



Concern Sharing Policy for suppliers

October 2023

S4C is committed to ensuring that the highest standards of behaviour are maintained in all aspects of what S4C and its suppliers do.

As well as complying with the law, S4C expects its suppliers to act in accordance with the standards of conduct outlined in the S4C Supplier Standards Code.

S4C supports the establishment of CIISA (The Creative Industries Independent Standards Authority) which will be operational in 2024.

This Policy outlines how, and in what circumstances, you can share concerns about wrongdoings with S4C. The purpose of the policy is to enable you to do this in a confidential and reliable manner.

What is a Concern for the purpose of this policy?

'Concern' in this policy means any reasonable belief that wrongdoing has occurred, is occurring or is likely to occur where its disclosure to S4C is a matter of public interest.

Although not an exhaustive list, wrongdoing can include:

- misconduct, fraud, tax evasion or bribery;
- crimes or illegal acts;
- abuse of authority;
- failure to comply with a legal, compliance or regulatory duty;
- behaviour that has, or is likely to endanger the health and safety or well-being of individuals including bullying, harassment and prejudice;
- behaviour that has damaged, or is likely to damage, the environment;
- hiding information relating to one of the above.

What is not a Concern for the purpose of this policy?

It is not the intention of this policy to allow individuals to:

- report an incident that poses an immediate threat to life or property (the emergency services should be notified);
- make a complaint relating to personal employment matters. You should refer these to the company you work for;
- resolve personal or legal disputes;
- make accusations that you know are false;
- make any complaints or submit comments about S4C programmes.

Who can report a Concern to S4C?



Any apprentices, individuals on work experience, agency workers, contractors, freelancers, content creators, producers, contributors, and anyone else who provides content or services to S4C.

What should I do before sharing a Concern with S4C?

It is not the intention of this policy that you share Concerns with S4C where it would be reasonable and appropriate for you to share them with the company you work for first, particularly where the company is working positively to resolve them.

You should therefore, when it is reasonable to do so, try to share and/or resolve any Concern with your line manager in the company where you work. S4C understands that this is not always possible or appropriate and therefore you should consider any other possible options available, including but not limited to:

- advice from your Human Resources department - is there anyone within the department who would be able to help you with your Concern?
- discuss with another member of staff who is more senior than your line manager or a member of senior management?
- use the whistleblowing procedure of the company you work for.

If any of the alternative options are not appropriate, or if you do not feel comfortable using them, or if you feel that your company has dealt with your complaint inadequately, S4C's Concern Sharing facility provides an additional route for you to try to resolve your Concern.

Principles of Concern Sharing

All Concerns shared through the Concern Sharing facility will be processed in complete confidence. However, if you wish, you can choose not to share your personal details by sharing your Concern anonymously.

S4C will ensure the following in relation to the Concern Sharing facility:

Confidentiality

- Your confidentiality will be respected and the information you share in your Concern will not be seen by anyone other than the selected individuals who have responsibility for investigating your Concern.

Assessment and action

- Your Concern will be processed and investigated as soon as possible. If S4C concludes that it is not possible for S4C to adequately investigate the Concern then it will provide suitable advice and guidance on what steps you can take next.

Anonymity

- Although you can choose to remain anonymous, it must be noted that this may, in some circumstances, limit S4C's ability to investigate your Concerns or (in cases where S4C cannot carry out an investigation) give alternative guidance;
- Nobody who raises a Concern will suffer a disadvantage as a result of the fact that they have shared a Concern, as long as the matter has been raised in good faith.



No revenge

- Appropriate steps will be taken in respect of anyone who deliberately conceals wrongdoing, tries to prevent a person from raising a Concern, or harasses or pursues them for raising a Concern. Such steps may include immediate dismissal in the case of S4C staff, termination of the relevant agreement with S4C, or the matter will be passed on to the appropriate authorities for further investigation.

How can I share a Concern?

If you have tried to go through the first recommended steps, or if those steps are inappropriate or impossible in your case, you can notify S4C of a Concern by sending an email to pryder_concern@s4c.cymru.

You should indicate in your contact that you are doing so under the Concern Sharing policy.

You have the right to do this anonymously if you wish. You will not be disadvantaged if you choose to remain anonymous.

What happens after contacting us?

In the first instance your email will be considered by S4C's Head of Legal.

The Head of Legal can then, if they feel it is reasonably necessary, notify the following individuals:

- Chief Finance Officer if it is a financial concern;
- Chief Operating Officer if it is an executive concern;
- Director of Human Resources if health and safety and/or staff welfare is concerned
- Chief Content Officer; and/or
- Any other senior officer, as appropriate.

After this, the Head of Legal will suggest the next steps, which may include one or more of the following:

- An internal investigation by S4C;
- An investigation by external investigators appointed by S4C;
- Referral to the third party supplier in question to carry out an internal evaluation, including demonstration to S4C:
 - o that they have appropriate systems in place to investigate or that a suitable investigation has been carried out; and
 - o the result of the investigation.
- Referral to external organizations that specialize in providing guidance to complainants who raise specific types of complaints; and or
- Report the matter to the police or a suitable public authority.

You will receive a response and feedback as soon as practicable and no more than 28 working days after the Head of Legal has considered your matter.



If anyone from S4C dealing with your Concern believes that they have already been involved in the matter, or has any conflict or interest in the matter being reported, they will refrain from being involved in your matter. In such cases, S4C will appoint another suitable individual, who will be a senior manager.

Concern Resolution

Once a decision is made about what action(s) should be taken, you will receive feedback on this. You will be informed, as much as possible, about the steps that have been taken. It is possible that we may not be able to report back fully in every case, for example if the matter has been referred to the police.

The results of investigations and/or suggested actions will be regularly reported back to S4C's Audit and Risk Committee, on a confidential basis.

Every effort will be made to respond and deal with your question or Concern promptly, especially when circumstances dictate that time is of the essence.

In the case of issues relating to actions that take place entirely within a third party supplier, where S4C does not have access to documents and records, it is possible that S4C will not be able to carry out an adequate investigation itself. If so, S4C will suggest alternative steps to try to resolve the problem and to deal with your Concern appropriately.

Other helplines available

The Film & TV Charity specializes in providing support to everyone who works behind the scenes in film and television, dealing with a wide range of issues, including bullying and harassment, legal advice and debt. Their helpline number is 0800 054 0000. For more information about the services they provide, visit their [website](#).

Protect (formerly *Public Concern at Work*) provides confidential advice to employees who are unsure whether or how to make a public interest complaint. For whistleblowing advice, call 020 3117 2520. For more information about the services they provide, visit their [website](#).

Acas (*Advisory, Conciliation and Arbitration Service*) is an independent and impartial organization that provides information, advice, training, mediation and other services to employers, employees and workers to help prevent or resolve problems in the workplace. Acas can be contacted free of charge on its confidential helpline: 0300 123 1100. Advice on bullying and harassment can be found on its [website](#).

Other resources available

The **Equality and Human Rights Commissioner** is an independent statutory body with responsibility for encouraging equality and diversity, getting rid of illegal discrimination, and protecting and promoting the human rights of everyone in Britain. You can find a guide on discrimination and human rights on its [website](#).