



Social Media Policy

November 2017

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1. Introduction and Scope

- 1.1 Social media has developed to such a degree over recent years that it now has a prominent role in day to day life. Such a development has naturally resulted in the increased use of social media by S4C and the independent production sector as a way of connecting with the S4C audience.
- 1.2 S4C wishes to develop its social media platforms in order that they become a key method of distributing a wide range of high quality, comprehensive content with the interests of the S4C audience at their forefront.
- 1.3 This policy provides guidelines to the independent production sector regarding the use of social media platforms in connection with S4C Programmes.
- 1.4 Social media as referred to in this policy means all social media platforms, such as Twitter, Facebook, Instagram, YouTube, Snapchat, blogs and websites and any other platforms of a similar nature created from time to time, including blogs ("Social Media").
- 1.5 Producers including their relevant staff ("Producers") must ensure that they are familiar with the entirety of this document. In the event Producers have any queries, please do not hesitate to contact S4C's Social Media Manager (details of whom can be found at section 13 of this policy).
- 1.6 Please note that this policy should not be read in isolation and should be considered alongside S4C's other policies which can be found on the S4C production site, <http://www.s4c.cymru/en/production/page/1154/guidelines/> ("S4C Production Site") including the Social Media Guide Summary (as amended from time to time).
- 1.7 This policy is reviewed regularly. To ensure Producers are using the most recent policy, please visit the S4C Production Site.

2. S4C Aims

- 2.1 Social Media used in connection with S4C programmes should support S4C in: i) appealing to a wide channel audience, ii) strengthening S4C's relationship with its audience, and iii) increasing the channel's viewing figures. S4C wants to develop its position in the digital world by using creative methods of distributing content and engaging with its audience.
- 2.2 In order to achieve the aims mentioned in paragraph 2.1 above, S4C will strive to ensure that content released on its Social Media platforms is of a high standard, thoughtful and compliments S4C's broadcasting priorities and that such material and engagement with its audience is undertaken in a responsible and positive manner.

3. S4C's Social Media Structure

- 3.1 Notwithstanding clause 3.5 below, S4C wishes to focus on its main Social Media accounts and develop its following within those accounts, rather than dilute its audience by having them spread over a large collection of Social Media accounts. By focusing on a small number of Social Media accounts, S4C can share messages and content with a wider audience.

- 3.2 In order to achieve these aims S4C intends for the majority of social media campaigns associated with S4C Programmes to be conducted via S4C's Social Media accounts specified by S4C from time to time.
- 3.3 Producers will discuss in advance with S4C the intended nature of their Social Media campaign and the content intended to be released via S4C's Social Media accounts. This should be noted clearly in the Editorial and Business Brief – see paragraph 4.2 below.
- 3.4 Producers will agree a strategy for a Social Media campaign with S4C in advance. Such strategy will typically involve one of the following scenarios:
- a) Producers will be required to deliver Social Media material to S4C, and S4C will release the material via its Social Media accounts as considered appropriate for the S4C Programme target audience;
 - b) S4C will establish a page in association with the S4C Social Media account considered most appropriate in light of the intended Social Media campaign and will provide Producers with details of the way in which to make content available via that particular platform, enabling content to be released in accordance with the agreed strategy for the Social Media campaign and the terms and conditions of the Social Media platform; or
 - c) S4C will grant Producers with details of the way in which to make content available on an existing S4C Social Media account, enabling content to be released in accordance with the strategy and timetable agreed with S4C and the terms and conditions of the Social Media platform.
- 3.5 There may be occasions when S4C considers it appropriate to deviate from the above mentioned Social Media campaign structures as well as this policy more generally. Such departures will be in S4C's sole discretion and any bespoke Social Media campaign structure will be discussed between S4C and the Producers and subject to the advance agreement of S4C.

4. Social Media Campaign Approval Procedure

- 4.1 Producers must discuss their intended use of Social Media in association with S4C/an S4C Programme with the S4C Programme Commissioner and the S4C Social Media Manager at the outset of the project / S4C Programme commissioning process.
- 4.2 Once the intended use has been discussed and agreed with the S4C Programme Commissioner and the Social Media Manager, Producers must complete section 2.3 of the Editorial and Business Brief corresponding to the relevant S4C Programme and must outline the Producers intentions in respect of using Social Media in connection with the S4C Programme.
- 4.3 Upon completion of section 2.3 of the Editorial and Business Brief, the S4C Social Media Manager will discuss the intended use, offer guidance and agree a Social Media campaign plan with the Producers. The overall nature and tone of the Social Media content relating to the campaign will be agreed at this stage. Where S4C and the Producers are unable to agree upon the appropriate campaign strategy, the decision of S4C will prevail.
- 4.4 Any later changes to a Social Media campaign strategy or the tone and nature of its content must be approved in advance by the S4C Social Media Manager.

5. Use of Social Media – S4C's Key Rules

- 5.1 ***Usual Laws Apply***

Please remember that all usual laws apply when using Social Media. When undertaking a Social Media campaign in association with S4C/an S4C Programme, the Producers agree to abide by all applicable laws. Particularly relevant to the use of Social Media are laws relating to intellectual property, breach of contracts, breach of confidentiality, defamation, data protection and laws relating to contempt of court, but this list is by no means exhaustive.

S4C expects its Producers to comply with S4C's Data Protection Policy and S4C's Privacy Policy as found on the S4C Production Site, as well as the relevant Social Media platforms' own data and privacy policies (as applicable).

S4C expects its Producers to apply the same standards to the content it creates and releases on Social Media as it does to the material it broadcasts on television.

5.2 ***Abide by the Social Media Platform's Terms and Conditions***

All Social Media platforms also have their own terms and conditions. By signing up to these platforms, S4C is/the Producers are (as applicable) agreeing to abide by these terms. Producers must therefore ensure that they comply with such terms and conditions when using Social Media in association with S4C/an S4C Programme.

Please note that the platforms often update and amend their terms and conditions, therefore Producers should continue to familiarise themselves with the most up to date version.

5.3 ***Follow the agreed Social Media Campaign Plan***

As part of the approval procedure outlined in section 4 of this policy, the S4C Social Media Manager will have agreed a Social Media campaign plan with the Producers. This may involve agreeing certain milestones or timetables. In order to ensure the successful delivery of the Social Media campaign, it is expected that Producers cooperate fully with S4C and follow the agreed Social Media campaign plan.

5.4 ***Respect the S4C Brand***

The S4C brand is an important and valuable asset to S4C and one which S4C is proud and protective of. When using Social Media, Producers agree not to do anything which might damage the S4C brand in any way or indeed the relationships S4C has with its audience, other third parties and/or organisations. In no circumstances can Producers use the S4C brand and logo without obtaining S4C's prior written approval. Any authorised use of the S4C brand/logo by a Producer must be done in accordance with S4C's Brand Guidelines which are available on the S4C Website at <http://www.s4c.cymru/en/production/page/1154/guidelines/> or as are otherwise provided by S4C to the Producer.

5.5 ***Remember it's a Public Forum***

Remember that Social Media is a public forum and content posted on Social Media platforms can spread/be shared quickly. When posting content, a good question to consider is whether Producers would be comfortable for the same content to appear in a national newspaper or on a TV broadcast? Key rule: think before you click.

5.6 ***Age Appropriateness***

Please note that many Social Media platforms have an age restriction of 13+. As such, S4C asks Producers to consider the general appropriateness of the use of Social Media in connection with an S4C Programme, particularly when the target audience of that S4C Programme may be younger than the age restriction applicable to the Social Media platform in question. Producers must be able to justify why they consider the use of Social Media to be appropriate in such circumstances. S4C does not want to encourage individuals younger than 13 to visit platforms they are not old enough to use. For example, if an account is opened in relation to the 'Cyw' brand then this should be targeted at the parents/guardians for advisory and promotional purposes only.

- 5.7 ***Don't Respond to Complaints/Press Enquiries without S4C Permission***
Producers should not respond directly to complaints regarding S4C or its programmes or services or to press enquiries, unless S4C has authorised them to do so. Producers must immediately refer any complaints or press enquiries to the S4C's Social Media Manager and if that individual is not available, Producers must notify the S4C's Viewer's Hotline. Producers should ensure that they are familiar with S4C's Complaints Policy.

6. Social Media Content Standards

6.1 Content Quality Standards

6.1.1 General

Content posted on any Social Media platform associated with S4C or associated with an S4C Programme should be engaging, evergreen (as far as possible), of a high picture quality and linguistically correct. Where a live streaming service is used, good quality microphones and lighting must be used. It is imperative that Producers ensure that the internet and/or wi-fi connection operates to a reasonable speed throughout the project. Where the intention is to use equipment other than broadcast quality equipment, the specification of any such equipment will require S4C's prior written approval.

6.1.2 Ofcom Standards

S4C considers the Ofcom Code to be a good benchmark in terms of the quality and standards to be met regarding content to be included on its Social Media platforms. Content should be accurate and not mislead the audience. Due accuracy and impartiality is especially important in respect of news and current affairs content. Furthermore, what would ordinarily be considered post-watershed material should not be posted on a Social Media platform without an appropriate warning about the content and without the prior approval of S4C.

In addition, Producers should pay due consideration to and adhere to the principles of the Ofcom code dealing with matters such as contributor consents, privacy, harm and offence and the protection of under 18s.

6.1.3 Language

All content posted to Social Media platforms must adhere to the language, tone and nature of the Social Media campaign agreed with the S4C Programme Commissioner and Social Media Manager.

If a member of the public communicates with Producers via a Social Media platform in the Welsh language and it is appropriate for Producers to respond to that individual, Producers must respond in Welsh.

6.2 Reposting and Liking

Producers should think carefully before liking or reposting 3rd party material on Social Media as this may be construed as an endorsement by S4C of the original author's view or of a brand, product or service.

If Producers repost/retweet a defamatory comment or statement, Producers and/or the owner of the Social Media account could find themselves having to defend a legal defamation action for the retweet/repost.

6.3 Clearances

6.3.1 IP

When placing any material on a Social Media platform, for example stills, clips and videos, Producers **must** ensure that the material in question is cleared **for this use** i.e. that Producers have all necessary permissions, licences and/or consents for use on the particular Social Media platform. Attention is particularly drawn to third party material and music.

Music has many different rights associated with it, for example, rights in the sound recording, the composition, the performance, rights of publication etc, all of which must be cleared to enable its use. Commercial music in particular will require specific negotiation and is often difficult to clear. For this reason, Producers are advised to ensure their Social Media content includes commissioned music or library music only.

It should be noted that even when programmes may have been cleared for broadcast or website use, this does not necessarily mean that the use of such material has been adequately cleared for use on Social Media platforms.

When publishing material on a Social Media platform, Producers need to consider whether they have the rights to make the material available on a world-wide basis. Where Producers do not have the right to make material available world-wide, Producers will need to geoblock the material to the territory they have cleared it for and notify S4C of the need to geoblock. Where Producers are not able to geoblock the material, do not post it to Social Media.

6.3.2 Moral rights

When using a third party's material, Producers should credit the author where it is reasonably practicable to do so, and not amend the content unless Producers have express permission to do so. Producers should never claim ownership or authorship of something that isn't theirs.

6.4 **Commercial Promotional Restrictions**

The area of commercial promotions is regulated by the 'UK Code of Non-Broadcast Advertising and Direct & Promotional Marketing' ("Cap Code") and many Social Media platforms will have their own rules and regulations in this area. S4C's view is that Producers should not post any commercial promotions on Social Media without having obtained prior authorisation from the S4C Social Media Manager.

Producers may not enter into sponsorship arrangements with any third party in connection with Social Media platforms associated with S4C and/or S4C Programmes without the prior written approval of S4C.

Producers must not offer for sale products or services via Social Media platforms associated with S4C or S4C Programmes unless Producers have the prior written consent from S4C to do so.

Producers must ensure compliance with the Cap Code. The Cap Code is the rule book for non-broadcast advertisements, sales promotions and direct marketing communications (marketing communications).

6.5 **Competitions**

In the event that Producers wish to run a competition on Social Media, Producers must obtain S4C's advance approval to do so. Please see S4C's Interactivity and Competition Guidelines on the S4C Website http://www.s4c.cymru/media/media_assets/2017.02.13_Guidelines_for_Interacting_or_Competing_on_S4C_programmes_.pdf for more information regarding prize promotions.

Any competition is expected to be conducted fairly and transparently and in accordance with all applicable laws and guidelines. Prize promotions are regulated by the Cap Code and Producers are asked to refer to and adhere to the code whilst conducting a competition.

Producers must communicate all applicable significant conditions to participants in advance of them taking part in a prize promotion where such information may impact upon an individual's decision to take part in the prize promotion or where the omission of such information is likely to mislead the public. The Cap Code gives guidance regarding what are considered to be significant conditions.

Producers must ensure full terms and conditions relating to the competition are available for participants to view prior to taking part in the competition.

Prizes must be suitable for the age of those eligible to take part in the competition. Particular care must be taken in respect of prizes where entrants under the age of 18 are able to enter. For example, Producers must not offer alcohol as a competition prize where individual's under the age of 18 are allowed to enter the competition.

Producers must give due consideration to matters such as data protection and parental consents when planning and running a competition/prize draw.

Social Media platforms may also have specific rules in their terms and conditions as to the running of competitions via their platforms and these rules should be adhered to.

6.6 ***Elections***

During election periods, S4C is under a duty of due impartiality under Section 6 of the OFCOM Code. During this period, when using Social Media in association with S4C/S4C Programmes, Producers should review the election guidelines on the S4C website and abide by those guidelines in addition to this policy. All guidelines for television programmes apply in the same way to all election material on the web and Social Media.

Faces and Editorial Persons (as defined in the S4C Programme Compliance Guidelines) should not compromise S4C's impartiality or integrity by expressing opinions on political issues on websites or personal accounts on Social Media.

In accordance with the S4C Programme Compliance Guidelines please bear in mind that Faces and Editorial Personnel are required to notify S4C before taking part in political activities. Comments on social media during elections or by-elections could be classed as such activity.

6.7 ***Prohibited content***

The following content is prohibited on any Social Media platform associated with S4C or an S4C Programme:

6.7.1 *Ongoing legal matters*

Producers must not comment on any ongoing legal matter that they or S4C are party to. Any news reporting on ongoing legal matters or criminal investigations must be carefully considered and undertaken in accordance with contempt of court and defamation laws. Producers are advised to obtain legal advice in this regard. Producers should not comment on matters where there are reporting restrictions in place e.e. injunctions. Producers must not comment on any ongoing public matters which S4C is involved in.

6.7.2 *Confidential information*

Producers must not post any information relating to S4C or third parties which cannot be found in the public domain. This will include any statements, commissioning information or ratings. Always obtain S4C's consent prior to publishing any scheduling information.

6.7.3 *Defamation*

Producers should not repeat, post, repost, share or like allegations or stories which Producers do not know are true as, in doing so, Producers may fall foul of laws on defamation. Inferences and innuendo can still be seen as defamatory. With regards to repeating the defamatory words of another, the individual reposting the defamatory comment could still be liable in the event of legal action.

6.7.4 *Offensive statements*

Producers should not make any offensive statements, such as statements relating to gender, age, sexual orientation, disability, religion, race, culture, gender reassignment, pregnancy/maternity etc.

6.7.5 *Content aimed at under 13s*

As most social media platforms will only allow children the age of 13 and above to have an account with them, Producers should not post anything which is aimed directly at children under the age of 13 as this may encourage them to use these platforms. Any material posted in relation to children's programmes should be targeted towards parents/guardians for advisory and promotional purposes only.

7. Moderation

- 7.1 S4C's general position is that all user generated content on its Social Media platforms is not the subject of moderation and will only take down inappropriate material when notified.
- 7.2 Where Producers have established independent Social Media Accounts in association with S4C/an S4C Programme, Producers are required, wherever possible to include a 'Take Down' notice as outlined below on the platform's homepage:
- 7.3 "Take Down Policy: We love to hear from you but please keep it friendly. We reserve the right to delete any content which is defamatory, abusive, profane, spam or any other content which we deem to be inappropriate."

8. Child Protection

- 8.1 Should Producers come across any content on a Social Media account which raises concerns regarding a child's welfare Producers are referred to the reporting procedures in the S4C's Child Protection Policy and must follow these. Producers are also asked to fill the Social Media Reporting Form at Appendix 1 and return this to S4C's Social Media Manager.

9. Security

- 9.1 Producers must keep logs of all Social Media accounts independent of S4C's Social media accounts and who has access to those accounts. This will be discussed with Producers when agreeing the Social Media campaign structure with S4C's Social Media Manager.
- 9.2 Passwords for Social Media accounts are considered confidential information and Producers must treat such information with care and keep it secure. Producers must

share passwords with as few people as possible. When people who are privy to current password information leave a team, Producers must immediately change those passwords.

- 9.3 In the event Producers become aware a Social Media account associated with S4C or an S4C Programme has been hacked or has been accessed without authorisation, Producers must immediately take all reasonable steps to secure the Social Media account, remove any offensive material published and inform S4C's Social Media Manager. Whilst discussing the structure of your Social Media campaign with S4C's Social Media Manager, Producers must have plans in place to deal with eventualities such as an account being hacked.

10. Closing Accounts

- 10.1 Where Social Media accounts are opened by Producers independently of S4C's Social Media accounts, Producers must not leave accounts dormant once a Social Media campaign has ended. When discussing the structure of the Social Media campaign with S4C's Social Media Manager, Producers should also discuss and agree on a strategy for closing the accounts if and when necessary.
- 10.2 When closing an independent Social Media account associated with S4C, Producers should post a message advising users that the account will soon be closing, noting the date that it will close. If there are alternative S4C Social Media accounts that users may be interested in, having similar content, Producers can post a message suggesting users may be interested in following the alternative Social Media accounts. The approach Producers have agreed with S4C's Social Media Manager regarding moderating the Social Media account must be maintained until the closure of the account. On the advised closing date, Producers must close the account.

11. Personal Accounts

11.1 Guidelines

S4C does not seek to restrict personal use of social media sites by those who are working on S4C programmes. But when making use of Social Media sites whether in a professional or personal/social capacity, individuals working on S4C programmes are expected to refrain from making statements that are detrimental to the public image of S4C, its programmes or its services. This is particularly relevant to the faces of the channel including presenters, actors, reporters, interviewers and commentators who appear regularly on S4C.

The following points of good practice are recommended in order to provide safeguards so that those individuals working on S4C programmes do not jeopardise S4C's reputation through their actions on social media sites.

Where the social media account is a personal one:

- The individual should avoid giving the impression that they are communicating on behalf of S4C. For example, S4C should not be included in the user name or account name, e.g. @johnjones is fine but @johnjonesS4C would NOT be acceptable;
- The individual should avoid making comments that are unfavourable or negative to the programmes and/or services with which they are involved on behalf of S4C.

11.2 Good Practice Generally

Generally, when using personal accounts:

- The individual should avoid saying anything on social media sites that they would be unwilling to state publicly on television or in a newspaper.
- The individual should not make any comments that are racist, which cause harassment or discriminate or which are libellous, which amount to bullying or which cause offence etc.
- The individual should not share any confidential information including the personal information of any individual or confidential details about S4C or the S4C programme or their own business.
- The individual should not breach any third party copyright for example when copying photos, music or video from the internet without permission.
- The individual should not mislead the public, act in an unlawful manner or promote any unlawful act.
- The individual should not behave in an aggressive manner towards individuals particularly when discussing S4C content and/or activities. The individual should respond to any criticism in a measured way.
- The individual should consult S4C before responding to any complaint about S4C or a S4C programme or service.
- If the individual has tweeted or made a comment, and is then unsure as to whether it was appropriate to make and believe that it could impact on S4C, this should be brought to their manager's attention as soon as possible, even if the comment has been deleted. Whether to bring the circumstance to the attention of the S4C's Communications Department is a matter for the manager.
- Simply, if the individual is unsure as to the suitability of what they are about to tweet or publish, they should not publish it.

12. S4C Content – Using and Referencing Social Media

General

- 12.1 Producers must always seek S4C's approval before referring to Social Media in other media (e.g. in broadcasts, online content, print material).
- 12.2 When including references to Social Media in other media, Producers should refer to the relevant platform's terms and conditions beforehand. The platform's consent may need to be obtained for the use of its trademarks, logos or brand and there may be strict guidelines for their use.

References in Broadcasts

- 12.3 When considering to include references to Social Media platforms within television broadcast material, Producers should have particular regard to Rule 9 of the Ofcom code and Ofcom's guidance to Rule 9. The relevant guidance is summarised below, but Producers should always seek up to date information as published on the Ofcom website.
- 12.4 It should be remembered that Social Media platforms are commercial sites. Rule 9.4 of the Ofcom Code states that products, services and trademarks must not be promoted in programming - this includes Social Media platforms. In general therefore, Social Media platforms should not be referred to using favourable or superlative language and any prices or availability should not be discussed.

- 12.5 However, there are certain circumstances that justify a greater degree of information about products or services within programmes. For specific, limited, exceptions to Rule 9.4, see the rules on programme related material below.
- 12.6 Rule 9.5 of the Ofcom Code states that no undue prominence may be given in programming to a product, service or trademark (including Social Media). Undue prominence may result from:
- the presence of, or reference to Social Media in programming where there is no editorial justification; or
 - the manner in which the Social Media appears or is referred to in programming.
- 12.7 There must always be editorial justification for the inclusion of references to Social Media in programming.
- 12.8 Ofcom allows the use of references to Social Media to allow communication with the programme audience, subject to the following considerations:
- viewers aren't charged for the use of the Social Media site;
 - there is no commercial agreement in place for S4C/or the production company to make the reference;
 - details of other general means of communication, such as email, are also supplied;
 - the frequency with which the Social Media platform is mentioned is justifiable editorially. Care should be taken to avoid the Social Media being featured unduly prominently;
 - no more than the name of the Social Media platform and the other minimum necessary contact details should be given. There should be no discussion of the Social Media platform beyond simple information about how to use it to contact the producer/S4C.

Programme related material (PRM)

- 12.9 As noted above, as an exception to Rule 9.4, PRM may be promoted in programming as long as it is promoted during or around the programme from which it is directly derived and only where it is editorially justified.
- 12.10 "Directly derived from a specific programme" means that the product or service, (e.g. the Social Media page) is 'directly derived' to a significant extent from the specific programme. It is unlikely therefore that a Social Media page which existed before the programme would meet this definition.
- 12.11 The PRM (e.g. the Social Media page) must also be intended to allow viewers to benefit fully from, or to interact with, that specific programme.
- 12.12 In promoting a Social Media page as PRM, Producers must have regard to the rules in Section One (Protecting the Under-eighteens) and Section Two (Harm and Offence) of the Ofcom Code. Particular care should be taken where broadcast advertising of the product or service is prohibited or restricted. For example, the promotion of a Social Media page derived from a programme that attracts an child audience of under 13s is likely to be unacceptable.
- 12.13 A promotion for PRM in or around a children's programme should normally be in terms of general information only, for example about the availability of the Social Media Page. It would normally not be appropriate for such a promotion to invite a direct response from viewers.

- 12.14 Although there is no specific limit for the amount of PRM a programme may contain, Ofcom has found that the following was unacceptable: three promotional sequences broadcast a total of 5 times over the course of a 2 hour programme, with each sequence lasting approximately 30 seconds. Taken together, Ofcom found that the repeated focus on the PRM in this instance was unduly prominent.
- 12.15 It is clear therefore that Ofcom takes a strict view of undue prominence. Any on air references to Social Media whether in programmes or continuity must be very brief and not repetitive.

13. Contact Details

- 13.1 *S4C Social Media Manager*
Gweirydd Davies
Gweirydd.Davies@s4c.cymru
02920 741225

APPENDIX 1

SOCIAL MEDIA REPORTING FORM

(See overleaf)

Social Media Reporting Form

This social media reporting form works alongside our 'S4C Child Protection Policy' (http://www.s4c.cymru/media/media_assets/S4C_Child_Protection_Policy_14_01_2015.pdf) whereby the following procedure should be taken:

- STEP ONE Make the S4C Designated Person (Elin Morris on 02920 747444) aware or their deputy as nominated from time to time.
If out of business hours, then call the NSPCC Helpline (on 08088 005000).
- STEP TWO Fill out this form with all relevant detail of the actions taken/any referrals.
- STEP THREE Send a copy of this form to the S4C Designated Person.

DATE

PLATFORM

- e.g. Twitter,
Facebook

BACKGROUND

- Name/details of the user making the comment
- When did you become aware of the comment/behaviour to be reported
- Reasons for believing the child is in distress or at risk of harm
- If possible, please include a copy of the comment

STEPS TAKEN

- Since becoming aware of the situation, what steps have you taken

CONTACT DETAILS

- Name & contact number
- We may need to discuss anything you have included on this form