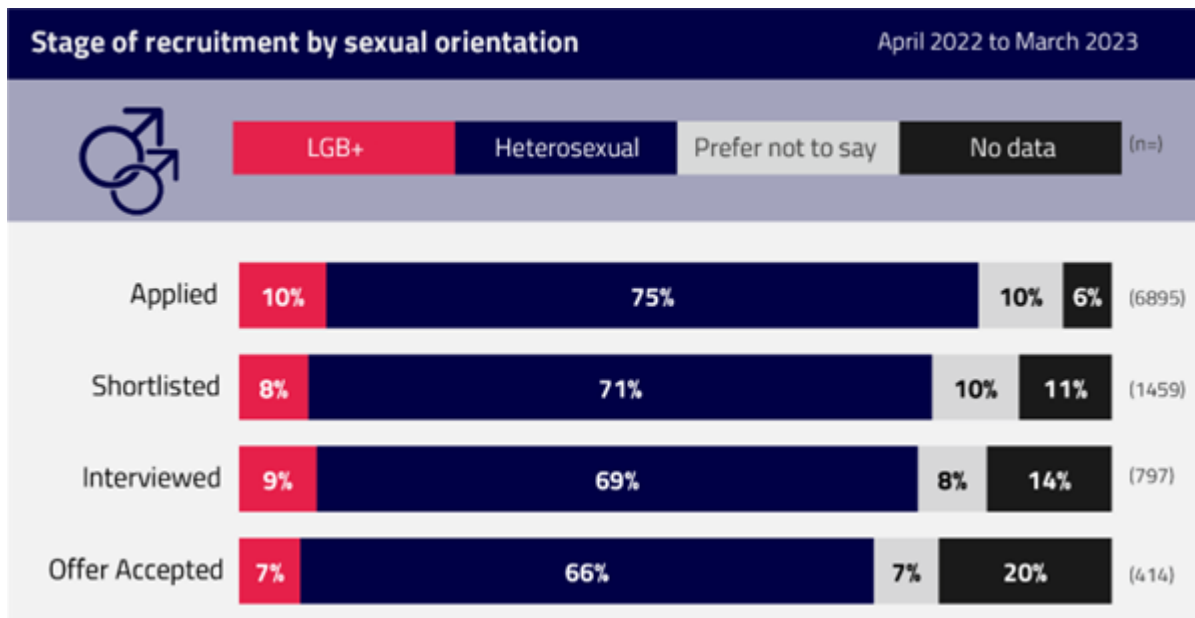
There was a drop in the proportion of people from minority ethnic backgrounds between the application (44%) and interview (27%) stages, with 24% of all job offers being accepted by minority ethnic colleagues. We continue to monitor this closely and will broaden our data set in this area.

Figure 16: Stage of recruitment by disability



Nine percent of applicants said they were disabled, increasing to 11% at the interview stages and resulting in 10% of those who accepted jobs. We are exploring ways to ensure more disabled people apply to our roles.

Figure 17: Stage of recruitment by sexual orientation

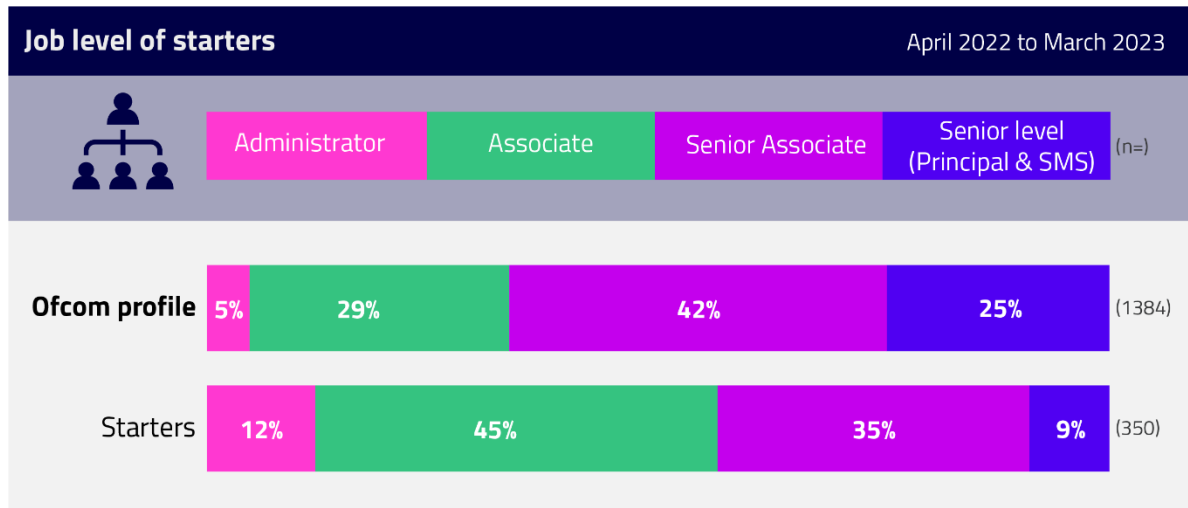


The proportion of people who told us they are LGB+ at application (10%) stage was similar to the proportion of LGB+ applicants who were then interviewed (9%). Seven percent of LGB+ applicants accepted job offers from us.

Starters

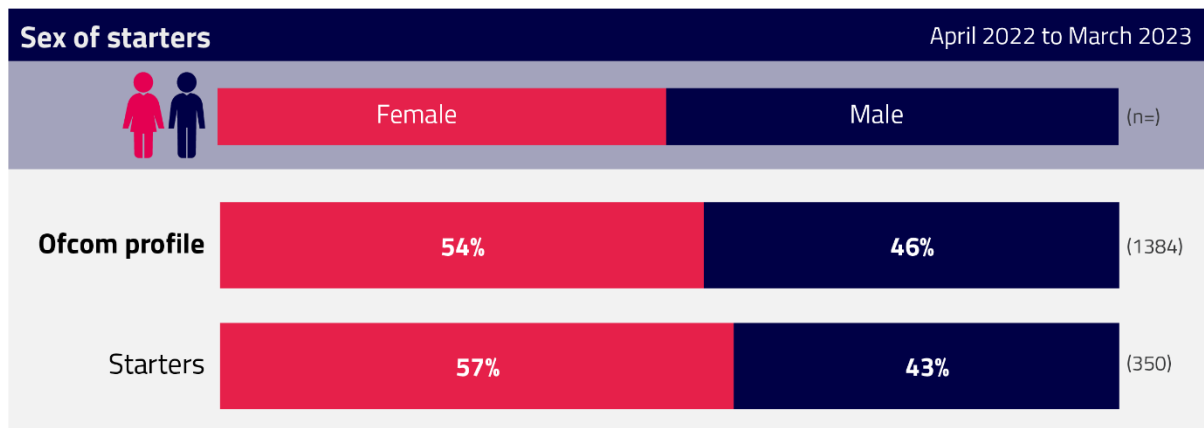
Three hundred and fifty people joined Ofcom during the period of April 2022 to March 2023. Our organisational profile grew due to new regulatory duties for online safety and telecoms security.

Figure 18: Job level of starters



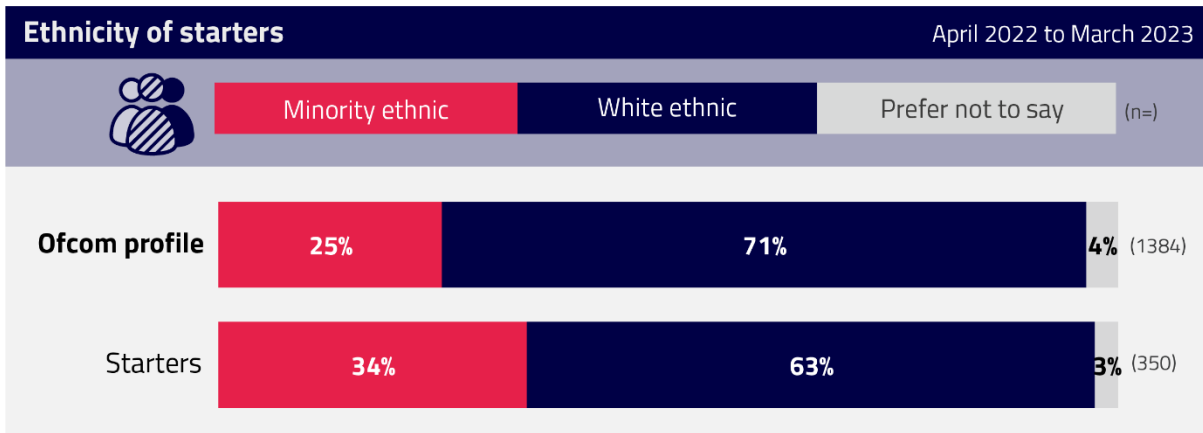
The largest proportion of our new roles were in Associate (45%) and Senior Associate roles (35%). The large intake of Associates roles also reflects our early careers strategy to build our talent pipeline. A smaller proportion of new starters were in Administrator and senior grades (12% and 9% respectively).

Figure 19: Sex of starters



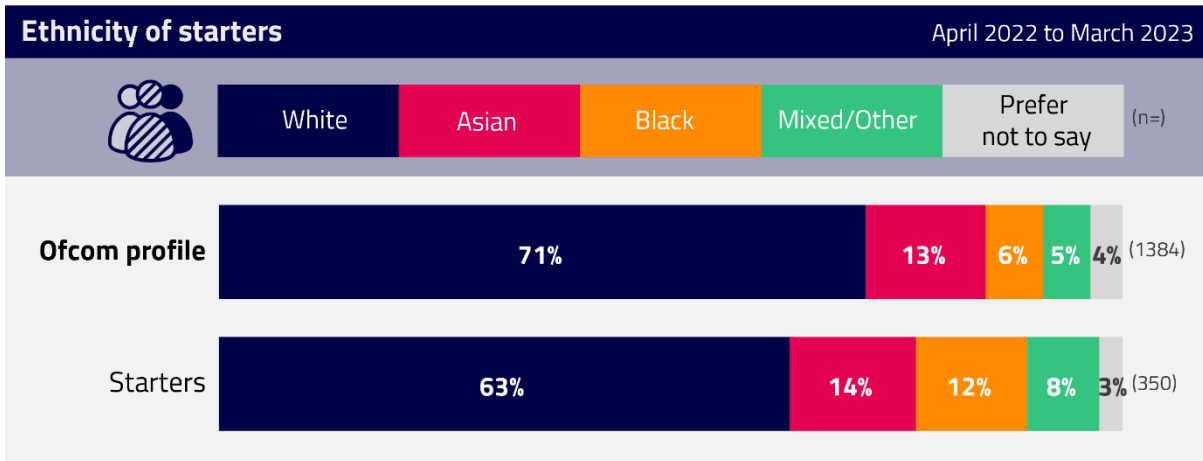
Fifty-seven percent of new starters into Ofcom were women.

Figure 20: Ethnicity of starters (combined Minority ethnic)



A higher proportion of those who started at Ofcom were from a minority ethnic background (34%) relative to our staff minority ethnic profile (25%).

Figure 21: Ethnicity of starters (in-depth)



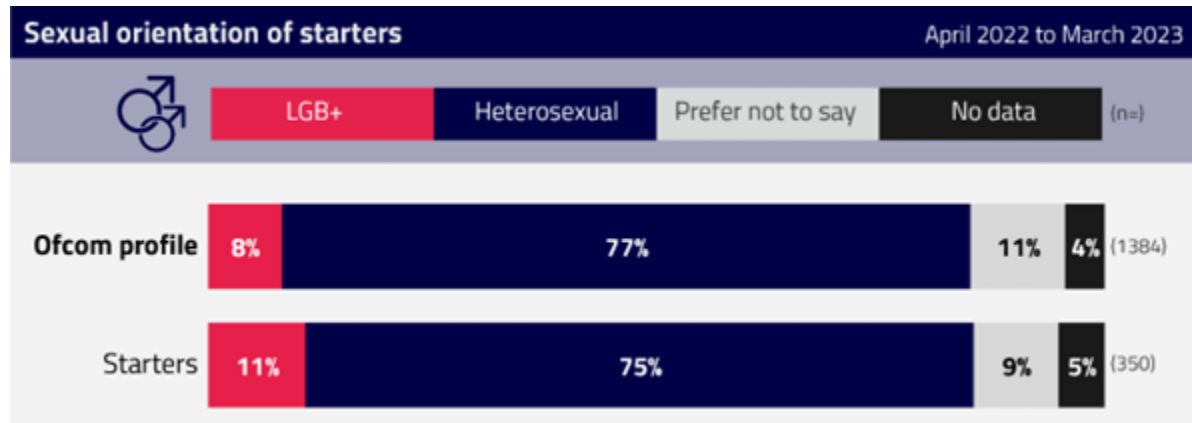
More in-depth analysis shows the proportion of Asian (14%) and Black (12%) starters was higher than their overall Ofcom representation. The representation of those from dual or multiple backgrounds and other ethnic backgrounds combined (3%) was lower than their Ofcom representation. The biggest variance between Ofcom profile and the new starter rate was among colleagues from Black backgrounds (6pp higher than average).

Figure 22: Disability of starters



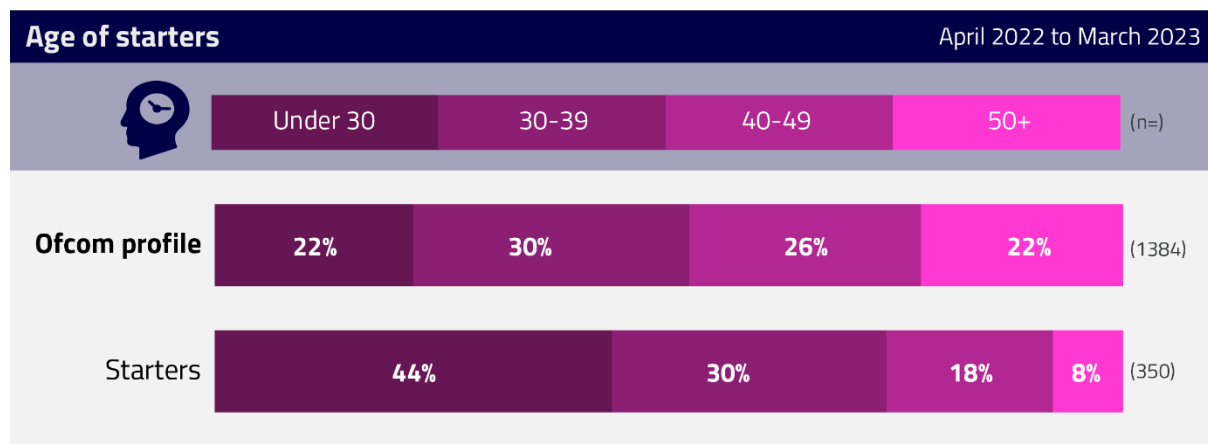
Nine percent of new joiners said they were disabled, lower than the proportion of disabled people at Ofcom (13%). Ofcom is a Disability Confident Level 2 Employer and our ambition is to attain level 3 accreditation. We support the government’s Disability Confident scheme offering a guaranteed first stage interview to disabled applicants who meet the minimum criteria of a role, wherever practicable, and have experience of using the Access to Work service for our staff. Given our move into digital recruitment practices, we may offer the opportunity of first stage interviews to be a video presentation, video interview or panel interview.

Figure 23: Sexual orientation of starters



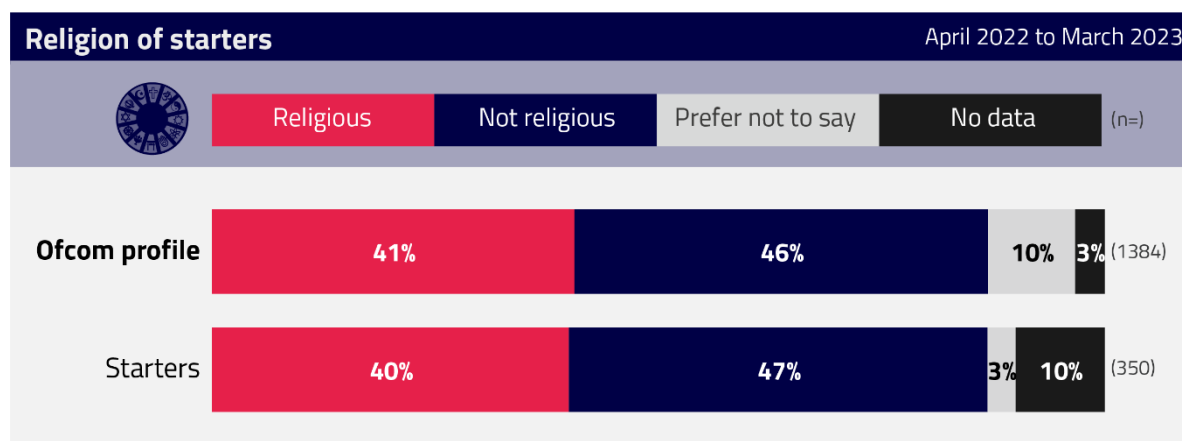
Eleven percent of new starters said they were LGB+, higher than our average LGB+ representation of 8%.

Figure 24: Age of starters



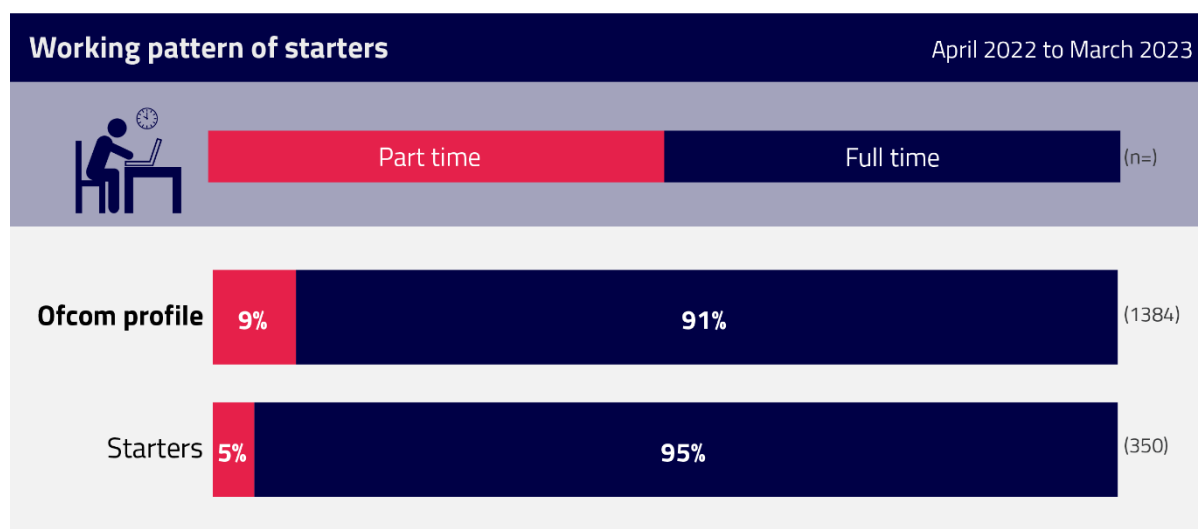
By age, just over four in ten (44%) new starters were aged under 30, this is reflective of our intake being highest in Associate roles. A third (30%) of new joiners were aged 30-39, similar to our Ofcom staff profile for the same age bracket, while 18% were aged 40-49. We recruited lower proportions of people in the 50+ years age bracket (8%), relative to their average representation at Ofcom.

Figure 25: Religion of starters



A similar proportion of our new recruits (40%) considered themselves religious, in line with the Ofcom average (41%). Forty-seven percent of starters said they were not religious which is in line with the Ofcom-wide picture of 46%.

Figure 26: Working hours of starters

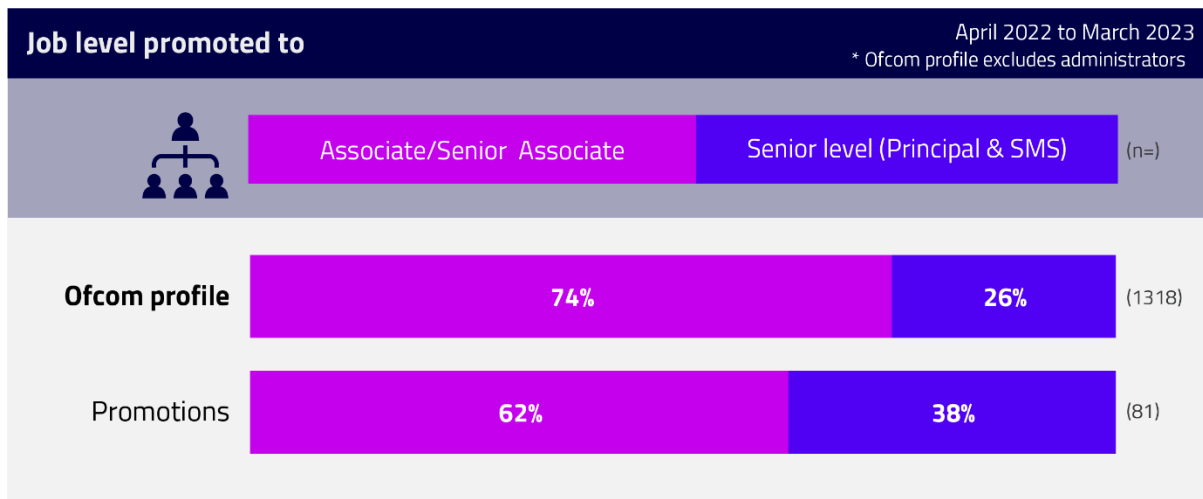


Five percent of people who joined us took up part-time working hours (less than 35 hours a week), lower than the 9% of staff at Ofcom who work part-time. Our jobs offer flexible working, which includes part-time working, wherever and as much as feasible for the role.

Promotions

Eighty-one Ofcom employees were promoted in 2022/23, lower than the 99 people that were promoted in 2021/22. Promotions take place as part of our internal promotion process or by colleagues successfully applying for higher level positions which are advertised internally and externally. In role promotions are open to Administrators and Associates, allowing them to gain promotion to the level above. Their application is endorsed by their line manager if there is evidence they have increased the responsibilities of their job, have consistently excelled at their objectives and have demonstrated the competencies/skill level required of the grade above.

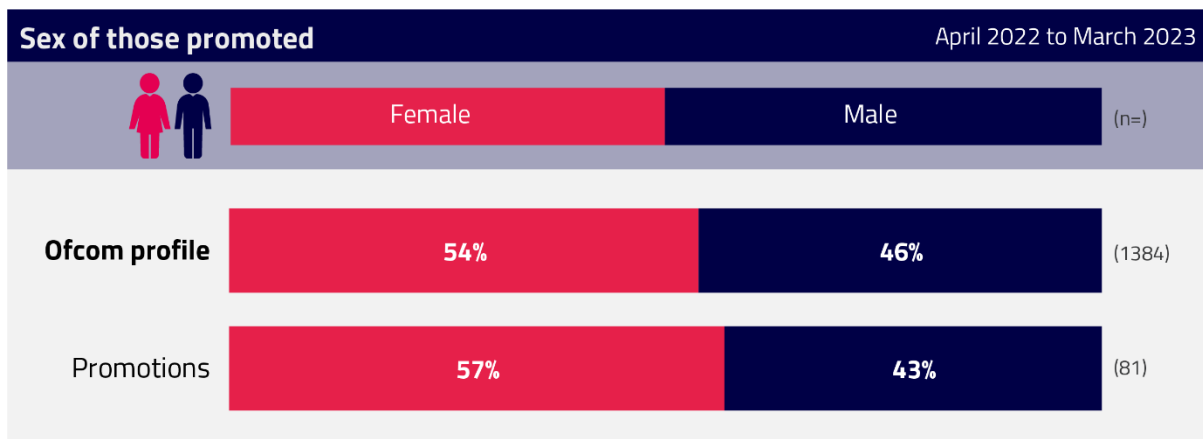
Figure 27: Job level promoted to



The grades shown are those that a colleague is promoted to. Associates were formerly Administrators, Senior Associates were Associates, Principals were Senior Associates and SMS were formerly Principals. The base is Associate levels upwards only (n=1318) therefore the Ofcom grade profiles here are different to the proportions shown for the full base of 1384 staff.

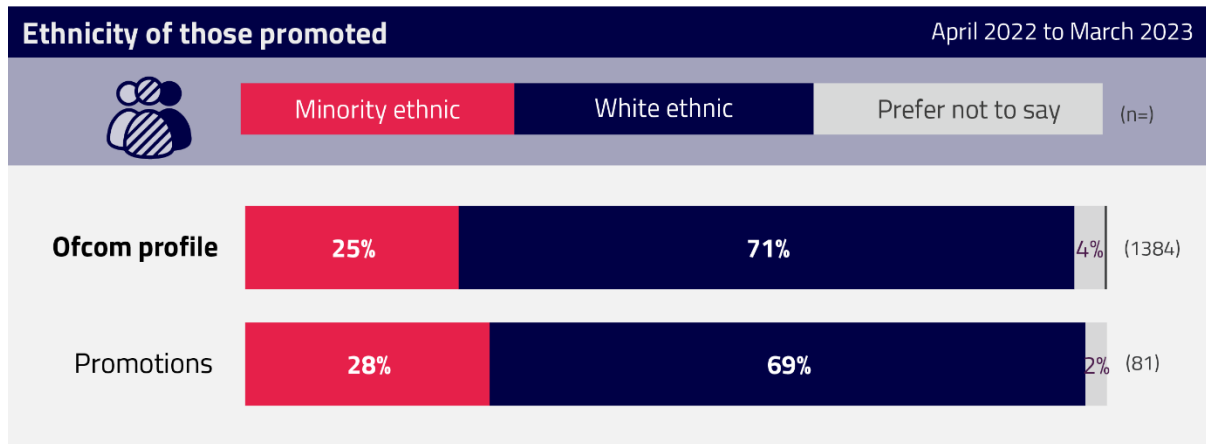
Across April 2022 to March 2023 the largest source of promotion was from Associate into Senior Associate roles (54%). Promotion levels into SMS roles were smallest at 5%. There were no in-role promotions for roles above Senior Associates and the third (38%) of promotions into Principal and SMS levels were secured through a competitive process by existing staff. This above average proportion reflects our strategy to provide opportunities for internal progression within Ofcom.

Figure 28: Sex of those promoted



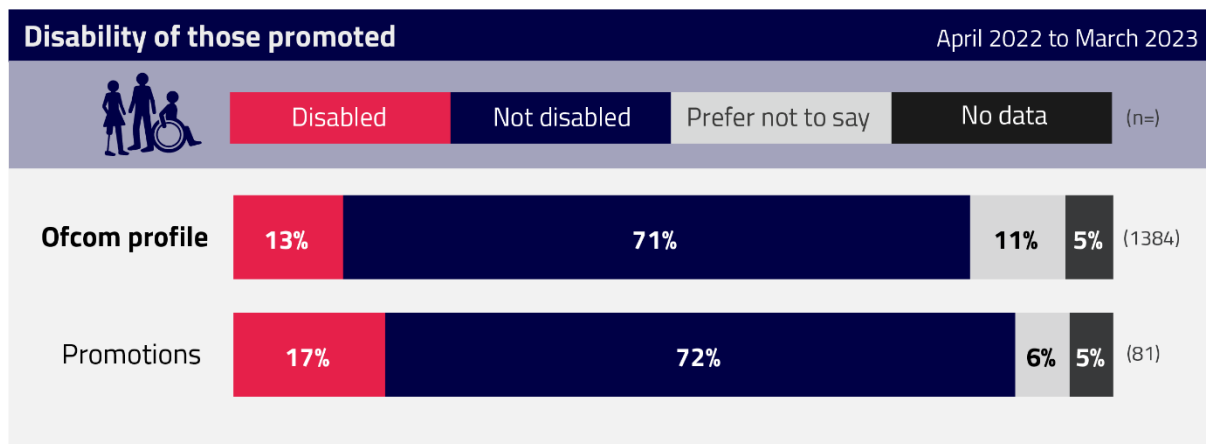
Fifty-seven percent of promotions were awarded to women, higher than the Ofcom average profile for women (54%).

Figure 29: Ethnicity of those promoted



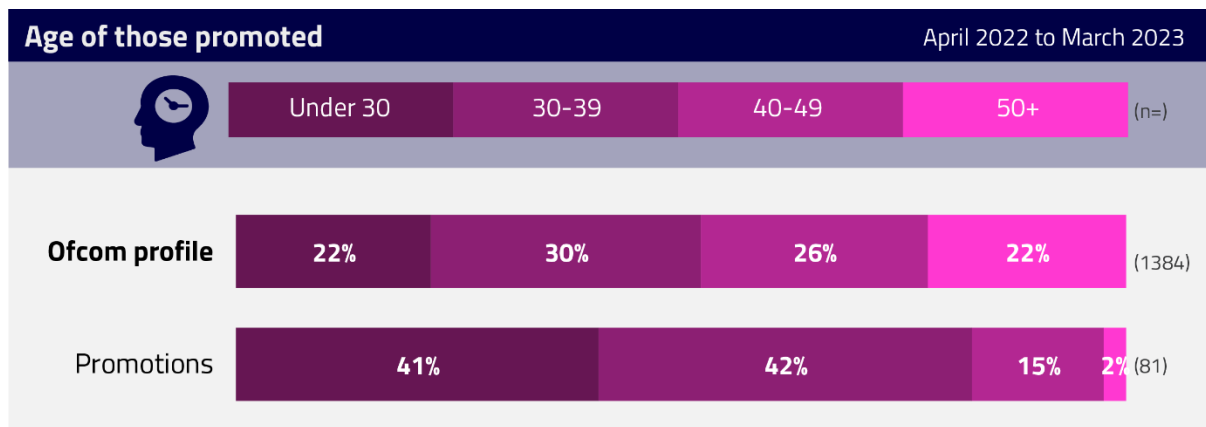
The proportion of colleagues that were promoted who were from a minority ethnic background (28%) was slightly higher than their overall representation of 25%. Sixty-nine percent of colleagues who were promoted were from a White background, lower than their 71% representation within Ofcom as a whole.

Figure 30: Disability of those promoted



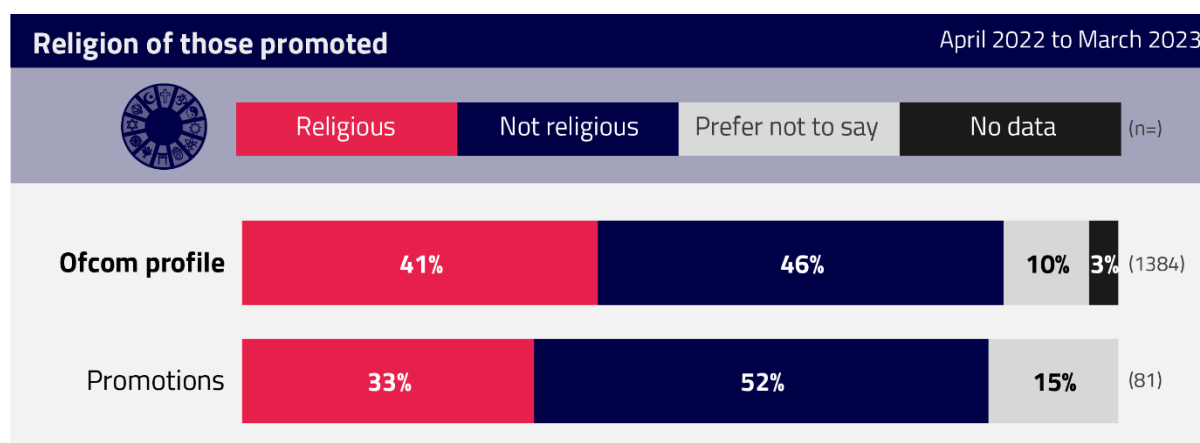
Seventeen percent of colleagues who were promoted had a disability, higher than the representation of disabled colleagues (13%) across Ofcom.

Figure 31: Age of those promoted



By age group, most promotions were of those aged 30-39 years (42%). Over a third (41%) of those promoted were aged under 30, higher than their representation at Ofcom (22%), while lower proportions of people aged 40-49 (15%) and 50+ (2%) were promoted, lower than their profile across Ofcom (26% and 22% respectively). This is because the largest number of staff in these age brackets are Senior Associates and Principals already and the vacancies for Principals and SMS are naturally lower than other grades and must be advertised through a competitive process.

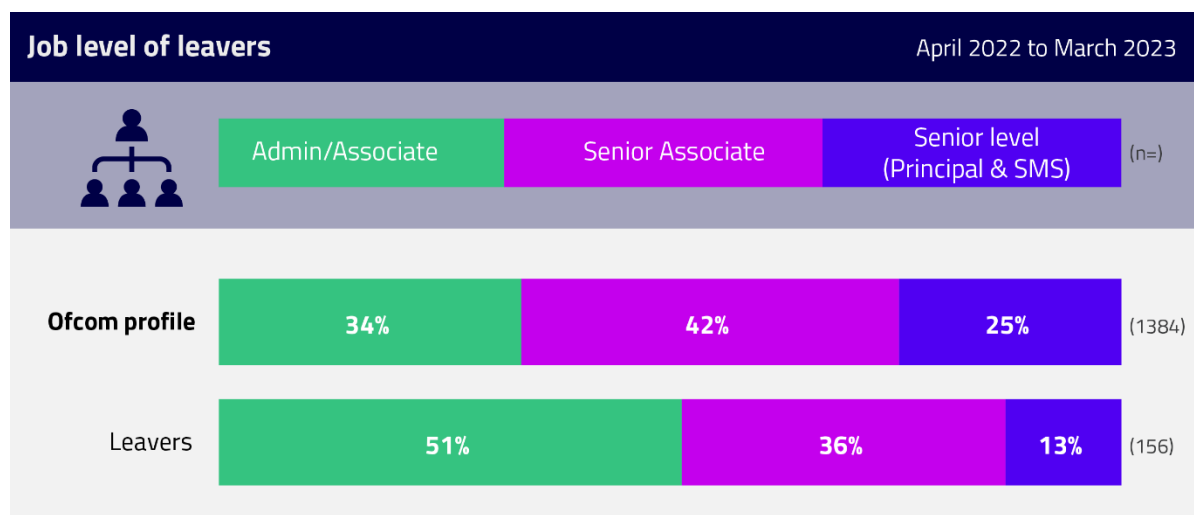
Figure 32: Religion of those promoted



Forty-one percent of all colleagues hold religious beliefs in Ofcom. 33% of colleagues who were promoted were religious.

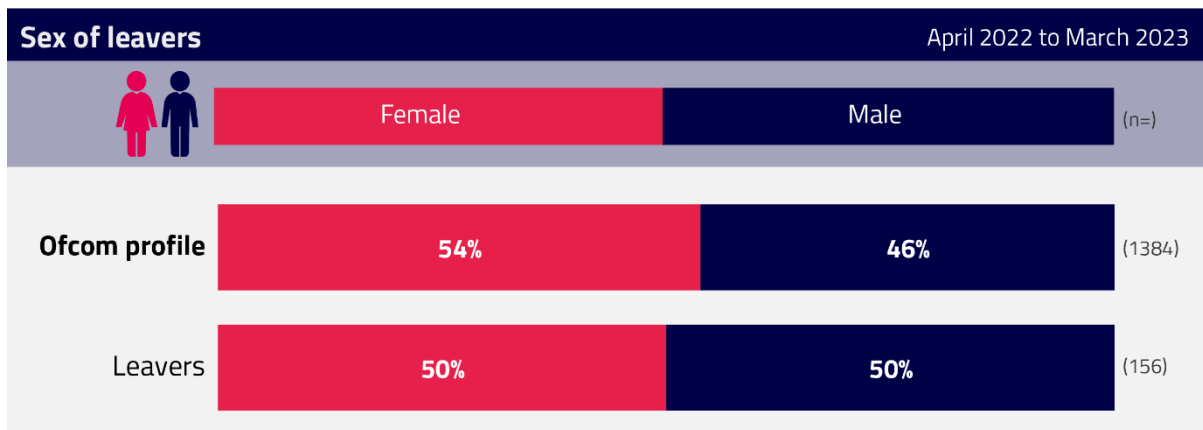
Leavers

Figure 33: Job level of leavers



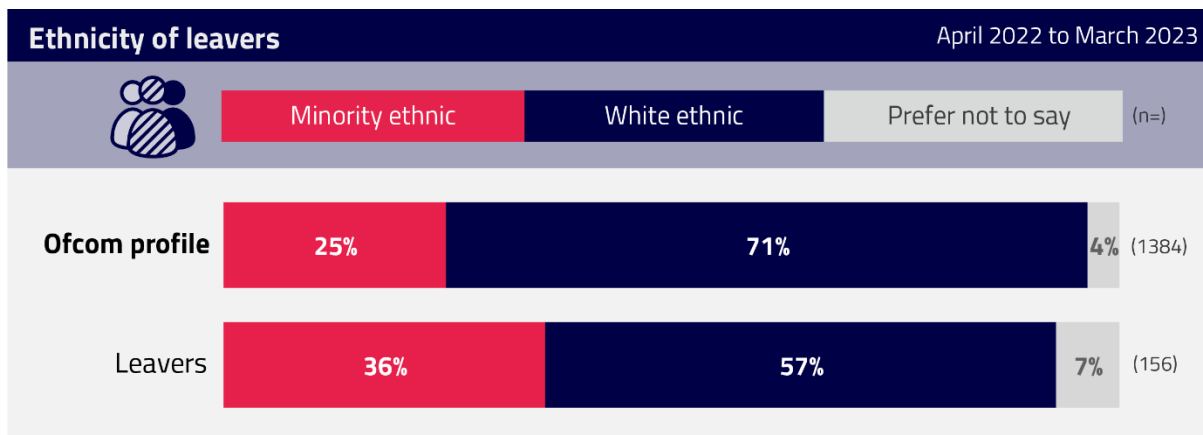
The grade distribution of leavers was all in line with their representation at Ofcom in contrast to the distribution of new starters which were skewed towards Administrators and Associates (51% combined), and which was lower among Senior Associates and Principals and SMS.

Figure 34: Leavers by sex



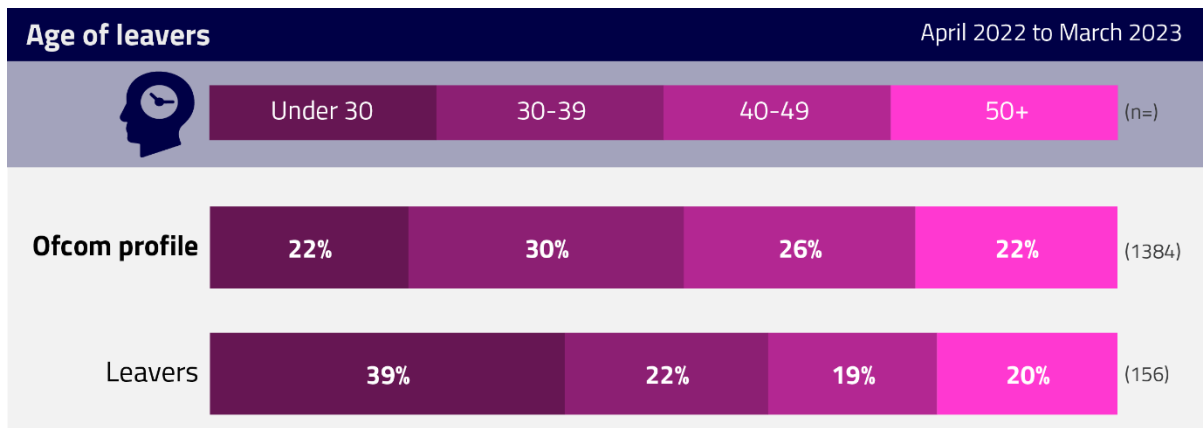
A lower proportion of females (50%) left Ofcom compared to their Ofcom representation (54%) but higher in comparison to the previous year number of female leavers (46%).

Figure 35: Leavers by ethnicity



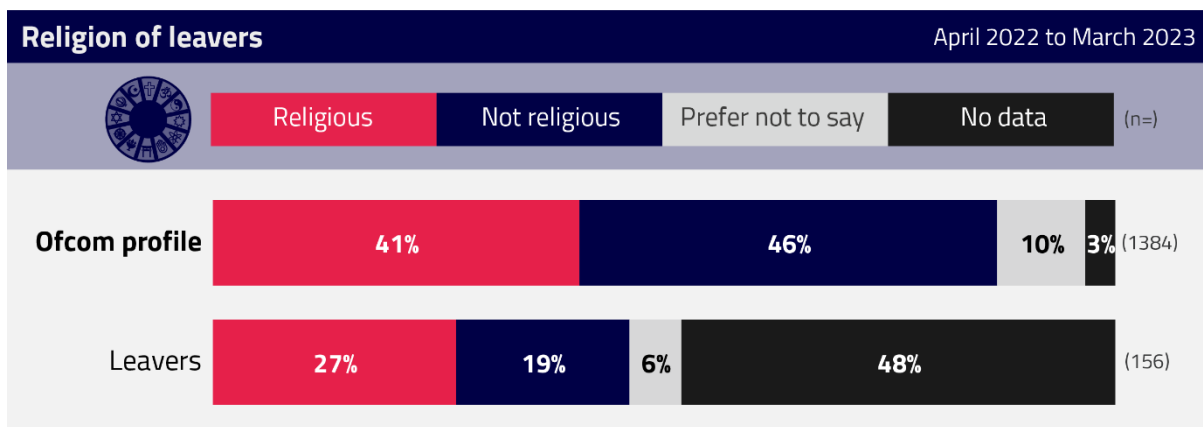
Thirty-six percent of leavers were from minority ethnic backgrounds, higher than the representation of minority ethnic people in Ofcom (25%). Fifty-seven percent of leavers were from White ethnic backgrounds lower than the overall representation of staff from a White ethnic background (71%). Breaking the ethnicity down further, the data shows that of minority ethnic employees who moved on from Ofcom, a larger proportion were from Black ethnic backgrounds (18%) compared to their Ofcom profile (6%) while the leavers rate for Asian staff was the same as their Ofcom average profile (13%). Ofcom is taking forward focussed work to ensure it retains minority ethnic talent.

Figure 36: Leavers by age



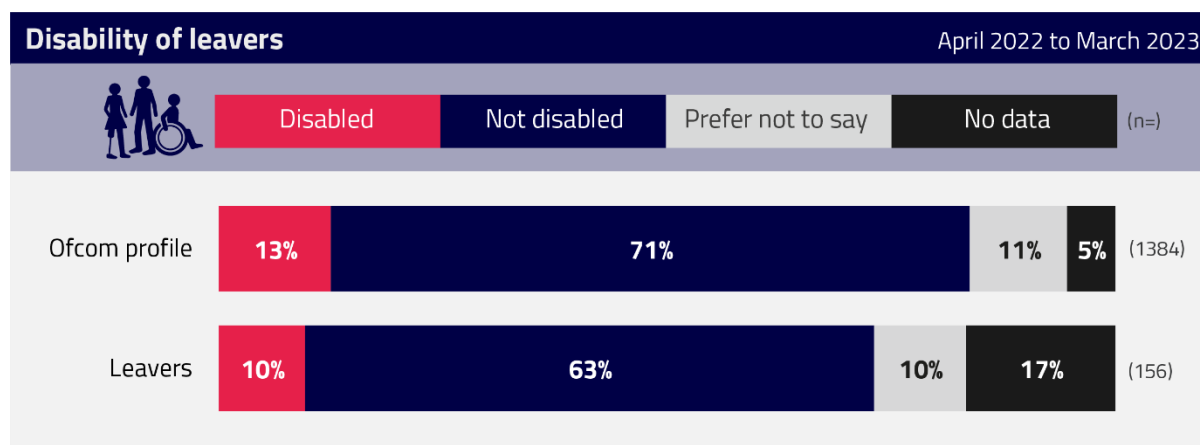
The leavers rate by age group was highest among the under-30s (39%) and 30-39 year-olds (22%) accounting for 62% of people who left us in the last year. These rates are higher than the Ofcom average representation for these age groups (52% combined). This is likely to be reflective of people wanting to move on as they explore career options.

Figure 37: Leavers by religion



The proportion of religious (27%) and non-religious (19%) colleagues who left us were both below their representation at Ofcom overall. However, it should be noted that there is a much higher proportion of people where we don't hold data on their religion or belief or who prefer not to share this information with us.

Figure 38: Leavers by disability



The proportion of leavers who were disabled (10%) and non-disabled colleagues (63%) was below their respective representation at Ofcom overall. However, it should be noted that there is a higher proportion of leavers (17%) where we don't hold data on their disability status than the overall disability profile at Ofcom (5%).

About our data

The diversity questions we ask

The questions we ask covers 'sex' which in the Equality Act 2010 means the sex assigned to a person at birth or the sex a person has legally transitioned to. The term LGBT+ refers to a combined picture of sexual orientation (lesbian, gay, bi) and gender identity including non-binary, trans and other identities. Ethnicity (also refers to 'race' in the Equality Act 2010) and our questions relating to disability, sexual orientation and religion or belief, are aligned to the legal definitions. Age data is taken from date-of-birth information and, along with sex, is a required field for HMRC reporting purposes. Part-time working information is based on people's contractual hours once they join us.

We monitor the diversity of all our people processes to ensure fairness for all. When people apply for jobs at Ofcom and when people join Ofcom, we ask them to complete a diversity monitoring form and to review their information annually or when details need to be updated. We encourage our colleagues to share their information, but people are free to decide not to answer the questions and to choose 'prefer not to say'. We also have some 'no data' gaps where people have chosen not to provide any information at all. Both sets of data are included in our reporting. These no data gaps are largely from our legacy HR systems and from people who have been with us for a longer time. We will continue to work towards closing our gaps by explaining why we ask for the data and how we use it and by creating an environment in which people feel comfortable and safe to do so.

Only data that covers at least ten people is captured in this report, to protect people's private information and make sure they are not identifiable. This means there will be some data points where we either group up data or where we don't show any data at all, e.g., trans colleagues and specific minority ethnic communities. Wherever possible, we have shared more in-depth cuts of data – such as ethnicity – when we are able to meet our data threshold.

References

- [Race/ethnicity ONS Labour market statistics A09](#): Labour market status by ethnic group average of Apr-Jun 22, Jul-Sep 22, Oct-Dec 22, Jan-Mar 2023). All employed minority ethnic people aged 16+ (employees and self-employed) in the UK.
- For London we use ONS Annual Population Survey Jan 22 – Dec 22 – [NomisWeb Table T05 Economic activity by ethnic group and nationality](#). Proportion in employment, aged 16-64 in London.
- [Female employment rate \(aged 16 to 64, seasonally adjusted\): %](#), Office for National Statistics.
- [Employment of disabled people 2022](#), published 26 January 2023, Office for National Statistics.
- [Sexual orientation, England and Wales: Census 2021](#), published 6 January 2023, Office for National Statistics.
- [Religion, England and Wales: Census 2021: The religion of usual residents and household religious composition in England and Wales, Census 2021 data](#), updated 29 November 2022, Office for National Statistics.
- [Economic labour market status of individuals aged 50 and over, trends over time: September 2022](#), published 8 September 2022, GOV.UK.
- [Statistical bulletin - Civil Service Statistics: 2022](#), 2 March 2023, Office for National Statistics.
- [Gender pay gap in the UK: 2022](#), 26 October 2022, Office for National Statistics.