

## About the survey

Ofcom collects qualitative equity, diversity and inclusion (EDI) data from broadcasters annually in order to develop a more comprehensive picture of what broadcasters are doing to promote equality and diversity in their organisations.

The survey takes the form of a 'maturity model' which assesses a broadcaster's effectiveness at achieving a range of EDI objectives. The model helps broadcasters to explore and understand the degree of maturity in their approach to EDI and provides suggestions to help further develop their approach. Broadcasters are asked questions on seven EDI themes, which map across to Ofcom's guidance to broadcasters, to enable broadcasters to understand the degree of 'maturity' in their EDI arrangements relevant to each theme – ranging from 'starting' to 'achieving'. This information also helps develop our understanding of whether broadcasters are achieving different EDI objectives across their organisations.

Broadcast licensees with more than 20 UK-based employees should have received a formal notice requesting this information which sets out why Ofcom requires this data and what it will be used for. Licensees with 20 or fewer UK-based employees are not required to complete this survey. If you have received the formal notification request but now have 20 or fewer UK-based employees, you are only required to complete section A of the quantitative workforce survey and submit your response to us. We have also provided a text version of the full survey on our website to all broadcast licensees so that smaller broadcasters can use it as a means of self-evaluating their EDI arrangements.

Annex 1 to your formal notice sets out data protection obligations you must comply with before processing any information which is personal data. Please read this before completing the questionnaire and follow the steps described. Further information on how to complete this qualitative survey can be found in the user guidance document sent to you alongside the formal notification request.

**All licensees with more than 20 UK-based employees and who are authorised to broadcast for more than 31 days per year are required to complete section A and the questions marked as (MANDATORY) in sections 1 to 5.**

We also strongly encourage broadcasters to complete all questions because this will provide you with valuable feedback on your EDI arrangements and allow you to identify areas which require more focus. It will also help Ofcom to drive and monitor improvements to workforce diversity and inclusion, as well as understand the changing priorities of the broadcasting sector and support learning, evaluation and collaboration within the sector. If a partial response is provided your score for that section may not be an accurate reflection of your current arrangements.

Sections 6 and 7 relate to commissioning and freelancers, respectively. We recognise that not all broadcasters will have commissioners or work with freelancers, therefore there is an option to skip the questions in these sections if they do not apply to your organisation. Skipping these questions will not affect a broadcaster's rating in other areas of the maturity model.

Once you have answered a question click the 'Next' button at the bottom of the page to proceed to the next question. If you need to go back to a previous question you will need to use the 'Back' button on the survey to do so (and the 'Next' button to advance again). DO NOT USE THE BACK OR FORWARD BUTTONS ON YOUR WEB BROWSER, as this will result in the loss of information on your current page. You can save your responses and return to the survey at a later date by selecting the 'Save and exit' option at the bottom, provided your responses are submitted ahead of the deadline.

You may wish to follow this link to open a text version of the survey so that you can view it in full before you begin to complete it and/or if you need to refer to other questions from other parts of the survey.

The questions in the survey are grouped by the following themes:

- 1) Strategy and leadership
- 2) Data collection, monitoring and evaluation
- 3) Recruitment
- 4) Retention, development and progression
- 5) Culture and voice
- 6) Commissioning
- 7) Freelancers

If you have any questions about this survey that are not addressed in the user guidance, you can contact us at [EDlinbroadcasting@ofcom.org.uk](mailto:EDlinbroadcasting@ofcom.org.uk)

## Your details

A1. Please check/complete the following details. If anything already filled in is incorrect please enter the alternative. If you have autofill switched on within your browser, be careful to ensure that the correct information is provided in these boxes.

Name: \_\_\_\_\_  
\_\_\_\_\_

Email address: \_\_\_\_\_  
\_\_\_\_\_

Job title: \_\_\_\_\_  
\_\_\_\_\_

Organisation: \_\_\_\_\_  
\_\_\_\_\_

Number of licences included in this submission: \_\_\_\_\_  
\_\_\_\_\_

If you are answering this survey on an aggregated basis, i.e. on behalf of more than one licence holder, please set out which licensed services the aggregated information relates to (Otherwise leave blank)

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**A3. How many people does {A1d} currently employ either full or part time in connection with the provision of licensed broadcasting services?** This number should NOT include freelancers or volunteers.

Total number of employees \_\_\_\_\_  
\_\_\_\_\_

**A4. How many of the {A3} employees are based in and outside the UK?**

Employees based in the UK \_\_\_\_\_  
\_\_\_\_\_

Employees based outside the UK \_\_\_\_\_  
\_\_\_\_\_

**Total** \_\_\_\_\_  
\_\_\_\_\_

**The total for A4 should add to {A3} as specified at A3. The current total is {Total\_A4}. Please amend before you continue.**

**A5. Are your licensed service(s) received in the UK?**

- Yes
- No

**A6. Is {A1d} authorised to broadcast for more than 31 days a year?**

- Yes
- No

**As your organisation either has fewer than 21 UK-based employees, or isn't authorised to broadcast for more than 31 days a year (or both), you do not meet the obligation threshold for completing this survey. Please click 'Next' and then 'Submit' to send us your response.**

## **Section 1: Strategy and Leadership**

To achieve sustained progress in EDI, an organisation should take an evidence-based approach, with clarity about: the desired trajectory; measurable and achievable goals; and effective leadership by those able to influence change. To meet your licence conditions you should have a written policy statement on your arrangements for promoting equality of opportunity.

**S1.a Do you have a regularly updated EDI policy statement or strategy, with specific arrangements relating to disability, race and sex? (MANDATORY)**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

### Why are we asking this?

Having a clear statement of intent and a roadmap for your organisation is crucial. It drives evidence-based improvements and helps everyone know what they need to do. **You are required to make arrangements for promoting equality of opportunity in relation to disability, race and sex in order to meet your licence conditions.**

### Suggested next steps

Begin by researching what's already working in companies across the industry. People are often willing to share information and collaborate when it comes to EDI. An effective EDI strategy shows a direct link with your organisation's overall strategy.

### Suggested next steps

Consider developing a draft EDI strategy based on the data you hold about your workforce (overall and at different levels within the organisation) and how engaged and fair employees feel the organisation is. At a minimum, and to comply with your licence conditions, this should cover disability, race and sex. Consider where you want to set your ambitions as an organisation and how you can quantify and measure those ambitions. Please refer to our guidance for broadcasters to help you with this.

### Suggested next steps

To maintain relevance, we recommend that you review your EDI strategy from time to time in consultation with the Board, where relevant, and staff representatives (e.g. staff networks or employee research groups). Make sure you engage people from across the organisation - including senior leaders and staff groups, to ensure ownership and delivery and that you involve underrepresented groups.

### Suggested next steps

To maintain relevance, we recommend that you review your EDI strategy from time to time in consultation with the Board, where relevant, and staff representatives (e.g. staff networks or employee research groups).

## Section 1: Strategy and Leadership

**S1.b Do you have EDI governance structures?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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### Why are we asking this?

Ensuring that EDI is part of the accountability mechanisms within your organisation will provide transparency and add urgency to delivering your objectives.

### Suggested next steps

Depending on the size of your organisation there will be different options for EDI governance structures. Sometimes there can be a separate EDI group, drawn from different levels and parts of an organisation. At other times, accountability begins with the Board and is fully integrated within other strategic management frameworks.

### Suggested next steps

Think about the accountability and planning structures within your organisation. Ensure that your planning processes and evaluation of success/impact take into account the impact on EDI.

### Suggested next steps

Once you are clear on who is accountable and what mechanisms you have for assessing progress on EDI, ensure that everyone within your organisation is aware of how you measure progress.

### Suggested next steps

As you keep your EDI strategy under review, monitor progress and evaluate impact, consider whether the governance structure that you have adopted is effective in driving positive change, or whether improvements can be made. Ensure that you share evaluation and next steps with your workforce.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**S1.c Do senior leaders have EDI objectives?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

Senior leaders and managers will rightly focus on what they have been made accountable for delivering. Introducing relevant and achievable EDI objectives can help to integrate EDI considerations throughout an organisation.

**Suggested next steps**

Depending upon the nature of your management structures, it may be helpful to consider senior leaders and managers having specific EDI objectives.

**Suggested next steps**

Having specific EDI objectives for senior leaders and managers helps to ensure that EDI remains a priority across the organisation. Make objectives SMART (specific, measurable, achievable, relevant and time-bound) - what gets measured gets done.

**Suggested next steps**

Consider ways to share progress and celebrate success within your organisation. It's important for everyone to know that their actions and contribution are making a positive difference. If you aren't seeing this, consider how you are driving accountability for delivery of your EDI strategy and how individuals are held to account.

**Suggested next steps**

You could consider making EDI impact part of your senior recruitment criteria to ensure that everyone understands how important this is to your organisation.

## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 1: Strategy and Leadership

### S1.d Do you clearly communicate your EDI strategy to employees and other stakeholders? (MANDATORY)

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

## Why are we asking this?

Communicating your commitment to promoting EDI creates transparency, clarity and impact, including for decision-making and expected behaviour. This information needs to be made easily accessible to all staff. **In order to meet your licence conditions, you are required to make your employees aware of your arrangements around equal opportunities and training.**

## Suggested next steps

**You should communicate your EDI arrangements in order to meet your licence conditions.** Consider when and how you communicate with employees and other stakeholders, including at recruitment, during induction, and in performance and appraisal processes.

## Suggested next steps

There may be opportunities through publications such as annual reports and via social media to communicate your approach. Ensure your communications are accessible and inclusive.

## Suggested next steps

Ensure your approach to EDI is clear to everyone, from the Board to audiences, via your website and other internal and external communications

## Suggested next steps

Make sure that you regularly review how you are communicating about EDI and what your messages are. Your communications could include progress you have made and what you have learnt. Ensure you also get feedback on staff reaction to your communications.

## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

# Section 1: Strategy and Leadership

**S1.e Do you have senior EDI champions or sponsors or another mechanism to provide visible leadership on EDI?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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### Why are we asking this?

Having visible leaders on EDI helps affirm commitment and provides one or more senior points of contact for employees and other stakeholders.

### Suggested next steps

Think about how to balance overall leadership accountability with visible champions or sponsors for your overall EDI strategy or for different aspects of EDI.

### Suggested next steps

Consider the remit of a champion or sponsor and ensure that leaders are supported in the role. This can include mechanisms such as reverse or reciprocal mentoring.

### Suggested next steps

Ensure your approach to senior level championship or sponsorship is regularly reviewed and that it is meaningful.

### Suggested next steps

Reflect on the difference having senior level champions or sponsors has made to the embedding and impact of your EDI strategy and to the culture of your organisation. Consider where you can build on your successes.



## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 1: Strategy and Leadership

### RESULTS SUMMARY

Based on the answers you have provided your total score for **Strategy and Leadership** is **{S1TOTAL}** out of **15**.

This means for **Strategy and Leadership** your organisation is currently:

### STARTING

This means that you have work to do in the early stages of developing your EDI arrangements. This may include:

- Creating a clear policy statement or EDI strategy
- Exploring values and objectives
- Engaging senior leaders

### ENGAGED

This means that you need to plan the next stages of your EDI arrangements. This may include:

- Executing priority elements of your strategy
- Publishing your values and objectives
- Securing commitment from senior leaders

### PROGRESSING

This means that you now need to concentrate on the impact of your EDI arrangements. This may include:

- Measuring the effectiveness of your strategy
- Proving that leaders act according to your values
- Ensuring that managers are accountable for EDI objectives

### ACHIEVING

You are doing very well with this aspect of EDI. To maintain this level, consider:

- How your strategy responds to crisis and ambiguity
- How senior leaders are profiled as role models and offer mentoring
- How you plan to evolve your EDI arrangements and introduce more ambitious plans for your overall strategy or the development of senior leaders

You can also refer to our guidance for broadcasters to provide you with further suggestions to help you develop your EDI arrangements.



## S2.a Do you monitor the diversity of your workforce to identify any underrepresentation by disability, race and sex? (MANDATORY)

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

### Why are we asking this?

In order to promote equality of opportunity in the broadcasting sector, Ofcom requests information in our annual quantitative data survey. Analysing the data collected to help reduce underrepresentation in the workforce is crucial. We actively encourage broadcasters to monitor other characteristics, including socio-economic background and geographic location.

### Suggested next steps

Consider what diversity characteristics it makes sense to monitor. You should, at a minimum, and in order to meet your licence conditions, monitor underrepresentation by disability, race and sex.

### Suggested next steps

Consider your diversity data collection and what is proportionate and meaningful for an organisation of your size. At a minimum Ofcom expects that you will monitor underrepresentation by disability, race and sex. Consider whether you could also monitor age, religion and sexual orientation. Also think about the indicators of socio-economic background and geographical location.

### Suggested next steps

Consider what the diversity data is telling you and how can it inform your EDI arrangements. Track trends in data within your organisation and the sector over time to ensure your EDI arrangements are sufficiently ambitious and are driving change. Read Ofcom's monitoring reports to better understand the issues and areas of underrepresentation in the sector.

### Suggested next steps

Do you have sufficient cross-sectional analysis to capture the presence and experience of people with more than one of the characteristics that are underrepresented in your workforce or at senior levels? Data gaps can mean blindspots. Consider how you can close data gaps, for example through building trust in the use, storage and access to diversity data.

## Section 2: Data Collection, Monitoring and Evaluation

## S2.b Do you monitor the diversity of your workforce to identify any underrepresentation by other characteristics, such as age, religion/belief, sexual orientation, socio-economic background or geographic location?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach

- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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### Why are we asking this?

Although broadcasters' licence conditions relate only to disability, race and sex, we believe a broader approach to diversity is important and that monitoring provides important information, depending upon the size of employer.

### Suggested next steps

Consider whether there is a case for monitoring characteristics beyond disability, race and sex. This decision will depend upon the size of your organisation, levels of underrepresentation and your scope for EDI arrangements to address it.

### Suggested next steps

Find out about other broadcasters of a similar size and what they monitor. Broadcasters' responses to Ofcom's regular annual quantitative data surveys can support your research.

### Suggested next steps

Whatever level of data collection and analysis you feel able to undertake, consider trends and establish priorities to inform your strategy. Where you can, consider a cross-sectional approach for people who are members of more than one underrepresented group.

### Suggested next steps

Whatever level of data collection and analysis you feel able to undertake, consider trends and establish priorities to inform your strategy, as well as cross-sectional insights about people who are members of more than one underrepresented group. Keep the collection of data under review and consider whether further analysis or investigation is required to close data gaps.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 2: Data Collection, Monitoring and Evaluation

**S2.c** Do you clearly identify where there is underrepresentation in your senior team when compared with a relevant benchmark (e.g. data for the UK as a whole or for the city/cities or region(s) within which you are based); and put in place arrangements for addressing this underrepresentation? (MANDATORY)

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

### Why are we asking this?

You need to understand any underrepresentation clearly to determine whether and how to address it.

### Suggested next steps

The datasets you use to inform your strategy for change are likely to vary according to the size of your workforce. Consider who in your organisation could facilitate a debate about potential action to address underrepresentation.

### Suggested next steps

Try to set out clearly which groups are underrepresented, actions you are taking, or will take, to address this, and what you are aiming to achieve.

### Suggested next steps

Your EDI strategy should explain how you will address underrepresentation in your workforce and your senior team as well as setting out any EDI arrangements that underpin this.

### Suggested next steps

You should keep any underrepresentation under review. As things change you should evaluate what you have learned, what is working and what isn't.

## Section 2: Data Collection, Monitoring and Evaluation

**S2.d** Do you undertake communications or other initiatives to increase the completeness of the workforce diversity data collected by your organisation?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information

Not relevant to our organisation

Please explain why...

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### Why are we asking this?

The completeness of your data is crucial to understanding EDI within your organisation, for setting measurable and effective EDI objectives and for monitoring your progress and evaluating the efficacy of specific EDI arrangements.

### Suggested next steps

People may be reluctant to share information for a range of reasons. Consider asking employees, perhaps using a focus group or anonymous survey, to understand what is stopping them from sharing data and what would make them feel comfortable to share information. It is helpful to have a strong rationale for asking about diversity and stating clearly what you intend to do with the information.

### Suggested next steps

There is a growing body of evidence about the reasons why individuals may not complete diversity data monitoring forms and what might make a difference. Consider asking employees, perhaps using a focus group or anonymous survey, to understand what is stopping them from sharing data and what would make them feel comfortable to share information. It is helpful to have a strong rationale for asking about diversity and stating clearly what you intend to do with the information. Talk to other broadcasters or EDI leaders in other sectors to get ideas.

### Suggested next steps

You may have linked the collection of workforce diversity data to your EDI strategy. To help increase data collection rates it is important to reassure people that they won't face discrimination if they share certain kinds of data. Try to be specific about who will see the data, how it will be stored, how it will be used and when it will be destroyed.

### Suggested next steps

Make it easy for employees to update their own employment record and their diversity data. As well as effective corporate communications and specific exercises to collect data at recruitment or appointment, you should have a continuous approach to improving data collection and give as much agency as possible to individuals to compile their own data entries.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 2: Data Collection, Monitoring and Evaluation

**S2.e Do senior leaders regularly review 'live', recently collected data and workforce trends and take demonstrable action to drive EDI?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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### Why are we asking this?

Things are unlikely to change without conscious intent, accountability and evidence-based action.

### Suggested next steps

Consider building these reviews into an annual meeting of the Board or a regular meeting of senior leaders.

### Suggested next steps

Consider what workforce diversity trends are telling you and what actions could be effective as a result.

### Suggested next steps

Ensure that you assess actions taken as a result of collecting and analysing data and consider whether they are effective. Demonstrate senior accountability: adjust actions if necessary and share successes with the organisation as a whole.

**Suggested next steps**

Demonstrate senior accountability: adjust actions if necessary and share successes with the organisation as a whole. If you have valuable experience, consider sharing it with other broadcasters.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 2: Data Collection, Monitoring and Evaluation**

**S2.f Do senior leaders and managers review trends in diversity data for absence, disciplinary, grievance and allegations of harassment, bullying and discrimination?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

Patterns may be apparent which can help to identify possible inequities in the treatment of people from under-represented groups. Reviewing this at senior level can help give a strong message and organisational accountability.

**Suggested next steps**

Monitoring these procedures according to different under-represented groups can provide important insight into pockets of inequity, barriers and bias within your organisation.



**Suggested next steps**

Consider whether there are issues arising relating to absence, performance or behaviour that you have identified from data, exit interviews or observation. These are sensitive issues and it's important to ensure anonymity and confidentiality in any discussions about them. Issues are more likely to be addressed if senior leaders are aware of any patterns and likely issues.

**Suggested next steps**

If there are issues for particular groups of staff, consider whether systemic action is required, such as an independent investigation or further guidance and training.

**Suggested next steps**

It's important to remain vigilant about inequities of experience for employees; these processes provide important early warning signals. Continue to consider the best ways of communicating to staff your commitment to addressing these issues.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 2: Data Collection, Monitoring and Evaluation**

**S2.g Does EDI monitoring and evaluation feed into changes in your EDI arrangements?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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## Why are we asking this?

Monitoring and evaluation can tell you about current issues within your organisation and whether EDI arrangements are effective. They will help you to decide when to modify your EDI objectives or relevant policies and procedures. They could also identify particular training needs or important issues to communicate to parts of your organisation or the whole organisation.

## Suggested next steps

Explore what other organisations are doing to interpret their monitoring data and how they evaluate the impact of their EDI arrangements.

## Suggested next steps

Ensure that you use a range of sources of information to review your impact and make changes accordingly. The information could be qualitative and quantitative data, including from diversity monitoring, employee surveys, monitoring of key HR processes, exit interviews, and messages from staff forums and diversity groups.

## Suggested next steps

Try to establish a settled cycle of setting, delivering, monitoring and evaluating your EDI strategy.

## Suggested next steps

Consider what you could share with your employees to celebrate progress and to thank people who have contributed. If you have valuable insights, please also share these with Ofcom and other broadcasters.

## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 2: Data Collection, Monitoring and Evaluation

### RESULTS SUMMARY

Based on the answers you have provided your total score for **Data Collection, Monitoring and Evaluation** is **{S2TOTAL}** out of **21**. This means for **Data Collection, Monitoring and Evaluation** your organisation is currently:

### STARTING

This means that you have work to do in the early stages of your EDI journey. This may include:

- Exploring what others are doing to collect diversity and inclusion data at different stages of the employee journey.
- Considering GDPR requirements and ensuring that you have an effective data security strategy

## ENGAGED

This means that you need to plan the next stages of your EDI journey. This may include:

- Ensuring that you have sufficient expertise to analyse what data is telling you about EDI
- Considering quantitative data from diversity snapshot surveys or employee records, if you hold it
- Considering what the quantitative and qualitative data you have access to tells you about EDI within your organisation. For example, from employee surveys, exit interviews, training feedback and appraisal processes.

## PROGRESSING

This means that you now need to concentrate on the impact of your EDI journey. This may include:

- Reviewing whether you have sufficient insight from the data you collect and what cross-sectional analysis you can undertake
- Engaging with employees from across your organisation to gather additional insights
- Introducing mechanisms to evaluate the impact of EDI initiatives

## ACHIEVING

You are doing well with this aspect of your EDI journey. To maintain this level, consider:

- Ensuring that your EDI strategy has a clear evaluation element to it
- How you will share the learning from delivery of your EDI strategy across the organisation, and potentially with others, to contribute to good practice and learning on EDI

You can also refer to our guidance for broadcasters to provide you with further suggestions to help you develop your EDI arrangements.

### **Would you like to provide any additional comments regarding Data Collection, Monitoring and Evaluation?**

This is voluntary and the information you submit does not have an impact on your overall score. However, it might aid Ofcom in our understanding of your EDI arrangements or help us to compare results across the industry. Please do not provide any personal data or information you consider to be confidential. The text box has a character limit of 1500 so please make your response as succinct as possible.



- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

## Why are we asking this?

Communicating your ambition to be a diverse and inclusive organisation is important for recruiting and retaining the broadest range of talent and tackling underrepresentation.

## Suggested next steps

Think about how you communicate your EDI ambitions in recruitment literature and where you advertise job roles.

## Suggested next steps

Consider reviewing your recruitment policy, processes, and associated communications. Consider what you know about the candidates that express an interest in roles and opportunities, and which candidates get shortlisted and appointed. Understanding the diversity of the candidates selected can help to indicate whether there are issues to address and what approach to take. For example, the legislation on disability is different to other areas and many organisations guarantee an interview to candidates who are disabled and also meet all the minimum criteria for a role. The Disability Confident Employer scheme has plenty of advice on this.

## Suggested next steps

It can be hard to increase diversity in professional areas with diversity imbalances or at senior levels where there are relatively few opportunities for change. Think about your policies and whether offering a broader range of flexible working could attract candidates or could ensure that internal candidates progress. The Equality and Human Rights Commission can provide guidance on recruitment practices like positive action and there are many specialists advisory bodies and recruitment consultancies that can help you locate candidates from underrepresented groups.

## Suggested next steps

The Equality Act and the Equality and Human Rights Commission can provide guidance on recruitment practices like positive action and there are many specialists advisory bodies and recruitment consultancies that can help you locate candidates from underrepresented groups.

## Section 3: Recruitment

**S3.b** When recruiting, do you take into account a wide range of indicators of background, experience or identity, such as socio-economic status and geographical background to help identify underrepresentation in all its forms?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information

Not relevant to our organisation

Please explain why...

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### Why are we asking this?

Disadvantage and inequality are complex; you should, where possible, take a cross-sectional approach to consider what EDI arrangements are needed.

### Suggested next steps

If your organisation is monitoring and using recruitment data effectively on sex, race and disability, consider how you could make greater use of wider diversity data to expose any lack of representation and barriers or bias which you may currently be unaware of.

### Suggested next steps

There are many examples of how to ask questions that provide, for example, an understanding of socio-economic background. You could research and identify these and consider whether they are useful or effective for your organisation. Consider whether it would be useful to understand where candidates are located geographically to ensure that your recruitment process is open and inclusive.

### Suggested next steps

Think about how you can communicate your objective to remove barriers and bias in relation to socio-economic and geographic background. Consider how you can open up debate about the benefit of a truly diverse talent pipeline. Review your job advertisements and consider including any policies that may help attract a wider range of talent, for example remote or flexible working,

### Suggested next steps

Consider whether your data give you opportunities to identify cross-sectional underrepresentation for candidates from two or more underrepresented groups. For example, depending upon the size of your workforce it might be helpful to consider groupings such as sex and race, or race and socio-economic background together.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

# Section 3: Recruitment

**S3.c Do you regularly review your recruitment process to ensure that it is fair and inclusive, drawing on current best practice?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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## Why are we asking this?

The recruitment process is extremely vulnerable to unconscious bias and may contain practical barriers which you are unaware of.

## Suggested next steps

Consider launching a review to ensure that your hiring process is inclusive and bias and barrier-free. Ensure that you are offering disability-related reasonable adjustments as part of your recruitment process.

## Suggested next steps

Think about each constituent part of the recruitment process and how you can remove bias and barriers, and promote inclusion. Review where you advertise roles and what you say about EDI. You could use a gender decoder to ensure that language does not implicitly deter applicants. Consider introducing neutral or 'blind' recruitment, which removes unnecessary information from shortlisting, such as names, nationality or country of origin. The decision-makers in the recruitment process should see only essential and relevant information to avoid unconscious bias.

## Suggested next steps

Review feedback you receive from candidates on your recruitment policy and practice, as this can provide valuable insights. Assess the outcome of each recruitment drive and consider whether additional methods to reach diverse applicants are required.

**Suggested next steps**

Track and assess the success of your recruitment approach in attracting diverse candidates to identify and build on the effective practices and talent pipelines. Keep your recruitment policy and process under review and make sure that you continue to look at new ways to promote access and inclusion.

**Suggested next steps**

Track and assess the success of your recruitment approach in attracting diverse candidates. Identify and build on effective practices and create effective talent pipelines. Keep your recruitment policy and process under review and ensure you continue to look at new ways to promote access and inclusion.

**Section 3: Recruitment**

**S3.d Do you provide training on inclusive hiring practice?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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**Why are we asking this?**

Managers may not understand how to manage their own biases or how to remove cultural and practical barriers for others without guidance, training and support.

**Suggested next steps**

Review any generic management training or training you contract out to third parties, to ensure the EDI practices represented are up to date. You should also review whether there are any inclusive recruitment elements in the training.



**Suggested next steps**

Training should underpin your organisation’s EDI strategy and approach. It should be bespoke to your organisation and be integrated with inclusive and effective HR recruitment policies.

**Suggested next steps**

Get feedback from trained delegates and ensure that the training you provide is fit for purpose.

**Suggested next steps**

Ensure that there is a way for issues and ideas that are discussed during management training on recruitment to feed back into organisational policy and practice.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 3: Recruitment**

**S3.e Do you collect views from new starters to your organisation (e.g. via onboarding or new starter surveys, or through timely organisational surveys)?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we’re achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

You can learn valuable information about your recruitment and onboarding process and how inclusive an organisation feels to new starters by formally capturing this information.

### **Suggested next steps**

Consider whether you can introduce an anonymised survey of new starters within your organisation. For smaller organisations, where anonymisation may be more challenging, a request for feedback from an HR officer might prove a better route to gaining useful insight.

### **Suggested next steps**

Onboarding surveys, sometimes referred to as new starter surveys, measure the experience of new employees and help leaders improve the onboarding and induction process. These surveys often consist of anonymous questions to identify how well new employees found the process of recruiting, hiring, and starting their role. This may be more challenging for smaller organisations and a request for feedback from an HR officer might prove a better route to gaining useful insight.

### **Suggested next steps**

You can include questions about new starters' awareness of your brand, their experience of the interview process and their first few months in their new role.

### **Suggested next steps**

Ensure there is a way for issues and ideas raised from these surveys to feed back into organisational policy and practice.

### **Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## **Section 3: Recruitment**

**S3.f Are you taking evidence-based action in your recruitment policy approach to ensure the diversity of your workforce overall is replicated at senior levels? (MANDATORY)**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

### **Why are we asking this?**

Diverse leadership supports innovation, creativity and problem solving. One way to measure this is to choose a suitable set of benchmarks and assess your performance against it.

### Suggested next steps

If your organisation uses executive search agencies for senior roles, be explicit about wanting to see diverse shortlists and ensure that agencies seek out quality candidates from a range of underrepresented backgrounds.

### Suggested next steps

Depending on the size of your organisation, consider setting diversity recruitment ambitions for senior and middle managers. These ambitions will help focus minds on casting the recruitment net wide and can help colleagues be open to what leaders look like and the traits and characteristics they have. While diversity is a richer concept than simply a set of numbers relating to particular groups, having some understanding of how your organisation compares to national or local demographics is useful.

### Suggested next steps

It is valuable for organisations to promote the benefits of all kinds of diversity at all levels of the business, including of socio-economic background or belief. Try to maintain a broad lens on diversity to ensure it isn't seen as something 'held' only by people who are not white or male. At the same time, it's important to have clear diversity targets, covering a wide range of characteristics, for senior roles.

### Suggested next steps

Ensure you celebrate successes but also be aware that a focus on EDI arrangements can be challenging for some people who may feel undervalued as a result of the emphasis on certain types of diversity. Retention is as important as recruitment. When someone from an underrepresented group joins a less diverse senior team, there can be accusations of tokenism, often expressed indirectly and obliquely. This can create pressure on recently recruited or promoted appointees. Be ready to support these staff.

## Section 3: Recruitment

### RESULTS SUMMARY

Based on the answers you have provided your total score for **Recruitment** is **{S3TOTAL}** out of **18**.

This means for **Recruitment** your organisation is currently:

#### STARTING

This means that you have work to do in the early stages of developing your EDI arrangements. This may include:

- Establishing a relevant database to understand your recruitment outcomes
- Reviewing your recruitment policy and processes for potential barriers and bias

#### ENGAGED

This means that you need to plan the next stages of your EDI arrangements. This may include:

- Considering the contribution recruitment can make to improving the diversity of your organisation at all levels
- Assessing whether your recruitment processes need further improvement to increase the diversity of employees.

## PROGRESSING

This means that you now need to concentrate on the impact of your EDI arrangements. This may include:

- Communicating clearly with the whole organisation about your approach to recruitment and how you wish to use it to drive EDI
- Ensuring that hiring managers understand your EDI objectives, know how to identify and challenge bias in themselves and others, and are practised at inclusive hiring

## ACHIEVING

You are doing well with this aspect of EDI. To maintain this level, consider:

- How your recruitment strategy is affecting equity gaps across the organisation
- How you can incentivise all those involved in your recruitment to cast a wide net for diverse talent, for example through procurement of executive research agencies
- Whether revisions to your EDI strategy or to your recruitment policy and process are required

You can also refer to our guidance for broadcasters to provide you with further suggestions to help you develop your EDI arrangements.

### **Would you like to provide any additional comments regarding Recruitment?**

This is voluntary and the information you submit does not have an impact on your overall score. However, it might aid Ofcom in our understanding of your EDI arrangements or help us to compare results across the industry. Please do not provide any personal data or information you consider to be confidential. The text box has a character limit of 1500 so please make your response as succinct as possible.



**S4.a Do you undertake any specific career development initiatives for underrepresented groups, such as leadership programmes, mentoring or sponsorship schemes?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

Consciously providing visible routes for groups that are significantly underrepresented at senior levels can nurture ambition, improve performance and support progression and promotion.

**Suggested next steps**

Consider from your data whether there is a rationale for creating a specific development initiative.

**Suggested next steps**

Ensure that you consider a range of options for career development initiatives for employees from underrepresented groups, where possible seeking employee feedback into what will help boost progression.

**Suggested next steps**

Aim for clear objectives for your career development programmes, evaluate their impact, and track participants to determine whether they are progressing within a specified time period.

**Suggested next steps**

Review the effectiveness of initiatives, including the impact on the diversity of senior employees.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 4: Retention, Development and Progression

**S4.b** Do you have any arrangements to address underrepresentation of particular groups in relation to succession planning and internal recruitment, particularly to senior roles? (MANDATORY)

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

### Why are we asking this?

Offering development opportunities fairly, including 'acting up' opportunities, can help to address underrepresentation at more senior levels and drive retention and employee engagement. It means that people from underrepresented groups have a chance to compete on merit and helps to ensure that affinity bias and other unintended barriers to progression are addressed.

### Suggested next steps

Taking effective action requires knowing where you are on diversity at different levels and parts of your organisation. Recruiting internally and equitably can be an important factor in retaining underrepresented staff. Consider the potential for mentoring or sponsorship.

### Suggested next steps

Start by reviewing your training and development policy and the process for, and take-up of, opportunities for 'acting up' roles or assignments. Consider your overall approach to performance management and appraisals and whether line managers encourage everyone to consider their personal development, and whether they allocate 'acting up' opportunities based on competence. Consider whether there is a role for mentoring or sponsorship here.

### Suggested next steps

Remember that you can recruit solely from within your organisation, depending on the likely availability of good quality candidates. This could provide an opportunity for internal candidates from underrepresented groups to compete on merit.

### Suggested next steps

Ensure that you check that EDI arrangements to support development and progression for underrepresented groups are making a difference to the diversity of your workforce, including at senior levels. Listen to the views of your staff groups and what employee surveys tell you about perceptions of fairness within your organisation. Take action if you feel there isn't support for this approach or that employees don't understand the rationale for positive action.

**S4.c Do you ensure that employees from underrepresented groups have equal opportunity to access learning and development opportunities? (MANDATORY)**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

**Why are we asking this?**

You will be more effective as an organisation if you have a well-developed and equitable approach to learning and development. **You are required to make and review arrangements for training and retraining of your employees in order to meet your licence conditions.**

**Suggested next steps**

Consider the rationale for learning and development within your organisation and whether a training needs assessment can become a regular part of your operations.

**Suggested next steps**

Think about resourcing and monitoring the actions of line managers so you can ensure equal access to learning and development opportunities.

**Suggested next steps**

Consider what you know about those who take up opportunities for learning and development? Ensure that you monitor the take-up of learning and development opportunities across your organisation and ensure that there are no opportunities for unconscious bias in terms of who has access to it.

**Suggested next steps**

Look for ways to ensure that learning and development is adding value to your organisation and addressing underrepresentation, and whether employees feel that access is fair and transparent.

**Section 4: Retention, Development and Progression**

**S4.d Do line managers proactively encourage take-up of opportunities for learning and development? (MANDATORY)**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results



**Why are we asking this?**

It's important that your organisation focusses on progression for underrepresented groups, not just on recruitment and entry level roles. A systematic approach to skills development will ensure that diverse talent is retained and can progress to senior roles within your organisation. **You are required to make and review arrangements for training and retraining of your employees in order to meet your licence conditions**

**Suggested next steps**

Ensure all line managers are aware of your EDI strategy and that they are appraised on how they manage skills development and progression, as well as performance.

**Suggested next steps**

Consider including a specific question about line managers' performance in relation to team and individual development in appraisal processes.

**Suggested next steps**

Ensure any employee opinion surveys ask about managers' approach to learning and development, and progression.

**Suggested next steps**

Consider 360 degree feedback of managers and other ways of assessing whether there is a consistent approach to supporting learning, development and progression.

**Section 4: Retention, Development and Progression**

**S4.e Do you set targets relating to retention and/or progression?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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## Why are we asking this?

Targets can help to maintain a focus on diverse representation at all levels of your organisation and throughout employees' careers.

## Suggested next steps

Consider whether there is disproportionality in the frequency and speed with which employees progress within your organisation, or in who leaves, and how best to monitor this. If there is disproportionality, consider targets to focus attention on ensuring fairness at all stages of recruitment and progression, and on the employee experience.

## Suggested next steps

Ensure that your rationale for focussing on diversity in progression and retention is clear to everyone and explain how fairness in decision-making is achieved.

## Suggested next steps

Monitor trends and initiatives regularly so that senior leaders in particular understand the make-up of the workforce and how it is changing.

## Suggested next steps

If you have successes in achieving greater workforce diversity through recruitment at junior and senior levels, or in relation to retention of underrepresented groups, share them with employees. Share learning from your efforts to develop, progress and retain employees with Ofcom and other broadcasters.

## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 4: Retention, Development and Progression

### S4.f Do you have a workplace adjustments policy and/or procedure?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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## Why are we asking this?

It's important that employees who are disabled, neurodivergent or have long-term health conditions are enabled to reach their full potential. This means addressing barriers to access at each stage of the employee journey and making conversations about this aspect of inclusion routine and positive.

## Suggested next steps

Having an explicit written policy and process for requesting, identifying and managing adjustments can communicate positive intent and encourage sharing of personal needs. You may find it helpful to look at the many examples of policies, including those of unions and organisations representing disabled people.

## Suggested next steps

If you have an employee network covering disability, this can be a helpful forum for supporting the development of a policy and/or procedure on workplace adjustments. Ensure that the procedure itself and any associated guidance and training emphasise the many different types of impairments, long-term health conditions and aspects of neurodivergence. Broadcasters should aim for systemic change that maximises disability access and neuro-inclusion for everyone, while recognising that there may still be a need for individual adjustments.

## Suggested next steps

'Proving' disability shouldn't be the gateway to support. Try to develop a positive narrative setting out how workplace adjustments can remove barriers and prevent the development or worsening of impairments or health conditions. Some broadcasters use an employee 'passport'. Consider introducing these to provide a portable record of agreed adjustments, such as equipment or management support. This means that employees don't have to repeatedly share their disability status or details unnecessarily.

## Suggested next steps

Ensure that internal communications feature (and are accessible to) colleagues who happen to be disabled, and try to identify senior disabled role models. This can create a positive culture around disability and encourage people to request adjustments. If you don't already have an employee 'passport' to provide a portable record of agreed adjustments, such as equipment or management support, consider introducing these. This will mean that employees don't have to repeatedly share their disability status or details unnecessarily.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 4: Retention, Development and Progression

### S4.g Do you have a flexible working policy and/or procedure?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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### Why are we asking this?

Many employees need a flexible approach to when and where they work. This can be particularly the case for some underrepresented groups. A policy provides clarity on how to determine what is possible within particular contracts or roles; a written process ensures that decisions are objective and fair.

### Suggested next steps

It's crucial that everyone in the organisation is aware of legal rights in this area and that they understand the procedures for requesting and implementing flexible working. If you don't yet have anything in place, look at what other organisations are doing.

### Suggested next steps

Consider setting up an action group of interested employees, relevant HR and senior managers and, where relevant, trade union representatives to draft or revise a flexible working policy. Think about how this can best serve employees and the business, and how much clarity you can achieve in setting out the boundaries of what is possible.

**Suggested next steps**

Implement monitoring of your flexible working policy. Consider whether line managers are consistently implementing it so that it is fair to all employees. Make sure you capture and assess any relevant insight and opinion from employee surveys and exit interviews. Consider whether the process for decision-making is clear, transparent and fair.

**Suggested next steps**

Assess whether your flexible working policy is adding value to the delivery of your EDI strategy and whether it is well-publicised to job candidates and supported by current employees.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 4: Retention, Development and Progression**

**S4.h Do you conduct an exit process for all leavers?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

Exit surveys/interviews can provide valuable feedback for managers and organisations as a whole. It is often at the point when people are leaving an organisation that they will raise the real reason for leaving, or issues they experienced during their employment.

### **Suggested next steps**

An exit insight process, for example in the form of surveys or interviews, can give valuable information about what works well and less well within an organisation. If you are a small broadcaster, consider whether an external third-party approach could increase disclosure of any issues. The results of the process should be anonymised where they are shared beyond the HR team and confidentiality should be observed.

### **Suggested next steps**

Make sure that your internal or third-party exit process has a clear structure and includes questions that enable people to give feedback on how safe, fair and inclusive they feel their employer has been. This should include their experience with their individual team and manager as well as the organisation as a whole. The results of the process should be anonymised where they are shared beyond the HR team and confidentiality should be observed.

### **Suggested next steps**

Examine how the results of your internal or third-party exit process are consistently reviewed, for example via individual survey forms/interviews or in aggregate. Monitor the diversity of leavers to check for any trends. The people who have oversight of these results should be aware of any recurring themes and any problematic issues that could constitute discrimination, harassment or victimisation.

### **Suggested next steps**

Make sure to celebrate retention rates and the positive experiences that people have had at your organisation.

### **Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## **Section 4: Retention, Development and Progression**

### **S4.i Do you have a health and wellbeing at work policy and/or procedure?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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### Why are we asking this?

It's important because supporting employees' physical and mental health at work is a vital part of an employer's duty of care and supports workforce cohesion and productivity.

### Suggested next steps

You will likely have some provision for physical health with regards to safety practices and workplace adjustments, but by also addressing mental health issues, organisations can improve the general wellbeing of employees, reduce absenteeism and presenteeism, reduce staff turnover, and increase productivity.

### Suggested next steps

Consider setting up an action group of interested employees, relevant HR and senior managers and potential external wellbeing professionals to consider the framing of your wellbeing at work policy. Think about how this can best serve employees and the business and how much clarity you can achieve in setting out the boundaries of what is possible.

### Suggested next steps

Implement monitoring of your wellbeing policy. Consider whether line managers are consistently implementing the policy so it is fair to all employees. Make sure you capture and assess any relevant insight and opinion from employee surveys and exit interviews. You might also use pulse surveys (a set of survey questions on a particular subject sent to the same employees on a regular basis) to better assess attitudes towards wellbeing within your organisation to see whether this is affected seasonally or by work patterns.

### Suggested next steps

Assess whether your wellbeing policy is adding value to the delivery of your EDI strategy and whether it is well-publicised to job candidates and supported by current employees. Consider how you could showcase your innovative practises beyond your own organisation.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.





## PROGRESSING

This means that you now need to concentrate on the impact of your EDI arrangements in relation to recruitment retention and progression.

This may include:

- Beginning to measure and appraise the competencies of managers according to an EDI performance framework
- Monitoring take-up of policies such as flexible working or workplace adjustments
- Focussing on the mental and physical health and well-being of all colleagues

## ACHIEVING

You are doing well with this aspect of EDI. To maintain this level, consider:

- Integrating the promotion of EDI competencies and values at induction, in performance management and in regular cycles of training and development
- Assessing the impact of your EDI-related policies to ensure that they are making a difference to EDI, supporting retention and the diversity of senior managers

You can also refer to our guidance for broadcasters to provide you with further suggestions to help you develop your EDI arrangements.

### **Would you like to provide any additional comments regarding Retention, Development and Progression?**

This is voluntary and the information you submit does not have an impact on your overall score. However, it might aid Ofcom in our understanding of your EDI arrangements or help us to compare results across the industry. Please do not provide any personal data or information you consider to be confidential. The text box has a character limit of 1500.



- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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### Why are we asking this?

Surveys can 'lift the lid' on what may be going on in your workforce, particularly for colleagues from underrepresented groups. It also provides a way to track your progress on EDI over time. Understanding how your employees view leadership on EDI and how they experience their workplace is vital for employee retention and employer reputation.

### Suggested next steps

There are many companies that provide staff surveys, who may have a set of EDI questions as part of their offer. It is also relatively easy to devise and run your own survey if you have the time and experience. Begin small and focussed to test your response rate, then add more detail over time.

### Suggested next steps

Organisations need good diversity data and high rates of disclosure and completion of surveys to gain meaningful insights. If this is a challenge in your organisation, find out what others do to encourage completion. Transparency is important and employees need to understand who will see the data and how it will be used, stored and managed. It is important to give assurances of confidentiality. Ensuring that you clearly report back on action taken as a result of survey findings will help build completion rates over time.

### Suggested next steps

Make sure that you share the key messages from surveys with teams and that they are discussed by senior managers. Ensure that you clearly communicate any resulting actions to the organisation.

**Suggested next steps**

Tracking the same questions over time can help indicate where you are making progress and which issues are persisting. It's helpful to review the questions you ask from time to time, but aim for consistency wherever possible. Remember to inform employees about the results of surveys and actions taken as a result, i.e. "You said . . . We did . . ." Consider other mechanisms for hearing from staff about what works well, and what specific issues and challenges there are. You may wish to consider using focus groups to hear about employees' experiences or to encourage ideas about how to improve things.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 5: Culture and Voice**

**S5.b Do you take action based on the views and experiences of employees, particularly where colleagues from underrepresented groups appear to have different views and experiences?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

It's crucial to demonstrate to all employees that you are interested in their views and that you are acting on them.

**Suggested next steps**

If you are beginning to develop ways to listen to your workforce, make sure you build in how results will be communicated to employees and how action will be taken.

**Suggested next steps**

If you have not measured employee opinion before, think about its implications for your current EDI arrangements – consider how it can shape initiatives and help with evaluation.

**Suggested next steps**

Make sure that you are considering the views of employees and using them to improve what you do. Remember to report back to all staff clearly.

**Suggested next steps**

Diversity data and employee surveys can form part of the evaluation of your EDI strategy. Review your surveys periodically so that your organisation can continuously improve. This may mean adding new elements to an employee survey which can illuminate areas that still need improvement. Be sure to celebrate your successes with your employees.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 5: Culture and Voice**

**S5.c Do you provide opportunities for diverse voices, including those from underrepresented groups, to feed into EDI strategy, planning and/or evaluation, for example through employee networks or a staff forum?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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## Why are we asking this?

Listening to all employees, including colleagues from underrepresented groups, is crucial. Diversity of background, experience and identity are important for more effective operations, driving creativity, innovation and risk management. Employees need to be given routes to engage in these discussions.

## Suggested next steps

Consider mechanisms such as a staff forum, regular focus groups made up of people from across the organisation, or employee networks for particular groups of colleagues. These can contribute lived experience to inform your EDI strategy or your corporate strategy.

## Suggested next steps

To get early strategic alignment between your EDI objectives and your employee networks, make sure that you share your strategy with them. This will help to ensure it is understood; you should also explain the opportunities and limits they have for contributing to that strategy. Typically, people from underrepresented groups may have an interest in things like progression and retention, but it may not be in their power to address this directly. There may be other ways in which networks can educate the organisation and enhance the organisational culture.

## Suggested next steps

Try and get the balance between allowing groups to evolve according to the wishes of members and offering support for their development. Be clear about expectations and accountabilities to avoid misunderstandings. Encourage networks to see the value in creating their own strategies, role descriptions, terms of engagement, etc.

## Suggested next steps

Regularly assess how you develop your networks, how their work is evolving, whether you can offer training, and what success stories you should be celebrating as a crucial element of ensuring an inclusive workplace culture. You can highlight good practice internally and across the wider industry, helping to drive positive change.

## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 5: Culture and Voice

### S5.d Do you provide resourcing to support any employee networks?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results

- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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### Why are we asking this?

Networks often contribute significantly to ensuring organisations are fair and inclusive. They provide access to lived experience and are valuable. They should be supported, respected and acknowledged - as should the individuals who coordinate them.

### Suggested next steps

Find specific resourcing for networks, such as funded admin time or a set number of days a month allocated to the chair or chairs of a network. These may currently exist as charity or personal project days.

### Suggested next steps

Consider which senior stakeholders can help secure resourcing and support for these groups. This can start with allocating time to lead networks, and gradually grow into funding as it proves impactful.

### Suggested next steps

Consider how your networks can engage effectively with the existing governance mechanisms of your organisation, e.g. it could be helpful to have a regular meeting with a Board EDI champion. As networks mature, they might make the case for an annual budget based on a proven track record, rather than on an events basis. Consider formalising the relationship between networks and HR, for example via terms of reference, to manage expectations.

### Suggested next steps

As networks mature, you should encourage and support leads to pause and review their impact. An important part of this is assessing the diversity within a particular network membership. This can lead to new developments – such as a neurodiversity network emerging from a disability network or new initiatives focussed on a particular ethnic group. Supporting work across networks is crucial too, to ensure consideration of cross-sectional experience. Consider formalising the relationship between networks and HR, for example via terms of reference, to manage expectations.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 5: Culture and Voice**

**S5.e Do you provide training on EDI to all employees?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

Expectations, behaviours and language change over time. Giving your employees the literacy and competence to act in fair and inclusive ways is vital.

**Suggested next steps**

There are different ways of making a workplace culture equitable, fair and inclusive. This includes setting objectives, establishing effective policies and practices, and providing guidance and training. EDI training alone won't ensure equity, diversity or inclusion but it can set out clearly an organisation's expectations about decisions and behaviour and provide employees with the skills needed. There are many experts who can help you with this training.

**Suggested next steps**

Consider a training-needs assessment for your organisation on EDI. Involve HR, any EDI group, staff forum or employee networks. Discover what would be most useful for all colleagues, line managers, senior managers and the Board. Training needs may differ. If you have a formal induction process, you may need to review it to ensure that it effectively supports your EDI objectives and makes clear the expectations your organisation has about equity, diversity and inclusion. Examine the credentials of any third-party suppliers and make sure they understand your needs.



**Suggested next steps**

Evaluate the outputs of your training and relate this back to your EDI objectives. Consider who undertakes EDI training. If training is only taken by some, you may find you don't reach the people who would particularly benefit from it. Encourage people to consider it part of their continuous professional development.

**Suggested next steps**

There are a wide range of EDI training providers. Make sure that you use rigorous procurement processes to assess the quality of your contractors. Consider piloting any training to ensure a good fit with your organisation and its EDI objectives. Collect and analyse trainees' feedback. While it's good for everyone to take EDI training, it should still be presented as an opportunity to engage in something new, and not a mandatory exercise. EDI development should focus on actions, social accountability, and working with people across boundaries. It should not be a lecture with a series of yes/no answers.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 5: Culture and Voice**

**S5.f Do you have a document that defines expected workplace behaviours?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

It's important because everyone needs to understand what is expected of them and what will and won't be acceptable.

**Suggested next steps**

A code of conduct or a dignity at work policy is useful to set out not just the behaviours to avoid but what is expected of everyone at your organisation in relation to being fair and inclusive in their language, behaviours and decisions.

**Suggested next steps**

If you are just starting out, you could usefully co-create this document with a cross-section of your staff or in consultation with a staff forum and/or employee networks.

**Suggested next steps**

Statements of this kind have a shelf life. To remind everyone about the importance of individual behaviours and decisions, it can be useful to engage people in refreshing them from time to time.

**Suggested next steps**

Make sure that your document forms part of your induction process and consider including it as a discussion point in annual appraisals.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 5: Culture and Voice**

**S5.g Do you have a policy and process to address bullying, harassment and victimisation?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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## Why are we asking this?

You need a well-publicised clear policy and mechanism for addressing inappropriate and potentially unlawful behaviours.

## Suggested next steps

Consider example policies from within the broadcasting sector and/or outside it, and how these could be adapted to your organisation and context.

## Suggested next steps

Is your reporting mechanism via a third party? It can be particularly difficult to complain from within organisations about a manager or colleague. Providing a third-party reporting mechanism can help ensure that allegations come to light and are properly dealt with. Ensure that your policy and the reporting process are transparent and well-publicised.

## Suggested next steps

Consider how you will monitor the incidence of allegations of bullying, harassment and victimisation; whether there are patterns and what if any trends you can identify. Think about whether there is a need for training, wider communications and the role of leaders in demonstrating inclusive behaviours.

## Suggested next steps

Regularly assess trends relating to negative workplace behaviours. Bring reports to the Board where appropriate and ensure that everyone understands a zero-tolerance approach to unacceptable behaviour.

## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 5: Culture and Voice

### S5.h Do your employees have effective channels to raise EDI issues related to your broadcast output?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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## Why are we asking this?

Groups with some shared backgrounds, experiences or identities may have a particular interest in portrayal and representation on-screen/air. It's important that all colleagues have the ability and confidence to communicate concerns to the organisation if they think the output does not align with its EDI strategy. Remember that the lived experience of your staff is also reflected in your audiences so can provide valuable audience insight.

## Suggested next steps

Employee networks are a popular way to ensure employees have a voice. Begin by researching how these are formed. If you feel your organisation is too small to support networks for individual characteristics, consider a diversity forum which welcomes everyone to contribute.

## Suggested next steps

If you have employee networks or a diversity forum, consider engaging them in discussion about your output. It's important to set out the terms of reference for any consultation with employee networks and to set expectations about their potential impact early to avoid any misconceptions. Listening and responding to concerns and encouraging positive ideas is vital.

## Suggested next steps

If you are struggling to turn employee feedback about your output into action, consider how you might use network sponsors. These are usually senior leaders or executives in the organisation who take accountability for the values and sometimes objectives of a network. They do not need to represent or have experience as a member of any particular group, but they must be able to extend the reach and influence of the network to create change and adopt network issues as their own.

## Suggested next steps

Make sure you acknowledge the contribution of staff who have volunteered for employee networks/forums and have helped provide a voice for concerns.

## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 5: Culture and Voice

### **RESULTS SUMMARY**

Based on the answers you have provided your total score for **Culture and Voice** is **{S5TOTAL}** out of **24**.

This means for **Culture and Voice** your organisation is currently:

### **STARTING**

This means that you have work to do in the early stages of your EDI journey. This may include:

- Considering how your organisation can understand the experiences of diverse colleagues
- Thinking about a range of channels for ideas and input, including anonymous feedback on leadership, management and culture

### **ENGAGED**

This means that you need to plan the next stages of your EDI journey. This may include:

- Scheduling and organising the ways in which you gain insight and understand the impact of EDI on colleagues
- Thinking about how to give underrepresented groups of colleagues within your organisation a voice and providing supportive structures to ensure that this is heard.

### **PROGRESSING**

This means that you now need to concentrate on the impact of your EDI journey. This may include:

- Ensuring regular analysis of insights by leaders
- Informing the whole organisation about changes you have made because of colleagues' contributions and insights

### **ACHIEVING**

You are doing well with this aspect of your EDI journey. To maintain this level, consider:

- How you can promote and celebrate the contribution of colleagues' collective voice, and the work of any specific diversity groups
- Whether there are particular issues arising from what you learn, that need addressing in a revised EDI strategy
- Whether your analysis indicates any specific training needs

You can also refer to our guidance for broadcasters to provide you with further suggestions to help you develop your EDI arrangements.

### **Would you like to provide any additional comments regarding Culture and Voice?**

This is voluntary and the information you submit does not have an impact on your overall score. However, it might aid Ofcom in our understanding of your EDI arrangements or help us to compare results across the industry. Please do not provide any personal data or information you consider to be confidential. The text box has a character limit of 1500.

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## Section 6: Commissioning

The influence of broadcasters on the wider sector is significant, and we want to see broadcasters ensuring that EDI is taken into account when commissioning content from production partners. EDI throughout the production chain is a vital factor in broadcasters' ability to deliver content which reflects and serves their diverse audiences across the UK. For this reason, we have included Section 6 (and Section 7 on Freelancers) in this EDI maturity model, although Ofcom will not assess a broadcaster's compliance with its diversity licence conditions on the basis of answers to Sections 6 and 7. We recognise that not every broadcaster commissions content from production partners, so you can answer "Not applicable/No content commissioned" to move onto the next section.

**S6.a** Do you have a diversity policy for content commissioning covering areas such as diverse on-air/screen representation or diversity of subject matter likely to appeal to a wide range of audiences?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Not applicable/No content commissioned (SKIP SECTION)
- Unwilling to provide this information

### Why are we asking this?

A clear statement of intent on commissioning and diversity can help drive a consistent approach to delivering content that effectively represents and appeals to the diverse audiences of the UK.

### Suggested next steps

Begin by researching the diverse commissioning policies of organisations that are similar to yours to see how they are considering EDI in their commissioning approach. Consult with employees from underrepresented groups to hear their views on your output.

### Suggested next steps

You may have already researched the diverse commissioning policies of organisations that are similar to yours; you should also speak to other broadcasters and your production partners to understand how the policies work in practice and what actions are most effective.

### Suggested next steps

You may have set general aspirations which you could develop into SMART (specific, measurable, achievable, relevant and time-bound) targets for your organisation and production partners. You should consider how you will evaluate the impact of this policy, including receiving feedback from: audiences, employees, production partners and production teams.

### Suggested next steps

Ensure your policy considers both who is included on screen/air and how they are portrayed. Review how your commissioning policy has enhanced your impact as a broadcaster and where is there scope for further development. Ensure there is senior level scrutiny of the findings, and iterate your policy accordingly. Continue to assess the effectiveness of any SMART (specific, measurable, achievable, relevant and time-bound) targets and consider new or different targets and objectives as you reach your goals. Consider sharing your successes and challenges with Ofcom and other broadcasters.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**S6.b** Do you have a diversity commissioning policy designed to increase EDI in production teams. For example, specifications about underrepresented groups in your contracts with production partners or monitoring the diversity of content teams (e.g. through Diamond for the TV industry)?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

Broadcasters can use their commissioning power to drive EDI in the wider sector through procurement and through the support they provide to production companies.

**Suggested next steps**

Think about how you can incorporate your EDI ambitions and values in your commissioning approach. Consider whether you encourage, incentivise or support suppliers to work with diverse and underrepresented talent.

**Suggested next steps**

Make sure you involve relevant in-house teams and external organisations that represent freelancers to develop an effective commissioning policy in relation to the workforce contracted to make your content commissions.

**Suggested next steps**

Review the EDI requirements placed on production teams regularly to understand whether they are having the intended effect. Develop any general aspirations into SMART targets for your organisation and production partners. Consider whether there are further ways to incentivise production companies to help deliver your commissioning policy goals. Be clear in policies and contracts of any consequences for production partners who fail to deliver diversity requirements you may have set. Decide how you will evaluate what impact your policy is making.



**Suggested next steps**

Review how your commissioning policy has enhanced your impact as a broadcaster and ensure senior level scrutiny of your findings. Consider where there is scope for further development. For example: additional ways to incentivise production companies to help deliver the commissioning policy goals, or being clear in policies and contracts about any consequences for production partners who fail to deliver diversity requirements you may have set. Continue to assess the effectiveness of any SMART targets and consider new or different targets and objectives as you reach your goals. Consider sharing your successes and challenges with Ofcom and other broadcasters.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

**Section 6: Commissioning**

**S6.c Do you ringfence funding for diverse commissioning for on screen/air content and talent and/or production partners or content makers?**

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

**Please explain why...**

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**Please let us know any EDI criteria production partners need to meet to receive ringfenced funding.**

Please do not provide any personal data or information you consider to be confidential.



### Suggested next steps

Make sure that you are collecting data to assess the impact of the funding. Assess how effective your funding criteria are in delivering your EDI objectives.

### Suggested next steps

Review the impact of ringfenced funding on: your output, audience perceptions, production companies and the freelance workforce. Consider whether there are any new areas where you can drive innovation and inclusion. Review whether the metrics you use to assess the impact of the funding, tell you what you need to know. Remain open to the idea of developing your measurement framework as the initiative matures.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 6: Commissioning

### RESULTS SUMMARY

Based on the answers you have provided your total score for **Commissioning** is **{S6TOTAL}** out of **9**.

This means for **Commissioning** your organisation is currently:

#### **STARTING**

This means that you have work to do in the early stages of developing your EDI commissioning approach. This may include:

- Understanding the current diversity of your on-air or on-screen representation and your off-screen production workforce.
- Engaging with a range of stakeholders including employees, production companies and freelancers, as well as bodies who may represent these various groups, when developing an EDI commissioning strategy and policy

#### **ENGAGED**

This means that you need to plan the next stages of your EDI commissioning approach. This may include:

- Analysing your output in relation to EDI and your off-screen production workforce.
- Producing a commissioning diversity policy with input from relevant stakeholders

#### **PROGRESSING**

This means that you now need to concentrate on the effectiveness of your EDI commissioning approach. This may include:

- Measuring the impact of your diversity commissioning policy, and any ringfenced funding initiatives on output, audiences and production partners

## ACHIEVING

You are doing well with this aspect of EDI. To maintain this level, consider:

- Measuring the EDI aspects of your output over time and benchmarking these against the rest of the sector
- Measuring the impact of your diversity commissioning policy and any ringfenced funding initiatives on output, audiences and production partners. Keep your commissioning approach to delivering greater EDI under review: continue to develop your approach and add more stretching objectives as the initiative matures.

You can also refer to our guidance for broadcasters to provide you with further suggestions to help you develop your EDI arrangements.

### **Would you like to provide any additional comments regarding Commissioning?**

This is voluntary and the information you submit does not have an impact on your overall score. However, it might aid Ofcom in our understanding of your EDI arrangements or help us to compare results across the industry. Please do not provide any personal data or information you consider to be confidential. The text box has a character limit of 1500.

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## Section 7: Freelancers

The influence of broadcasters on the wider industry is significant; and we want to see them continuing to use that influence to drive EDI in the freelance workforce. For this reason, we have included Section 7 (and Section 6 on Commissioning) in this EDI maturity model. However, Ofcom will not use answers to Sections 6 and 7 to assess a broadcaster's compliance with relevant legislation. We recognise that not every broadcaster contracts freelancers, so you can answer "Not applicable/No freelancers" to move onto the next section. (See the Creative Diversity Network website for more information on how some broadcasters monitor the diversity of freelancers on their productions via the Diamond system).

**S7.a** Do you have any policies and/or take any action to promote EDI among freelancers, either those who contract with you directly or with your production partners? Please use the free text box at the end of this section to tell us about any specific examples you would like to share.

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Not applicable/No freelancers (SKIP SECTION)
- Unwilling to provide this information

### Why are we asking this?

Inequalities within the sector are often seen very acutely among the significant proportion of the broadcast workforce that are freelance. Without organisational support, freelancers can lack opportunities to develop and progress, and this can disproportionately affect those from under-represented groups.

### Suggested next steps

Having a written policy and/or statement relating to EDI and freelancers can help set expected behaviours. Review the terms you and production partners offer to freelancers to ensure they are equitable. This can encourage greater productivity.

### Suggested next steps

Make sure you obtain information about the make-up of your freelance workforce and the experiences of under-represented freelancers, including how they feel about your organisation.

### Suggested next steps

In the early stages, you may want to gather feedback from freelancers to inform the development of any EDI policies relating to them.

### Suggested next steps

Review the impact of your freelance policies and/or initiatives. Consider whether there are specific groups that could benefit from additional targeted objectives to further improve EDI in your freelance workforce. Celebrate and share success stories with Ofcom and other broadcasters about the way freelancers are included in your EDI initiatives.

### Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

- S7.b Do you place any EDI requirements on production partners in relation to freelancers contracted to work on your commissions?**
- No - we have not started this
  - No - but we have committed to a plan and we're making progress
  - Yes - we have launched this and are developing our approach
  - Yes - this is successful and we're achieving useful results
  - Unwilling to provide this information
  - Not relevant to our organisation

**Please explain why...**

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**Why are we asking this?**

Broadcasters can influence EDI in the wider sector through their relationships with their suppliers.

**Suggested next steps**

Review your commissioning and procurement policies and processes to consider whether EDI could form part of future arrangements.

**Suggested next steps**

Consider including EDI policies in the terms and conditions of your contracts with production companies.

**Suggested next steps**

Consider whether being proactive on EDI in the freelance workforce is something you could incentivise in awarding contracts. Make sure this is not just about the makeup of production teams but also about the experience of, and opportunities for, under-represented groups.

**Suggested next steps**

Consider whether being proactive on EDI in the freelance workforce is something you could incentivise in awarding contracts. Make sure this is not just about the makeup of production teams but also about the experience of and opportunities for under-represented groups. Celebrate and share success and learning with Ofcom and other broadcasters about your impact on EDI in the freelance workforce.

**Suggested next steps**

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## S7.c Do you have a complaints procedure for freelancers working on your productions to report harassment, bullying, discrimination or victimisation?

- No - we have not started this
- No - but we have committed to a plan and we're making progress
- Yes - we have launched this and are developing our approach
- Yes - this is successful and we're achieving useful results
- Unwilling to provide this information
- Not relevant to our organisation

Please explain why...

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### Why are we asking this?

Freelancers have fewer protections in relation to employment and may be more reluctant to report these behaviours.

### Suggested next steps

Consider whether you could open your internal complaints mechanism to freelancers who work for you and for those working on productions via production companies. Consider whether you can engage with any cross-industry initiatives to protect freelancers.

### Suggested next steps

Publicise the procedure and put in place processes to monitor its use, to determine if there are any serious breaches or patterns of behaviour. Consider providing wording on your complaints procedure for production companies to include in their contracts with freelancers, or making it a contractual obligation that production partners publicise the procedure (e.g. in contracts or call sheets). Consider whether you can engage with any cross-industry initiatives to protect freelancers.

### Suggested next steps

Ensure that production companies you contract with are aware that any harassment, bullying, discrimination or victimisation of freelancers is unacceptable. Encourage your production partners to publicise the complaints procedure to freelancers working on your commissions, e.g. consider stipulating the process must be flagged in freelancers' contracts or call sheets. Engage with the freelance broadcast community to explain the process of making a complaint and how freelancers' future work can be protected. Consider whether you can also engage with any cross-industry initiatives to protect freelancers.



## Suggested next steps

Ensure your production partners publicise the complaints procedure to freelancers working on your commissions, e.g. consider stipulating that the process must be flagged in freelancers' contracts or call sheets. Make sure that you take strong action if you find patterns of behaviour that constitute harassment, bullying, discrimination or victimisation. Consider whether you can also engage with any cross-industry initiatives to protect freelancers.

## Suggested next steps

We strongly encourage you to indicate the level of activity you have undertaken in this area. The purpose of this survey is to support you on your EDI journey and to provide you with suggested next steps to help you develop your approach.

## Section 7: Freelancers

### RESULTS SUMMARY

Based on the answers you have provided your total score for **Freelancers** is **{S7TOTAL}** out of **9**.  
This means for **Freelancers** your organisation is currently:

#### STARTING

This means that you have work to do in the early stages of developing your EDI arrangements in relation to freelancers. This may include:

- Developing a policy
- Ensuring there is an effective complaints procedure

#### ENGAGED

This means that you need to plan the next stages of your EDI arrangements in relation to freelancers. This may include:

- Understanding the diversity of the freelancers you work with directly and via production companies
- Asking production companies to promote arrangements for complaints via a third-party

#### PROGRESSING

This means that you now need to concentrate on the impact of your EDI arrangements in relation to freelancers. This may include:

- Measuring the effectiveness of your policy
- Measuring the use of a complaints mechanism
- Understanding whether the arrangements you have made to address EDI among freelancers are working

#### ACHIEVING

You are doing well with this aspect of EDI. To maintain this level, consider:

- How the diversity of the freelancers you work with directly and via production companies is changing over time
- Whether freelancer satisfaction on EDI is improving over time



## **RESULTS SUMMARY**

The following summarises the total scores and categories assigned for each section, based on your responses:

**Section 1: Strategy and Leadership** - {S1TOTAL}, {S1CATEGORY}

**Section 2: Data Collection, Monitoring and Evaluation** - {S2TOTAL}, {S2CATEGORY}

**Section 3: Recruitment** - {S3TOTAL}, {S3CATEGORY}

**Section 4: Retention, Development and Progression** - {S4TOTAL}, {S4CATEGORY}

**Section 5: Culture and Voice** - {S5TOTAL}, {S5CATEGORY}

**Section 6: Commissioning** - {S6TOTAL}, {S6CATEGORY}

**Section 7: Freelancers** - {S7TOTAL}, {S7CATEGORY}

**Would you like to provide any comments on the maturity assessment tool?** Please do not provide any personal data or information you consider to be confidential. The text box has a character limit of 1500.



**Please click Submit to send us your answers.**

For further information please see Ofcom's Equity, Diversity and Inclusion Hub. If you would like further support or to discuss any aspect of the survey or your organisation's approach to EDI please contact the Ofcom EDI team at [ediinbroadcasting@ofcom.org.uk](mailto:ediinbroadcasting@ofcom.org.uk)