

## Your response

At ITV, we want to create and showcase content by, with and for everyone, connecting and reflecting modern audiences. As the UK’s largest commercial broadcaster, we recognise the power and reach of our programming, and our Public Service responsibility to ensure that we authentically represent and reflect the whole of the UK on-screen, off-screen in our production teams, and within our workforce. We want to appeal to all of our audiences – ITV is for everyone, no matter who they are.

Diversity data enables us to measure our progress, identify areas to prioritise, and evaluate our interventions. Transparency and accountability is key to driving change. So, in addition to reporting to Ofcom each year, we regularly share our D&I activity and progress through our [Diversity Acceleration Plan report](#), [ITV’s Annual report](#) and [Social Purpose report](#).

We are in the process of changing our system that manages People data at ITV, and we are updating some of our diversity questions and response options in consultation with colleagues. This means that some of our diversity questions and response options will change in 2023. In this response, we have outlined the current questions that we ask and provisional plans about how we may update questions.

Ofcom plays a key role in holding the broadcasting industry to account on D&I and enabling comparisons between broadcasters. We welcome this opportunity to share our perspective on how Ofcom could update its questions to assess diversity in broadcasting and enable greater consistency in how broadcasters report and benchmark progress.

Question	Your response
<p><b>1a) Do you think Ofcom should change the way it asks about sex and gender?</b></p> <p><b>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?</b></p> <p><b>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.</b></p>	<p>Confidential? – Y / N</p> <p>1a) In addition to the current question Ofcom asks about sex and gender, it would be helpful to add a separate question about gender identity. The Diamond Fifth Cut report, published by the Creative Diversity Network in 2022, highlighted that transgender people are particularly underrepresented off-screen in the broadcast industry, where they make 0.3% of contributions compared to population estimates of 0.8%.</p> <p>1b) As the 2021 census included a question on gender identity, Ofcom could take a similar approach by adding a question to better identify underrepresentation of trans people in broadcasting and highlight any barriers to progression. In the current question on gender, it is positive that Ofcom gives the response option ‘Other (e.g. Intersex, non-binary)’, and there would be value in Ofcom providing guidance on how to enter responses when individuals select</p>

	<p>multiple categories (e.g., someone who is both intersex and male).</p> <p>1c) Our current question on gender provides the response options 'Female; Male; Non-binary; Prefer not to say'. On gender identity, we ask 'Is your gender identity the same as the sex you were assigned at birth?' and provide the response options 'No; Non-binary identity; Yes; Prefer not to say'. Ahead of updating our system that manages People data in 2023, we are looking into how we can improve these questions and response options in consultation with colleagues. For example, we are exploring updating our question on gender to 'What is your gender? Man; Non-binary; Woman; I use another term; Prefer not to say' and updating our question on gender identity to 'Are you trans? No; Yes; Prefer not to say'.</p>
<p><b>2a) Do you think Ofcom should change the way it asks about sexuality?</b></p> <p><b>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?</b></p> <p><b>2c) If you are a broadcaster or other data-collecting body, please provide information on the way you currently ask questions on sexual orientation.</b></p>	<p>2a) No</p> <p>2b) N/A</p> <p>2c) Our current question on sexual orientation provides the response options 'Bisexual; Gay man; Gay woman/Lesbian; Heterosexual/Straight; Other; Prefer not to say'. Our staff network ITV Pride recently expanded their description and logo from 'the LGBT+ network' to 'the LGBTQ+ network'. In consultation with colleagues, we are exploring adding 'Queer' and an option to self-describe in ITV's response options for this question.</p>

<p><b>3a) Do you think Ofcom should change the way it asks about race and ethnicity?</b></p> <p><b>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?</b></p> <p><b>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.</b></p>	<p>3a) No</p> <p>3b) N/A</p> <p>3c) We currently use the census categories for ethnic groups. This involves having a broad group for 'Asian / Asian British', whereas Ofcom has separate groups for 'East Asian / East Asian British' and 'South Asian / South Asian British'. While we have been following the census categories to enable consistent benchmarking, we agree with Ofcom's approach and are exploring changing our response options to enable greater specificity when reporting the representation and experiences of East and South East Asian and South Asian colleagues.</p> <p>Our current ethnic group response options are: 'Asian/Asian British - Any other Asian Background; Asian/Asian British - Bangladeshi; Asian/Asian British - Chinese; Asian/Asian British - Indian; Asian/Asian British - Pakistani; Black African/Caribbean/Black British - African; Black African/Caribbean/Black British - Any other background; Black African/Caribbean/Black British - Caribbean; Mixed/multiple ethnic groups - Any other mixed/multiple ethnic background; Mixed/multiple ethnic groups - White and Asian; Mixed/ multiple ethnic groups - White and Black African; Mixed/ multiple ethnic groups - White and Black Caribbean; Other Ethnic Group - Any other ethnic group; Other Ethnic Group - Arab; Prefer not to say; White - Any other white Background; White - English/ Welsh/ Scottish/ Northern Irish/ British; White - Gypsy or Irish Traveller; White - Irish'.</p>
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<p><b>4a) Do you think that Ofcom should change way it asks about disability?</b></p> <p><b>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?</b></p> <p><b>4c) If you are a broadcaster or other data-collecting body, please provide information on the way</b></p>	<p>4a and 4b) Through consultation with ITV Able, our staff network for d/Deaf, disabled and neurodiverse colleagues and allies, there was support for the different response options in the <a href="#">harmonised standard for questions on impairment</a> produced by the Government Statistical Service (as outlined in section 3.22 of Ofcom's call for inputs). These response options are clearer and could help improve our understanding of the accessibility requirements and workplace adjustments that are needed in broadcasting.</p> <p>If the current response options are retained, there would be value in separating out 'Multiple' from the other examples in response option F ('Multiple, Long term or other disability / condition (This includes conditions such as diabetes, epilepsy,</p>
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**you currently ask questions on disability.**

arthritis, asthma, speech impairments, facial disfigurements’) and providing guidance on how to enter responses when individuals have selected multiple categories (e.g. if someone has a sensory disability and a physical disability).

4c) Through consultation with colleagues, we are exploring changing the wording of our question to ‘Do you consider yourself to be d/Deaf, disabled, neurodiverse, or do you have a long-term health condition?’

We are also considering using the harmonised standard for questions on impairment produced by the Government Statistical Service. Our current question is ‘Health condition/ Disability/ Learning disability’ with the response options: ‘A long standing illness or health condition such as cancer, HIV, chronic heart disease, or epilepsy; A mental health difficulty such as depression, schizophrenia or anxiety disorder; A physical or mobility issues such as difficulty using arms or using a wheelchair or crutches; A specific learning disability such as dyslexia or dyspraxia or AD(H)D; Blind or visual loss uncorrected by glasses; D/deaf or hearing loss; N/A (No health condition, disability or learning difference); Other - A health condition or learning difference that is not listed above; Prefer not to say; Social/ communication - such as a speech and language or Asperger's syndrome/ other autistic spectrum disorder’.

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

5a) No

**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?**

5b) N/A

**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.**

5c) We ask three questions on socio-economic background: ‘What was the occupation of the main household earner when you were 14?’  
Clerical and intermediate: secretary, PA, call centre agent, nursery nurse, firefighter; Don’t know/ Not Applicable; Inactive (including those that are retired); Long term unemployed: claimed Jobseekers Allowance/benefit for more than a year; Middle or junior managers: office/ retail/ bank/ restaurant/ warehouse manager; Modern profession: teacher, nurse, social worker, police sergeant or above, IT; Other; Prefer not to say; Routine manual & service: HGV Driver, cleaner, porter, labourer, bar staff; Semi-routine manual/service: postal, security, farmer, machinist, sales asst; Senior manager/administrator with planning/ finance duties: finance manager, CEO; Student; Technical & Craft: mechanic,

	<p>plumber, electrician, gardener, train driver; Traditional: accountant, solicitor, doctor, civil/mechanical engineer’.</p> <p>‘Did your parent(s)/guardian(s) have a degree (or equivalent) when you were 18? Don't know; No; Prefer not to say; Yes’.</p> <p>‘What type of school did you attend for the most time between ages of 11 and 16? Attended school outside the UK; Don't know; Independent or fee paying school - bursary; Independent or fee paying school - no bursary; Prefer not to say; State-run or state-funded school - non-selective; State-run or state-funded school - selective on academic, faith or other grounds’.</p>
<p><b>6a) Do you think that Ofcom should change the way it asks about management experience and promotions?</b></p> <p><b>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?</b></p> <p><b>6c) Do you think that Ofcom should change the job function groupings in the workforce questionnaire?</b></p> <p><b>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?</b></p> <p><b>6e) If you are a broadcaster or other data-collecting body, please provide information on the way you currently classify job types / seniority / promotions.</b></p>	<p>6a) As there are different ways of measuring and defining seniority, Ofcom could help standardise how this is reported across the industry. To ensure we are providing this information in a consistent way, we would value guidance from Ofcom to define the different categories under management experience and promotions.</p> <p>6b) One standardised measure that could be considered is reporting pay quartiles using the existing pay gap methodology. While there are still limitations with using pay quartiles as a proxy for seniority, and pay gap reporting beyond gender is currently voluntary, this approach could enable consistent comparisons.</p> <p>6c) To reduce subjectivity in how we classify roles, we would value guidance from Ofcom on the different job function groupings and how to classify people who are in multiple categories. For instance, there is overlap between ‘on-screen talent role’ and other categories such as journalism.</p> <p>6d) N/A</p> <p>6e) Seniority: we currently categorise whether colleagues are part of our Senior Leadership Team (including our Management Board), line managers, or non-managers.</p> <p>Promotions: we currently infer promotion through other data points, but we are looking to introduce more robust tracking as part of the wider project to update our systems next year.</p>

Job types: we are in the process of updating these for our new HR system. [✕]

**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.**

7a) As the diversity of different nations and regions varies greatly, it would be helpful to understand the extent to which broadcasters reflect the diversity of the local areas we operate in.

7b) Ofcom could ask for diversity data by regions.

7c) We currently hold office locations for staff. For our larger offices, we compare diversity data to the local population using census data. In News, we hold regional data at an organisational level using the following categories:

- Anglia
- Border
- Central
- Granada
- London
- Meridian
- Tyne Tees
- UTV
- Wales
- West Country
- Yorkshire

<p><b>8a) Do you think Ofcom should collect cross-sectional data?</b></p> <p><b>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?</b></p> <p><b>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.</b></p>	<p>8a) It would be helpful for Ofcom to collect cross-sectional data to better understand the barriers faced by people with multiple protected characteristics.</p> <p>8b) The main intersections it would be good to ask about are:</p> <ul style="list-style-type: none"> <li>● Specific ethnic group and gender (e.g., Black women, South Asian women etc.)</li> <li>● Ethnicity and disability (e.g., disabled people of colour)</li> <li>● Ethnicity and socio-economic status</li> <li>● Disability and socio-economic status</li> <li>● Sexual orientation and ethnicity</li> </ul> <p>8c) We recently conducted intersectional analyses and consider multiple intersections including the ones listed above. While it is good to have flexibility to focus on the intersections that are most relevant for each organisation, having some shared measures that each broadcaster reports on would be valuable.</p>
<p><b>9a) Do you think Ofcom should change and expand the benchmarks it uses?</b></p> <p><b>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?</b></p> <p><b>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).</b></p>	<p>9a) No</p> <p>9b) N/A</p> <p>9c) We benchmark data using UK labour market data from ONS, local census data, Diamond, and we benchmark against other broadcasters as listed in Ofcom reports.</p>
<p><b>Do you have any views on other aspects of data collection practices that we have not considered in this Call for Inputs?</b></p>	<p>Two key strengths of Ofcom’s annual diversity report are how the broadcasters are compared in a consistent way, and the way Ofcom can highlight shared challenges and insights from across the industry.</p> <p>While the quantitative section enables clear comparisons, the qualitative section of the survey is more challenging to benchmark. To address this, Ofcom could make the</p>

qualitative section more structured by asking questions that focus on key objectives and shared challenges that broadcasters face. For example, asking about the Doubling Disability initiative that broadcasters committed to through the Creative Diversity Network (CDN), and ongoing efforts to address underrepresentation in senior roles.

We encourage Ofcom to coordinate with the CDN on a shared approach to collecting and reporting diversity data, keeping each other informed of plans and developments, particularly as the CDN are currently updating the industry-wide Diamond system that monitors diversity in broadcasting. A shared approach could help create a clearer picture of the diversity of our industry, and consistent messaging could enable us to better target interventions.

We recommend that Ofcom reports diversity data as a proportion of staff that shared data (including those who select 'prefer not to say') and separately report the proportion of staff that did not complete diversity monitoring forms (the data gap). In our regular external reporting, we report our diversity data as a proportion of those who have completed diversity monitoring forms as we consider this to be a clearer way to monitor diversity and benchmark data. For instance, in the latest Ofcom report, there was a 27% data gap for sexual orientation across the UK-based TV industry in 2021. That makes it challenging to compare Ofcom's reported figures of 6% Lesbian/ Gay/ Bisexual and 61% Heterosexual with the UK labour market / population benchmarks of 4% Lesbian/ Gay/ Bisexual and 96% Heterosexual.

As we and other broadcasters already report on our D&I progress externally in various ways, Ofcom has an opportunity to streamline how it asks about the diversity of the broadcasting workforce to have greater impact (both through the quantitative and qualitative sections of the survey). This would enable broadcasters to spend more time delivering D&I interventions while still reporting the key information needed to ensure accountability and drive change across the sector.

Please complete this form in full and return to [diversityinbroadcast@ofcom.org.uk](mailto:diversityinbroadcast@ofcom.org.uk).