

Diversity and equal opportunities in television

Monitoring report on the UK broadcasting industry

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Chief Executive foreword

Our broadcasting industry is central to the UK's cultural landscape, its society and creative economy. Television has the power to shape and represent our identities and values.



To achieve that, broadcasters must reflect the society we live in today. But Ofcom's previous audience research¹ suggests they are falling short.

Ethnic minority groups feel they are portrayed neutrally or negatively on television. Half of disabled people feel under-represented on screen, while many older people, especially women, say they are represented negatively.

Audiences expect to see programmes that authentically portray modern life across the UK, its nations and regions - and the best way to achieve that is for broadcasters to widen the breadth of talented people working on and off screen.

Too many people from minority groups struggle to get into television. That creates a cultural disconnection between the people who make programmes, and the many millions who watch them.

Ofcom is determined to work with industry to address the problem – beginning with transparency and accountability. Nothing can improve if it cannot be accurately measured.

So, we have launched a major programme to monitor and help improve workforce diversity across UK broadcasting. This is our first, of what will be an annual report on the television industry; we'll undertake the same exercise across radio later this year.

Our findings shed clear light on the scale and nature of the diversity challenge, revealing which groups lack representation across major television broadcasters. We look at the make-up of employees across different roles, the steps that are being taken to promote equal opportunities and some of the strategies aimed at improving diversity.

Many of the results will concern the whole industry. Women and ethnic-minority employees are significantly under-represented in senior roles across UK-based broadcasters. Disabled people are particularly poorly represented at all levels of the industry. Among freelancers working for broadcasters, half remain unmonitored and those who are monitored are overwhelmingly male, white and don't self-define as disabled.

And while some broadcasters have provided comprehensive data, we are very concerned that many have failed to assess the diversity of their employees across a range of characteristics. That is unacceptable; we will investigate those who have not provided us with the data we required, and those whose equal opportunities arrangements are lacking.

We also highlight the steps many broadcasters are taking to improve their diversity – from ethnic representation targets, to Channel 4's Year of Disability and Sky's Women in Leadership programme.

These are valuable initiatives, but the whole industry needs to do much more. Ofcom has examined the arrangements each licensee has in place to promote equal employment opportunities. We are informing broadcasters where these are inadequate, working with them to improve their practices.

As the national broadcaster, the BBC should lead the way. By 2020, the BBC wants its employees to comprise 50% women, 8% disabled people, 8% lesbian, gay or bisexual (LGB) people and 15% people from Black, Asian and ethnic minority backgrounds. We are considering these commitments as part of our work on the BBC performance framework.

This report sets out the action Ofcom is taking to help improve diversity. It explains how we will develop our monitoring programme; and we invite feedback on questions such as how the social, geographic and educational make-up of the industry can be measured and improved. As we hold the industry to account, we also have targets to further improve our own diversity at Ofcom.

Achieving equal representation is a crucial issue facing our broadcasting industry. By drawing on the best and brightest talent across all our communities, broadcasters can deliver even better programmes that genuinely reflect our rich and diverse society.

This report reveals just how far there is to go, and where clear action is required.

Sharon White
Chief Executive, Ofcom

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Executive summary

This is the first report from Ofcom's new, annual Diversity in Broadcasting monitoring programme, which will reveal how well broadcasters are promoting equality of opportunity, diversity and inclusion in employment.

About this report

This report presents our main findings across the UK-based² television broadcasters that Ofcom regulates. It does not include radio, as we will begin a similar exercise across the radio industry later this year.³

We have required broadcasters to provide data on the three characteristics where we have powers to do so: gender; racial group; and disability. In addition, we have requested data on other 'protected characteristics' in the Equality Act 2010:⁴ age; sexual orientation; religion or belief; pregnancy and maternity; and gender reassignment.⁵

We recently⁶ wrote to the Secretary of State for Digital, Culture, Media and Sport to request legislative change which would, among other things, allow us to require broadcasters to provide information on these additional characteristics in the future.

Our report focuses on the main five UK broadcasters: the BBC;⁷ Channel 4; ITV; Sky and Viacom.⁸ We compare them, by characteristic, to UK population averages and the wider UK-based broadcasting industry. We also set out findings from the total UK-based industry.

The report examines diversity across job roles, job levels, completion of training and development, promotions, joiners and leavers.

Seventy-eight⁹ of 347 broadcasters provided substantive data on 49,314 employees working for UK broadcasters,¹⁰ of which 37,433 are employed in the UK-based industry.¹¹ Some 172 smaller broadcasters, who together represent just 1,311 employees, were not required to provide detailed data.

In addition to this report, Ofcom's online diversity hub provides further information on the total industry analysis, the UK-based industry, the arrangements broadcasters have in place to promote equal employment opportunities and the methodology behind this report.

The data were collected via a questionnaire sent to all television broadcasters¹² and are based on broadcasters' own reporting systems.¹³ As such, there may be some variation in how categories are defined.

2. This includes all Ofcom television licensees that have 98% or more of their employees based in the UK, the BBC and S4C. It excludes around 2,000 UK based employees working for broadcasters with less than 98% of their staff in the UK and does not cover the independent production sector. A full analysis of all Ofcom licensees' employees can be found on [Ofcom's online diversity hub](#).

3. The BBC data includes radio, as it was provided to Ofcom in combined form.

4. The relevant protected characteristics for the purposes of the public sector equality duty in section 149 of the Equality Act 2010.

5. For pregnancy and maternity, gender reassignment and nations (including a Welsh language section) please see the [UK-based industry document](#) on the Ofcom online diversity hub.

6. Sent on 28 July 2017.

7. In this report the BBC UK public services are reported as 'the BBC' separately from BBC Worldwide and BBC Global News (which are both commercial services). BBC World Service data is not included.

8. Viacom International Media Networks Europe holds many Ofcom television licences, including the licences for the Channel 5 service and its portfolio channels.

9. These 78 broadcasters account for 110 licences as some broadcasters provided a single response for a group of companies.

10. The BBC and broadcasters licensed by Ofcom, authorised to broadcast for more than 31 days per year and with more than 20 employees were required to respond with data on their employees. Broadcasters who did not meet this threshold were not required to respond with data. S4C provided data on a voluntary basis.

11. Across broadcasters who have at least 98% of their employees based in the UK.

12. This includes all Ofcom television licensees, the BBC and S4C.

13. Further information on the methodology used to collect the information in this report and the legal basis for its request can be found on [Ofcom's online diversity hub](#).

The data gap

We have found that the television industry urgently needs to undertake better, more regular monitoring of its employees. Though most broadcasters provided information on the gender of their employees, they didn't provide racial group data on 20% of industry employees, and disability data on 36% of employees. Broadcasters provided even less data for other characteristics: 43% of employees were categorised as no data on age; 62% on sexual orientation; and 67% on religion or belief.

Fifty-seven of the broadcasters surveyed failed to provide mandatory data on gender, racial group and disability. We have begun enforcement action against these broadcasters, recording any breaches of their licence obligations, and will consider sanctions where appropriate.¹⁴

The report also shows 30,000 freelancers work across the industry. Up to half of these

may be captured by the industry's Diamond¹⁵ monitoring project, as they work on programme production. That would still leave around 15,000 freelancers not monitored. Many broadcasters do not collect diversity data on their freelancers. Of those that do, their freelancers are more likely to be male, less likely to be from an ethnic minority background, and less likely to self-define as disabled.

Crucially, these shortfalls in data make it harder to assess how far broadcasters must go to reflect the wider population in their employment. For example, just 3% of UK television employees described themselves as disabled, compared to 18% of the UK population. As we received no disability data for 30% of the industry, disability representation may be better or worse than the numbers suggest, depending on representation among the 30% for whom we have no data.

Definitions

UK-based industry

This covers broadcasters who hold an Ofcom licence and who have 98% or more of their employees based in the UK, plus the BBC and S4C (who are not licensed by Ofcom). It does not include independent producers or freelancers.

Main five broadcasters

These are the BBC, which commissions and directly produces programmes as well as working with the independent production sector (including BBC Studios); Channel 4, which commissions programmes from the independent sector, but does no direct production; ITV, which like the BBC commissions and directly produces programmes (ITV Studios) as well as working with the independent sector; Sky, which commissions programmes and largely works through the independent sector; and Viacom, which commissions programmes and has a mix of in-house and out-of-house production.

Job Roles

Employee information has been provided for five job categories:

- programming jobs (this includes off-screen production and may also include on-screen);
- commissioning jobs (a sub-set of programming roles);

- technical and engineering;
- sales and marketing; and
- support and administrative.

Not all broadcasters categorise job roles in exactly this way. To compare broadcasters we asked them to provide information in the categories that they considered most closely matched those they currently use.

Freelancers

This covers freelancers who work directly for the broadcasters across any of the listed job roles above. In providing their data, broadcasters may have taken different approaches. Some freelancers working for the broadcasters may also be working in the independent production sector.

Workforce

This refers to broadcasters' employees and to freelancers who support the provision of broadcast services.

Data gaps

Broadcasters were given the option of indicating where they had no data. As a result, some data in the report do not add up to 100%; in some cases by a significant margin where the data gap is large.

14. For further information on the enforcement undertaken see [Ofcom's online diversity hub](#).

15. <https://creativitydiversitynetwork.com/diamond/about-diamond/>

How diverse are broadcasters?¹⁶

The five main UK broadcasters

The report focuses on the five major UK broadcasters - the BBC, Channel 4, ITV, Sky and Viacom (owner of Channel 5) - given their size and scale. Their diversity profiles, and the extent to which they monitor and measure the make-up of their employees, vary significantly.

The BBC is second to Channel 4 in terms of representation of employees across most characteristics. As the UK's largest broadcaster,

the BBC's diversity performance has a disproportionate effect on the wider industry. Sky did not provide data on three characteristics and is middle-to-bottom compared to the other four broadcasters, as is ITV on everything other than gender. Channel 4 has the most diverse workforce across most characteristics, and Viacom is in the middle compared to the other four broadcasters on most areas.

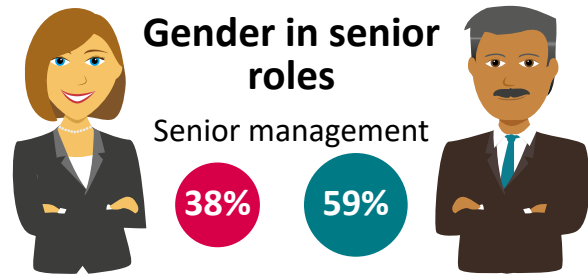
	UK population	UK-based industry	Main five broadcasters	BBC	Channel 4	ITV	Sky	Viacom	Data gap
	Percentage (%)	Percentage reported (%)							Not reported (%)
Gender									
Men	49	52	52	53	41	48	58	49	1
Women	51	47	48	47	59	52	42	51	
Women in senior roles	-	38	39	39	36	42	31	48	14
Racial group									
Black, Asian and minority ethnic	14	11	12	13	18	8	13	16	17
Disability									
Those with disability	18	3	3	4	11	1	2	1	30
Age									
Under 40 years old	51	35	39	45	62	56	n/a	19	29
Over 40 years old	49	37	42	56	38	43	n/a	8	
Women under 40 years old	-	38	43	48	67	62	n/a	23	28
Women over 40 years old	-	34	40	52	32	38	n/a	5	
Men under 40 years old	-	30	34	41	52	52	n/a	16	31
Men over 40 years old	-	39	45	59	48	48	n/a	10	
Sexual orientation									
Heterosexual	94	41	49	59	84	61	n/a	17	51
Lesbian / Gay / Bisexual	2	3	4	5	6	4	n/a	2	
Religion and belief									
Religious	67	19	23	32	50	n/a	n/a	7	59
Non-religious	26	18	21	31	36	n/a	n/a	11	

Gender

We received gender data for 99% of employees, leaving 1% not currently monitored.

Women are under-represented across the UK-based industry, accounting for 47% of employees, versus 51% of the wider population. Among the five main broadcasters, Channel 4 has the highest proportion of female employees at 59%, followed by ITV at 52%. The BBC's employees are 47% female.

Women are represented even less at senior levels. Male employees comprise 59% of senior management¹⁷ across the UK-based broadcasting industry. All of the five main broadcasters have more men than women at senior management level. At the BBC, 39% of senior roles are held by women.



Most employees in programming roles are men, but most commissioners are women. Women account for 47% of programming roles, but for 61% of commissioning roles.

Racial group

We received racial group data for 81% of employees, with 2% of employees choosing not to disclose, leaving 17% for which data were not provided.

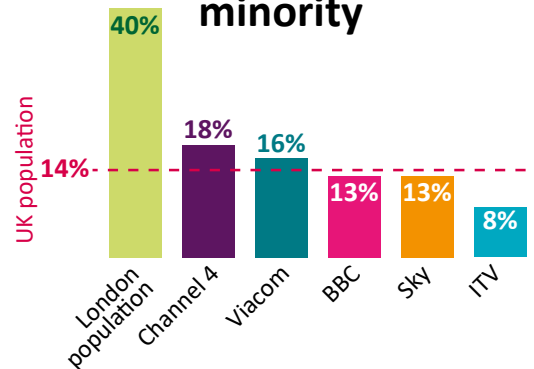
Ethnic minority employees are under-represented across the UK-based industry. The proportion of employees from an ethnic minority background is 11%, versus 14% of the wider population.

Two of the five main broadcasters employ a greater proportion of people from an ethnic minority background¹⁸ than the UK average: Channel 4 at 18%; and Viacom at 16%. Ethnic minorities represent 13% of the BBC's employees, but only 6% of senior staff, behind only ITV. The main broadcasters are largely based in London, where 40% of people are from an ethnic minority background.¹⁹

Ethnic minority representation is lower still at senior levels: only 9% at board and non-executive level, and 8% at senior management level across the UK-based industry.

Ethnic minority representation is at a similar level among programming roles as across other roles. Of those working in programming roles across the UK-based industry, 11% are from an ethnic minority background. Within

Proportion from an ethnic minority



commissioning roles, the figure is 13%; 14% for technology and engineering; 13% for sales and marketing; and 12% in support and administrative roles. Across the five main broadcasters, only the BBC employs people from an ethnic minority background in commissioning roles broadly in line with the UK population average, at 15%.

Employees from an ethnic minority background are less likely to be trained or promoted. Only 8% of those who received training and only 10% of those promoted were from an ethnic minority background across the UK-based industry. However, broadcasters did not provide data on 54% of those trained and 28% of those promoted.

17. 27% of board and non-executives are female, there is no gender data on 10% of this group.

18. This covers people who self-define as Black, Asian or Minority Ethnic (BAME)

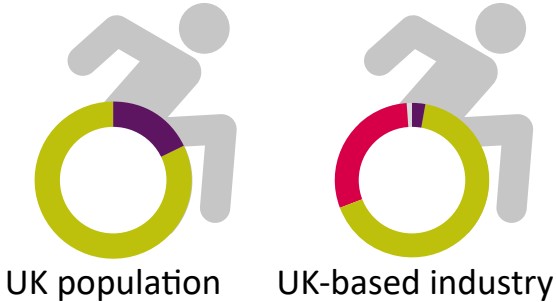
19. The London figure is taken from ONS annual population information <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/ethnicity/articles/ethnicityandnationalidentityinenglandandwales/2012-12-11>

Disability

We received disability data for 69% of employees, with 1% choosing not to disclose, leaving 30% for which data were not provided.

Proportion with a disability

● Disabled ● Non-disabled ● Not reported



There is a worrying lack of disability data, and disabled people appear to be significantly under-represented. Only 3% of employees working across the UK-based industry described themselves as disabled, compared to 18% of the UK population.²⁰ The 30% of employees undefined equates to more than 11,000 employees.

Disability representation and monitoring vary greatly across the five main broadcasters.

Channel 4 had the highest proportion of disabled employees at 11%, and Viacom had the lowest at just 1%. Four per cent of the BBC's employees are disabled. Sky provided information on 2% of its employees, who identified themselves as disabled. ITV provided data on fewer than half of its employees.

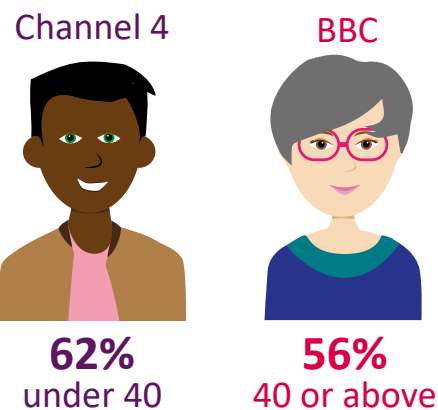
Age, sexual orientation, and religion or belief

We received very little data from broadcasters on the age of their employees, their sexual orientation, or their religion or belief. We are very concerned about broadcasters' lack of data, as this makes it extremely hard to assess the diversity of these characteristics within the industry.

Sky and Viacom did not provide complete age data. Of the five main broadcasters, Sky provided no information on the age of its employees, and Viacom on just 27% of its employees. Of the three others, Channel 4 has the youngest employees, with 62% of employees under 40, and the BBC the oldest, with 56% aged 40 or above.²¹

Fewer than half of UK-based broadcasters provided information about the sexual orientation of their employees. The BBC and ITV provided this data on two-thirds of their employees; Sky provided none; and Viacom on less than 20% of its employees. Only Channel 4 provided data on all its employees – showing that 6% of employees consider themselves lesbian, gay or bisexual (LGB).²²

Age diversity



Channel 4 has the most complete data on religion or belief. Channel 4 reported on almost all of its employees, with just over a third considering themselves to have a religion or belief. ITV and Sky provided no data on the religion or belief of their employees; Viacom provided data on less than 20% of its employees. The BBC reported on two-thirds of its employees, showing religious and non-religious employees in equal balance.

20. The UK profile is taken from the Census 2011- Activity limiting health problem or disability (limited a lot or limited a little) <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilityinenglandandwales/2013-01-30>

21. The corresponding figures are 45% of BBC employees are aged under 40 (doesn't total 100% due to rounding) and ITV has 56% of employees aged under 40. The three broadcasters providing information on age had a complete data set, with no 'no data'.

22. Information on broadcasters' arrangements for gender reassignment/transgender employees can be found on the [Ofcom online diversity hub](#).

Conclusions and next steps

Our findings show that too many broadcasters do not sufficiently understand the make-up of their employees, and collect too little or no diversity data. Among the major broadcasters - with the exception of Channel 4 - the data are patchy. The industry cannot address what it doesn't fully understand.

Action by broadcasters

We want to see a step-change from broadcasters to improve diversity:

- **Broadcasters should regularly measure and monitor the make-up of their workforce to a consistently high standard**, having regard to Ofcom's new guidance,²³ capturing all characteristics and job roles.
- **We expect broadcasters to set diversity targets.** All broadcasters should set clear targets on diversity so their employees more accurately reflect the society we live in.
- **Broadcasters should lead from the top.** We want chief executives to be accountable for delivery against their diversity targets. Comprehensive diversity policies need to be embedded from the top down, with senior diversity champions leading the agenda; appraisals of senior employees against diversity objectives; and 'unconscious bias' and diversity training.

Action by Ofcom

Ofcom will continue to work closely with the industry to help improve the diversity of its employees.

- **We will develop our monitoring programme further.** This report is the first in a series of annual publications in which we will measure, year on year, the diversity of the TV industry's workforce, which broadcasters are improving and which have more work to do. Ahead of next year's data request we will work with broadcasters to identify how data provision can be made easier and the data more comparable. We will also explore what new information can be provided, such as employees' social, geographic or educational background.
- **Improved diversity measures.** We have examined in detail the arrangements each licensee has in place to promote equal employment opportunities, in line with their licence condition. We will ask licensees we assess to have inadequate arrangements in place to explain how they will meet their obligations.
- **Better diversity guidance.** In light of the findings from this report, we will update our guidance to which broadcasters must have regard when developing their arrangements to promote equal opportunities.²⁴
- **Enforcement action against broadcasters who fail to provide required data.** Some 57 licensees failed to respond to our request to provide information regarding the make-up of their employees. We have commenced enforcement action and will publish our findings shortly.
- **We are seeking additional powers.** We have written to the Secretary of State for Digital, Culture, Media and Sport to request an extension to the list of protected characteristics in sections 27 and 337 of the Communication Act 2003. This would allow us to require broadcasters to provide data on a broader range of characteristics, rather than sections of this request being voluntary, and require their equal opportunities arrangements to cover these characteristics.²⁵
- **We will report next on the radio industry.** Over the coming months, we will undertake the same diversity reporting exercise across the UK's radio industry.

23. As noted under 'Actions by Ofcom' we will be updating our guidance on promoting equal opportunities.

24. We have already produced guidance in collaboration with the Equality and Human Rights Commission called 'Thinking outside the box' https://www.ofcom.org.uk/_data/assets/pdf_file/0030/47496/increasing-diversity.pdf on what action can lawfully be taken to increase diversity in the industry, and have developed an online diversity resource hub which contains a wealth of information to help broadcasters. www.ofcom.org.uk/diversity.

25. In the case of the BBC, the Secretary of State would give a direction requiring the BBC's arrangements to cover additional characteristics.

Five main television broadcasters²⁶

In this section we focus on the five main broadcasters with 750+ employees, which are part of the UK-based industry, and which provided information on three or more of the protected characteristics.

These five broadcasters are:

- **BBC**²⁷
- Channel Four Television Corporation (**Channel 4**)
- ITV Group (**ITV**)
- Sky UK Limited (**Sky**)
- Viacom International Media Networks Europe (**Viacom**) which owns Channel 5

We have compared these five broadcasters across the six protected characteristics we asked about,²⁸ against each other and across the UK-based industry. Following this comparison, more detailed information is provided on each of the five broadcasters, including how each broadcaster's total number of employees breaks down by job level and job role.

For the breakdown of gender, racial group and disability characteristics for each of the 78 broadcasters who responded to our information request, and detail on which broadcasters provided information on the other characteristics, please go to the total industry document on the Ofcom online diversity hub at www.ofcom.org.uk/diversity.

For further information on arrangements broadcasters have in place to promote equal opportunities, including those that focus on particular protected characteristics, such as gender or disability, please see [page 26](#) of this report and Ofcom's online diversity hub.

How do the five main broadcasters compare?

These five broadcasters represent 81% of the UK-based industry, and vary in size. The BBC is the largest by some distance, with 19,629 employees (40% of all employees reported on). This is followed by Sky (4,795) and ITV (4,099). Channel 4 and Viacom each have fewer than 1,000 employees.

Across the five broadcasters there were some substantial gaps in the data provided, most notably on age, sexual orientation, and religion or belief. Sky did not provide information on any of these characteristics, and the information

provided by Viacom accounts for just over a quarter of its employees. There were also gaps in the data provided by ITV and the BBC, though Channel 4 had a small percentage of no data across the characteristics.

The five main broadcasters are also compared to UK population averages and the UK-based television industry. More information on the diversity breakdown across the total industry and across the UK-based industry can be found on Ofcom's online diversity hub.²⁹

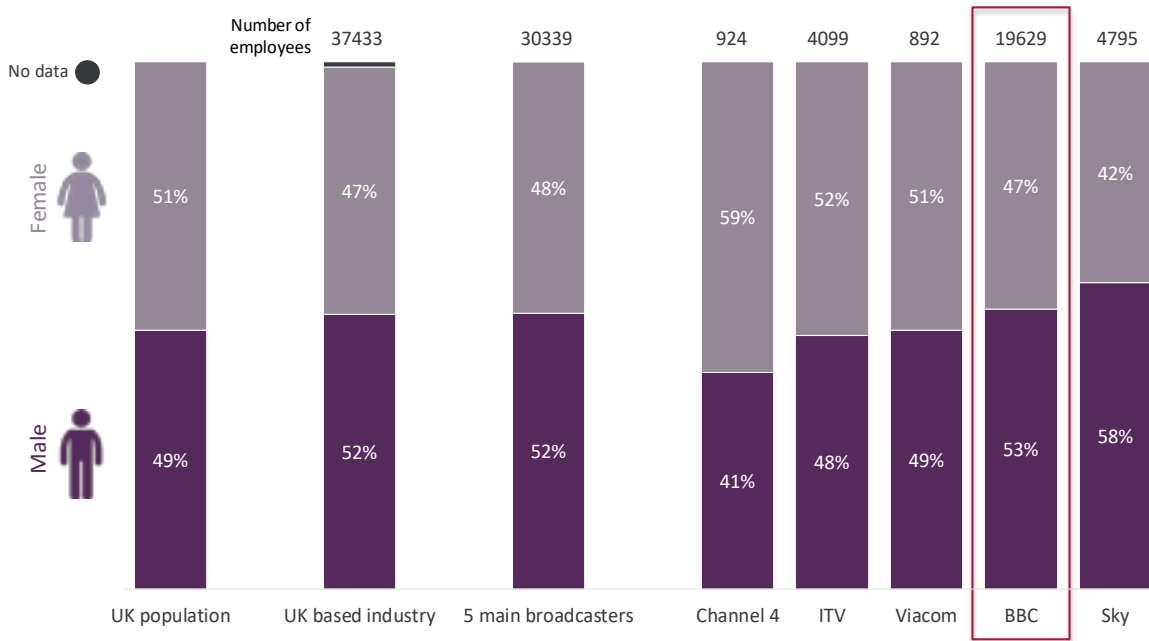
26. For information on the data provided by each of the five main broadcasters, please see page 32 of the report.

27. As noted in the BBC data information at the back of this report, this data refers to 2016 calendar year and the BBC has since published 2017 data in its Equality Information Report. The BBC carried out an internal push on reporting information in late 2016, which it notes in the 2017 report is the reason for some substantial increases in minority groups in comparison to its 2016 data.

28. We received little data on pregnancy and maternity, and limited information on gender reassignment arrangements. We have therefore summarised the information we received on a more qualitative basis, set out in the [total industry document on Ofcom's online diversity hub](#).

29. [Ofcom's online diversity hub: www.ofcom.org.uk/diversity](http://www.ofcom.org.uk/diversity)

Gender



Gender profiles were complete for all five broadcasters. Across these broadcasters, employees are slightly more likely to be male than female (52% compared to 48%). While in line with the proportion across the total industry³⁰, both are more male-focused than the UK population average³¹ which is 51% female.

The BBC ranked fourth for female representation across its employees (47%). Sky showed the lowest proportion of female employees at 42%. Channel 4 has the highest proportion of female employees at 59%, followed by ITV at 52% and Viacom (which includes Channel 5) at 51%.

At the BBC, 39% of senior management roles are held by women, lower than both Viacom and ITV where 48% and 42% respectively of senior management roles are held by women. Channel 4 has 36% of senior management roles held by women, followed by Sky which has the lowest percentage of women in senior management roles at 31%.³²

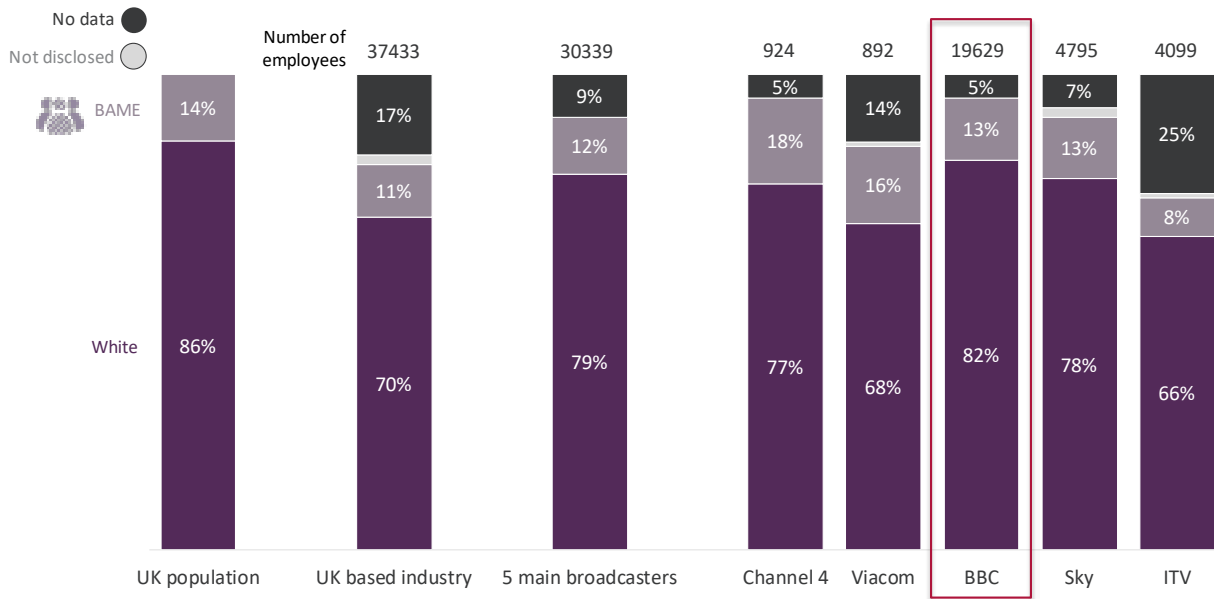
- The BBC is fourth out of the five broadcasters on representation of women.
- The BBC is third out of the five broadcasters on representation of senior women.

30. See [total television industry document](#) on the Ofcom online diversity hub for the full industry analysis.

31 Annual Population Survey <https://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=17>

32. All five broadcasters provided complete data on gender at senior management level. Therefore the proportions for men at senior management level are the remaining proportion to total 100%.

Racial group



Ethnic minority employees make up 12% of employees across these five broadcasters, lower than the UK population average of 14%.³³ The BBC ranked joint third with Sky, at 13%, with the lowest proportion of people from an ethnic minority background found at ITV with only 8%. Channel 4 showed the highest proportion of employees from an ethnic minority background among the five broadcasters at 18%, followed by Viacom at 16%. However, the racial group of 17% of employees (just over 6,000) across the UK-based industry is unknown. This ‘no data’ figure is driven by ITV, which did not provide racial group information for a quarter of its employees.

There is under-representation of employees from an ethnic minority background in senior

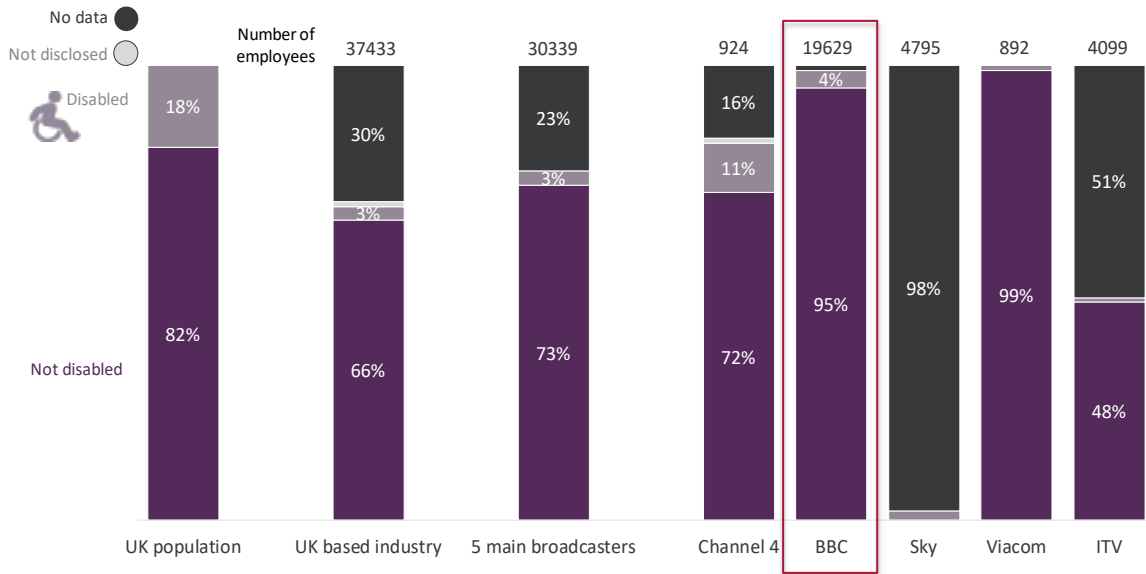
management roles. Across the BBC, only 6% of senior roles are held by people from an ethnic minority background, with only ITV having a lower proportion. The highest proportion across the five broadcasters is at Sky, where up to 15% of employees in senior roles are from an ethnic minority background, followed by Viacom and Channel 4 with up to 10%.

Among the main five broadcasters, only the BBC’s proportion of ethnic minority employees in commissioning roles is broadly in line with the UK population average, at 15%. Both Channel 4 and ITV have a lower proportion of ethnic minority employees in commissioning roles. Sky and Viacom did not provide information on racial group by job role.

- The BBC is joint third out of the five broadcasters on representation of people from an ethnic minority background.
- The BBC is fourth out of the five broadcasters on senior representation of people from an ethnic minority background.

33. Given the 9% of ‘no data’ this figure may be higher across the five main broadcasters if they had complete data.

Disability

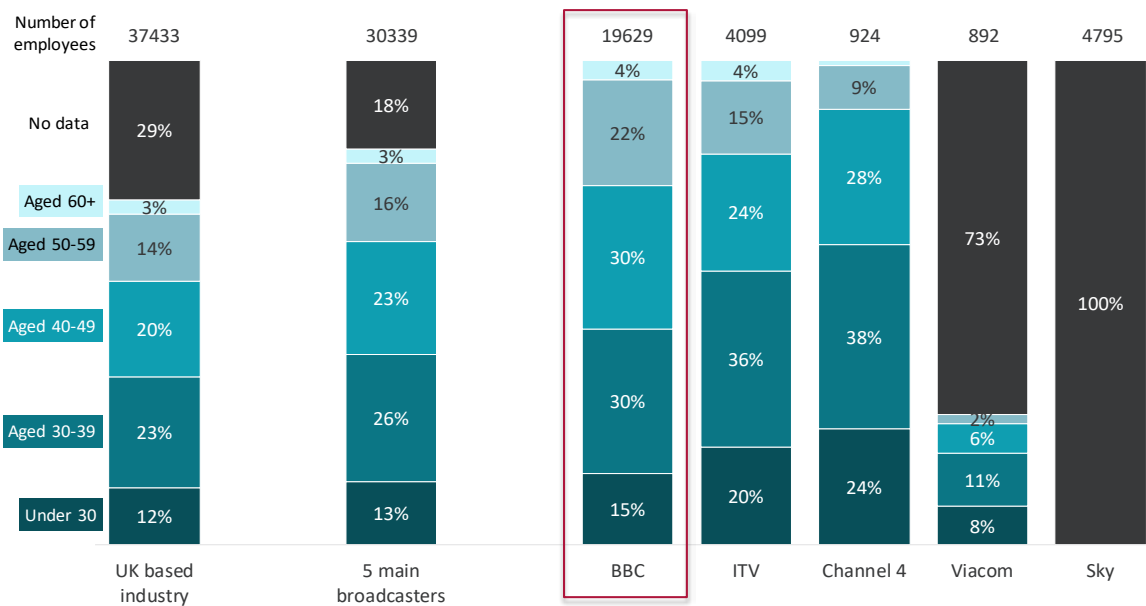


While the five main broadcasters make up over 81% of all employees across the UK-based industry, only 3% of their employees self-define as disabled. Across the BBC, 4% of employees self-define as disabled, second to Channel 4 which has the highest proportion of disabled employees

(11%) by far. Across the five main broadcasters, almost a quarter of employees are not defined. While the rate of undefined employees is lower than across the UK-based industry as a whole (30%), this still equates to almost 7,000 people.

- The BBC is second out of the five broadcasters on representation of disabled people.

Age



Data on age were provided by four of the five large broadcasters (BBC, Channel 4, ITV and Viacom), though Viacom provided age data for just 27% of its employees. Sky did not provide any data on age.

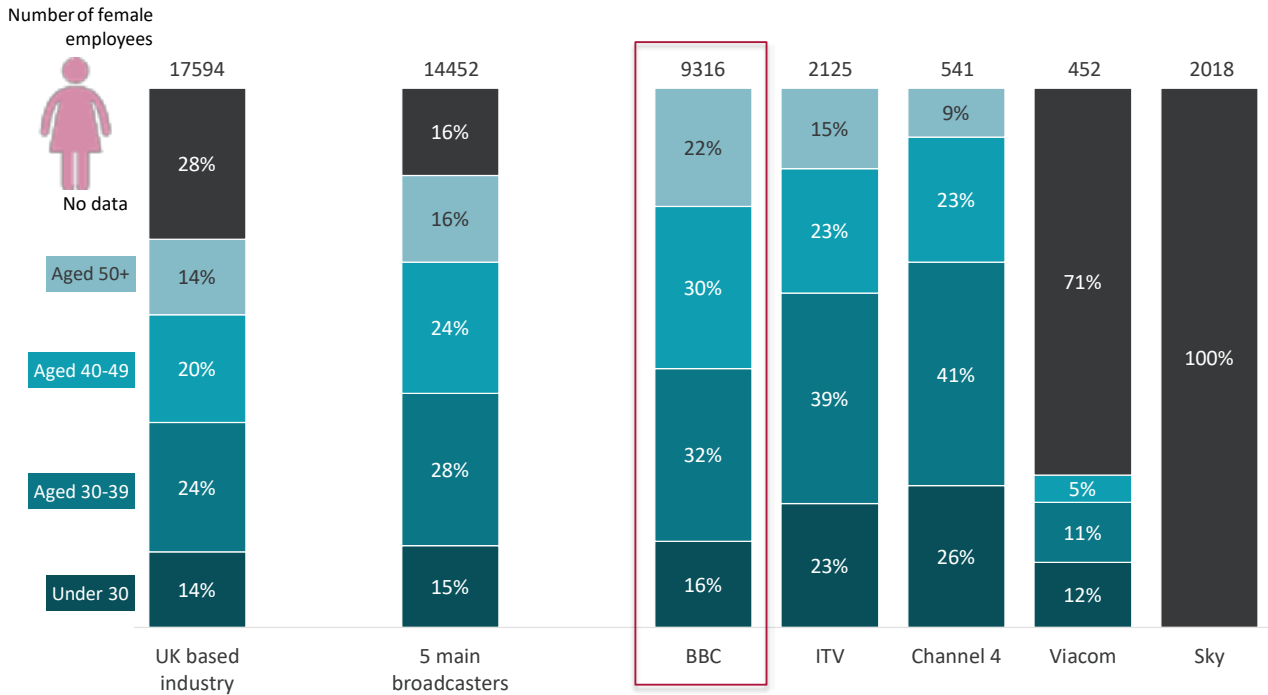
Across the five main broadcasters, 39% of employees were aged under 40. The BBC has the oldest employees, with 56% of employees aged 40 or over. Channel 4 has the youngest employees, with 62% of employees aged under 40.

2. Five main television broadcasters

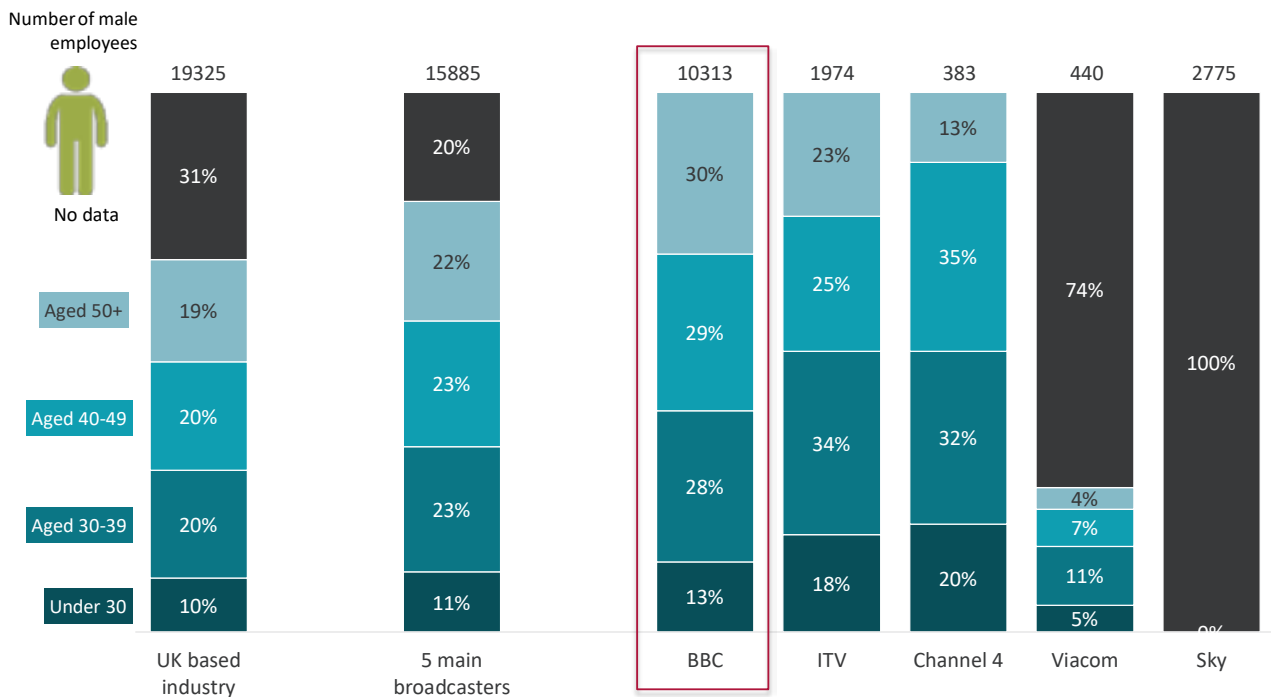
All of the broadcasters providing information on age employ a greater percentage of older men (aged 50 or over) than older women, and a greater percentage of younger women (aged 30 or under) than younger men.

The BBC employs 8 percentage points more men over 50 than women. This is the same percentage difference as ITV but higher than Channel 4, where the gap between men and women aged 50 and over is 4 percentage points.

Female employees

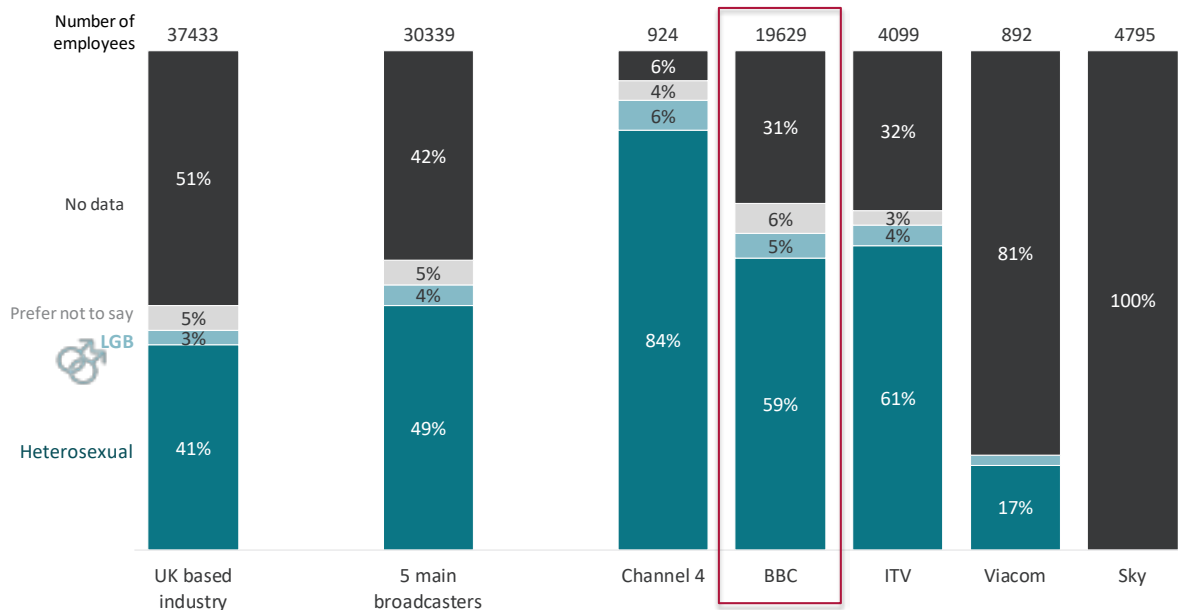


Male employees



- The BBC has the highest proportion of men and women over 40 and the lowest proportion of men and women under 40 out of the four broadcasters.
- The BBC employs 8 percentage points more men over 50 than women.

Sexual orientation



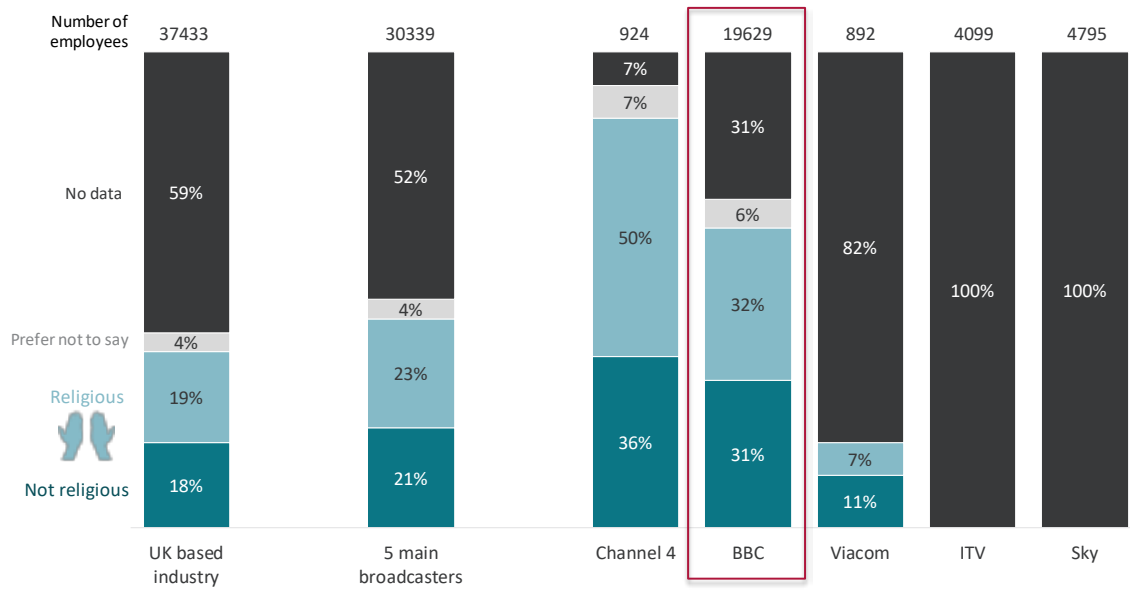
The BBC, Channel 4, ITV and Viacom provided data on sexual orientation. Sky did not. Across four broadcasters, 4% of employees were self-defined as lesbian, gay or bisexual (LGB), compared to 3% across the UK-based industry.

The BBC has the second-highest proportion of LGB employees (5%) slightly behind Channel 4 which has the highest proportion at 6%. Four percent of ITV's employees define themselves as LGB.

Across the five broadcasters combined, we received no data for over two-fifths (or 13,000) employees. Almost a third of employees at the BBC and ITV were undefined. Viacom did not provide us with data for over 80% of their employees. Channel 4, by contrast, provided data for almost all its employees (94%).

- The BBC is second out of the five broadcasters on representation of lesbian, gay or bisexual people.

Religion or belief

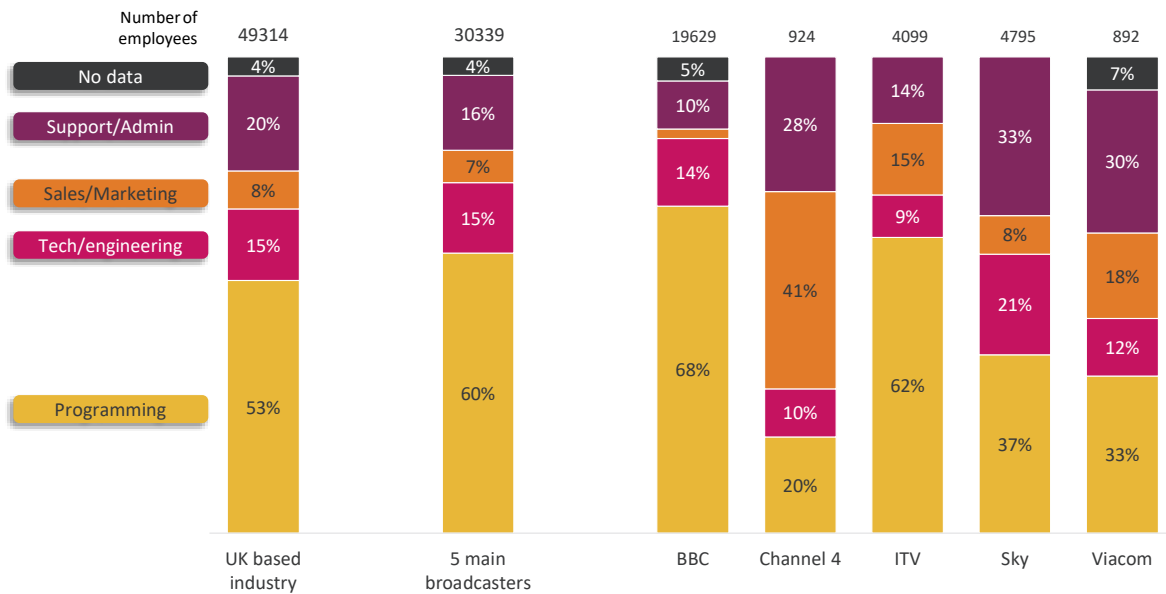


Three of the five main broadcasters (BBC, Channel 4 and Viacom) provided data on religion or belief. The BBC provided data for nearly two-thirds of its employees; Viacom’s data account for close to a fifth of its employees. Channel 4’s data were relatively complete with information for 93% of its employees.

Across the main broadcasters that provided data, almost equal proportions of employees were defined as not religious or religious (21% and 23% respectively) with no data provided for over half of the employees. Channel 4 has a higher proportion of employees defined as religious compared to not religious (50% and 36% respectively) and the BBC is evenly split (32% religious and 31% not religious).

- The BBC is second out of the five broadcasters on provision of data for religion or belief.
- The BBC has an equal proportion of religious and non-religious employees.

Job types

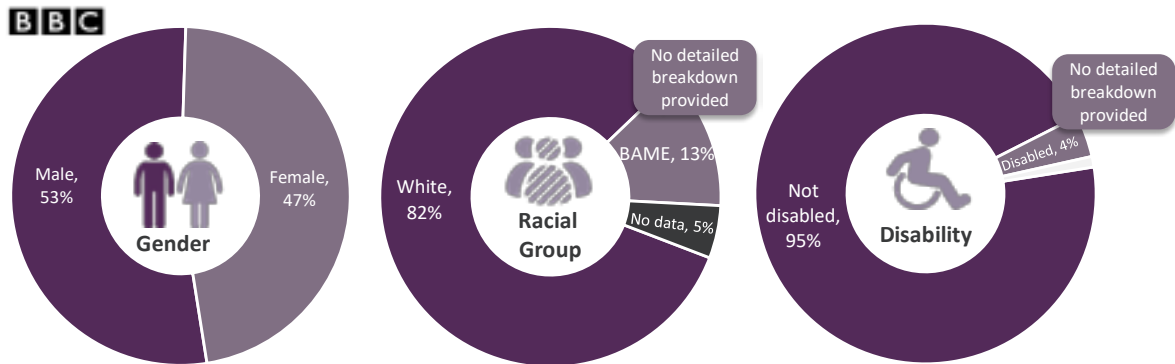


Across both the UK-based industry and the five main broadcasters, the majority of employees were categorised as working in programming roles. The BBC has the highest proportion of employees categorised as working in programming at 68%; Channel 4 has the lowest at 20%.³⁴

Channel 4 has the highest proportion of sales and marketing employees at 41% and Sky has the highest proportion of support and administrative employees at 33%.

34. As Channel 4 do not produce in-house programmes this may be the reason for the lower proportion of employees in programming roles.

How diverse is the BBC?³⁵



Employees of the BBC are increasingly likely to be male, the more senior their role. The BBC’s Board and senior management employees together are 61% male, and their mid-level management (three-fifths of the organisation overall) are 57% male. Overall, the BBC’s employees are 53% male.

Over two-thirds of roles at the organisation are defined as being within programming. While male employees hold just over half of these roles (52%), employees in commissioning roles are more likely to be female (63%).

Employees from an ethnic minority background make up 13% of employees, slightly below the UK average figure of 14%.

Ethnic minority representation at senior management level is at just 6% compared to 91% who self-define as white and 4% undefined (no data). At mid-level management, 14% of employees are from an ethnic minority background in line with the UK population; 81% are from a white background and 5% were undefined (no data).

Employees from an ethnic minority background are under-represented across programming roles overall at 12%. The proportion across

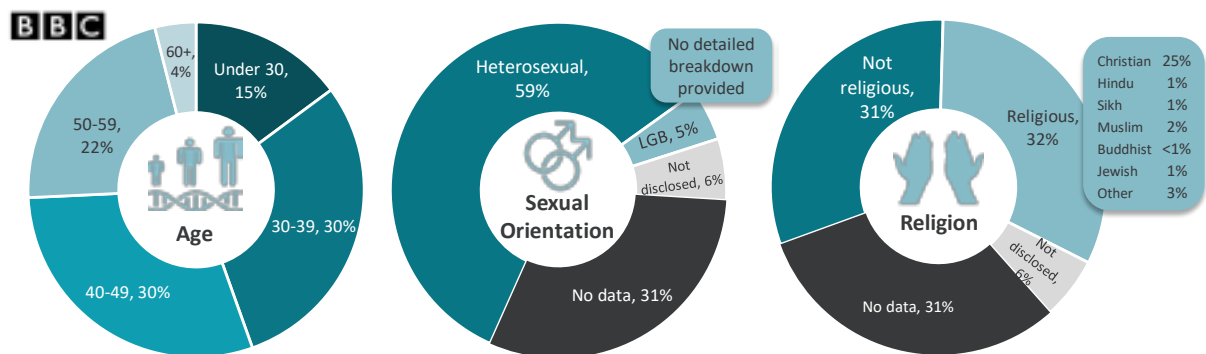
commissioning roles appears to be in line with the UK population average.

Disabled employees make up only 4% of BBC employees compared to 18% across the UK population.³⁶

More than half (56%) of BBC employees are aged 40 or over and the BBC employs 8 percentage points more men than women aged over 50.

While lesbian, gay and bisexual (LGB) employees make up 5% of BBC employees, their representation across commissioning specific roles almost doubles to 9%.

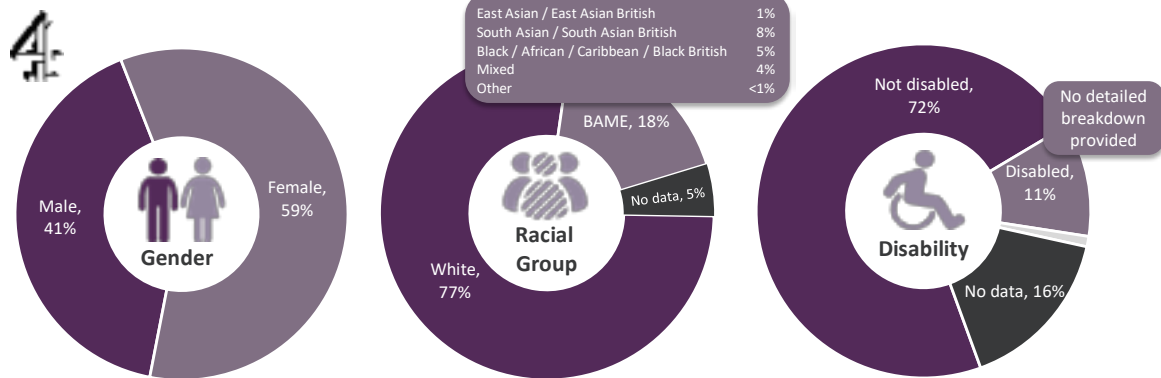
In terms of progressing through the organisation, the proportion of women, disabled and LGB employees promoted was in line with the average representation across the organisation at 47%, 4% and 5% respectively. However, only 10% of all employees promoted were from an ethnic minority background, which is lower than the average across the organisation (13%), compared to 76% of those promoted being from a white background and 14% undefined (no data). This suggests that employees from an ethnic minority background are less likely to be promoted than other employees.



35. This is 2016 data and therefore differs from the BBC’s equality information report (<http://downloads.bbc.co.uk/diversity/pdf/equality-information-report-2017.pdf>). The BBC carried out an internal push on reporting information in late 2016, which it notes in the 2017 report is the reason for some substantial increases in minority groups in comparison to its 2016 data. For information on the data provided by each of the five main broadcasters please see [page 32](#) of this report.

36. The UK profile is taken from the Census 2011- Activity limiting health problem or disability (limited a lot or limited a little) <https://www.ons.gov.uk>

How diverse is Channel 4?³⁷



Employees at Channel 4 are more likely to be female overall (59% of employees). However, this position is reversed at senior management level, which is only 36% female, compared to 64% male

Women are more likely than men to hold most job roles including programming (60%) and commissioning (54%), with only technical and engineering roles held by a higher proportion of male employees (69%).

People from an ethnic minority background make up 18% of Channel 4’s employees, higher than the UK population average of 14%.

The representation of employees from an ethnic minority background falls at mid-level management to 10% and at senior management level it is even lower.

While very few employees in commissioning roles are from an ethnic minority background, there appears to be better representation of people from an ethnic minority background in programming roles more generally, at 17%.³⁸

In terms of career progression, 15% of those promoted were from an ethnic minority background, which is lower than the percentage of people from an ethnic minority background at

Channel 4 (18%). This suggests that employees from an ethnic minority background are less likely to be promoted than other employees. Eighty-three percent of those promoted were white (1% were undefined) compared to 77% of the organisation defined as white.

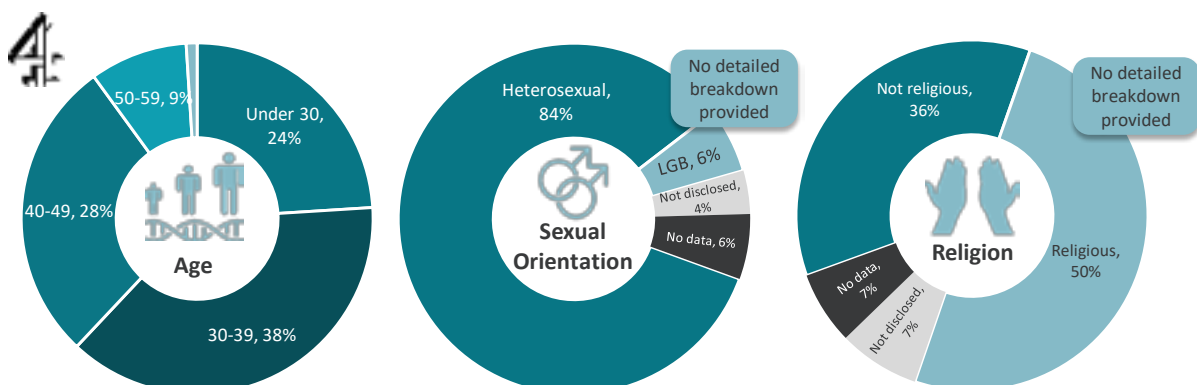
Channel 4 has the highest proportion of disabled employees compared to other TV broadcasters, at 11%; this figure increases slightly at senior management. However, these still fall below the proportion of disabled people across the UK (18%).

Fourteen percent of employees promoted described themselves as disabled, which is higher than average across the organisation (11%).

Channel 4 employees are more likely to be under 40 years old (62%), with only 10% of employees aged 50 or over.

LGB employees make up 6% of Channel 4’s employees, and a greater percentage of those promoted.

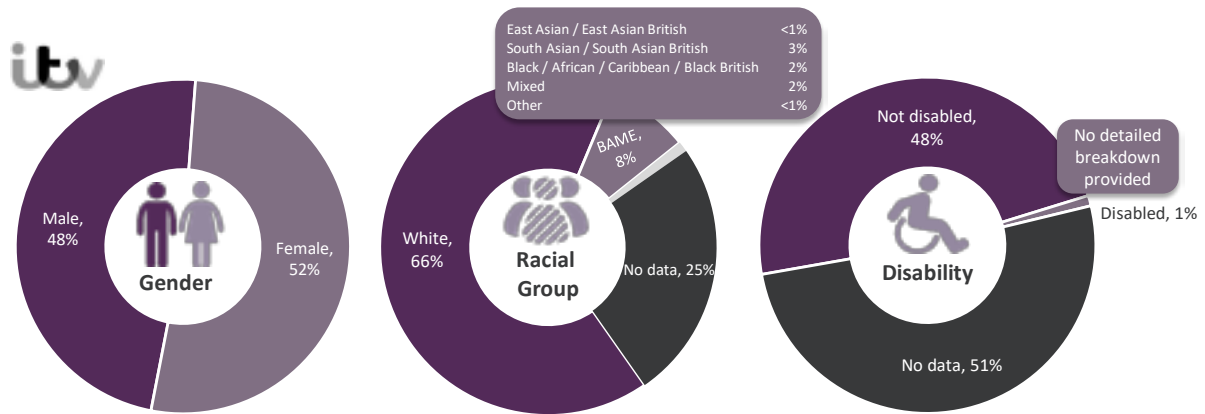
Channel 4 has a higher proportion of employees defined as religious compared to not religious (50% and 36% respectively).



37. For information on the data provided by each of the five main broadcasters please see page 32 of the report.

38. 78% self-defined as white, 1% didn’t disclose and 4% undefined (no data)

How diverse is ITV?³⁹



ITV employees are 52% female, 48% male, broadly in line with the UK population (51% female, 49% male).

This is reversed at senior management level, where just 42% of employees are female, and to a lesser extent at mid-level management, where just under half of employees are female (49%).

Sixty-two per cent of employees at ITV hold programming roles. Female employees comprise around half of these roles (51%) and the majority of commissioning roles (79%).

Only 8% of employees are from an ethnic minority background, which is much lower than ethnic minority representation across the UK population (14%). Within senior management, ethnic minority representation is below 10%.

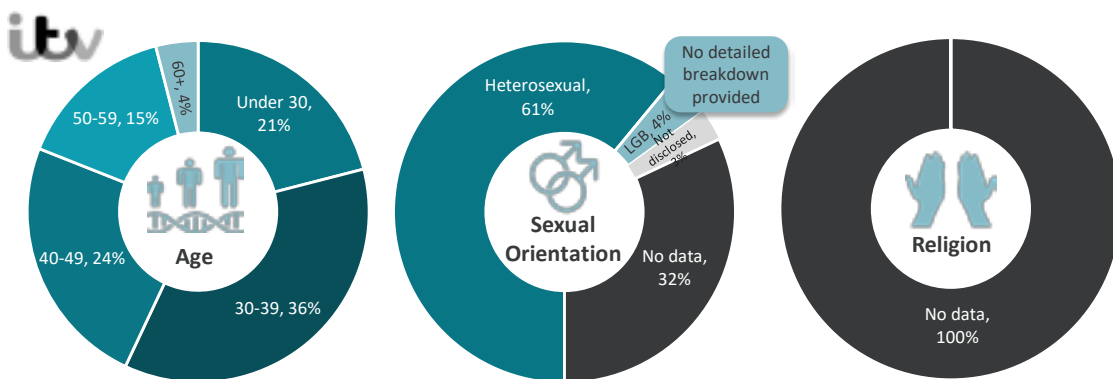
Only 6% of employees in programming roles describe themselves as from an ethnic minority background, compared to 62% from a white background, 1% who chose not to disclose their ethnicity and 32% who were undefined.

This increases to 9% among commissioning roles but is still below the UK population and UK-based industry average. People from an ethnic minority background are over-represented across non-programming roles compared to the average across ITV. This is particularly true of technical and engineering roles, 20% of which are held by ethnic minority employees, higher than the UK population average.

As ITV provided very little data on disability, it's difficult to get an accurate picture of disability across ITV's employees. The data it did provide shows that just 1% of employees are defined as disabled, rising slightly across senior management, but very low compared to the UK population average of 18%.

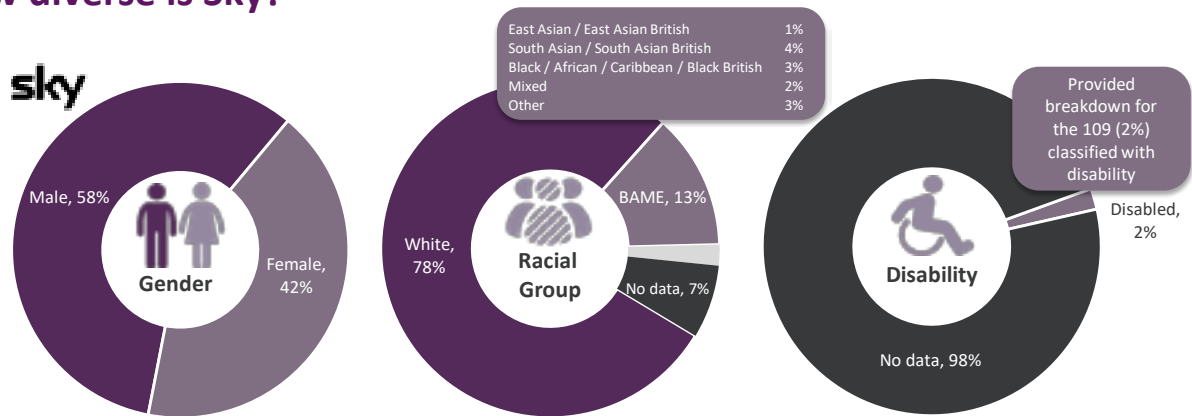
Disabled people appear not to be represented at all within programming roles at ITV.

Employees at ITV are more likely to be under 40 years old (56% of employees) than over.



39. For information on the data provided by each of the five main broadcasters please see page 32 of the report.

How diverse is Sky?⁴⁰



Fifty-eight percent of Sky’s employees are male. Some 70% of board and non-executive level, and 69% of senior management employees are male, while 59% of employees at mid and junior management level are male.

Eighty-one per cent of Sky’s 4,795 employees are defined as non-management, 57% of whom are male.

Technical and engineering roles are most likely to be male (72%); there is a similar picture in programming roles (61%). Support and administrative roles are more likely to be female (54%). Sky did not provide separate information on employees in commissioning roles.

The proportion of Sky’s employees from an ethnic minority background is 13%, slightly below the population average of 14%.

People from an ethnic minority background comprise just 11% of senior management, and 8% of middle and junior management. Sky provided racial group data on just 20% of board and non-executive level. Fourteen percent of non-management employees are from an ethnic minority background, in line with the UK population average.

The percentage of employees from an ethnic minority background is lowest in programming roles at 10% and highest in sales and marketing at 17%. Of employees receiving training, 81% were white compared to 14% from an ethnic minority background, 2% who chose not to disclose their ethnicity and 4% who were undefined.

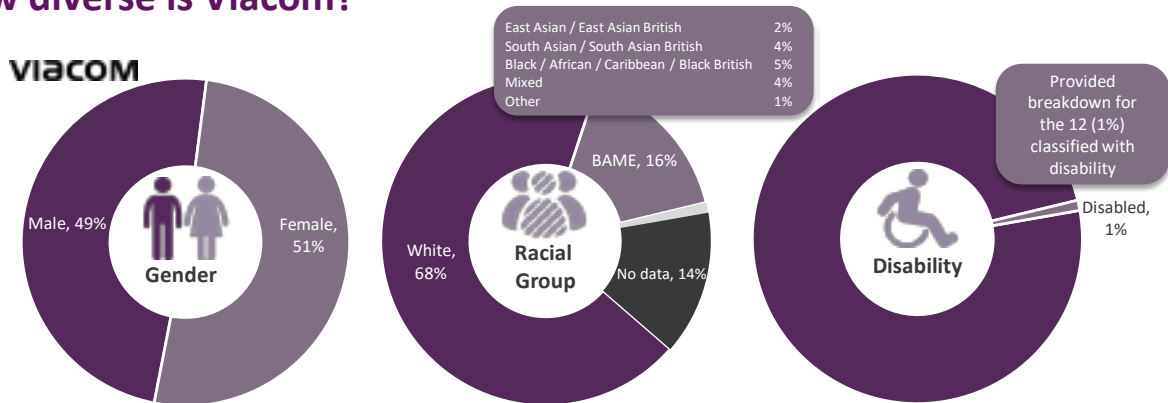
Sky only provided data for those who self-defined as disabled (comprising 2% of their total employees). It is difficult to get an accurate picture of disability across Sky without a breakdown between people who said they didn’t have a disability and those who weren’t asked.

The data available on disability highlight that more employees in non-management roles defined as disabled (3%), compared to senior, middle, and junior management roles (1%). This is much lower than the UK population average of 18%.

Sky provided no data on age, sexual orientation or religion or belief.

40. For information on the data provided by each of the five main broadcasters please see page 32 of the report.

How diverse is Viacom?⁴¹



Viacom has slightly more female employees (51%) than male employees (49%), in line with the UK population. Senior management are slightly more likely to be male than female (48% female). At mid and junior management level the female proportion is slightly higher (52% female). Non-management roles are evenly split between men and women.

Women are less likely to be employed in technical and engineering roles (17%). Women comprise 49% of programming roles, rising to 57% in support and administrative roles and 56% in sales and marketing roles.

Women were more likely to be promoted than men in 2016, with 60% of promotions going to female employees. Employees leaving Viacom in 2016 were also more likely to be female – 59% of all leavers.

Sixteen per cent of Viacom’s employees are from an ethnic minority background, 2% more than the national average of 14%.

Employees from an ethnic minority background are more likely to hold non-management roles (19%) and less likely to hold more senior roles. Employees from an ethnic minority background are more likely to hold non-programming

roles (22% of support and administrative roles, 17% of technical and engineering roles and 14% sales and marketing) and less likely to hold programming roles (12%).

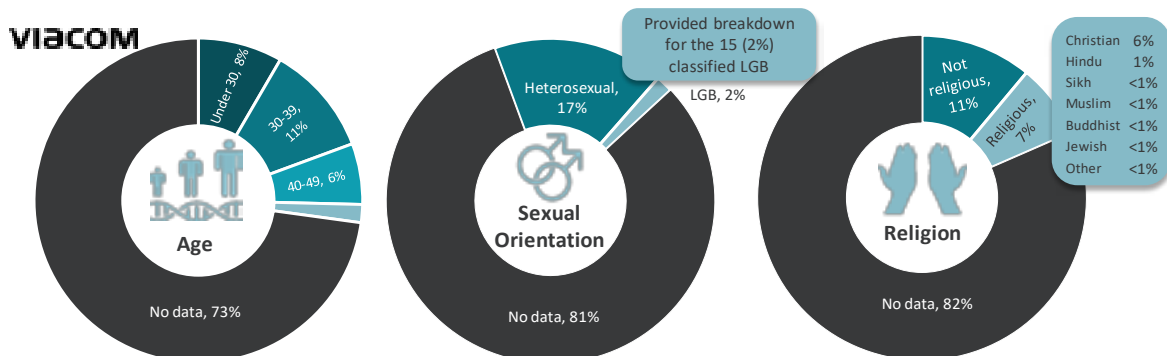
Across Viacom 1% of employees defined themselves as disabled. Disabled employees make up between 1% and 2% of employees across most job levels and roles.

While Viacom provided information on all of the characteristics we requested, the high percentage of returns listed as ‘no data’ on age, sexual orientation and religion or belief, makes it difficult to draw conclusions.

Of the 19% of employees providing information on their sexual orientation, 2% identified as LGB. LGB employees are similarly represented across most job roles.

Of the 18% of Viacom employees providing information on their religion or belief, 11% identified as not religious and 7% identified as religious. Six percent identified as Christian and all other religions were represented by 1% or less employees.

Viacom did not provide separate information on commissioning roles.



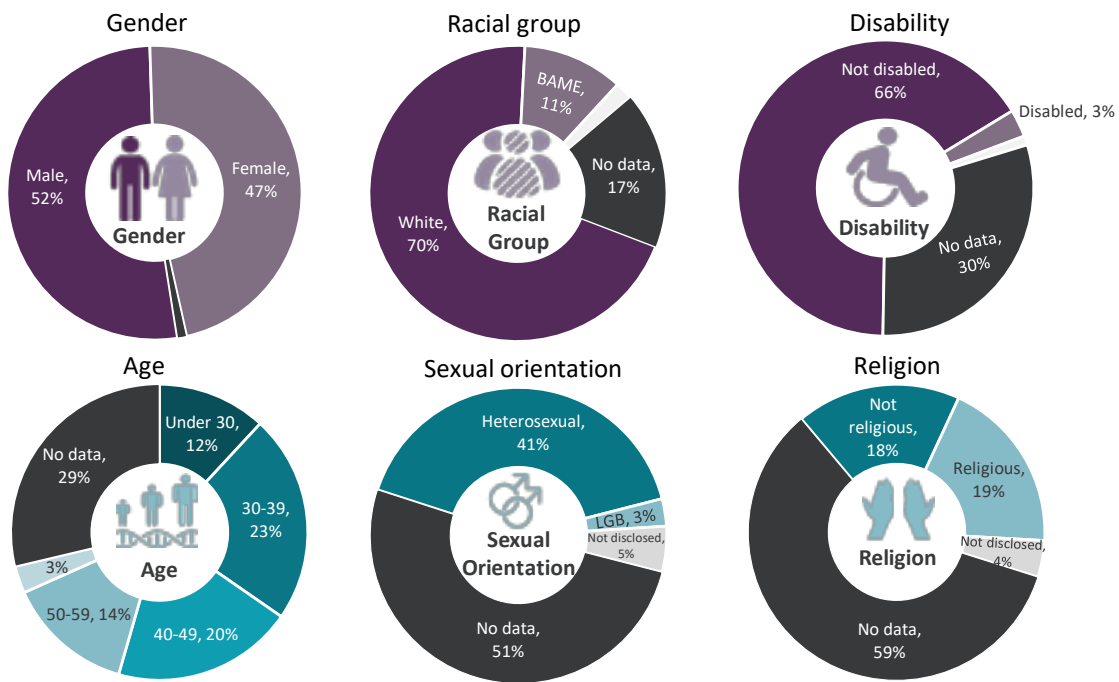
41. For information on the data provided by each of the five main broadcasters please see page 32 of the report.

UK-based industry

This section of the report looks at the profile of the UK-based television industry⁴² (including the five broadcasters featured in section 3 above) which together accounts for 37,433 employees, nearly all of whom are based in the UK.^{43,44}

For further information on the methodology used for this report please see the [Ofcom online diversity hub](#).

Overview of characteristics in UK-based broadcasters



Gender

Across the UK-based industry, employees are 52% male and 47% female, compared with the UK population profile of 49% male and 51% female.⁴⁵

As with the main five broadcasters, employees are increasingly likely to be male the more senior the role. Board and non-executive level jobs are 63% male,⁴⁶ at senior management 59% and at mid and junior management 55%.

Of the 1,290 employees promoted across UK-based broadcasters in 2016, male employees (48%) were more likely to be promoted than female employees (45%), with no data on 7% of employees promoted.

42. The 45 UK-based broadcasters considered in this section (see the [total industry document](#) on Ofcom’s online diversity hub for a full list), covering 437 licences out of 742, all met the qualification threshold of having 21 or more employees and being authorised to broadcast more than 31 days a year, and have 98% or more of their employees based in the UK. There are an additional 2,742 UK-based employees that are not included in this section but are covered in the [total industry analysis](#), as the broadcasters they work for have a total UK-based employee base of 97% or less.

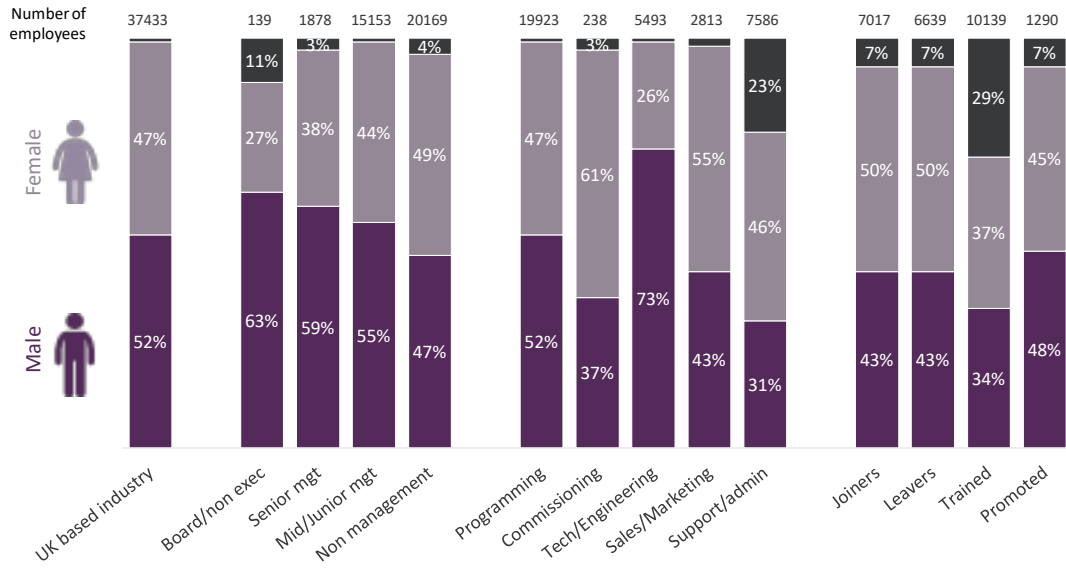
43. We requested 2016 calendar year data in an information request sent in March 2017. Most broadcasters could provide 2016 data, either from the end of the year or as an average across the year.

44. 170 employees of the 37,433 are based outside the UK. This year’s questionnaire did not collect international based employee information separately to that of UK employees.

45. Due to rounding of percentage figures these do not add up to 100%.

46. These proportions include 15 individuals who Viacom initially defined as board level but later reclassified as senior management.

3. UK-based industry



Racial group

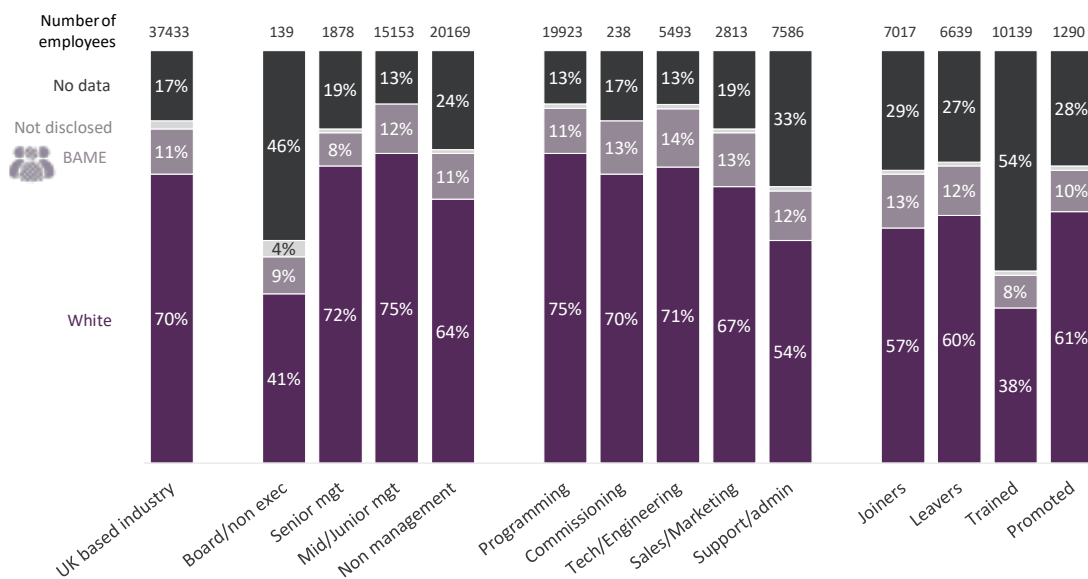
Eleven per cent of employees across the UK-based broadcasters are from an ethnic minority background, compared to the UK average of 14%, and 70% of employees self-define as white. The industry figure is significantly below the proportion of people from an ethnic minority background in London (40%) where many broadcasters have their main offices.

Ethnic minority representation is also much lower than the UK average of 14% at more senior levels across the UK-based broadcasters. Employees from an ethnic minority background comprise just 8% of senior management roles.⁴⁷ We received

racial group data in respect of half of board and non-executive roles; the data we did receive shows that just 9% of these roles are held by people from an ethnic minority background.

Of those working in programming roles, 75% of employees are white, higher than across all job roles, and 11% are from an ethnic minority background, with 13% of undefined and 1% choosing not to disclose their ethnicity.

We asked for information relating to the nations of the UK which can be found on Ofcom's online diversity hub.⁴⁸



47. These proportions exclude an additional 15 individuals who Viacom initially defined as board but later re-classified as senior management.

48. Some broadcasters also chose to highlight related initiatives and S4C, a broadcaster not holding an Ofcom licence, which provided information on a voluntary basis, requested we include in this report information on Welsh language ability within the broadcaster. The Welsh language information is found in the [UK-based industry document on the Ofcom online diversity hub](#).

Disability, age, sexual orientation and religion or belief

Broadcasters provided much less data on these protected characteristics, with the least information on religion or belief (59% no data), followed by sexual orientation (51% no data), disability (30% no data) and no age data for 29% of employees. This is disappointing and something we will be encouraging broadcasters to improve.

When breaking the data down into subgroups, such as job type and job level, the picture is even less complete and it becomes difficult on some of these characteristics to make meaningful observations.

Where we have been able to draw conclusions from the data these are provided in both the UK-based broadcasters and total industry sections on Ofcom’s online diversity hub. In addition, some broadcasters have arrangements in place that aim to support or promote equal opportunities for employees with these protected characteristics. Examples are found on [page 26](#) of this document and in more detail on Ofcom’s online diversity hub.

Freelancers

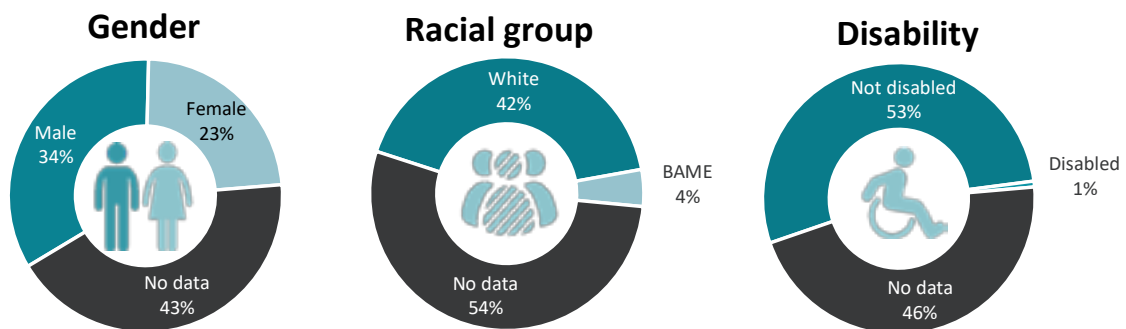
Broadcasters were required to provide the numbers of freelancers who work for them, 28,442 freelancers in total. Of the 78 broadcasters who were required to provide this data, 65 of them indicated they employed at least one freelancer.

Though some broadcasters stated that they were considering collecting diversity data on freelancers in future, only 16 out of the 65 broadcasters provided information on the gender, racial group or disability of their freelancers, covering 16,402 freelancers. Across the main five broadcasters only the BBC provided data on those three characteristics of its freelancers.

Freelancers are more likely to be male than female, with 34% of freelancers male, 23% female with 43% undefined (no data). In contrast, the industry-wide employee data shows less of a disparity between male and female employees. Only 4% of freelancers are from an ethnic minority background, significantly lower than the UK population average (14%), the total industry employee figure (17%), and the UK-based broadcasters figure (11%). Just 1% of freelancers are reported as disabled, compared to 3% or 4% of employees across the UK-based industry.

We will shortly be updating our guidance on how broadcasters can better promote equal opportunities and monitor their progress for freelancers.

Profiles of freelancers⁴⁹



49. This shows the gender, racial group and disability breakdown of the freelancers working for the 16 broadcasters collecting this information as well as the proportion of broadcasters unable to provide this information.

Steps taken by broadcasters to promote equal opportunities

This section of the report summarises some key findings from television broadcasters' arrangements for promoting equal opportunities.

While some broadcasters have initiatives which support and encourage the employment of under-represented groups, as set out below, others have schemes that are open to everyone but encourage wide participation or aim to encourage inclusion across their organisation.⁵⁰

Broadcasters were asked whether they have in place arrangements to promote equal employment opportunities and training in relation to gender, racial group and disability,⁵¹ as well as the other protected characteristics of age, sexual orientation, religion or belief, pregnancy and maternity, gender reassignment, and marriage and civil partnership. We also asked broadcasters whether they had initiatives in place to promote social mobility.

They were also asked whether their organisation has in place a written equal opportunities policy statement.

Sixty-four of 78 licensees (82%) had in place arrangements to promote equal employment opportunities and training in relation to gender, racial group and disability. In response to the question regarding whether their organisation has in place a written equal opportunities policy statement 67 of 78 licensees (86%) said they did.

Here we focus on some of the initiatives offered by the five main broadcasters to improve representation across the key protected characteristics covered by the research. Further examples, including other broadcasters' initiatives, can be found on Ofcom's online diversity hub. This section does not seek to cover all the information that broadcasters provided to us and they may have more measures in place than they shared with Ofcom.

Gender

Several broadcasters have schemes in place aimed at supporting women in their organisations and increasing female representation at senior levels.

For example, Sky's 'Women in Leadership' programme aims to achieve a sustainable 50/50 balance of men and women in most senior leadership roles and seeks to achieve this through a range of initiatives including requiring 50/50

balanced shortlists for all senior vacancies and by providing sponsors, networking and personal development support for its female employees.

Channel 4 has initiatives in place to encourage women to develop in senior roles in which they may lack representation, such as commissioning or directing.

Racial group

Some broadcasters offer targeted apprenticeships, internships and interest groups. Viacom offers both year-long apprenticeships and paid internships in conjunction with Creative Access, with half of intakes from an ethnic minority background.

The BBC has also partnered with Creative Access to give over 30 graduate interns from ethnic minority backgrounds the opportunity to train in roles at the corporation.

Over 75% of these graduates went on to secure contracts within the BBC. The BBC also partnered with the Clore Leadership Programme to develop and launch a senior development programme for ethnic minority talent. The BBC runs a diversity creative talent fund that supports emerging writers, talent and producers from ethnic minority backgrounds to develop ideas across all areas of TV.

50. Examples of these initiatives can be found on Ofcom's online diversity hub in the '[Steps broadcasters are taking to promote equal opportunities](#)' document.

51. The broadcasters are required to have such arrangements in place.

In addition to also working with Creative Access, ITV has in place a targeted mentoring programme for people from ethnic minority backgrounds.

Sky has set targets for senior production team roles and writers to at least equal representation in society as a whole, working with independent production companies and external organisations to diversify the talent pipeline into the industry. This includes its financial sponsorship and support for the Journalism Diversity Fund, which offers bursaries for accredited journalism courses for disadvantaged students.

Sky also supports the Black Collective of Media in Sport and participates in the Creative Diversity Network Commissioner Programme, which aims to broaden the pool of commissioning talent.

Though this report focuses on work carried out in 2016, some broadcasters have made more recent commitments to improving the representation of ethnic minority employees at senior levels. These include Channel 4's plans to conduct research to better understand the barriers that might exist for employees from ethnic minority backgrounds.

Disability

Channel 4's 'Year of Disability' included initiatives aimed at improving representation both on and off screen. In addition to on-screen achievements, Channel 4 provided career support and development for 26 people working in the industry, working with independent partners to accelerate career progression and to remove some of the barriers to career development facing disabled people.

Some 50% of all Channel 4's apprenticeships and 35% of work experience placements were offered to disabled people. The broadcaster also set up a panel of 'Year of Disability Advisers' who offered support while Channel 4 developed the staff disclosure campaign 'This is Me' (which raised awareness of types of disability and encouraged greater openness, acceptance and disclosure among Channel 4 employees) and a specific disability employment strategy.

The BBC's assistant commissioner development programme will include at least one disabled person on a two-year, fixed-term training contract and it will ensure that at least 10% of its apprenticeship places are taken up by disabled people. The BBC 'Extend' scheme provides work experience placements for disabled people across the BBC and the BBC also ringfences 10% of places on the Creative Access Internship Programme for disabled people.

Sky runs workshops on mental health and offers related support to its employees.

Though not strictly focused on employees, Viacom's diversity strategy notes its association with the MTV Staying Alive Charitable Foundation, which works to raise awareness of HIV/AIDs among young people as well as the Comedy Central work with mental health charity MIND. These initiatives are likely to have a positive impact on both existing and prospective employees as they demonstrate Viacom's focus on inclusion.

Age

Most work experience and internship schemes are aimed at young people. Several schemes, though not deliberately focused on younger people, are likely to attract a high proportion of younger age groups as they are promoted or made available to universities, college or school students.

Other schemes were targeted at young people, not because they were noted as under-represented, but because this was a way to attract new and sometimes different talent to the industry. For example, the Viacom talent scheme for young people looking to get a break in the creative industries, MTV Breaks, offers work placements, seminars and workshops.

Sexual orientation

Though there are fewer initiatives targeted at supporting those of different sexual orientations than some of the other protected characteristics,

several broadcasters arrange events and activities to show their support for the LGBT community.

Social mobility

Viacom's partnership with Mama Youth provides opportunities to those from non-conventional academic backgrounds and to provide an educational programme to intern hiring managers.

Channel 4's social mobility schemes include the 4Talent Grassroots Social Mobility Drive, which engages with potential industry entrants from areas of high social disadvantage, and the Social Mobility Guaranteed Interview Scheme, which assesses socioeconomic background and offers interviews to those with one or more indicators.

Since we requested information for this report the BBC has begun to include social mobility-related information on its workforce in the BBC Equality Information Report.

All of the main five broadcasters offer their employees either unconscious bias or some form of diversity training or e-learning to promote diversity and inclusion. Most of the broadcasters have internal employee networks that focus on particular characteristics, for example Viacom has a group for women in management. Other relevant schemes include ITV's Plus 1 initiative which specifically engages line managers to focus on promoting greater diversity across resourcing, development and talent practices at ITV. Viacom operates a diversity steering group in the UK which meets monthly and involves most of the UK senior management team.

Conclusions and next steps

This section outlines the conclusions we have drawn from the data, and the action broadcasters and Ofcom need to take to improve representation across the UK's television industry.

Broadcasters' current monitoring

Many areas are not monitored sufficiently.

Many broadcasters do not comprehensively monitor the diversity of their employees, with some failing to monitor certain protected characteristics altogether.⁵² This data gap makes it harder to assess how far broadcasters must go to reflect the wider population.⁵³

Data are lacking on job type and seniority.

Even where broadcasters have data, they are incomplete, with less information on those at senior levels in the broadcasters and across different job roles. Broadcasters must improve data gathering in this area. Senior employees are more likely to be decision-makers, exerting particular influence. Commissioning and programming roles directly affect the diversity of content provided on screen.

Information provided by broadcasters

lacks clarity. Many appear not to distinguish between employees who were asked for – but chose not to disclose – information, and those who weren't asked at all. This distinction is important for broadcasters to identify which employees have not been offered the opportunity to provide information.

Information provided by broadcasters lacks important detail.

Many collect data within broad categories that offer limited insight. Around 30% of broadcasters did not provide us with racial group breakdown beyond 'white' or 'ethnic minority background'. Some only record employees with a disability status if they make a related workplace request. This practice offers a limited picture of a small number of employees with a physical disability, but may fail to identify employees with non-physical disabilities, or conditions that may require support from an employer to ensure equal opportunity.

Where broadcasters' monitoring must improve

Broadcasters need to improve their monitoring to:

- cover all of the protected characteristics;
- include all employees, capturing all main job levels and job types;
- provide high-quality data through consistent, accurate and regular monitoring. Requesting data only from new starters is not sufficient, as some characteristics change over time; and
- request data of freelancers.

52. Some broadcasters explained they monitor their employees but did not have consent from the individuals to share the data with Ofcom on a voluntary basis.

53. Of the 78 broadcasters who met the threshold required to provide us with the data, only 14 (18%) provided data for all of their employees on the three characteristics of gender, racial group and disability.

Why better monitoring matters

Broadcasters have an obligation, as a condition of their licences, to take measures to promote equality of opportunity in employment.

Without accurate monitoring, it is unclear how some broadcasters can identify any gaps, ensure the relevance of their equality and diversity policies, and plan engagement with their employees to promote these policies.

Where broadcasters do not comprehensively monitor the diversity of their employees, or measure characteristics infrequently

(for example, when an employee joins the organisation), they lack an accurate picture of the make-up of their employees and any under-representation. Such a picture is vital to develop effective equal opportunities policies, and to increase employee diversity.

Ofcom will work closely with broadcasters to improve their measures and monitoring. We will report on progress in our second monitoring report next year.

Further action by broadcasters

Broadcasters should regularly measure and monitor the make-up of their employees to a consistently high standard, having regard to Ofcom's new guidance,⁵⁴ capturing all characteristics and job roles.

We expect broadcasters to set diversity targets. All broadcasters should set clear targets on diversity so their make-up of employees better reflect the society we live in.

Broadcasters should lead from the top. We want chief executives to be accountable for delivery against their diversity targets.

Encouragement of diversity, and commitment to a fully inclusive workforce, must be embedded in organisations from the top down. Some ways that broadcasters are doing this include:

- having a senior level diversity champion leading the agenda within their organisation;
- appraising all senior employees against diversity objectives; and
- requiring all recruiting staff to undertake 'unconscious bias' and diversity training.

Broadcasters must develop more focused, longer-term strategies to tackle cross-industry under-representation. They should consider joint initiatives which are properly scoped, funded for the long term and consistently evaluated, in order to improve the representation of under-represented groups across the whole industry.

Broadcasters should recognise that disabled people are under-represented in television. Disability is the only characteristic that can be supported by positive discrimination under the Equality Act 2010,⁵⁵ and we urge broadcasters to be mindful of this when considering how to improve representation of disabled people in their employment.

Improving diversity should be part of a long-term plan. While many broadcasters have undertaken various initiatives to tackle under-representation (see the '[Steps broadcasters are taking](#)' document on the Ofcom online diversity hub), many measures are short-term, rather than being part of a long-term plan with regular assessment of overall impact.

54. In light of the findings in this report we will update our guidance to which broadcasters must have regard when developing their arrangements to promote equal opportunities.

55. Certain positive action measures are allowed in relation to other protected characteristics. See Thinking outside the box (https://www.ofcom.org.uk/__data/assets/pdf_file/0030/47496/increasing-diversity.pdf) for further information.

Further action by Ofcom

Ofcom will continue to work closely with the industry to help improve the diversity of its employees.

We will call for improved diversity measures. We have examined in detail the arrangements each licensee has in place to promote equal employment opportunities, in line with their licence condition. We will be writing to each licensee whom we feel has inadequate arrangements in place to ask how they intend to meet their obligation. We will work with those broadcasters to improve their diversity measures, ensuring progress is maintained throughout the year.

We will revise our diversity guidance. In light of the findings from this report, we will update our guidance to which broadcasters must have regard when developing their arrangements to promote equal opportunities.⁵⁶

We will take enforcement action against broadcasters who fail to provide required data. Some 57 licensees failed to respond to our request to provide information regarding the make-up of their employees. We have commenced enforcement action and will publish our findings shortly, which will be available on Ofcom's online diversity hub.

We will develop our monitoring programme further. This report is the first in a series of annual publications in which we will measure, year on year, the diversity of the TV industry employees, which broadcasters are improving and which have more work to do. Ahead of next year's data request we will work with broadcasters to identify how data provision can be made easier and the data more comparable. We will also explore what new information can be provided, such as employees' social, geographic or educational background.

We will seek additional powers. We have written to the Secretary of State for Digital, Culture, Media and Sport to request an extension to the list of protected characteristics in sections 27 and 337 of the Communication Act 2003. This would allow us to require broadcasters to provide data on a broader range of characteristics, rather than sections of this request being voluntary, and require their equal opportunities arrangements to cover these characteristics.⁵⁷

We will report next on the radio industry. Later this year, we will undertake the same diversity reporting exercise across the UK's radio industry. Once we have this data, we will consider what challenges must be tackled to encourage better promotion of equal opportunities in radio.

56. We have already produced guidance in collaboration with the Equality and Human Rights Commission called '[Thinking outside the box](#)' and have developed an [online diversity resource hub](#) which contains a wealth of information to help broadcasters.

57. In the case of the BBC, the Secretary of State would give a direction requiring the BBC's arrangements to cover additional characteristics.

Five main television broadcasters – data information

BBC data information

- These data only refer to the BBC UK public services as set out in the BBC Charter and Agreement (and do not include the World Service). We asked for television services only but the BBC was unable to separate radio due to roles overlapping the two areas. We will discuss this with the BBC in more detail for our radio report later in the year.
- The BBC data did not separate board and non-executives from senior management and did not provide a breakdown of the racial groups. For information on the BBC's commercial services licensed by Ofcom (BBC Worldwide and BBC Global News) please see the Ofcom online diversity hub.

Channel 4 data information

- Data provided by Channel 4 is as at 31 December 2016. The total number of employees (924) differs to that in its 2016 Annual Report (813), which is based on the average number of employees across 2016.
- Channel 4 does not hold diversity data for the non-executive members of the board, who are appointed by Ofcom. Since the number of executive members of the board is small, Channel 4 has requested that their diversity information is kept confidential.
- Channel 4's data also cover its portfolio channels.

ITV data information

- The ITV data include all its licensees – including regional channels and UTV.
- These figures are as reported in ITV's 2016 annual report (which includes the gender split information).

Sky data information

- Sky was unable to provide data requested in relation to employees promoted within Sky as it does not currently collect this data.
- Sky was also unable to report separately on employees in commissioning roles – these employees have been included within data on programming roles.
- In relation to the voluntary submissions, Sky was unable to provide the data requested and provided the following explanation: "As we continue to progress our internal diversity monitoring initiative, we have set up a data-protection work stream as part of the project. A key responsibility of this work stream is to revise our privacy statement, consent options and improve the way we collect employee consent and understanding as part of a wider declaration campaign."

Viacom data information

- Viacom International Media Networks Europe (Viacom) includes Channel 5 and its portfolio channels, as well as several other channels.
- Viacom did not provide separate data for employees in commissioning roles; they were included within the programming figures. It did not provide information on those trained in 2016.
- Viacom was not able to provide training information by demographic and as an overall completion number. The number disclosed represented the total number of training incidents and could include multiple occasions per employee.
- Viacom noted that consent for the voluntary information was only gained from 27% of employees.

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