Your response

Question	Your response
1a) Do you think Ofcom should change the way it asks about sex and gender? **1b) If yes, how do you think we should change the questionnaire in relation to sex and gender to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **1c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sex and gender.**	Confidential? - N
2a) Do you think Ofcom should change the way it asks about sexuality? **2b) If yes, how do you think we should change the questionnaire in relation to sexual orientation to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **2c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sexual orientation.**	Confidential? - N
3a) Do you think Ofcom should change the way it asks about race and ethnicity? **3b) If yes, how do you think we should change the questionnaire in relation to race and ethnicity to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **3c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on race and ethnicity.**	Confidential? - N

4a) Do you think that Ofcom should change way it asks about disability? **4b) If yes, how do you think we should change the questionnaire in relation to disability to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **4c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on disability.**	Confidential? - N
5a) Do you think Ofcom should change the way it asks for information about socio-economic background? **5b) If yes, how do you think we should change the questionnaire in relation to socio-economic background to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **5c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on socio-economic background.**	Confidential? - N
6a) Do you think that Ofcom should change the way it asks about management experience and promotions? **6b) If yes how do you think we should change the questionnaire in relation to management experience and promotions to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **6c) Do you think that Ofcom should change the job function groupings in the workforce questionnaire?** **6d) If yes, how do you think we should change our questionnaire in relation to job function groupings to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?**	Confidential? - N

6e) If you are a broadcaster or other data-collecting body, please provide information on the way you currently classify job types / seniority / promotions.	
7a) Should Ofcom collect diversity data by nation and region? **7b) If yes, how do you think we should ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **7c) If you are a broadcaster, please provide information on the data you current collect on the geographic location of your workforce.**	Confidential? - N
8a) Do you think Ofcom should collect cross-sectional data? **8b) If yes, how should we ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **8c) If you are a broadcaster or other data collecting organisation, please provide information on what cross-sectional data you currently use within your organisation.**	Confidential? - N
9a) Do you think Ofcom should change and expand the benchmarks it uses? **9b) If yes, how do you think we should change our benchmarks to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?** **9c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently benchmark data (particularly in relation to socio-economic background and diversity in different geographical regions).**	Confidential? - N
Do you have any views on other aspects of data collection practices that we have not considered in this Call for Inputs?	Confidential? - N

Please complete this form in full and return to diversityinbroadcast@ofcom.org.uk.

About us

1. Directors UK is the professional association of UK screen directors. It is a membership organisation representing the creative, economic, and contractual interests of over 8,000 members — the majority of working TV and film directors in the UK.

2. Directors UK collects and distributes royalty payments and provides a range of services to members including campaigning, commercial negotiations, legal advice, events, training, and career development. Directors UK works closely with fellow organisations around the world to represent directors' rights and concerns, promotes excellence in the craft of direction and champions change to the current landscape to create an equal opportunity industry for all.

3. Our members come from a wide variety of backgrounds and represent a broad spectrum of characteristics. Our members have asked us to champion and campaign for greater diversity in broadcasting. Although Directors UK members are predominantly freelance, and we recognise that the data collection being considered in this call for input is relating to the employed workforce, we are responding as we believe that decisions taken following this review of data collection methods for workers are likely to be replicated to any data that is collected for freelance workers. We are also aware that the background and diversity status of those in employed positions does have an impact on the policies, hiring and commissioning decisions that affect the freelance workforce.

4. Only accurate data can highlight where the inequalities lie. We have undertaken research on diversity with the film and TV directing community ourselves, and have insight into the complexities of collecting and analysing this type of data.

General comments

Alignment with ONS (as outlined in para 3.6)

5. We agree in principle to the alignment/benchmarking of future surveys with the ONS format and language. ONS specialise in data collection. Any groundwork they have laid in terms of language and format will be well considered and will have been designed by expert statisticians to maximise clarity and responses. The ONS approach has also been updated recently for the census and is likely to reflect the latest in data collection.

6. As broadcasters must represent and reflect the audiences they serve as part of their licencing obligation, the ability to directly match the detail of industry diversity datasets with ONS population data enables a more accurate picture of societal representation within the industry to be established.

Language (as outlined in paragraph 3.7)

7. Although Ofcom seeks to use appropriate and inclusive language, it is important to highlight that there is no perfect wording to suit all possible or likely respondents, as it cannot anticipate all variations of response, the lived experiences of those responding, the educational level of attainment of the responder or all personalities and how these might influence the way they respond to a question or prompt.

8. One of the issues around use of language is that it is an inherently emotive component. How an individual sees themselves and expresses that to the world, can carry significant emotional weight. If they don't feel the questions or prompts in diversity data collection include their identity or acknowledges the legitimacy of the identity they see in themselves, this is likely to impact completion levels as they may feel 'I don't fit their criteria' or 'this questionnaire is voiding my lived experience'.

9. Where possible we would advocate that the use of 'other' should be removed as it can be alienating and literally 'othering' to people. An alternative approach is the one used by ScreenSkills (the industry educational body):

- Prefer to self-describe: _____

10. However, we recognise that in building a longitudinal data set to see progress towards representation over time, analysts will need to review historic data and (to a significant degree) be able to marry up past and present. The more answer options a question contains, and the more open answers respondents have, the more complex it becomes to connect old data (without this granularity) to the new data.

1.a Do you think Ofcom should change the way it asks about sex and gender?

11. Yes. The current use of the word 'other' for anyone that falls outside of binary understanding of gender as male or female, can be alienating and literally 'othering' to people. It denies the validity of how they see themselves.

1.b If yes, how do you think we should change the questionnaire in relation to how it asks about sex and gender to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

12. We would advise aligning it with the ONS style of question which distinguishes between sex and gender identity. The sample question around sex and gender from the ONS makes a clear distinction between a designated biological sex at birth, and gender identity now. This seems to offer the best of both worlds and enables respondents to self-identify and provide specific data in the free type fields.

13. Provide some definition of the difference between sex and gender for clarification, as there is likely to be some confusion. In social conversation these can be used interchangeably, and there can also be generational differences in interpretation.

1.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sex and gender.

14. N/A.

Question 2

2.a Do you think Ofcom should change the way it asks about sexual orientation?

15. Yes. The grouping together under 'other sexual orientations' implies that sexual orientations not specifically listed are deviations from the norm, and people may not wish to be considered in this way.

2.b If yes, how do you think we should change the questionnaire in relation to how it asks about sexual orientation to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

16. It would be advisable to reflect how ONS have asked the question in the 2021 Census as they are also allowing individuals to self-disclose sexual orientation.

2.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sexual orientation.

17. N/A.

Question 3

3.a Do you think Ofcom should change the way it asks about race and ethnicity?

18. We have had feedback from our members about the use of collective terminology in the industry. Grouping all non-white racial groups together with terms such as 'BAME' is considered derisory.

3.b If yes, how do you think we should change the questionnaire in relation to how it asks about race and ethnicity to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

19. We would advocate for the removal of any use of the acronym BAME.

20. We acknowledge that there is no collective terminology which is going to satisfy all respondents, and over time any new terminology is likely to become to be regarded as offensive. The Lenny Henry Institute has done considerable research in this area and we would refer to them for appropriate use of language.

21. The addition of nationality as a question would add clarification and nuance. However, Ofcom is right to consider how gathering additional information would be assessed against the ONS criteria.

22. Additional feedback we have received from members is that under "5) Mixed" respondents are able to identify whether they are White and either Black African/Black Caribbean/Black Asian, but they are not able to select from the different groups identified as White in 1). We note that ONS allows people to self-disclose any other mixed background and this may be the way around these issues.

3.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on race and ethnicity

23. N/A.

Question 4

4.a Do you think that Ofcom should change the way it asks about disability?

4.b If yes, how do you think we should change the questionnaire in relation to how it asks about disability to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

24. We consulted members of our disability working group. The feedback we received was that they did not see a problem with the questions being asked, rather that the problem is with the lack of disabled people being employed in the industry and the lack of action being taken to address this.

4.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on disability.

25. N/A.

Question 5

5.a Do you think Ofcom should change the way it asks for information about socio-economic background?

26. The questions asked around parental occupation, school type, parental qualifications and eligibility for free school meals are aligned with the key recommendations issued by government suggesting how socio-economic data should be collected from employees[1].

27. These questions provide more than one data point from which to determine socio-economic status rather than relying on what an individual might perceive or present themselves to be. Interestingly, research by the LSE in 2021[2] found that middle class people would often identify themselves as working class, presenting themselves as having overcome adversity or poverty. In a Guardian article the researchers noted that "*it is also striking that such misidentification was higher among the actors and television professionals we spoke to*"[3]. With TV and Film sector research strongly indicating the industry is dominated by people from more affluent economic backgrounds, the current questions give multiple factors which allow for a more robust assessment of socio-economic background.

5.b If yes, how do you think we should change the questionnaire in relation to socio-economic background to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

28. N/A

5.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on socio-economic background

---

[1] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/768371/Measuring_Socio-economic_Background_in_your_Workforce__recommended_measures_for_use_by_employers.pdf
[2] Deflecting Privilege: Class Identity and the Intergenerational Self - Sam Friedman, Dave O'Brien, Ian McDonald, 2021 (sagepub.com)
[3] Why do so many professional, middle-class Brits insist they're working class? | Sam Friedman | The Guardian

29. N/A.

Question 6

6.a Do you think that Ofcom should change the way it asks about management experience and promotions?

6.b If yes how do you think we should change the questionnaire in relation to management experience and promotions to better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

6.c Do you think that Ofcom should change the job function groupings in the workforce questionnaire?

6.d If yes, how do you think we should change our questionnaire in relation to job function groupings to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

30. Although we are not best placed to advise regarding employed staff roles, promotion and status, Ofcom has stated that: "*We are particularly interested in gaining a deeper insight into those holding senior positions who are often more able to influence both recruitment and the content that is broadcast to audiences*"[4] We believe that in order to achieve this in television it is essential to have a better understanding of the makeup of the workforce involved in undertaking talent recruitment/management, and also those at Commissioning and Executive Producer level, as these are the roles that have direct influence on the commissioning and hiring of the freelance talent who make the content, and are seen by many in the industry as the gatekeepers to opportunities for freelance talent. Having a greater understanding of the people in hiring positions may provide insights into the wider picture of access and barriers to opportunity across the entire production workforce – both staff and freelance. To that end it would be useful for Ofcom to consider gathering role specific data in these areas of HR/Talent /Commissioning/Executive Producer if they want to get deeper insight on those influencing content and who works where.

Question 7

7.a Should Ofcom collect diversity data by nation and region?

31. Yes, we believe it is important to collect diversity data by nation and region, to better understand the makeup of the workforce across the country, and in order to identify where there is underrepresentation.

7.b If yes, how do you think we should ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

32. We believe it is important to collect *both* the hub *and* postcode data. To have a true picture of the workforce it is essential to understand where people live (postcode data) and work (hub data) as they may live in a different area from where they work. This is even more likely since the pandemic. For example, it is not uncommon for senior managers to live in London, but work

---

[4] Consultation doc, para 3.29, page 15

in one of the regional hubs e.g. Manchester, Cardiff, Glasgow. As such people making policy, hiring and editorial decisions may be living outside of the area and travelling to their regional hub for a few days a week.

33. In the consultation document Ofcom states that: *"We see value in identifying how the diversity of workforces compares to regionally specific population data, so we can better understand whether broadcasters are reflecting the diversity of the communities in which they operate."* If only hub data is collected it may show on paper that there is, for example, a female, person of colour, working in a senior role in a particular area e.g. Manchester, but if they do not live there it is not necessarily a true picture of whether the workforce is representative of the area and communities in which they are operating. This is particularly relevant on a socio-economic level. It is also important because senior management have influence on other hiring decisions. By also collecting postcode data it would give a clearer indication of where access to opportunities exist and whether the workforce is having to travel to access them, and whether the hubs are creating opportunities locally.

34. Although this consultation is focused on employed people, if the same data sets were then applied to any data collected for freelancers it would give a much fuller picture of the diversity of work force across the country as freelancers working on contracts are more likely to move around for work, and this then changes the hub picture.

35. It is likely that employers would already have postcode and hub information recorded on employment records. We would suggest that postcode data collected by Ofcom should be limited to the first 4 characters to prevent too much identifying information being made available.

7.c If you are a broadcaster, please provide information on the data you current collect on the geographic location of your workforce.

36. N/A

Question 8 8.a Do you think Ofcom should collect cross-sectional data?

37. Yes. There is a pressing need to look at intersectionality of the data, as rarely is a person working in this industry restricted to just one criteria. The employment opportunities (and eligibility) of a heterosexual woman of colour, with caring responsibilities, living in the nations and regions, is going to be markedly different to a gay, white male, from a lower socio-economic background, with a disability living in London.

8.b If yes, how should we ask this question to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

38. It is likely to take responders some time to adapt to answering more questions on different aspects of their characteristics. Indeed, more questions may even be unpopular. We would suggest that any work around intersectionality of characteristics and their impact on representation or how they create career blocks, is done by the analysts reviewing the submissions behind the scenes, not the responders.

8.c If you are a broadcaster or other data collecting organisation, please provide information on what cross-sectional data you currently use within your organisation

39. N/A.

Question 9 9.a Do you think Ofcom should change and expand the benchmarks it uses?

40. Yes.

9.b If yes, how do you think we should change our benchmarks to help us better identify underrepresentation in broadcasting and highlight any barriers to progression in the industry?

41. We agree that in the nations and regions appropriate benchmarks that reflect the makeup of the local area should be used, as there can be wide variances from the national average in some areas.

9.c If you are a broadcaster or other data-collecting body, please provide information on the way you currently benchmark data (particularly in relation to socio-economic background and diversity in different geographical regions).

42. N/A.

Question 10 Do you have any views on other aspects of data collection practices that we have not considered in this Call for Inputs?

43. Age is a characteristic that we would consider needs to be moved into the mandatory data collection category. The industry has a widely reported skills shortage[5]. Our understanding of the sector is that employment in the sector skews towards youth with only 21% of offscreen contributions made by people 50 and over[6]. With better data on the age of the workforce, the industry will be better able to identify the career stages when talent drain occurs and can then take action to stem the flow.

44. We would also suggest collecting data around caring responsibilities, to gain insights around career breaks and talent drain. Collecting voluntary data on whether responders have caring responsibilities would provide additional insight on career breaks and returns, and what levels of support the industry provides on looking after carers.

45. Data collection is necessary, but for the responder it can sometimes be onerous, particularly if they have a neuro-diversity that makes reading and absorbing lengthy documents challenging. It is important for Ofcom and broadcasters to take this into consideration.

46. Similarly consideration needs to be given to the accessibility of completing data surveys. Are hard copies and online versions available? Can it be submitted as a recording? Are the forms available in braille or via audio description?

Directors UK
May 2022

---

[5] Acute skills shortage threatens British film studios' production boom | Television industry | The Guardian
[6] page 34 of TheFifthCut-Diamond-at-5.pdf (creativediversitynetwork.com)