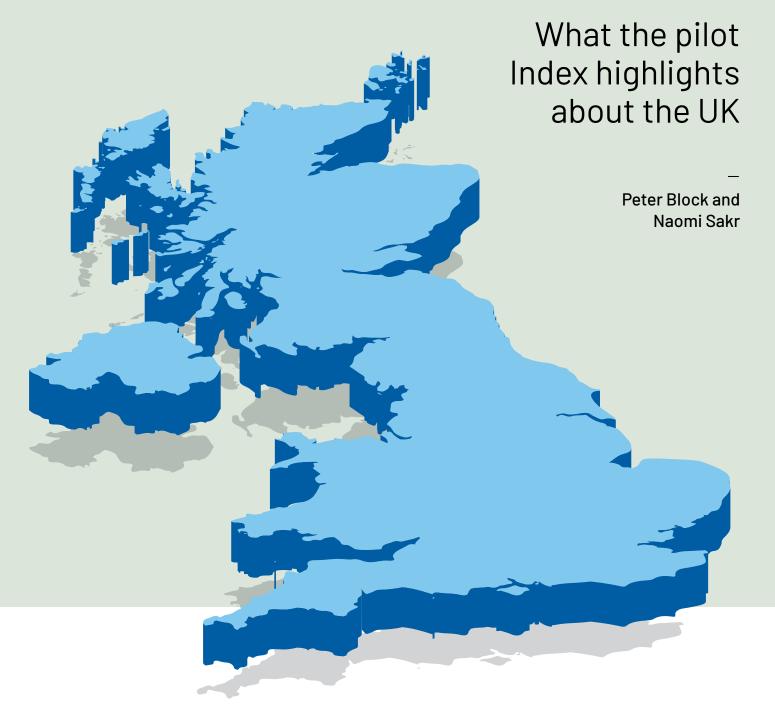


# THE MEDIA DIVERSITY INDEX 2025





# THE MEDIA DIVERSITY INDEX 2025

WHAT THE PILOT INDEX HIGHLIGHTS
ABOUT THE UK

MDI and the authors wish to acknowledge those individuals whose input has been crucial to this report, including those who were generous with their time and knowledge in helping with answers to the survey questions. The scoring system for the overall pilot index was devised by Craig Robertson and advice on the pilot questionnaire design was received from Nico Drok, Epp Lauk and Greg Treadwell.

.....

# CONTENTS

4	INTRODUCTION			
5	HOW THE UK SCORES			
5	THE MDI PILOT DIVERSITY INDEX			
6	SUMMARY OF MEDIA DIVERSITY INDEX FINDINGS FOR THE UK			
6	MEDIA LAW, LICENSING, AND REGULATION			
7	MEDIA WORKFORCE DIVERSITY AND RECRUITMENT POLICIES			
9	ENSURING ACCESS AND REPRESENTATION			
10	CONSULTATION AND HANDLING COMPLAINTS			
12	REFLECTIONS ON THE UK PILOT SURVEY			
13	RECOMMENDATIONS ARISING FROM THE UK PILOT SURVEY			

# INTRO

MDI began piloting the Media Diversity Index in 11 European countries in Q4 2024. This was a first step towards developing an index that stakeholders inside and outside the media industry can use as a benchmark for evaluating the performance of specific countries regarding diversity and inclusion in their media. The index covers both governance and content and is created through an expert survey, whereby responses gathered translate into scores. Hitherto, the media development sector has used a number of indexes to monitor, evaluate and rank national information systems in relation to press and internet freedom, civil and political rights, the trustworthiness of journalism and so on. The Media Diversity Index is eventually intended as an annual exercise that will complement these rankings by pioneering a set of indicators and a scoring system that can act as a barometer for progress or backsliding in the field of media diversity. The indicators are intended to reflect the environment for media diversity on two levels. The first is the underpinning of national regulatory and representative bodies operating in the media sector, in terms of their powers and how proactive they are in using the powers they have. The second seeks to track the extent to which media outlets promote and ensure diversity and inclusion both internally, through their workforce and recruitment, and externally, through their approach to representation.

MDI commissioned the report on Media Diversity in the UK in Q2 2025 as part of the pilot index project. In focusing on the UK MDI was mindful of new legislation passed just before the general election of July 2024 brought in a new government, including the Online Safety Act of 2023 and Media Act of 2024. The new government faced issues related to these laws and around media ownership as highlighted in the Media Reform Coalition's 2025 report Who Owns the UK Media? With possible legal adjustments in prospect and ministers required to make decisions about permissible levels of foreign ownership in the UK press, this report also comes at a time of deliberations feeding into the full review of the BBC's current charter, which runs to the end of 2027. Data for the UK media diversity survey were gathered during April and May 2025 through expert interviews and a large body of industry reports and academic articles. A full list of sources consulted follows the account below and sources from the list are cited throughout the report as appropriate.

With the pilot index now undertaken for 12 countries, the next step will be to develop and refine the index questionnaire, drawing on insights and experience from the pilot. This work will be undertaken by MDI's Media Diversity Research Centre in collaboration with academic and other civil society partners in Europe, with a view to eventually extending the index to all EU countries plus the UK and later to other regions.

## HOW THE UK SCORES

The UK's score on the index ranks it in the top tier of countries included in the index to date, with a score of 65.25. Tier 1 countries are those with scores in a band around 60 as shown in the table below, where the UK comes slightly ahead of Belgium. Scores for the countries in this tier were boosted by evidence of diversity provision being built into regulation, recruitment and handling complaints.

The 12 countries initially chosen for the pilot were all in Europe, spread across the north, south, east and centre of the continent. (Hungary was to have been included but could not be ranked because no completed survey was received.) The countries were chosen because of glaring discrepancies between their rankings in the Economist Intelligence Unit 2023 Democracy Index and the Reporters sans frontières (RSF) 2024 Press Freedom index. The number of countries covered by both indexes (165 and 180) is reasonably similar and some countries (eg Finland, Ireland, Sweden, Luxembourg) get almost the exact same rank in both. Yet, as the table shows, the rank order of the UK on the RSF Press Freedom Index is considerably less favourable vis-à-vis other countries in the list of 12 than its order in either the EIU Democracy Index or the MDI Index. The fact that indexes which are linked to political, civic and media representation can yield such different results demonstrates the value of an index devoted to media diversity.

## THE MDI PILOT DIVERSITY INDEX

EIU rank order	RSF rank order	MDI rank order	MDI scores out of 80*
UK/Austria**	Estonia	United Kingdom	65.25
Austria/UK**	Portugal	Belgium	62.50
Greece	Latvia	Lithuania	59.75
Estonia	Lithuania	Portugal	59.25
Malta	Belgium	Greece	47.75
Portugal	UK	Austria	45.25
Belgium	Slovakia	Latvia	44.75
Cyprus	Austria	Estonia	44.25
Latvia	Cyprus	Slovakia	43.00
Lithuania	Hungary	Cyprus	35.25
Slovakia	Malta	Albania	33.25
Hungary	Greece	Malta	28.75
Albania	Albania	Hungary	n/a

<sup>\*</sup>Out of 80 distinct possible responses, answers were weighted so that Yes/No scored 1/0 and ordinal variables were scored on a five-point scale from 1 to 0 (1; 0.75; 0.5; 0.25; 0).

<sup>\*\*</sup> Ranked equally at number 18

# SUMMARY OF MEDIA DIVERSITY INDEX FINDINGS FOR THE UK

Like other countries in Tier 1 of the pilot index, the UK benefits from diversity provision being mandatory or promoted in significant aspects of regulation, recruitment and handling complaints, which are three of four areas covered by the survey. Where the scores are less encouraging is in the area of access and representation. Universal service obligations apply to digital access and access services are mandated for those with visual or hearing impairments, while regional language content is supported. However, the nature and extent of representation of diverse groups in society is mixed, depending on platform, region and group as discussed in what follows.

#### Media law, licensing, and regulation

Fundamental to media diversity outcomes are requirements set out in the regulatory system. In the UK there is a dichotomy between the systems for broadcasting and telecoms on one hand and print media, including the digital output of newspapers, on the other. In both systems there is a history of controversy over the appropriate degree of regulatory intervention but, because there has continued to be no press equivalent of the conditionality and accountability that are linked to licensing of broadcasters, outcomes in terms of diversity, whether in recruitment or output, have diverged. Self-regulation in print media means that questions on law and licensing largely apply to broadcast, with the focus on the converged regulator, Ofcom (Office of Communications). Telecoms companies are not licensed in the UK but operate under Ofcom's General Conditions of Entitlement, covering network functioning, numbering and customer protection. Ofcom's duties with regard to ensuring media diversity have shifted along a spectrum of different degrees of intervention since they were first set out in full in the Communications Act of 2003. Other institutions besides Ofcom that play a role in regulating sections of the UK media include the national human rights institution, the Equality and Human Rights Commission (EHRC), and the National Union of Journalists (NUJ), which applies a code of conduct that covers discriminatory reporting (NUJ 2018). Concerns have been expressed about the EHRC's ability to fulfil its mandate since its budget was cut in stages from GBP62 million in 2010 to GBP17.4 million in 2020 and again to GBP17.1 million in 2023/24, leading to major reductions in staffing and a decision to deprioritise some areas.

However, the overall regulatory commitment and performance of these bodies gives the UK a full score on nine out of 12 questions in this section of the survey, where many of the questions called for Yes/No answers. Ofcom oversees the universal service obligations whereby everyone in the UK has the right to request access to a minimum set of communications services at affordable prices. It is legally obligated to prevent and take action against content by media providers or social media companies that incites violence or hatred and has powers to protect children from harmful content by mandating age verification, content moderation, search moderation, and effective handling of complaints (Ofcom 2023a, 2023b, 2024a, 2024b, 2024c, 2025a; Milmo 2025). Ofcom monitors licensees' compliance with quotas for regional production and distribution (Ofcom 2024d, 2024e). However, when it comes to ensuring specified quotas of original locally made content for children, there is disparity between the BBC, for which this is a requirement written into its Operating Licence (Ofcom 2019a), and ITV which, despite being a public service

broadcaster, has had no legal obligation in this regard since it was removed under the Communications Act of 2003. Locally originated content, with its budgetary implications, is crucial if children are to see their experience reflected on screen.

Community radio in the UK, a not-for-profit sector mainly run by volunteers, is an important element in ensuring that diverse groups in society are adequately served. It is considered a separate category that warrants a degree of leniency in certain licensing conditions. Based on a March 2024 consultation on proposals to streamline and simplify the conditions for licensing community radio operators in the UK, Ofcom stated that it intended to focus more on qualitative than quantitative aspects of licensing so as to enable licensees to manage their resources more effectively (Ofcom 2024f).

Self-regulation of the legacy press leads to ambiguity and questionable effectiveness with regard to promoting diversity. The current situation, of two parallel regulatory bodies, can be traced to the phone hacking scandal of the 2000s, when journalists at British newspapers were accused of making payments to police and hacking into the phones of celebrities, politicians and members of the royal family as well as a murdered schoolgirl, relatives of deceased British soldiers and victims of the London bombings on 7 July 2005. David Cameron, prime minister at the climax of revelations about the hacking in 2011, set up the Leveson enquiry into the 'culture, practices and ethics' of the press. This led to a Royal Charter on press regulation allowing for creation of one or more independent self-regulatory bodies for the press and establishment of a Press Recognition Panel to ensure that these bodies would be independent and able to protect the public. Today only one body is recognised by the Panel. This is Impress (Independent Monitor for the Press), which represents only a small number of publications. The second, IPSO (Independent Press Standards Organisation), is the larger of the two, covering most major national and regional newspapers, and does not seek recognition. Some publications subscribe to neither body.

IPSO makes membership conditional on adhering to the Editors' Code of Practice, which explicitly addresses discriminatory reporting (IPSO 2025). Clause 12 of the Code prohibits making prejudicial or pejorative references about individuals based on their race, colour, religion, gender, sexual orientation, or any physical or mental illness or disability. However, the code applies only to named individuals and there has been strong criticism of IPSO for failing to fine newspapers for breaches of the code. For example, the NUJ argues that IPSO is as toothless as the Press Complaints Commission, the voluntary body that preceded it.

#### Media workforce diversity and recruitment policies

Answers in this section of the survey were plotted on a five-point scale, with performance rated highly in all but two of the seven questions. That is partly because the questions mainly address policies and intentions rather than achievements. Thus the results reflect extensive proactive monitoring of diversity on and off screen by Ofcom, the BBC and initiatives such as the Creative Diversity Network's (CDN's) Diamond project, launched in 2016 to standardise collection and analysis of data across the prominent television industry bodies that participate. The Diamond report released in June 2025 was the first to include freelancers. Diamond routinely collects data on over-50s, people with disability, Black, Asian and minority ethnic groups, women, and people who are transgender, lesbian, gay or bisexual. One core aim of this regular monitoring is to redress off-screen under-representation of specific groups, with levels of representation in the workforce compared with those in the overall UK population and levels of seniority and type of job also measured. The Diamond reports show gradual improvements over the years but onscreen visibility (eg of minority ethnic groups) is often not matched by off-screen contributions or progression to senior roles (Creative Diversity Network 2024).

Ofcom's duty to collect data on equality and diversity, set out under the Communications Act of 2003 but partially removed by the Conservative-led government of David Cameron that came to power in 2010, was subsequently restored in stages after criticism of the situation, much of it led by the prominent black British comedian and actor Sir Lenny Henry. In 2015 the EHRC and Ofcom produced a joint publication entitled Thinking Outside the Box as an attempt to prod broadcasters into taking more robust positive action on diversity without concerns about legal repercussions. In 2016 Ofcom resumed collecting data from licensed broadcasters on their staff demographics. Aspects of diversity covered include sex, race, disability, and other protected characteristics, with quantitative and qualitative information gathered from licensees to hold them accountable for promoting equal opportunities (Ofcom 2022, 2023c). This process also involves individual exchanges about potential for improvement and roundtable discussions with broadcasters to share best practice. However, there is no formal benchmark enshrined in legislation and independent commentators and monitoring organisations argue that Ofcom's carrot and stick approach offers too much of the former and not enough of the latter (Block 2015, 2021). It has been suggested that a formal qualitative benchmark process could yield better outcomes, through application of a maturity model first developed by the Broadcast Equality and Training Regulator and tested in association with the Public Media Alliance in a pilot study (Block 2019).

The BBC is mandated under its charter as a public service broadcaster to actively recruit staff from diverse groups so as to reflect the diverse audiences it serves. The BBC says it aims to have a workforce that reflects the UK population in terms of gender, ethnicity, disability, and socio-economic background and has set out both the quantitative targets and strategies to achieve them in its *Workforce Ambitions* programme on diversity and inclusion. The strategies also take account of levels of seniority of staff (BBC 2025), reflecting the need for action to improve diversity at senior levels. Equity, the UK's main trade union for performing arts and entertainment, provides guidance on casting and working with performers who have visible and invisible disabilities as well as those who identify as LGBTQ+ (Equity 2025a; 2025b).

In the realm of top commercial media, performance with regard to workforce diversity is covered by Project Diamond for some big players such as ITV, Sky, Warner Bros, Paramount, Discovery and the BBC Studios commercial subsidiary UKTV. The Walt Disney Company, which has a sizeable workforce in the UK and, along with other streaming platforms, comes under a certain degree of Ofcom regulation according to the 2024 Media Act, publishes a breakdown of its employment statistics by gender, ethnicity and seniority (The Walt Disney Company 2024). Bauer Media Group and Global Media Group, both specialising in radio, have publicised diversity commitments but not achievements, although all companies with over 250 employees in the UK are legally required to report annually on their gender pay gap.

Outside Project Diamond, commercial media outlets are less obviously committed to inclusive hiring practices and industry voices have voiced concerns that funding challenges, a big drop in advertising revenue, redundancies, recruitment freezes and rising costs of production have sapped commitment to redressing inequalities, making it harder for people outside an inner circle to get commissions or get promoted (Cameo 2018; Ofcom 2024e). Research by a journalist for *The Guardian* in May 2025 (Bakare 2025) highlighted the disillusionment of black British TV makers at the obstacles facing them despite the positive statements that companies had issued about diversity, equity and inclusion in response to the racist murder of George Floyd in the US in 2020. There are a number of vocal critics of biased recruitment practices, including – besides Sir Lenny Henry – Marcus Ryder of the Film + TV Charity, David Olusoga and Afua Hirsch (Olusoga 2020, Hirsch 2020).

#### **Ensuring access and representation**

As indicated by the discrepancies highlighted above, between good intentions and actual outcomes, results on access and representation are mixed, with the UK falling short on several of the questions in this section. On the plus side, some basic elements of access are underpinned by law. Ofcom ensures universal broadband service provision, including in outlying and difficult-to-reach areas, by implementing a Universal Service Obligation (USO). This USO, mandated by the Government, gives homes and businesses the right to request a decent and affordable broadband connection, ensuring everyone can access digital services. The USO aims to prevent digital exclusion by guaranteeing a basic level of broadband access, regardless of location, and ensuring access to a comprehensive range of digital media (Leathley/Ofcom 2018). Legal requirements, regulated by Ofcom, mandate services to support access, such as subtitles, audio description, and British Sign Language (BSL) interpretation on TV. Major broadcasters are given quotas for the proportion of content that must be signed in BSL.

Public service media (such as the BBC, S4C, and Channel 4) are not legally required across the board to translate all content into national minority languages, but there is a general policy framework that encourages the promotion and support of minority languages. Language content for the UK's nations (including Welsh, Gaelic and Ulster-Scots) is supported mainly through public funding and dedicated channels, notably S4C for Wales and BBC Alba for Scotland. The BBC's Asian Network, intended to serve British Asians in the UK, has some shows in South Asian languages. Commercial radio is a wide landscape that can meet the needs of people in rural and outlying areas, with many stations, including those owned by large groups, broadcasting to relatively small areas and providing local news and other information. Community radio, recognised as a distinct not-for-profit category under the 2003 Communications Act, serves members of specific communities, whether based on interest, ethnicity, religion, geographic location and so on (Ofcom 2019b,2024f). By making content available digitally, streaming services of major broadcasters improve access for all in terms of the range of material that can be accessed and the length of time it is available.

The UK stands out from some countries examined in the Media Diversity Index pilot because of the volume, frequency and credibility of reporting that takes place on diversity in representation, especially in the broadcasting sector. One result of this is that patchy performance is brought to light and is not a matter of conjecture. Monitoring of media workforce diversity, discussed above, is complemented by studies of on-screen representation. The Creative Diversity Network's Project Diamond gives producers responsibility for providing 'perceived data' about the programmes they make, whereby they record the diversity characteristic of on-screen contributors 'as viewers might see or hear them', meaning that they should provide the information 'as if they were an audience member watching the programme for the first time'. For scripted programmes the data relate to the characters portrayed, not the actors playing them (Creative Diversity Network 2024). The data sample for Diamond reports is very large, amounting to more than 1.27 million on-screen and off-screen contributions recorded by individuals who completed diversity forms in 2022/23. That monitoring round found on-screen representation markedly below population estimates for people aged over 50 and disabled people.

A study by the Advertising Standards Authority (ASA) published in June 2025 corroborated the Diamond finding about under-representation of older people, with 44% of UK adults reportedly believing that older people are either underrepresented or not represented at all in ads. However, the issue of on-screen representation is not just a matter of numbers but how people are portrayed. As the ASA discovered through focus groups and a survey of

over 4,000 adults, 35 per cent of the UK public agree that older people tend to be negatively stereotyped in ads and respondents voiced concern that ads showing older people as lonely, purposeless or powerless could be harmful (ASA 2025).

Research commissioned by Ofcom in 2023 about lower socio-economic groups and their relationship with the BBC found a perception among these audiences - who make up almost a quarter of the UK population and who are also diverse as they include people in other minorities through ethnicity, disability or age - that there was little representation of 'normal lives, working-class lives' on the BBC, and where these groups were represented they were either 'criticised or caricatured' (Ofcom 2023d). This finding echoed one the BBC itself had reported in its 2020 Creative Diversity Report, namely that people from lower socio-economic background are often 'depicted negatively, fuelled by stereotypes and seen as the object of ridicule' (BBC 2020). Studies show that on-screen portrayals of class have tended to be associated with particular parts of the UK, 'fragmented families, poverty and limited community' and lacked the information about structural inequalities, such as those associated with race and gender, that would pre-empt negative judgements (Edwards and Moss 2024). One conclusion of an evaluation of media diversity reporting from 2021 to 2024, published by the Sir Lenny Henry Centre on Media Diversity at Birmingham City University, was that there was a 'general lack of knowledge on intersectional patterns' in media diversity and the ways that multiple characteristics 'can interact to perpetuate inequalities in the media environment' (Emmanuel and Tsatsou 2025).

Whereas some diversity reporting goes in-depth, its breadth is limited because not all media outlets subscribe to diversity reporting efforts. In many cases, commercial media, including commercial radio, lag behind public service outlets in proactive efforts on representation that address negative portrayals, bias by omission, or a London-centric agenda that neglects the UK's regions and rural communities. The Sir Lenny Henry Centre report mentioned above found far less focus on diversity trends and practices in the print sector than in broadcasting and similarly noted 'scant knowledge' about diversity in online streaming. The campaigning group Women in Journalism reported in 2024 on diversity in media workforces and representation and noted a failure on both counts in the print media, with one senior source stating that newspapers had shown 'no desire to change' because 'they don't have to' as 'no-one holds them to account' (Women in Journalism 2024).

One initiative worth noting, since sport is not covered by the Diamond monitoring, is Channel 4's commitment to increased visibility for people with disabilities, as demonstrated by its securing of rights to be the official UK broadcaster of the four-yearly Paralympic Games since they were held in London in 2012. Record-breaking audiences for the opening ceremony of the 2012 games encouraged the channel to seek to boost the number of people with disabilities as a proportion of its production team for the games, on the basis that diverse production teams — when empowered — drive more authentic representation.

#### Consultation and handling complaints

The handling of complaints is a key element in efforts to contest discriminatory media activity and, as such, requires the people who deal with the process to reflect the diverse populations they serve. Procedures in place in various institutions boost the UK's score in this section because the focus is on whether the provisions exist in principle rather than their application in practice; in matters relating to media portrayals, this can be a matter of interpretation. On the other hand, here as with other elements of the survey, the UK's record is marred by the absence of an effective system for overall press regulation, leading to a lack of robust or transparent procedures for resolving complaints by the public against newspapers that belong to the Independent Press Standards Organisation (IPSO).

Ofcom is explicit in its recognition that its own organisational make-up needs to represent the diverse demographics of the UK if it is to achieve its purpose of 'making communications work for everyone' (Ofcom 2025c). Its Diversity and Inclusion programme aims for an approximately equal gender balance on its boards and committees along with a level comparable with the relevant populations on disability and ethnicity, plus a broadening of socioeconomic and class diversity and regional diversity. However, there is no minority ethnic representation on Ofcom's 11-member board and it has no remit to handle complaints relating to workforce diversity (Ofcom 2023c).

Ofcom consults regularly on children's media habits, skills and understanding as well as parents' perspectives, publishing regular surveys as part of its media literacy research. Its published studies are both quantitative and qualitative, such as the annual *Children and Parents: Media Use and Attitudes* report (Ofcom 2024b) and the ten-year 'Children's Media Lives' project, which set out in 2014 to track the media behaviours and experiences of a small group of individual children between eight and 17 with a variety of backgrounds from all over the UK (Ofcom 2025a).

The BBC's Charter requires it to have a complaints framework that provides 'transparent, accessible, effective, timely and proportionate methods' of making sure it is meeting its obligations and fixing problems. However, Ofcom is also a backstop for complaints about broadcasting and streaming, which means that communications providers are required to have a Complaints Code of Practice that is approved by Ofcom and which they comply with. They must also belong to an Ofcom-approved Alternative Dispute Resolution (ADR) scheme and abide by its final decisions (Ofcom 2009). Changes to ADR procedures were in hand in 2025 (Ofcom 2025e). In 2022 Ofcom told the BBC to improve its complaints process because more than half of people making complaints reported having a bad experience and only one in five people felt satisfied. Part of the required improvement was to explain its reasons for not upholding complaints about impartiality or accuracy (BBC 2022, Jigsaw Research 2022).

The NUJ and Equity, two unions representing journalists and performers respectively, both invite members to share their experiences of discrimination at work. The NUJ has a 60+ Council for age discrimination and a Women's Network and Equality Council dealing with sexism, harassment, unequal pay and lack of representation (NUJ 2025a, NUJ 2025b). Equity, the UK's actors' union, actively encourages its members to share experiences of discrimination at work and can provide legal representation if necessary (Equity 2025c). It has a Women's Committee, Race Equality Committee, LGBT+ Committee, Deaf and Disabled Members' Committee and Wales National Committee for members in Wales. The Equality and Human Rights Commission (EHRC) invites complaints about discriminatory media activity, including advertising. It can investigate breaches of the Equality Act 2010 and take enforcement action if necessary (EHRC 2025).

IPSO's process for handling complaints, including those related to discriminatory reporting, is designed to be robust and transparent. However, concerns persist regarding the balance of interests, transparency, and the extent to which IPSO utilizes its powers to address systemic issues in the industry. IPSO's Complaints Committee has 12 members but the wording of its powers to investigate serious concerns raises the bar so high as to undermine the provision. IPSO stipulates that complaints about discrimination can only be taken forward by a person and that complaints from representative groups affected by an alleged breach of the Editor's Code will only be pursued where there is sufficient public interest. A study of IPSO's performance found little or no evidence of a significant change in newspaper standards and concluded that IPSO was 'acting as a smoke screen for the industry that funds it' (Frost 2024; Press Recognition Panel 2024).

# REFLECTIONS ON THE UK PILOT SURVEY

The study summarised here highlights a strong preoccupation with diversity in parts of the UK media and not in others. The differences are accentuated by the regulatory systems in place, which have a legal underpinning for broadcast but a voluntary arrangement for self-regulation in print. However, even though this contrast might not exist in the same way in other countries, there is a risk of over-simplification that calls for possible modification of the way parts of the survey are framed. It is not a simple dichotomy between print and broadcast in the UK because some newspapers have been proactive in promoting inclusive journalism by, for example, appointing their own ombudsmen to respond to readers' complaints or, as at *The Guardian*, appointing a Senior Editor for Diversity and Development. At the same time there are pockets of resistance to diversity initiatives in the television industry, where narratives of 'hard work' and 'meritocracy' combine with 'diversity fatigue' to question the inclusiveness agenda (Lee 2024). GB News was found to be in breach of broadcasting rules in March 2024 for remarks deemed sexist, misogynistic and offensive (Ofcom 2024i).

Ultimately the differentiation between operators according to their performance on diversity comes down not only to policies or procedures, which are what the survey partly sought to scrutinise, but to editorial and workplace attitudes, which are much harder to measure. As things stand, the proxy for these are outcomes as seen in media content. Assessments of the way diverse groups are portrayed in the media account for almost exactly half the total number of distinct questions in the survey, which was considered to be a fair weighting for this element vis-à-vis the governance issues relating to regulation, recruitment and complaints handling. Where the questions on representation could be finessed is in linking them more precisely with different types of media outlet so that analysis of portrayals on commercial media provides a more nuanced picture. Future surveys may also need a separate question on regulation of advertising.

As noted in the Introduction, MDI's Media Diversity Research Centre, which published the first round of the pilot index in 2024 (media-diversity.org/research-centre), will take account of issues arising from the project so far in seeking to develop and refine the index questionnaire.

# RECOMMENDATIONS ARISING FROM THE UK PILOT SURVEY

As this report has shown, a very large amount of data about diversity in UK media industries is collected and reported by various stakeholders in the industry as well as NGOs and scholars. The sheer volume of these statistics and the story they tell demonstrate a critical feature of the situation, namely that data collection may draw attention to the need for change but without thereby causing progressive change to happen. Initiatives taken by individual institutions, or even groups of institutions, can make only limited inroads in a field where structural inequalities and systemic disadvantages still dominate in education, housing, accessing public services and so on. The importance of practices aimed at promoting inclusiveness in media governance and media content lies in the wider contribution media operations make towards either normalising and reinforcing those inequalities and disadvantages across society or challenging them. On that basis MDI recommends the following:

- Synthesise, systematise and publicise regular data collection by academics and lobbying groups that evaluates the performance of newspapers regulated by IPSO in regard to both their reporting on diverse groups and their recruitment and retention of a diverse workforce. Existing studies deal with 'UK newsrooms' in general (eg Ethical Journalism Network 2023) or incorporate the UK's national dailies as part of a broader study (Women in Journalism 2024). Targeted monitoring is needed to provide consistent datasets that all non-governmental organisations and interest groups concerned with media diversity can cite when highlighting the lack of diversity in parts of the UK mainstream press.
- Ensure that socioeconomic status is kept in the foreground in reports on and discussions about media diversity. This can be linked to the business case for inclusiveness, since employer diversity programmes are gradually paying more attention to class diversity and social mobility because of evidence provided by management consultants that it can boost productivity and enhance employee retention (Jacobs 2025). Recent data indicate that only 12 per cent of UK journalists grew up in a working-class household: asked 'what was the main job of the main wage earner (if any) in your house when you were 14 years old?', 71 per cent of respondents reported that the main earner in their case had a job in the top three most privileged occupational categories out of a list of ten (Reuters Institute for the Study of Journalism 2025). The BBC has targets for staff and leaders from working-class backgrounds (BBC 2025) and in 2024 the Creative Diversity Network announced plans to add new questions on socio-economic background to its existing Diamond questionnaire forms. But in the wider UK this element of diversity has not yet attracted the attention that can trigger further initiatives for change.

- Introduce measures to cross reference different dimensions of media diversity in monitoring and reporting, with the aim of increasing awareness of, and knowledge about, the intersectional patterns underlying inequalities in the media environment. A study of media diversity reporting found this knowledge to be lacking (Emmanuel and Tsatsou 2025). Yet it is clear from studies such as those by the Creative Diversity Network (2024), the Advertising Standards Authority (2025) and others that, for example, older people and disabled people are not only under-represented on screen but the way they are depicted demonstrates that the intersection of age and disability is itself an issue, as is the intersection of these characteristics with socioeconomic group, gender, ethnicity and so on.
- Include data on promotion and seniority as standard in all media diversity reporting or indicate where it is outdated or still missing. Project Diamond and the BBC take account of promotion in their data gathering but precise levels of seniority can remain vague. Academic studies on UK practice are rare and not necessarily up-to-date. They include a chapter dealing specifically with progression of minority ethnic staff in a book on the BBC Asian Network that was published in 2021 but based on research conducted in 2015-2016 (Aujla-Sidhu 2021).

### REFERENCES

- ASA 2025. The Depiction of Older People in Advertising. Advertising Standards Authority. https://www.asa.org.uk/resource/the-depiction-of-older-people-in-ads.html
- AUJLA-SIDHU G. 2021. The BBC Asian Network. Cham: Palgrave Macmillan. <a href="https://doi.org/10.1007/978-3-030-65764-2\_4">https://doi.org/10.1007/978-3-030-65764-2\_4</a>
- BAKARE, L. 2025. Black British TV makers 'fighting over scraps' amid lack of opportunities. The Guardian, 27 May.
- BBC 2018. BBC Diversity Commissioning Code of Practice 2018. <a href="https://www.bbc.co.uk/creativediversity/reports/codeprogress2020#:~:text=The%20Code%20of%20Practice%20embeds,as%20well%20as%20next%20steps">https://www.bbc.co.uk/creativediversity/reports/codeprogress2020#:~:text=The%20Code%20of%20Practice%20embeds,as%20well%20as%20next%20steps</a>.
- BBC 2020. Creative Diversity Report. <a href="https://downloads.bbc.co.uk/aboutthebbc/reports/reports/creative-diversity-report-2020.pdf">https://downloads.bbc.co.uk/aboutthebbc/reports/reports/creative-diversity-report-2020.pdf</a>
- BBC 2022. BBC told to improve complaints process by regulator Ofcom. <a href="https://www.bbc.co.uk/news/entertainment-arts-61893741">https://www.bbc.co.uk/news/entertainment-arts-61893741</a>
- BBC 2025. Workforce Ambitions <a href="https://www.bbc.co.uk/diversity/you-belong/workforce-ambitions/">https://www.bbc.co.uk/diversity/you-belong/workforce-ambitions/</a>
- BLOCK, P. 2015. Equal Opportunities and the Broadcast Industry. DOI: 10.13140/ RG.2.1.2530.6966
- BLOCK, P. 2016. The empty shell of EO policies in media firms. Presentation to European Media Management Association (EMMA) conference, Porto.
- BLOCK, P. 2019. Beyond survival? People management strategies for development and growth of PSBs in a fragmented digital media landscape. Presentation to European Media Management Association (EMMA) conference, Cyprus. <a href="https://www.researchgate.net/publication/333718984\_Beyond\_survival\_People\_management\_strategies\_for\_development\_and\_growth\_of\_PSM\_organisations\_in\_a\_fragmented\_digital\_media\_landscape">https://www.researchgate.net/publication/333718984\_Beyond\_survival\_People\_management\_strategies\_for\_development\_and\_growth\_of\_PSM\_organisations\_in\_a\_fragmented\_digital\_media\_landscape</a>
- BLOCK, P. L. 2021. The future of diversity regulation in the UK broadcast industry models and ownership. Representology, The Journal of Media and Diversity, 1, pp 22–32. <a href="https://bcuassets.blob.core.windows.net/docs/representologyissue01spreads-132593421231672551.pdf">https://bcuassets.blob.core.windows.net/docs/representologyissue01spreads-132593421231672551.pdf</a>
- BYRNE, D. 2019. If your newsroom is not diverse, you will get the news wrong. Reuters Institute for the Study of Journalism. <a href="https://reutersinstitute.politics.ox.ac.uk/news/if-your-newsroom-not-diverse-you-will-get-news-wrong">https://reutersinstitute.politics.ox.ac.uk/news/if-your-newsroom-not-diverse-you-will-get-news-wrong</a>
- CAMEo 2018. Workforce Diversity in the UK Screen Sector: Evidence Review. CAMEo Research Institute for Cultural and Media Economies, University of Leicester.
- CREATIVE DIVERSITY NETWORK 2024. Diamond: The Seventh Cut. <a href="https://creative-diversitynetwork.com/diamond/diamond-reports/diamond-the-seventh-cut/">https://creative-diversitynetwork.com/diamond/diamond-reports/diamond-the-seventh-cut/</a>
- DEPARTMENT FOR SCIENCE, INFORMATION & TECHNOLOGY 2025. Online Safety Act: explainer. <a href="https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer">https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer</a>
- EDWARDS, L. & MOSS, G. 2024. Rapid evidence analysis of diversity in UK public service television: What do we know and what should we find out? *Journal of British Cinema and Television*, 21, 1–28. https://doi.org/10.3366/jbctv.2024.0697
- EHRC. 2025. Guidance on discriminatory adverts. <a href="https://www.equalityhumanrights.com/quidance/quidance-discriminatory-adverts">https://www.equalityhumanrights.com/quidance/quidance-discriminatory-adverts</a>

- EHRC & OFCOM 2019. Thinking outside the box: supporting the television industry to increase diversity. Originally published August 2015, updated March 2019. <a href="https://www.equalityhumanrights.com/sites/default/files/thinking-outside-the-box-increasing-diversity-television-broadcasting-industry.pdf">https://www.equalityhumanrights.com/sites/default/files/thinking-outside-the-box-increasing-diversity-television-broadcasting-industry.pdf</a>
- EMMANUEL N. M. and TSATSOU, P. 2025. UK Media Diversity Reporting 2021-2024: An Evaluation Report, Sir Lenny Henry Centre for Media Diversity, Birmingham City University. <a href="https://www.bcu.ac.uk/research/media-and-journalism/sir-lenny-henry-centre-for-media-diversity/research">https://www.bcu.ac.uk/research/media-and-journalism/sir-lenny-henry-centre-for-media-diversity/research</a>
- EQUITY 2025a. Casting guide for deaf, disabled and neurodiverse dancers. <a href="https://www.equity.org.uk/advice-and-support/casting-and-auditions/casting-guide-for-deaf-disabled-and-neurodiverse-dancers#:~:text=Our%20Casting%20Guide%20for%20Deaf,progressive%20dance%20companies%20to%20advance</a>
- EQUITY 2025b. Code of conduct for auditions. <a href="https://www.equity.org.uk/advice-and-support/casting-and-auditions/code-of-conduct-for-auditions">https://www.equity.org.uk/advice-and-support/casting-and-auditions/code-of-conduct-for-auditions</a>
- EQUITY 2025c. Discrimination. <a href="https://www.equity.org.uk/advice-and-support/dignity-at-work/equity4women-toolkit/discrimination">https://www.equity.org.uk/advice-and-support/dignity-at-work/equity4women-toolkit/discrimination</a>
- ETHICAL JOURNALISM NETWORK 2023. Structural Racism in UK Newsrooms. <a href="https://ethicaljournalismnetwork.org/wp-content/uploads/2023/03/EJN\_Structural-Racism\_April-2023.pdf">https://ethicaljournalismnetwork.org/wp-content/uploads/2023/03/EJN\_Structural-Racism\_April-2023.pdf</a>
- FROST, C. 2024. The Independent Press Standards Organisation: Standard setter or complaints pacifier? Ethical Space: International Journal of Communication Ethics, 21(1) <a href="https://ethicalspace.pubpub.org/pub/iluoku57/release/1">https://ethicalspace.pubpub.org/pub/iluoku57/release/1</a>
- HIRSCH, A. 2020. We should be free to talk about racism without being penalised. The Guardian, 27 August.
- IPSO. 2025. The Editors' Code of Practice. https://www.ipso.co.uk/what-we-do/
- JACOBS E 2025. Class is the missing link in employers' diversity drives. Financial Times, 29 May.
- JIGSAW RESEARCH 2022. Drivers of perceptions of due impartiality: The BBC and the wider news landscape. <a href="https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-2-6-weeks/222191-how-ofcom-regulates-the-bbc/associated-documents/4-drivers-of-perceptions-of-due-impartiality-the-bbc-and-the-wider-news-landscape.pdf?v=328092</a>
- LEATHLEY, S./OFCOM 2018. Implementing the Broadband Universal Service Obligation-Consultation on designation regulations. <u>Consultation on Designation Regulations for</u> <u>Broadband Universal Service Obligation | Policy Commons.</u>
- LEE, D. 2024. Backlash, white privilege and anger: Resistance to the equality, diversity and inclusion agenda in the British television industry. European Journal of Cultural Studies, 28 (3), 661-679. https://doi.org/10.1177/13675494241261812
- MILMO, D. 2025. What are the Ofcom measures to protect children online and will they work? The Guardian.
- NUJ 2018. NUJ Code of conduct. <a href="https://www.nuj.org.uk/about-us/rules-and-guidance/code-of-conduct.html">https://www.nuj.org.uk/about-us/rules-and-guidance/code-of-conduct.html</a>.
- NUJ 2025a. 60+ council seeks views on age discrimination at work. <a href="https://www.nuj.org.uk/resource/60-council-seeks-views-on-age-discrimination-at-work.html">https://www.nuj.org.uk/resource/60-council-seeks-views-on-age-discrimination-at-work.html</a>.
- NUJ 2025b. National Union of Journalists Rule Book 2023 2025. <a href="https://www.nuj.org.uk/resource/the-nuj-rule-book-2023-2025.html">https://www.nuj.org.uk/resource/the-nuj-rule-book-2023-2025.html</a>

- OFCOM 2009. A Review of Consumer Complaints Procedures. <a href="https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/8304-complaints\_procedures/associated-documents/secondary-documents/adr\_condoc.pdf?v=320327">https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/8304-complaints\_procedures/associated-documents/secondary-documents/adr\_condoc.pdf?v=320327</a>
- OFCOM 2016. Communications services for disabled people <a href="https://www.ofcom.org.uk/">https://www.ofcom.org.uk/</a>
   phones-and-broadband/accessibility/services-for-disabled-people
- OFCOM 2019a. BBC Children's news and first-run UK originations. <a href="https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/bbc-childrens-change-operating-licence">https://www.ofcom.org.uk/tv-radio-and-on-demand/bbc/bbc-childrens-change-operating-licence</a>
- 0FC0M. 2019b. Community radio. <a href="https://www.ofcom.org.uk/tv-radio-and-on-demand/community-radio/community-radio">https://www.ofcom.org.uk/tv-radio-and-on-demand/community-radio/community-radio</a>
- OFCOM 2020. Audience expectations in a digital world: Ipsos MORI research for Ofcom. <u>https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-standards/audience-expectations-in-a-digital-world</u>
- OFCOM 2022. Introducing Ofcom's new EDI assessment tool. <a href="https://www.ofcom.org.uk/tv-radio-and-on-demand/equity-and-diversity/new-assessment-tool">https://www.ofcom.org.uk/tv-radio-and-on-demand/equity-and-diversity/new-assessment-tool</a>
- OFCOM 2023a. Online safety. <a href="https://www.ofcom.org.uk/online-safety">https://www.ofcom.org.uk/online-safety</a>
- OFCOM 2023b. Universal service obligations (broadband and telephony) <a href="https://www.ofcom.org.uk/phones-and-broadband/telecoms-infrastructure/universal-service-obligation">https://www.ofcom.org.uk/phones-and-broadband/telecoms-infrastructure/universal-service-obligation</a>
- OFCOM 2023c. Overview of Ofcom's diversity in broadcasting remit <a href="https://www.ofcom.org.uk/tv-radio-and-on-demand/equity-and-diversity/overview-of-diversity-in-broadcasting-remit#:~:text=at%20least%20annually.-,Licence%20conditions,provision%20of%20the%20licenced%20service</a>
- OFCOM 2023d. BBC Audiences Review. <a href="https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/bbc/bbc-audience-review/bbc-audiences-review?v=330487">https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/bbc/bbc-audience-review/bbc-audiences-review?v=330487</a>
- OFCOM 2024a. Age-appropriate experiences for children online <a href="https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer#age-appropriate-experiences-for-children-online">https://www.gov.uk/government/publications/online-safety-act-explainer#age-appropriate-experiences-for-children-online</a>
- OFCOM 2024b. Children and Parents: Media Use and Attitudes Report 2024 <a href="https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-children/children-and-parents-media-use-and-attitudes-report-2024">https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-children/children-and-parents-media-use-and-attitudes-report-2024</a>
- OFCOM 2024c. Tackling online content that stirs up hatred, provokes violence and spreads disinformation. <a href="https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/tackling-online-content-that-stirs-up-hatred-provokes-violence-and-spreads-disinformation">https://www.ofcom.org.uk/online-safety/illegal-and-harmful-content/tackling-online-content-that-stirs-up-hatred-provokes-violence-and-spreads-disinformation</a>
- OFCOM 2024d. Public Service Broadcasting Annual Compliance Report: 2024. <a href="https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/annual-report-2024">https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/annual-report-2024</a>
- OFCOM 2024e. Review of Public Service Media (2019 23). <a href="https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/review-of-public-service-media-2019-23">https://www.ofcom.org.uk/tv-radio-and-on-demand/public-service-broadcasting/review-of-public-service-media-2019-23</a>
- OFCOM 2024f. Community Radio: future approach to Key Commitments. <a href="https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/community-radio---future-approach-to-key-commitments/associated-documents/statement-community-radio-future-approach-to-key-commitments.pdf?v=384656</a>
- OFCOM 2024g. Equity, Diversity and Inclusion in Broadcasting <a href="https://www.ofcom.org.uk/tv-radio-and-on-demand/equity-and-diversity/diversity">https://www.ofcom.org.uk/tv-radio-and-on-demand/equity-and-diversity/diversity</a>

- OFCOM 2024h. Diversity and Inclusion at Ofcom <a href="https://www.ofcom.org.uk/about-ofcom/diversity-and-equality/diversity-and-equality/diversity-and-equality/">https://www.ofcom.org.uk/about-ofcom/diversity-and-equality/</a>
- OFCOM 2025a. Children's Media Lives. <a href="https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-children/childrens-media-lives">https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-children/childrens-media-lives</a>
- OFCOM 2025b. Diversity and Equality <a href="https://www.ofcom.org.uk/about-ofcom/diversity-and-equality">https://www.ofcom.org.uk/about-ofcom/diversity-and-equality</a>
- OFCOM 2025d. Ofcom statement in response to High Court Judgment: GB News v Ofcom https://www.ofcom.org.uk/tv-radio-and-on-demand/broadcast-standards/ofcomstatement-in-response-to-high-court-judgment-qb-news-v-ofcom
- OFCOM 2025e. Review of ADR in the Telecoms Sector. <a href="https://www.ofcom.org.uk/siteassets/resources/documents/consultations/category-1-10-weeks/review-of-adr-in-the-telecoms-sector/statement/statement-on-ofcoms-review-of-adr-procedures.pdf?v=399797#:~:text=1.5%20In%20November%202023%2C%20we,the%20schemes%20under%20the%20Act</a>
- OLUSOGA, D. 2020. MacTaggart Lecture, Edinburgh television Festival 2020. The Guardian 24 August, <a href="https://www.theguardian.com/media/2020/aug/24/david-olusoga-his-edinburgh-television-festival-speech-in-full">https://www.theguardian.com/media/2020/aug/24/david-olusoga-his-edinburgh-television-festival-speech-in-full</a>
- PRESS RECOGNITION PANEL 2024. A review of the UK's Independent Press Standards
   Organisation's complaints process and related issues. <a href="https://www.pressrecognitionpanel.org.uk/ipso-review/">https://www.pressrecognitionpanel.org.uk/ipso-review/</a>
- REUTERS INSTITUTE FOR THE STUDY OF JOURNALISM 2025. UK Journalists in the 2020s. https://reutersinstitute.politics.ox.ac.uk/sites/default/files/2025-04/uk\_journalists\_in\_the\_2020s.pdf
- THE WALT DISNEY COMPANY 2024 Workforce Diversity Dashboard FY 2024. <a href="https://impact.disney.com/app/uploads/2024/12/FY24-Diversity-Dashboard-Workforce.pdf">https://impact.disney.com/app/uploads/2024/12/FY24-Diversity-Dashboard-Workforce.pdf</a>
- WOMEN IN JOURNALISM, 2024. Shocking lack of media diversity across newspapers, radio & television. <a href="https://womeninjournalism.co.uk/research/lack-diversity-british-newsrooms">https://womeninjournalism.co.uk/research/lack-diversity-british-newsrooms</a>

