

EQUAL OPPORTUNITIES EVALUATION REPORT

During the year 2011, Marjan Television Network (MTN) demonstrated its on-going commitment to Equal Opportunities in the work place. Set out below is an evaluation of MTN's practices in respect of equal opportunities, based on the self-evaluation equality and diversity framework introduced by the Broadcaster Equality and Training Regulator.

1. Motivation

We have a strategy that will motivate and enable our organisation to create an inclusive workplace with improved opportunities for everyone, to help us achieve business success.

1.1 Commitment

Everyone engaged in delivering our business has a shared understanding of the importance of creating an inclusive workplace with improved opportunities for everyone and their role and responsibilities in achieving this goal.

Policy

- (a) MTN has an “**Equal Opportunities Policy**” setting out its commitment to equality, diversity and creating an inclusive workplace, which is reviewed annually (most recently in April 2012) and provided to all employees in the “**Staff Manual**” (a copy of which is attached at Schedule 2) together with their employment contract at the commencement of their employment. The Equal Opportunities Policy can be found at pages 4 and 5 of the Staff Manual. In particular, section 1 (*Purpose of the policy*) which is set out below, demonstrates MTN’s commitment to creating an inclusive workplace:

“The Company supports the principle of equal opportunities and opposes discrimination on the basis of sex, marital or civil partnership status, gender reassignment, race, disability, sexual orientation, religious belief, part time or fixed term employment and age. Being a committed equal opportunities employer, the Company will take all reasonable steps to ensure that employees are treated equally and fairly in respect of these matters. All policies and practices will conform with the principle of equal opportunities in terms of recruitment, selection, training, promotion, career development, discipline, redundancy and dismissal. Our staff and applicants for employment shall not be disadvantaged by any policies or conditions of service which cannot be justified as necessary for operational purposes.”

- (b) In addition, MTN has a number of policies and guidance documentation in place (collated in the Staff Manual). Some of these documents are contractually incorporated into employees’ contracts (such as the staff Code of Conduct and the Company Rules) and place a contractual

obligation on MTN's employees to comply with certain documents, such as MTN's Equal Opportunities Policy, and related rules.

- (c) MTN's Equal Opportunities Policy also expands on the general statement of commitment set out above. It sets out the roles and responsibilities of the personnel responsible of the implementation of the Equal Opportunities Policy, particularly highlighting the personnel with overall responsibility and the responsibilities of personnel at management level (sections 4 to 6 inclusive). In addition, the expectations of the employees in relation to their compliance with MTN's Equal Opportunities Policy are made clear to the employees (sections 2 and 3).

Senior Decision Makers

- (d) Set out at Schedule 1 is the structure of the operations at MTN which has been prepared for the purposes of this evaluation for illustrative purposes only.
- (e) The Management Team discusses equal opportunities at MTN as and when required. MTN's approach to equal opportunities is driven by both (i) legal requirements and (ii) the Management Team's enthusiasm to have a diverse staff in order to bring a range of tastes, ideas and approaches to MTN's work.
- (f) If an equal opportunities issue arises, the procedure at MTN is that an employee should raise the issue informally with their line manager. If the issue cannot be resolved solely by the line manager, the line manager should raise the issue at the next Management Team meeting or alternatively arrange for it to be dealt with via MTN's "**Grievance Procedure**" (see pages 30-31 of the Staff Manual).

1.2 Leadership

Senior decision makers lead and are accountable for creating an inclusive workplace that supports business performance.

Policy

- (a) MTN has some plans in place to help create an inclusive workplace.
- (b) MTN has a designated HR budget, which covers all HR related costs, including recruitment advertisements.
- (c) Roles are advertised in various publications online, including the following:

- Specialist online recruitment advertising agencies which provide a platform to search jobs (such as Grapevine and Production Base) for technical production and broadcast staff. This advertising is paid for from the HR budget.
- The MTN Website

In relation to under-represented groups, since August 2010 MTN has employed one fulltime employee with learning difficulties (in the role of Studio Assistant) and in 2011 work experience placements of around three months were offered to people with physical or learning difficulties under the government Scheme “Remploy”.

1.3 Policies and Resources

Clear policies are in place to underpin our strategy for an inclusive workplace with improved opportunities for everyone. MTN has the necessary resources to realise these policies and objectives.

Policy

- As set out at section 1.1 above, MTN has an Equal Opportunities Policy that sets out its commitment to equal opportunities and includes further provisions relating to equal opportunities at MTN.
- In addition, MTN has policies, standards and guidance in place which explain how MTN considers issues of equality and diversity in all areas of employment.
- The Equal Opportunities Policy (pages 4 and 5 of the Staff Manual) sets out MTN’s position (as set out at section 1 above) and also the action it will take in the event of a breach of the Equal Opportunities Policy (sections 10 to 12 inclusive).
- The “**Company Rules**” (see pages 6 and 7 of the Staff Manual) form part of an employee’s contract with MTN. Section 7 of the Company Rules lists examples of gross misconduct, which will result in the termination of the employee’s employment without notice and include: discrimination (including harassment or victimisation) on grounds of sex, marital or civil partnership status, age, race, disability, sexual orientation or religious belief; and breach of the Code of Conduct.
- The “**Code of Conduct**” (see pages 10 and 11 of the Staff Manual), which forms part of the employee’s contract with MTN, sets out MTN’s non-discriminatory position and the standard of behaviour expected of each employee (see in particular sections 1 to 4). The Code of Conduct (pages 10 and 11 of the Staff Manual) sets out MTN’s position in that “it is

paramount that it operates and is seen to operate in a politically neutral manner and in a way that is sensitive to the beliefs and views of people from a variety of national, religious and cultural backgrounds” (section 1), and states that this Code of Conduct applies to MTN’s employees and contractors (section 2). A breach of this Code of Conduct may constitute gross misconduct (section 4).

- (f) The Grievance Procedure, “**Anti Harassment and Bullying Policy**” (see pages 32-36 of the Staff Manual) and the “**Procedure for Reporting a Wrongdoing**” (see pages 37-38 of the Staff Manual) set out the procedures which employees should use when reporting complaints and allegations and details how these are dealt with by MTN. In particular, MTN’s commitment to a workplace free of bullying, harassment and discrimination on grounds of sex, sexual orientation, marital or civil partnership status, gender reassignment, race, religion, colour, nationality, ethnic or national origin, disability or age is set out at Section 4 of the Anti Harassment and Bullying Policy. In addition, MTN’s commitment to protecting employees who raise allegations of bad practice is set out at Section 2 of the Procedure for Reporting a Wrongdoing.

Evaluation:

MTN considers itself to have a motivated working environment that provides equal opportunities to all employees. MTN’s attitude towards equal opportunities is clearly expressed to all employees (in the Equal Opportunities Policy and other documentation, including the Code of Conduct, in the Staff Manual), and employees are made aware of their duties in relation to MTN’s policy and how MTN will deal with any breaches of the Equal Opportunities Policy, Code of Conduct, Company Rules, Anti Harassment and Bullying Policy and other related documentation. This clear and robust presentation of MTN’s policies and ethos is extremely effective in creating an inclusive environment.

Although MTN advertises roles in a number of sources it is keen to open the opportunities to a wider audience and will consider further media in which it might advertise roles in order to target a more diverse range of applicants. MTN considers that its participation in the scheme “Remploy” was very successful and rewarding for all employees and scheme participants, and MTN plans to participate again in the future and also consider similar schemes.

2. Action

MTN takes action to create an inclusive workplace and improve opportunities for everyone.

2.1 Recruitment

MTN recruits fairly; attracting and appointing the best talent from a diverse pool.

- (a) MTN is committed to creating an inclusive workplace and aims to reflect this in the staff it recruits. In relation to the recruitment process, MTN ensures that any third party recruiter it uses is aware that it is an equal opportunities employer and that the selection of candidates for a job is in line with this.

Senior Decision Makers

- (b) The Management Team is committed to the open advertising of jobs, to recruiting a diverse workforce and to appointing on merit. For example, roles are advertised in various publications, as listed in section 1.2 above.

MTN broadcasts programming mainly in the Farsi language, which means that it is a requirement that the programme presenters and hosts speak both Farsi and English. In addition, some creative roles require the employee to speak Farsi in order to understand and create the content of the programmes. However, MTN recognises that a diverse work force promotes the best talent and results and ensures that the requirement for Farsi language speakers is limited to roles where it is necessary. Out of the total of 65 employees, 34 are male and 31 are female, and 46 are Farsi-speaking and 19 are not. MTN also engages 90-100 freelance employees at any one time. In addition, MTN employs 1 studio assistant who has learning difficulties.

2.2 Development

MTN identifies and removes any barriers to individual development, succession and reward, so that all employees can realise their full potential and are fairly rewarded within the workplace.

- (a) All MTN's employees have access to professional training and development opportunities and are encouraged to reach their full potential. Staff are introduced to the HR Manager, and a hard copy of the Staff Manual is provided to each member of Staff when they join. Having reviewed the on-going accessibility of the Staff Manual and any updates, MTN has decided that a copy of the Staff Manual will be available on the MTN intranet, which is currently under construction.

Senior Decision Makers

- (b) The Management Team clearly communicates the value to their organisation of developing and promoting talent from a range of diverse backgrounds. The Management Team is conscious that they lead by example. Its commitment to equal opportunities has clearly influenced the employees, who enjoy their (particularly multi-cultural) diversity

and use it to draw on their experiences and ideas that in turn benefit MTN, such as creative programming ideas and suggestions. The Remploy Scheme (described at section 1.2 (d) above) is an example of the Management Team leading by example.

Managers

- (c) MTN uses the annual employee appraisal process to identify development needs and discuss career plans with each employee. The Management Team then acts on this information to assist employees with achieving their personal targets.

If any relating to equal opportunities arise, they are raised by line managers during the Management Team meetings.

2.3 Retention

MTN takes appropriate steps to accommodate the different needs of its employees to help nurture and retain talented people from all backgrounds.

- (a) MTN is committed to meeting the varying and changing needs of our employees to help ensure they are able to continue to work and develop within our organisation.
- (b) **Physical environment** – As MTN is a fairly new business the facilities are reasonably new and they were refurbished in 2011. In order to accommodate people with physical disabilities, MTN has a ramp at the entrance to the premises and also a lift in addition to the stairs at the premises. In order to further improve facilities, refurbishment of the staff dining and conference areas has been commenced.
- (c) **Technology and equipment** – MTN provides staff with all equipment they need to carry out their roles, and ensures that it is in good working order. As MTN is based at television studios, there is a variety of suites to suit the differing role requirements and types. Each employee has a workstation and there are also some hot desks with PCs on the premises. Each employee has access to WIFI so that they can access the internal systems from their laptops. Visitors are given separate WIFI access in order to protect the internal systems. PAYE employees are given their own email address and access to MTN's internal document management system (powered by Google).
- (d) **Safety and emergency procedures** – MTN ensures that the relevant legal requirements are met and MTN has a number of staff who are trained in first aid. In addition, the “**Health and Safety at Work Rules**” are published in the Staff Manual (see pages 8 and 9) and are contractually incorporated into employee’s contracts. The Health and

Safety at Work Rules include information about where employees can find relevant standards, e.g. fire regulations and fire drill practices (section 5) and the names of appointed first aiders (section 11).

- (e) **Flexible working** - MTN has a Flexible Working Policy which is in the Staff Manual, which includes how employees can request adjustments and alternative arrangements, the appeal process and grounds for refusal by MTN. The flexible working policy is successful at MTN and is reflective of MTN's willingness to enable staff to work the hours that suit their needs. Arranging cover for staff on flexible working hours is part of the daily process at MTN and a rota is in place (supervised by the line manager for each team) that appears to work effectively. For example, flexible working hours are negotiated particularly by crew members so that they can work around family life, although the majority of staff request to work 10am to 5pm.

- (f) **Redundancy Programme** – MTN has never needed to make any redundancies. If the need arises, MTN will deal with any redundancies on a case by case basis and will ensure that no-one is subject to discrimination.

Evaluation:

MTN considers that its approach to recruitment and retention reflects its commitment to equal opportunities. On reflection, MTN considers that it may be beneficial to broaden the media in which jobs are advertised and also to make the Equal Opportunities Policy available at the application stage, so that applicants are aware of MTN's inclusive position (particularly since MTN broadcasts mainly in Farsi).

In relation to development, MTN feels it is more effective in responding to employees' requests for developments and training and also accommodating requests such as flexible working hours. This also assists MTN with retaining talent.

3. Evaluation

MTN evaluates the success of its actions to create an inclusive workplace and improve opportunities for everyone, to check that they are effective. We consider inclusion and diversity in its planning for the future to ensure continuous business performance.

3.1 Recruitment

MTN monitors its success in recruiting a diverse workforce and identifies priorities for improvement.

- (a) MTN has a number of policies in place to accommodate the needs of its employees and retain talent, such as the Flexible Working Policy provided in the Staff Manual discussed at section 2.3 (e) above.

Policy

- (b) Having reviewed MTN's lack of formal records relating to applicants' diversity, MTN will introduce a requirement that all job applicants complete a detachable monitoring form which asks them to declare their race, gender and any disability. This will be removed from any documentation from the recruitment process and used to monitor the progress the organisation is making in recruiting talent from diverse backgrounds. MTN did not have an equal opportunities monitoring form in 2011. MTN now has a template equal opportunities monitoring form which will be provided to each job applicant at the time of application and MTN will request that a completed form is returned with the job application (a copy of which is attached at Schedule 3).
- (c) MTN will use the data from completed monitoring forms to monitor the details of job applications to see if there are any correlations between applicants' qualities and the type of role they apply for, so that MTN can review its current procedures, such as where it is advertising for certain roles.

3.2 Development

MTN tracks the development of its employees and monitors how it rewards them, comparing the experiences of employees from different backgrounds, and identifying priorities for improvement.

Senior Decision Makers

- (a) The Management Team evaluates the representation of diverse employees at MTN by occupation/role and hierarchical level at the Management Team's meetings as and when required.
- (b) Going forward MTN now intends to monitor the recruitment of a diverse workforce at the application stage using its equal opportunities monitoring form. The Management Team will use information from these to evaluate the representation of diverse employees by role and hierarchical level on a quarterly basis at Management Team meetings. MTN checks how successfully its actions met the different needs of its employees and identifies priorities for improvement to help MTN nurture and retain a diverse group of talented people.

3.3 Retention

Senior Decision Makers

- (a) Data relating to leavers is kept (under the supervision of the HR Management) and provided to the Management Team on the identity groups of all leavers.

Evaluation:

MTN consciously provides an attractive working environment in order to retain its staff and create an inclusive workplace.

In addition MTN understands the importance of data for monitoring and using information relating to equal opportunities. Upon reflection, MTN considers that investing time and consideration in this area would benefit MTN by providing and highlighting certain information such as correlations between job applications or exits and particular groups of people.

Further comments:

MTN's commitment to equal opportunities is strong, consistent and clearly presented to its employees. MTN wishes to be a diverse working environment for its staff. Despite being a broadcaster with a specific (Farsi-speaking) audience, MTN is committed and active in its approach to creating an inclusive workplace.

MTN feels that it could improve its level of monitoring and evaluating the identity groups of its employees. For example, the equal opportunities monitoring form is a recent introduction that will assist this process, particularly for applicants for jobs at MTN.