

Nation Broadcasting Group

Arrangements to promote training and equal opportunities in Broadcasting

Annual Report – 2017

Developments since the last report

The last published report within Nation Broadcasting took place in early 2016.

Since that report Ofcom has published revised guidance to broadcasters relating to Diversity in Broadcasting which is available here:

https://www.ofcom.org.uk/data/assets/pdf_file/0010/108100/guidance-diversity-broadcasting.pdf

The main developments within Diversity since the last report relate to the following:-

- The Company Handbook has been refreshed (Feb 17 version)
- Recruiting Managers have attended a Diversity Workshop provided by Red Kite Law (Oct 17)
- The Group is required to comply with Ofcom's arrangements for the promotion of EO including reporting data. It appears Ofcom will require information in 2018 which is either not currently held, not collated centrally, or in some cases may require updating.
- The Group is likely to have additional obligations under the guidance which it is preparing for.

Formal Policy Statement

The latest Equal Opportunities Policy is included as Appendix 1 to this report. It is also available within the Company Handbook which is issued on employment and stored on the Company intranet system.

This policy is reviewed annually by the Managing Director in conjunction with External HR support provided by Red Kite Law.

Communication of Formal Policy Statement

This Annual report is available on the Company Intranet.

The existence of the report and associated obligations will be promoted through internal email and at site meetings held twice a year.

Effective Monitoring System

Typically, the Company has collected relevant information at or before entry to the organisation. This information has not previously been collated centrally.

We also recognise that there is currently no obvious mechanism for employees to advise of a change in their circumstances which might be relevant to this information.

Having been advised that the Group will be required to provide information to Ofcom in the future we are currently awaiting detail from Ofcom as to the exact nature and format required.

It is highly likely that we will then ask all our current staff to complete a revised version of our Entry Questionnaire so that we can be sure that the information we send to Ofcom is complete and current.

This information (anonymised at group level) will become our benchmark data for future monitoring and policy determination.

Diversity and training information already forms part of the formal employee review mechanism, however this information is not currently held or collated centrally.

Setting Diversity Targets and taking active steps to ensure fair recruitment processes

The Group will consider any appropriate Diversity targets during 2018 having collated existing data and considered whether particular characteristics are under-represented.

This will be a responsibility of the Managing Director.

In relation to recruitment, there is a long-standing provision that no offer of employment can be made to a candidate unless they have been interviewed by more than one recruiting manager.

In addition, recruiting managers attended a Diversity Training Workshop provided by Red Kite Law in October 2017

Objectives for 2018

Collate relevant information from all employees and report this to Ofcom as required.

Consider relevant Diversity Targets how these can be implemented.

Promote this policy and report through internal meetings.

Ensure that the existing policies continue to be adhered to.

Martin Mumford

22 November 2017

SECTION G: EQUAL OPPORTUNITIES, BULLYING & HARASSMENT POLICIES

54. EQUAL OPPORTUNITIES POLICY

54.1 We do not discriminate against staff or clients on the basis of their gender, sexual orientation, marital or civil partner status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age (“the protected characteristics”).

54.2 The principle of non-discrimination and equality of opportunity applies equally to the treatment of former staff and clients by members of our current workforce.

54.3 You have a duty to act in accordance with this policy, and therefore to treat clients and your colleagues with dignity at all times, and not to discriminate against or harass anyone.

In some situations, we may be at risk of being held responsible for the acts of individual members of staff and we will not tolerate any discriminatory practices or behaviour.

54.4 This policy applies to: recruitment and selection; training and development; opportunities for promotion; conditions of service, benefits, facilities and pay; health and safety; conduct at work; grievance and disciplinary procedures; and termination of employment, including redundancy.

54.5 This policy covers all individuals working at all levels and grades.

54.6 This policy does not form part of your Contract and may be amended at any time.

Forms of discrimination

54.7 Discrimination may be direct or indirect and it may occur intentionally or unintentionally.

54.8 Direct discrimination occurs where someone is put at a disadvantage for a reason related to one or more of the protected characteristics set out above.

54.9 Indirect discrimination occurs where an individual is subject to an unjustified provision, criterion or practice which puts them at a particular disadvantage because of one or more of the protected characteristics set out above in clause 50.1.

54.10 Discrimination also includes victimisation (less favourable treatment because of action taken to assert legal rights against discrimination or to assist a colleague in that regard) and harassment (which is dealt with under our Anti-harassment Policy).

Recruitment and selection

54.11 We aim to ensure that no job applicant receives less favourable treatment because of any of the protected characteristics listed above.

54.12 To ensure that this policy is operating effectively with respect to recruitment we may monitor applicant’s racial origins, gender, disability, sexual orientation, religion and age as part of the recruitment procedure. We may also maintain records of this data in an anonymised format solely for the purposes stated in this policy.

Staff training and promotion and conditions of service

54.13 Staff training needs will be identified through staff appraisals. Staff will be given appropriate access to training to enable them to progress and promotion decisions will be made on the basis of merit.

54.14 Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers and to provide appropriate facilities and conditions of service to meet the special needs of disadvantaged or underrepresented groups.

54.15 Our conditions of service, benefits and facilities are reviewed to ensure that they are available to all staff who should have access to them.

Disability discrimination

54.16 If you are disabled, or become disabled, you are encouraged to tell us about your condition.

This is to enable us to support you as much as possible. You may also wish to advise us of any reasonable adjustments to your working conditions or the duties of your job which you consider to be necessary, or which would assist you in the performance of your duties. We may wish to consult with you and with your medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and if possible they will be accommodated where reasonable and proportionate to the needs of your job.

Part-time workers

54.17 Part-time workers will be offered appropriate access to benefits, training and promotion opportunities. We will ensure requests to alter working hours are dealt with appropriately.

Breaches of the policy

54.18 If you believe that you have been discriminated against you are encouraged to raise the matter through our Grievance Procedure. If you believe that you have been subject to harassment you are encouraged to raise the matter through our Anti-harassment Policy.

54.19 Allegations regarding potential breaches of this policy may be treated in confidence and

investigated in accordance with the relevant procedure. If you make such allegations in good faith you will not be victimised or treated less favourably as a result. False allegations which are found to have been made maliciously or in bad faith may, however, be dealt with under our Disciplinary Procedure.

54.20 Any employee who is found to have committed acts of discrimination or harassment may face disciplinary action, which could result in dismissal for gross misconduct. We reserve the right to terminate our contractual relationship with other workers if they breach this policy.