

Confidential? – N

Stonewall is pleased to be invited to respond to this consultation on how Ofcom is working to improve the equality and diversity of its staff and inclusion in the workplace.

We believe every stakeholder in the media industry can and should take active steps to ensure their workforce reflects the diversity of the communities the media aims to represent and serve. Broadcasters are in a unique position to inform and increase the public's understanding of different communities and the issues they face. It is therefore vital that representation of these communities is fair, accurate and authentic and we believe this is only possible when the media industry is a place where diversity is cherished and championed.

General approach

We're pleased to see such a thorough plan however we believe there are areas where it could be even more detailed to ensure clarity of meaning, particularly around what is meant by diversity. In some areas of the plan specific identities are mentioned but elsewhere diversity is used as a catchall. Whether this means the full spectrum of protected characteristics is unclear. It would be good to have clarity and assurance on this.

Stonewall recommendation: Greater clarity on the meaning of diversity to provide assurance that this covers all protected characteristics or greater clarity on what exactly is being monitored/targeted/assessed.

3.3 a) We're pleased to see Ofcom implement diversity targets and we're keen for Ofcom to get to a point where they can consider whether there is a need to set targets for sexual orientation. When making this consideration, we would encourage Ofcom to consider specific identities, rather than looking at LGB as one homogenous group.

3.3 c) We would strongly encourage diversity monitoring to include trans and non-binary people and to seek expertise on how to monitor different identities effectively. In this section, and throughout the entire document, there is no mention of trans people, aside from the network group. There is also limited discussion of initiatives targeted at LGBT people, aside from the network group and Stonewall's Workplace Equality Index. We would also encourage Ofcom to ensure diversity training covers workplace equality for not only lesbian, gay and bi people but also trans and non-binary people.

Stonewall recommendation: Monitor not just sexual orientation but specific identities within LGB communities. Include trans and non-binary in monitoring exercises and seek expertise on how to do this. Ensure initiatives are developed and implemented that target LGBT people.

3.10 We're pleased to see leadership accountability for encouraging diversity. While there is a lead for sexual orientation it is vital there is a role – or it is made part of this existing role – to champion trans and non-binary equality in the workplace.

Stonewall recommendation: We suggest the lead for sexual orientation be extended so it also has responsibility for championing the full spectrum of the LGBT community. We would also suggest that the role description makes clear that the post holder is responsible for leading on trans and non-binary inclusion and that training and resources are provided to ensure the post-holder fully understands the issues this group faces in the workplace.

3.16 We are pleased that Ofcom will be looking at the diversity of staff at broadcasters as part of its regulation. We would also encourage Ofcom to consider the diversity of Ofcom's Boards, particularly

the Content Board. It is vital that the group overseeing this content is diverse. It is also vital they understand the needs of different communities and that there are initiatives to ensure that any gaps in knowledge are addressed.

Stonewall recommendation: Consider the diversity of all of Ofcom's board members and consider initiatives to increase and broaden their understanding of different communities needs.