



Promoting Equality and Diversity

Consultation

Publication date: 9 July 2009

Closing Date for Responses: 2 September 2009

Contents

Section		Page
1	Foreword	1
2	Introduction	2
3	Our duty towards equality	4
4	Progress on equalities	6
5	Reviewing our activities	10
6	Objectives and priorities	11
7	Involving our stakeholders	12
8	Making the SES happen	13
Annex		Page
1	Responding to this consultation	15
2	Ofcom's consultation principles	17
3	Consultation response cover sheet	18
4	Consultation questions	20
5	Action Plan	21
6	Governance Framework for the Ofcom Single Equality Scheme	35
7	Glossary	36

Section 1

Foreword

At Ofcom, we're determined to do more than the law actually requires when it comes to promoting equality and diversity inside our organisation, and in the wider sectors we regulate.

This starts by making sure that equality and diversity are ingrained in everything we do and become an automatic part of everyone's day-to-day role.

This document presents our Single Equality Scheme (SES), to promote equality in our dual roles as a significant employer and as the regulator of the UK's communications industries.

Of course, setting out policies is the easy part; delivering them is the challenge. However, at Ofcom today we have more people from a greater variety of backgrounds than ever before. This makes us more innovative, insightful and responsive as we promote equality outwards into the sectors we regulate.

Do please take the time to read this document, not only to find out about our progress, but also to see how we are actively working towards a communications sector that's fairer, equal and diverse.

Colette Bowe

Chairman

If you would like this document in large print, Braille or audio format, or in another language, please:
call 020 7981 3040 or 0300 123 3333;
textphone 020 7981 3043;
email contact@ofcom.org.uk; or
write to The Ofcom Advisory Team, Riverside House, 2a Southwark Bridge Road, London SE1 9HA

Section 2

Introduction

A little about Ofcom

Ofcom is the regulator of the UK's communications industries. We are responsible for television, radio, telephone and wireless communications services.

We were given our powers through the Communications Act of 2003. Our main duties are:

- to look after our citizens and consumers in relation to communications, and promote their interests; and
- to look after everyone's interests as consumers by promoting choice and competition where we think it is needed.

Ofcom is sponsored by the Department for Business, Innovation and Skills and the Department for Culture, Media and Sport. However, although we answer to Parliament, we are not a government department and we operate independently.

Our main office is in London, but with National offices in Wales, Scotland and Northern Ireland and a network of colleagues who work with us throughout the UK.

How we're run

The Ofcom Board provides our overall direction and makes sure we fulfil our duty to enforce the Communications Act.

The Content Board looks after the content we all see and hear, mainly through broadcasting.

The Communications Consumer Panel is an independent group which advises us on a range of issues which affect ordinary people as customers. In particular, it focuses on people who may be at a disadvantage, such as older people, people with disabilities, people on low incomes and people who live in rural and remote places.

The Advisory Committee on Older and Disabled People, which is one of five advisory committees we work with, also advises Ofcom on our policies and it reports directly to our board.

Our main roles

Ofcom has many different roles. They include:

- setting the guidelines that protect viewers and listeners from offensive material;
- making sure the UK uses its airwaves in a way that serves us all better;
- protecting customers from unfair selling and scams; and
- working to make markets function better, so that we all benefit from the wider choice and better value that comes with healthy competition.

We also have a clear set of values which guide what we do, and the way in which we do it. These range from working with openness and honesty, listening with an open mind and striving to make a difference for the UK's citizens and consumers, to empowering our colleagues, investing in talent and working in genuine collaboration across all of our teams.

We believe that everyone we work with, and every UK citizen we serve, deserves to be treated with respect.

Section 3

Our duty towards equality

What do we actually mean by 'equality'?

Equality means treating everyone fairly. At times, this may call for extra adjustments, such as for people with a disability. It also means respecting that the UK is a diverse society: everyone is different, and has equal rights to be included.

At Ofcom, it is a central part of our culture that everyone deserves to be treated equally.

The law also states that we have a responsibility to have due regard to tackling discrimination and promote equality of opportunity in the areas of:

- disability;
- gender; and
- race.

These responsibilities are known as the three 'general duties' to promote equality.

Ofcom's Single Equality Scheme (SES) addresses all three duties. It will also provide a framework to include any further duties that we must promote, including age, religion or belief, sexual orientation and transgender issues.

The SES will shape the way we do things in the two roles we perform. Firstly, we are an employer of around 830 people, and must promote equality in the way we recruit new staff, and in how we treat our employees day-to-day. Secondly, we are a regulator, with significant duties – for instance, we must take appropriate steps to promote equality of opportunity in relation to employment by those providing television and radio services.

What the duties demand

The law is very clear about what we need to do to promote the three duties.

The **race equality duty** requires that we have due regard to the need to:

- remove unlawful discrimination;
- promote equal opportunities across all races; and

- promote good relations between people of different racial groups.

The **disability equality duty** requires that we have due regard to the need to:

- remove unlawful discrimination;
- eliminate harassment of disabled people that is related to their disability;
- make sure disabled people have the same opportunities as everyone else;
- make allowances for disabilities, even if it means treating disabled people more favourably than others;
- promote positive attitudes to people with disabilities; and
- encourage disabled people to take part in public life.

The **gender equality duty** requires that we have due regard to the need to:

- remove unlawful discrimination that treats men and women differently;
- eliminate harassment; and
- promote equal opportunities for men and women.

The requirements above are reflected in an action plan (See Annex 5). The plan has taken into account feedback we've already received from a variety of stakeholders.

Equality and the Communications Act 2003

As well as the general laws above which apply to any public body, the Communications Act demands that Ofcom must, among other things:

- look to the needs of elderly and disabled people, and people on low incomes;
- promote equal opportunities to work and be trained in television and radio; and
- help people who have problems hearing or seeing to enjoy television services.

Section 4

Progress on equalities

A Background

Diversity sits at the heart of equality. It recognises and respects people's differences and makes sure that everyone is fully included.

In Ofcom, we have an established diversity strategy and a continuous programme to support it. The Diversity Manager gives regular updates to the Ofcom Board and Executive Committee. She is supported by the Diversity Working Group (DWG), an enthusiastic and committed volunteer group with representatives from all Ofcom departments. The contribution of these group members is not simply an add-on to their normal roles. Their work with the DWG is assessed, and rewarded, as part of their employment objectives. Their wide ranging support includes:

- contributing to our diversity strategy;
- representing Ofcom at conferences and sharing the knowledge and experience they've gained; and
- helping to decide the content of the Diversity Action Plan.

The working group as a whole makes sure that equality and diversity are central to everything we do at Ofcom.

We also have an active community programme. We allow colleagues to volunteer their time to help various groups in the local area and we hold a 'Celebrating Diversity' calendar of key cultural, religious and other relevant events such as Lesbian, Gay, Bisexual and Transgender (LGBT) Month, International Women's Day and Black History Month.

We regularly benchmark ourselves in diversity surveys and use the feedback to shape and improve our plans.

Our Northern Ireland national office has its own Equality Scheme and Disability Action Plan. It also completes annual reports for the Equality Commission in Northern Ireland and is represented at their meetings and training events.

To create the Single Equality Scheme, we formed a high-level Steering Group with senior representatives from each group across Ofcom. This has worked well, and has encouraged us to create a Diversity Steering Group to make sure we put equality at the heart of everything we do.

B Ofcom as an employer

Part of Ofcom's mission is to be an 'employer of choice': to create a place where people choose to work because it offers equal and inspiring opportunities to everyone.

We're therefore delighted that Jobcentre Plus, for example, has awarded us the 'Two Ticks' symbol. This is only given to employers who actively employ and encourage disabled people.

Our Human Resources team works closely with the Diversity Working Group, and our aim is not merely to obey the spirit of the law but to go beyond it. In the last year, for example, we have asked that job agencies try to find (where possible) 20 per cent of the candidates they send us from diversity groups and that they are people who might bring a range of skills, ideas and outlooks to roles at all levels at Ofcom.

Inside Ofcom we have also put in place:

- professional development and training programmes and initiatives to promote diversity within Ofcom;
- diversity education that all new-joiners receive as part of their basic introduction to Ofcom;
- an e-learning diversity module that all our colleagues are required to take, so that everyone understands their obligations and how diversity is reflected in our various policies;
- training sessions for managers on managing diverse teams;
- 'Lunch and Learn' events, where we explain how Ofcom responds to equality issues (such as the charges of racism on *Celebrity Big Brother*, and general complaints we receive on issues such as sexual orientation and disability);
- detailed reports on Ofcom's performance, including annual statistics on the diversity make-up of our staff; and
- a survey of our colleagues every two years where they can feed back their views on our progress in promoting equality and diversity.

C Ofcom as a Regulator

Equality in broadcasting

A key part of our role is to make sure that broadcasting serves everyone. This means every part of our society being fairly represented in television and radio programmes. And it also means offering equal opportunities to everyone who'd like to work in the industry.

The Ofcom Broadcasting Code sets out a range of rules for television and radio programmes that broadcasters must follow. Our Code is intended to protect all viewers and listeners from harmful or offensive content, and has particular rules to protect people from diverse groups against discrimination. If a programme breaks our rules, we publish our decision in a fortnightly Broadcast Bulletin, explaining why and how the programme failed to meet the requirements of the Code. In serious cases, we can impose a range of sanctions, including fines, on the broadcaster.

We have introduced a reporting system to make sure that broadcasters are promoting equality through the people they employ. Every year they have to make reports to our co-regulator, the Broadcast Training and Skills Regulator (BTSR), which publishes a summary of equality statistics on its website. We also give broadcasters active support: we provide guidance¹ in the form of minimum requirements and we have equipped them with an 'equality toolkit'² of good equality practices.

We have therefore been pleased to see two recent initiatives taken by the broadcasters:

- the BBC, ITV, Channel 4 and Sky announced in April 2009 that they now require their suppliers (such as independent production companies, in-house producers and post-production houses) to meet specific measures that improve diversity; and
- in May 2009, ITV announced six junior internships for people from backgrounds that are not widely represented within ITV.

We also announced in our Annual Plan for 2008/9 that we would focus on removing barriers that prevent vulnerable groups from enjoying broadcasting to the full.

In 2008, we:

- supported a major awareness campaign to promote Audio Description services (AD) on television programmes. The result was that awareness of AD among visually impaired people went up from 43% to 72%; and
- supported (with ITN, Mencap and the Community Channel) a pilot television news review programme aimed at people with learning difficulties. Our Media Literacy team is also developing a learning resource, *Switch On*, to help this group.

¹ For more on Ofcom's minimum requirements guidance, see: www.ofcom.org.uk/tv/ifi/guidance/guidance/

² The equality toolkit for broadcasters is available at: www.ofcom.org.uk/tv/ifi/guidance/eo-toolkit/

As a regulator, we make decisions based on evidence. Market research is therefore important in helping us to find out how our activities affect the UK's citizens and consumers. For example, our research into media literacy, among people with disabilities and minority ethnic groups, has given us a wealth of information to shape policy, promote innovation and encourage competition.

Consultations and Publications

At Ofcom we believe that a crucial part of our role is to listen. We therefore ask a wide range of people and groups for their views about our policies, to make sure we take different views into account. We do this in a number of ways including consulting with our committees such as the Advisory Committee for Older and Disabled People (ACOD), the Communications Consumer Panel and our advisory committees for England, Wales, Scotland and Northern Ireland. We also make sure that our publications are available and accessible to everyone who's interested in them, via our website.

Other sectors

The equality rules that broadcasters must follow do not apply to the other sectors we regulate. Even so, Ofcom is working to promote the benefits of equality and diversity there as well.

In 2008, we established the Telecoms Diversity Network. It's a voluntary group of telecoms providers who have agreed to work together to capture the benefits of equality and share best-practice. We have helped to kick off the initiative, getting the network established through hosting events and sharing information. A second annual conference is planned for the autumn. As with the broadcasters, we have created an equality toolkit for telecoms that sets out the benefits of equality and diversity, and how to go about achieving them.

Our commitment

As the regulator for the communications industries, we have powers that can make life better for their users.

Through experience, we also know our decisions and policies may have different impacts on different people. It's therefore vital that we become expert listeners, focusing on the diverse communities we serve and on the rich experiences and perspectives of our own people.

Our learning also comes from wider market research, including specific consultations with stakeholders, customers and users on a wide range of issues such as our Public Service Broadcasting Review; Next Generation Access to super-fast broadband; and the Digital Dividend Review. We also analyse complaints made to our Advisory Teams.

In turn, this broad range of information has helped to shape the Single Equality Scheme, which puts equality at the heart of everything we do. The scheme will touch every function, activity and policy at Ofcom.

Section 5

Reviewing our activities

Our first task in developing the Single Equality Scheme was to get a clear picture of how we've been doing so far. We therefore reviewed our activities in every part of the organisation.

This showed that we're making good progress, and has helped us to define the priorities for the new scheme over the next three years.

- **Disability**

Our review found that we have been very busy in the area of equality and disability, across all of Ofcom's groups. Our work has ranged from carrying out our legal duties that make sure disabled people are fully served by communications services, to preparing a report on the media literacy of disabled people in the UK. In particular, we have made considerable progress in the area of content regulation.

- **Gender**

Our review revealed that more activity had taken place in the other areas of equality. However, an Ofcom report on adult media literacy included issues relating to gender, and there has been activity focusing on the internal make-up of Ofcom. Recently, we also welcomed our first female chairman. We now need to build on our activities in this area.

- **Race**

Our activity on race equality has focused mainly on external projects, where almost every Ofcom department has made progress. Projects have ranged from a market competition enquiry into pre-paid international telephone calling cards to radio licences awarded by Ofcom to serve ethnic minority groups.

Overall, we found that Ofcom is already working on a wide variety of internal and external projects to promote disability, gender and race equality. Often, our initiatives are relevant to all three strands. However, our performance is not consistent across all of our departments, nor the three equality strands.

We will continue to use what we've learned as we track our progress and review the impact of the SES. The exercise will also have given us important data when we come to carry out Equality Impact Assessments (EIAs) (see Page 15 for more details).

Section 6

Objectives and priorities

A successful Single Equality Scheme will need to meet a clear set of objectives.

These have been defined following our review into Ofcom's performance so far in promoting equality issues.

The seven objectives are:

- **to make everyone at Ofcom more aware of our equality and diversity objectives;**
- **to seek a more diverse mix of people for our decision-making bodies;**
- **to make sure we always take equality into account when we develop our policies and put them into action;**
- **to make decisions based on information that takes equality into account;**
- **to seek a more diverse mix of people across Ofcom;**
- **to promote equality and diversity among the sectors we regulate; and**
- **to make our duties, policies and services accessible to everyone.**

Section 7

Involving our stakeholders

We have talked to and involved a wide variety of people – both outside and inside Ofcom – in developing our Single Equality Scheme.

External

We used an independent research agency to help us gain valuable insights from a range of external organisations. The researchers:

- carried out 20 in-depth interviews on reactions to our draft Single Equality Scheme, and our draft corporate objectives;
- held a workshop with senior Ofcom colleagues and stakeholders currently working in the area of equality and diversity.

Internal

- We conducted interviews with relevant members of Ofcom committees.
- We invited feedback on the draft Single Equality Scheme from all members of the Communications Consumer Panel and ACOD.
- The draft was also sent to our Directors of Nations and our Advisory Committees for the Nations.
- Everyone in Ofcom was encouraged to feed back their views through a feature on our intranet. This outlined the draft corporate objectives and the purpose of the Single Equality Scheme. We also plan to conduct focus groups with randomly selected Ofcom colleagues to discuss the SES.

The responses from this process have informed our action plan, a draft of which is attached at Annex 5.

Section 8

Making the SES happen

The Single Equality Scheme is not a destination: it's an important stepping stone on the way to creating a consistent and joined-up approach to promoting equality.

Although we are already active in promoting equality and diversity there is still work to do, and we have therefore created a new framework to make sure we can and will deliver it. The framework sets out a clear set of action plans, and pinpoints who is responsible for them.

You can see a diagram of this new framework at Annex 6.

Driving the scheme at Ofcom is a dedicated steering group. Its members – senior policy advisers who have been nominated by members of our Executive Committee (ExCo) – will review the progress of the action plans at least twice a year. The group will also report to ExCo on issues around risk, control and scrutiny in establishing the Single Equality Scheme.

The steering group will also watch out for any changes in equality law that may affect the scheme.

Monitoring

Internally

Internally, we monitor the diversity of our own employees by asking them to take part in an online feedback system. This gives us regular data on equality employment issues across the organisation, by department, job levels and across seven equality strands.

Also, our Advisory Committee on Older and Disabled People monitors progress of policies and projects that affect this group across the whole organisation. The committee receives quarterly diversity updates.

We also compare our effectiveness by using the tools of other equality organisations such as Stonewall's Equality Index, Opportunity Now, the Employers' Forum on Disability, and Race for Opportunity.

Externally

We carry out a wide range of research projects on the needs, concerns and experiences of our various stakeholders. However, we're very aware we could learn a great deal more from them, simply through our routine contact.

Similarly, we know there are gaps in our knowledge. For example, we could collect data on the gender of people who make complaints. Our objectives will address these gaps.

Equality Impact Assessments

In the course of among other things promoting equality in race, gender and disability, Ofcom carries out Equality Impact Assessments (EIA) to make sure that we have due regard to any impacts that our proposed policies or projects will have on diversity groups.

This is a rigorous and systematic process that may call on a variety of sources and tools, ranging from census data and existing research to specially commissioned studies.

Communication

We will publish the Single Equality Scheme on our website. It will also be available on request in a range of accessible formats.

Annex 1

Responding to this consultation

How to respond

- A1.1 Ofcom invites written views and comments on the issues raised in this document, to be made **by 5pm on 2 September 2009**.
- A1.2 Ofcom strongly prefers to receive responses using the online web form at http://www.ofcom.org.uk/consult/condocs/promoting_equality_diversity/, as this helps us to process the responses quickly and efficiently. We would also be grateful if you could assist us by completing a response cover sheet (see Annex 3), to indicate whether or not there are confidentiality issues. This response coversheet is incorporated into the online web form questionnaire.
- A1.3 For larger consultation responses - particularly those with supporting charts, tables or other data - please email ses@ofcom.org.uk attaching your response in Microsoft Word format, together with a consultation response coversheet.
- A1.4 Responses may alternatively be posted or faxed to the address below, marked with the title of the consultation.
- Jill Ainscough
6th Floor
Operations
Riverside House
2A Southwark Bridge Road
London SE1 9HA
- Fax: 020 7981 3406
- A1.5 Note that we do not need a hard copy in addition to an electronic version. Ofcom will acknowledge receipt of responses if they are submitted using the online web form but not otherwise.
- A1.6 It would be helpful if your response could include direct answers to the questions asked in this document, which are listed together at Annex 4. It would also help if you can explain why you hold your views and how Ofcom's proposals would impact on you.

Further information

- A1.7 If you want to discuss the issues and questions raised in this consultation, or need advice on the appropriate form of response, please contact Jill Ainscough on 020 7981 3000.

Confidentiality

- A1.8 We believe it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt. If you think your response should be kept confidential, can you please specify what part or whether

all of your response should be kept confidential, and specify why. Please also place such parts in a separate annex.

- A1.9 If someone asks us to keep part or all of a response confidential, we will treat this request seriously and will try to respect this. But sometimes we will need to publish all responses, including those that are marked as confidential, in order to meet legal obligations.
- A1.10 Please also note that copyright and all other intellectual property in responses will be assumed to be licensed to Ofcom to use. Ofcom's approach on intellectual property rights is explained further on its website at <http://www.ofcom.org.uk/about/accoun/disclaimer/>

Next steps

- A1.11 Following the end of the consultation period, Ofcom intends to publish a statement as soon as practicable.
- A1.12 Please note that you can register to receive free mail Updates alerting you to the publications of relevant Ofcom documents. For more details please see: http://www.ofcom.org.uk/static/subscribe/select_list.htm

Ofcom's consultation processes

- A1.13 Ofcom seeks to ensure that responding to a consultation is easy as possible. For more information please see our consultation principles in Annex 2.
- A1.14 If you have any comments or suggestions on how Ofcom conducts its consultations, please call our consultation helpdesk on 020 7981 3003 or e-mail us at consult@ofcom.org.uk . We would particularly welcome thoughts on how Ofcom could more effectively seek the views of those groups or individuals, such as small businesses or particular types of residential consumers, who are less likely to give their opinions through a formal consultation.
- A1.15 If you would like to discuss these issues or Ofcom's consultation processes more generally you can alternatively contact Vicki Nash, Director Scotland, who is Ofcom's consultation champion:

Vicki Nash
Ofcom
Sutherland House
149 St. Vincent Street
Glasgow G2 5NW

Tel: 0141 229 7401
Fax: 0141 229 7433

Email vicki.nash@ofcom.org.uk

Annex 2

Ofcom's consultation principles

A2.1 Ofcom has published the following seven principles that it will follow for each public written consultation:

Before the consultation

A2.2 Where possible, we will hold informal talks with people and organisations before announcing a big consultation to find out whether we are thinking in the right direction. If we do not have enough time to do this, we will hold an open meeting to explain our proposals shortly after announcing the consultation.

During the consultation

A2.3 We will be clear about who we are consulting, why, on what questions and for how long.

A2.4 We will make the consultation document as short and simple as possible with a summary of no more than two pages. We will try to make it as easy as possible to give us a written response. If the consultation is complicated, we may provide a shortened Plain English Guide for smaller organisations or individuals who would otherwise not be able to spare the time to share their views.

A2.5 We will consult for up to 10 weeks depending on the potential impact of our proposals.

A2.6 A person within Ofcom will be in charge of making sure we follow our own guidelines and reach out to the largest number of people and organisations interested in the outcome of our decisions. Ofcom's 'Consultation Champion' will also be the main person to contact with views on the way we run our consultations.

A2.7 If we are not able to follow one of these principles, we will explain why.

After the consultation

A2.8 We think it is important for everyone interested in an issue to see the views of others during a consultation. We would usually publish all the responses we have received on our website. In our statement, we will give reasons for our decisions and will give an account of how the views of those concerned helped shape those decisions.

Annex 3

Consultation response cover sheet

- A3.1 In the interests of transparency and good regulatory practice, we will publish all consultation responses in full on our website, www.ofcom.org.uk.
- A3.2 We have produced a coversheet for responses (see below) and would be very grateful if you could send one with your response (this is incorporated into the online web form if you respond in this way). This will speed up our processing of responses, and help to maintain confidentiality where appropriate.
- A3.3 The quality of consultation can be enhanced by publishing responses before the consultation period closes. In particular, this can help those individuals and organisations with limited resources or familiarity with the issues to respond in a more informed way. Therefore Ofcom would encourage respondents to complete their coversheet in a way that allows Ofcom to publish their responses upon receipt, rather than waiting until the consultation period has ended.
- A3.4 We strongly prefer to receive responses via the online web form which incorporates the coversheet. If you are responding via email, post or fax you can download an electronic copy of this coversheet in Word or RTF format from the 'Consultations' section of our website at www.ofcom.org.uk/consult/.
- A3.5 Please put any parts of your response you consider should be kept confidential in a separate annex to your response and include your reasons why this part of your response should not be published. This can include information such as your personal background and experience. If you want your name, address, other contact details, or job title to remain confidential, please provide them in your cover sheet only, so that we don't have to edit your response.

Cover sheet for response to an Ofcom consultation

BASIC DETAILS

Consultation title:

To (Ofcom contact):

Name of respondent:

Representing (self or organisation/s):

Address (if not received by email):

CONFIDENTIALITY

Please tick below what part of your response you consider is confidential, giving your reasons why

Nothing	<input type="checkbox"/>	Name/contact details/job title	<input type="checkbox"/>
Whole response	<input type="checkbox"/>	Organisation	<input type="checkbox"/>
Part of the response	<input type="checkbox"/>	If there is no separate annex, which parts?	

If you want part of your response, your name or your organisation not to be published, can Ofcom still publish a reference to the contents of your response (including, for any confidential parts, a general summary that does not disclose the specific information or enable you to be identified)?

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response that Ofcom can publish. However, in supplying this response, I understand that Ofcom may need to publish all responses, including those which are marked as confidential, in order to meet legal obligations. If I have sent my response by email, Ofcom can disregard any standard e-mail text about not disclosing email contents and attachments.

Ofcom seeks to publish responses on receipt. If your response is non-confidential (in whole or in part), and you would prefer us to publish your response only once the consultation has ended, please tick here.

Name

Signed (if hard copy)

Annex 4

Consultation questions

A4.1 Q1. What are your views on Ofcom's Single Equality Scheme?

Q2: To what extent do you believe that our approach will promote equality and diversity within Ofcom and in the sectors we regulate?

Annex 5

Action Plan

We have set out a series of action plans to make sure we achieve seven particular goals. Each has been designed to put equality and diversity at the heart of everything we do in our day-to-day activities.

Objective 1: To make everyone at Ofcom more aware of our equality and diversity objectives

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
1.1 Develop and launch a new training package, available on the Ofcom intranet, to raise awareness of equality and diversity	Research and buy leading computer-based training package to raise awareness of equality and diversity. Make it available to all Ofcom's staff.	All Ofcom staff will have access to the training package.	Professional Development (HR)	◆	◆	◆
1.2 Make sure everyone completes the computer-based diversity training.	Provide all colleagues with appropriate training and support on diversity issues	Everyone completes their training. Progress by department will be published each month.	All Depts	◆		
1.3 Include diversity updates in regular management briefings and department meetings	Keep the management community up to date with equality and diversity issues and initiatives	Everyone is kept up to date through department and team meetings	Internal Comms / Group Heads / HR	◆	◆	◆
1.4 Raise awareness of equality and diversity obligations; in particular, the use of Equality Impact Assessments (EIAs)	Develop training in EIAs for all policy groups	All groups trained	Group Heads / Professional Development	◆		

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
1.5 Develop a system for reporting Equality Impact Assessments	Develop a system to make sure that EIAs are carried out when they're needed	Regular reporting to Ofcom's Policy Executive on the proper running and quality of EIAs	CPC	◆	◆	◆
1.6 Make sure diversity becomes part of our everyday activities by making it a management priority	Build on the work of the SES Steering Group by creating a senior-level team which will put diversity at the heart of everything we do	Create a Diversity Steering Group, reporting every quarter to the Ofcom Board	Diversity lead and COO	◆		
1.7 Give more encouragement to colleagues to volunteer for the Diversity Working Group (DWG), which promotes equality and diversity	The DWG is a voluntary group where colleagues can help to promote and advance diversity. Their contribution should be formally recognised with a specific performance objective.	Proper credit and recognition for activities that move diversity forward, by including specific performance objectives which recognise the work of DWG members	All Depts and DWG members	◆	◆	◆
1.8 Make sure that Ofcom's Market Research team is fully briefed on our equality obligations, and that research agencies understand our need for more data on equality groups	Team briefing, and follow-up activity as needed	We gain a base of research data which, where possible, always provides breakdowns by gender and ethnicity	Market Intelligence / Market Research	◆	◆	◆

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
1.9 Promote diversity values when we work with international regulators and other policymakers	1) Include good examples/data on diversity in our 'Intro to Ofcom' slides; 2) help and encourage secondments/exchange programmes with key international peer regulators; 3) continue to be a good model of diversity as a team (maintaining a diverse range of professional backgrounds, languages, etc) 4) draw attention to key best practice from international peers which may help to inform and influence Ofcom's decision-making.	Raising the profile of Ofcom's diversity objectives can: <ul style="list-style-type: none"> - attract high quality international talent; - set the standard for other regulators to follow; and - give Ofcom opportunities to learn from best practice elsewhere 	Central Policy & Communications	◆	◆	◆

Objective 2: To seek a more diverse mix of people for our decision-making bodies

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
2.1 To gain statistics on how diversity groups are represented in Ofcom's decision-making and advisory bodies.	Research and report current statistics on where we are now, and what needs to be improved	We make decisions and policies that are increasingly representative of society at large	Central Policy & Communications	◆		
2.2 Increase the diversity of our decision-making bodies by interviewing a wider range of candidates for our jobs	Work to improve the recruitment process for decision-making bodies and advisory groups	Our decisions benefit because we can draw on a wider range of views and experiences	Central Policy & Communications	◆		
2.3 Review how diversity groups are represented on our steering groups	Research and report current statistics on where we are now, and what needs to be improved	We make decisions and policies that are increasingly representative of society at large	Central Policy & Communications	◆	◆	◆

Objective 3: To make sure we always take quality into account when we develop our policies and put them into action

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
3.1 To develop and launch the Equality Impact Assessment Toolkit and carry out training where needed	Assess all policies and projects using the EIA Toolkit. Check them using our project management system	All projects are assessed and logged. Equality issues are fully considered in all policy and project decisions.	Strategy & Market Developments / Internal Comms	◆		
3.2 Make sure policies and projects are assessed with an EIA, and monitored	Assess policies and projects using the EIA Toolkit. Check them using our project management system and carry out extra research if needed	Our project management system captures EIA decisions and ExCo receives regular report by project / group.	Management Reporting	◆	◆	◆
3.3 Add more equality groups to our EIA training and toolkits	Incorporate age, religion or belief, sexual orientation, gender reassignment and pregnancy and maternity as equality groups we consider in our training and toolkits	The scope of our EIAs expands to meet best practice and legislative requirements	All Depts	◆	◆	
3.4 International team to make sure that Ofcom gives proper weight to diversity, accessibility and equality when contributing to international policy debates	Spark debate and highlight diversity and global citizenship – for example, in disability access in EU Framework/USO policy; EU initiatives on Media diversity; internet regulation and cross-border enforcement	Ofcom makes a real and positive contribution to improving diversity policies, both at EU-level and internationally.	Central Policy & Communications	◆	◆	◆

Objective 4: To make decisions based on information that takes equality into account

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
4.1 Create a portal where all Ofcom colleagues can find the full range of consumer research into gender and minority ethnic issues. Starting with MEGs, and building over time to include gender and disability.	Launch a portal so that we have all the relevant information available at our fingertips to inform our decisions.	Full information available for all to see and use.	Strategy & Market Developments	◆		
4.2 Market research should take diversity groups into account as a matter of course.	Ensure that diversity groups are adequately represented in our market research	Better evidence that helps us make decisions	Strategy & Market Developments	◆	◆	◆
4.3 Develop our software tools so that information must be logged on broadcasting complaints related to diversity.	Make better use of the complaints data to identify trends in broadcasting complaints that relate to particular diversity groups.	Better analysis of the complaints we receive, helping us to report more accurately on the number, and nature, of complaints across the three diversity strands	Content & Standards	◆		
4.4 Find out whether we can extend the Ofcom Media Tracker survey to gauge the public's views on how equality issues are handled on radio and television	Become better at using data, so we can understand the impact of enforcement actions we may take	Better-informed policymakers and enforcers, who are able to take diversity issues into account	Content & Standards	◆	◆	◆

Objective 5: To seek a more diverse mix of people across Ofcom

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
5.1 Take the initiative to improve our rating in external benchmarking surveys, in order to encourage a wider, more diverse range of job applicants	Listen and learn from other organisations (such as Race for Opportunity, Stonewall and Opportunity Now) to make sure we're adopting best-practice.	A more diverse range of employees, as well as continuous improvements to policies and procedures	Professional Development (HR)	◆	◆	◆
5.2 Encourage job agencies and head-hunters we use to give us inclusive shortlists (where possible with at least 20% of candidates from diversity groups for that job).	Make this aspiration a consideration for any agency to be included on our preferred supplier list	We become more creative in the way we find candidates	HR & All Depts	◆		
5.3 Gain diversity data from more of our employees	Explain why we need this data through internal communications and reminders	Better management information will help us make decisions and launch initiatives	HR	◆		
5.4 Introduce 'respect for the individual' as a central part of the way we work	Make 'respect for the individual part' of everyone's performance appraisal	Greater awareness of why this belief is important at Ofcom.	Organisational Development, HR	◆		
5.5 Carry out Equality Impact Assessments on all HR policies	Carry out EIAs on all HR policies and improve them if needed	Completed EIAs and more robust policies	HR	◆		
5.6 Look again at the diversity modules of our Management Development Programme (MDP), and consider whether they should be extended to everyone who manages people	Gather feedback from the new MDP module and consider whether it's suitable for a wider audience	Best practice becomes part of our everyday approach, and provides a springboard to increased diversity at Ofcom	Professional Development (HR)	◆		

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
5.7 Look at how we promote our jobs, so that more women are encouraged to apply for them.	Work to attract more women in roles that are mainly filled by men; for example Field Operations	Achieve a more diverse pool of candidates, through a more gender-friendly recruitment approach	Field Operations / HR	◆		
5.8 Include questions relating to equality and diversity in the survey we make of colleagues every other year.	Ask specific questions so we can analyse our make-up according to diversity groups	A better understanding of the different groups that make up Ofcom, and their employment experiences.	Market Research	◆		
5.9 Look again at our exit interview questionnaire, and encourage more people to take part	Ask better questions to help us understand what it's like to work with Ofcom	A clearer understanding of trends and issues	HR	◆		
5.10 Provide opportunities for colleagues to take part in Ofcom's corporate social responsibility activities.	To provide all colleagues with CSR opportunities, which we recognise as an important part of career development	More people taking part in the language mentoring scheme, and a new volunteer scheme to work with people with disabilities.	COO Group	◆		
5.11 Use our Continuing Professional Development programme to give everyone the chance to develop skills which open up career opportunities	Review our everyday activities, including career development, to make sure diversity is included and promoted	Better development opportunities for all	Professional Development (HR)	◆		

Objective 6: To promote equality and diversity among the sectors we regulate

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
6.1 Host the annual conference of the Telecoms Diversity Forum	Organise and host the annual conference and other related seminars	Raised awareness of equality and diversity issues across the Telecoms sector	Diversity team	◆		
6.2 Make sure that providers of Electronic Programme Guides (EPGs) are making improved accessibility a priority, working with equipment manufacturers as appropriate	Encourage EPG providers to improve accessibility of EPGs to users who have problems with hearing or seeing	Providers recognise the importance of more accessible EPGs, and look for all technical advances to deliver them.	Content & Standards	◆		
6.3 Encourage broadcasters to create equal opportunities for everyone they employ, including freelancers, regardless of gender, ethnicity or disability by working with Ofcom's co-regulator, the Broadcast Training and Skills Regulator.	<p>Make sure that the Broadcast Training and Skills Regulator:</p> <ul style="list-style-type: none"> - produces a report in Summer 2009 on broadcasters' equal opportunities arrangements in 2008 (based on information provided to Ofcom); - develops a system to evaluate the broadcasters' equal opportunities arrangements, and assess the industry's progress; and - provides guidance on how to improve. 	The broadcasters comply with their obligations in this area.	Content & Standards	◆		
				◆	◆	◆
				◆	◆	◆

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
6.4 Make sure services such as subtitling, signing and audio description are available, through an accurate database that tells us who should provide them.	Take steps needed to make sure our stakeholder database is complete and accurate	Important services such as subtitling, audio description and signing are provided where they're needed	Strategy & Market Developments	T B A		

Objective 7: To make our duties, policies and services available to everyone

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
7.1 Make sure services such as subtitling, signing and audio description are available, through an accurate database that tells us who should provide them.	Review all systems to check for diversity data and reporting	A clear picture of where services are needed	All Depts		◆	
7.2 Make sure that the needs of diversity groups are set out fully in our Consumer Experience Reports	Publish research to widen awareness and understanding	Diversity information is available to be used across a wider audience	Strategy & Market Developments	◆		
7.3 Publish occasional reports on the levels of media literacy among people from ethnic minorities, and people with disabilities	Publish research to widen awareness and understanding	Diversity information is available to be used across a wider audience	Strategy & Market Developments	◆	◆	
7.4 Consider whether we can open up our internal diversity information portal to external visitors	Publish research to widen awareness and understanding	Diversity information is available to be used across a wider audience	Strategy & Market Developments	◆		
7.5 Publish research into consumers' motor skills and how they manage with communications technologies	Publish research to widen awareness and understanding	Diversity information is available to be used across a wider audience	Strategy & Market Developments	◆		
7.6 Revise the way we buy services to improve equality and diversity	Look at our current systems, and alter them as needed, to create equal opportunities	A wide range of bidders hoping to work with Ofcom. For major tenders, we will look into their diversity policies.	Finance	◆		

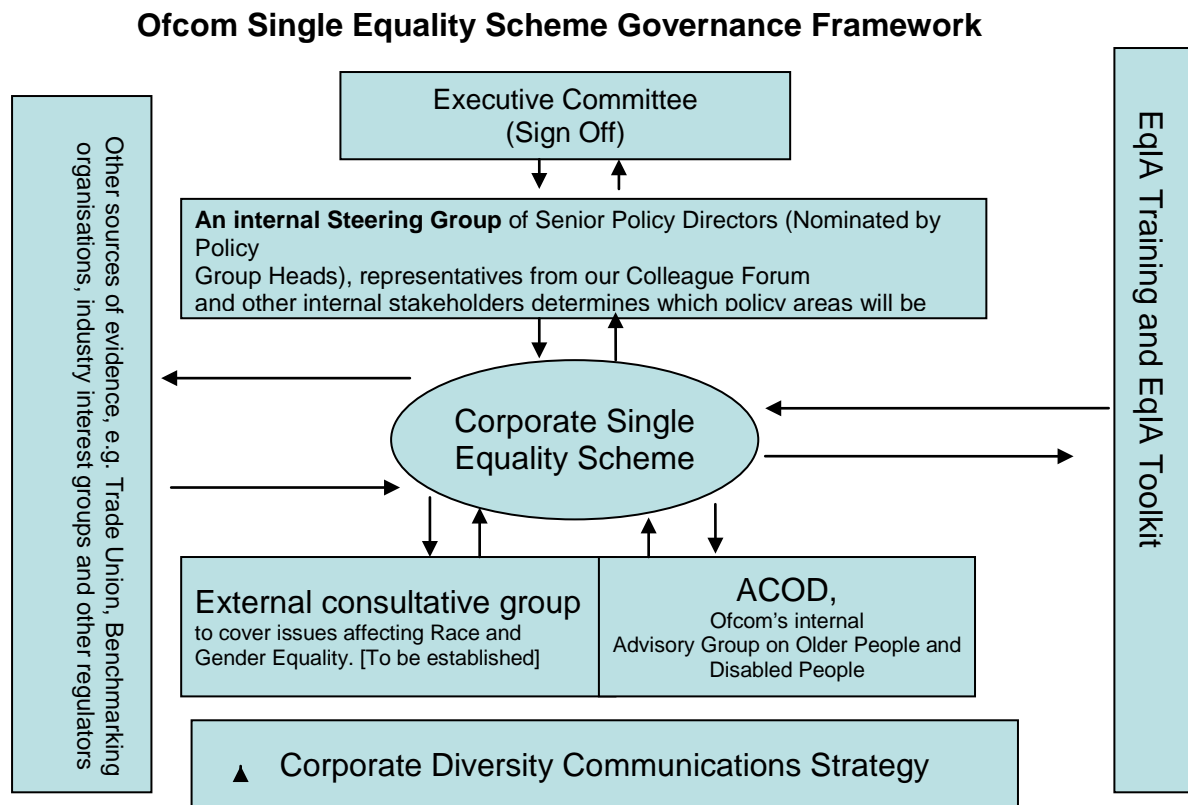
Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
7.7 Assign a member of Ofcom's web team to make sure our website meets current accessibility standards	Attend relevant accessibility seminars and advise on improvements we need to make	Everything we publish on the Ofcom website is accessible	Web Team	◆		
7.8 Publish a statement on our website that we will consider requests for publications in alternative formats and languages	Provide information online that is clear and accessible to all	People know we'll try to provide information in the format or language they need	Web Team	◆		
7.9 Provide written guidance to colleagues on when it's appropriate to produce Easy-Read versions of Ofcom documents	Provide clear guidance to colleagues, improving knowledge and awareness	Our colleagues know about accessibility options, and when to use them	Web Team	◆		
7.10 Take the lead in briefing specialist diversity media	Communicate directly with media outlets for diversity groups, where policies or projects have a specific impact on them	A higher profile for Ofcom's projects and policies among diversity groups, which in turn encourages greater participation in our consultations	Media & Corporate Relations	◆	◆	◆
7.11 Where we use photos or video clips, we'll make sure diversity groups are represented	Make sure our published material reflects diversity in society	More inclusive publications	Media, Comms and Web team	◆		
7.12 Consider how to involve diversity groups in Ofcom briefings and events, and address special dietary, access and communications needs	Work with diverse communities through Ofcom's internal and external events	A more open and inclusive environment that encourages people to participate	Events, reception and Facilities	◆		
7.13 Develop the <i>Switch On</i> learning resource to help people with learning disabilities with media literacy	Complete development of the <i>Switch On</i> resource	A new learning resource for people in a sector of society who are not currently catered for.	Content & Standards	◆		

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
7.14 Review the results of the latest round of Community Radio licensing, to identify results by diversity group.	Investigate if particular diversity groups' applications are more likely to fail, and why. Review the application form and guidance notes that are part of the Community Radio awards process	A community radio licensing system that's as open and accessible to all groups as possible, so that community radio serves a diverse audience.	Radio Team in Content & Standards	◆		
7.15 See how we can log more data about diversity, improving our knowledge and reporting	Analyse our current systems and identify new opportunities to capture better diversity data	Better quality reports, from the customer data available in our systems	IS & all Depts	◆		
7.16 Review whether the Television Access Services Code continues to make sure that services are being properly delivered	Conduct further research into the awareness, take-up and usage of audio description, and re-assess how we require access services to be provided.	People who need help with seeing or hearing television get the special services they need.	Content & Standards	◆		
7.17 Make sure that everyone who deals with the public is trained in their responsibilities under the Disability Discrimination Act (DDA)	To provide specific training in disability etiquette and the demands of the law	Better-trained front line colleagues, in particular those in Central Operations, Field Operations, Switchboard and Facilities.	Operations	◆	◆	◆

Objective	Activity	Outcome	Lead Dept	Target Date		
				2009/10	2010/11	2011/12
7.18 Make Ofcom's work better and more widely understood in countries outside the EU	<p>Use our language skills in presentations and, where appropriate, use translation (e.g. Chinese). Our international team to make better use of the language skills of colleagues across Ofcom.</p> <p>Ensure our International web pages meet international standards of accessibility (which includes languages and ease of use).</p>	Our work becomes more widely accessible and understood	Central Policy & Communications	◆	◆	◆

Annex 6

Governance Framework for the Ofcom Single Equality Scheme



The framework illustrates the flow of information into and from the development of the Single Equality Scheme. However, this is a simplified description, and does not show relationships within the framework.

Annex 7

Glossary

ACOD

The Advisory Committee for Older and Disabled People, advising on communications issues that particularly affect these groups.

Communications Consumer Panel

An independent panel advising Ofcom on consumer interests in the markets we regulate.

Content Board

Ofcom's advisory board on a wide range of broadcasting content issues, and media literacy.

DWG

Ofcom's Diversity Working Group, promoting diversity across Ofcom.

EIA

Equality Impact Assessment, designed to discover how a policy or project might affect diversity groups.

ExCo

Ofcom's Executive Committee, responsible for overseeing the management of Ofcom.

The 'general duties'

The duties of public bodies such as Ofcom to promote equality of opportunity and tackle discrimination in the areas of disability, gender and race.

LBGT

Lesbian Gay Bisexual Transgender.

SES

Ofcom's Single Equality Scheme.