

## **Diversity, Equality, Equal Opportunity and Inclusion Policy – June 2021**

This policy is available in English and Welsh and is available in large print on request to Human Resources. As required, S4C will also arrange for a braille copy and / or audio version of this policy to be prepared.

### **Introduction**

S4C is committed to promoting and integrating equality of opportunity into all aspects of its work and content and recognizes the importance of attracting, retaining and motivating a diverse workforce that reflects Wales. It encourages an environment where the workforce is valued and all contribute to our goal of providing a diverse and high quality programme service.

As a public body we have a wide range of legal obligations relating to equality, including the Equality Act 2010 and the Equality Act 2010 (Specific Duties) Regulations 2011.

There is a general duty under the Equality Act 2010 (“the Act”) for S4C to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic<sup>1</sup> and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

This general duty is supplemented by specific duties which are noted in the regulations made following the Act. This includes a duty to:

- publish information about how S4C is complying with the general duty; and
- publish specific and measurable objectives that S4C thinks it should achieve in order to promote the objectives of the general duty.

In addition we have specific obligations relating to equality under the Communications Act 2003.

---

<sup>1</sup> The Public Sector General Equality Duty protects nine protected characteristics. These are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It also applies to marriage and civil partnership to the extent that differences need to be removed.

In addition to complying with its statutory obligations, S4C embraces equality and diversity in a broader context, valuing and celebrating the range of individuals' characteristics and experiences, communication styles, languages, educational backgrounds, career or life experiences. S4C strives to ensure that it is an inclusive employer for all and recognises and celebrates what makes everyone unique.

S4C recognises and respects equality and diversity, and how this can affect the values and ethos of the workplace. S4C encourages a culture where all employees are valued and respected. All individuals have distinct talents, and S4C promotes the development of skills so as to optimise each individual's contribution. S4C also aims to ensure that each individual feels an important part of S4C and can take ownership of their role within the organization.

S4C recognises the contribution made by various organisations in raising awareness about equality and diversity in broadcasting, and sharing good practice in employment and production matters. S4C works with broadcast and other organisations - including the CDN - to ensure that it is aware of equality and diversity best practice. S4C also aims to share good practice with the Welsh language production sector to ensure a content and workforce that reflects Wales.

## **Aims**

The aim of this policy is to ensure that in carrying out its activities S4C will:

- promote equality of opportunity across all its activities;
- promote good relations between all its staff;
- eliminate unlawful discrimination;
- create conditions where all staff are treated with equal respect and are not subjected to unfair discrimination in any aspect of work life; and
- encourage individuals from a variety of backgrounds who are under-represented in the sector to work in S4C and in the industry, including people from lower socio-economic backgrounds.<sup>2</sup>

S4C does not allow discrimination on the grounds of sex, gender, race, colour, disability, ethnic background, socioeconomic background, age, family circumstances, marital status or civil partnership, part time or full time workers, religion, political persuasion, sexual orientation, gender reassignment, pregnancy and maternity, use of language (other than where the ability to communicate in Welsh is essential for the post) or other irrelevant distinction and is committed to work with diversity in a positive way.<sup>3</sup>

---

<sup>2</sup> Generally, groups that are under-represented in the sector are people who are disabled, D/deaf and neurodiverse; people from diverse ethnic backgrounds including Black and Asian people; people who are LGBTQ+; and people from lower socio-economic backgrounds.

<sup>3</sup> S4C is aware that terminology and language around social diversity and diverse identities change frequently and therefore any documents using such terminology will be updated periodically to reflect this.

S4C welcomes and encourages applications from groups of people who could be underrepresented. The principles of fair and open competition will apply and appointments will be made on merit.

S4C is also working in partnership with other organizations on plans to share information about the television sector in Wales with these groups to raise awareness of job opportunities.

## **Scope**

This policy applies to all members of staff at S4C as well as anyone working for or on behalf of S4C.

All individuals have a responsibility for the following:-

- supporting and implementing the aims and principles of this policy by accepting that there is equal opportunity for everyone in all aspects of work life and by promoting the principles of inclusion and equal opportunity for all;
- ensuring that all individuals are treated with respect and dignity;
- ensuring that their behaviour and actions do not amount to discrimination, harassment, bullying, micro-aggression or victimisation in any way;
- fostering a culture where compliance with this policy and discussion around inclusion more generally is embedded within the work of S4C; and
- informing Human Resources in the event that they are or become disabled in order that S4C can consider any reasonable adjustments to premises or working arrangements to ensure that the member of staff is not disadvantaged and is able to carry out their duties fully, where reasonably practicable. Such information will be processed only to the extent necessary to satisfy S4C's statutory obligations and will be held and maintained in accordance with its Data Protection Policy.

Human Resources, with input from S4C's Diversity and Inclusion Officer, will be responsible for:-

- ensuring that all staff are aware of this policy;
- ensuring that all procedures relating to staff recruitment, selection, promotion, discipline and grievance are carried out in accordance with the principles of this policy;
- providing advice, guidance and support in relation to the principles of this policy;
- providing training to ensure that the policy is understood and put into practice;
- ensuring that any infringement, or alleged infringement of this policy by staff is treated seriously and in accordance with S4C's Grievance Policy and Procedures; and
- monitoring the effectiveness of the policy on a regular basis.

## General Principles

In order to promote equality of opportunity, S4C recognises the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic which are connected to that characteristic;
- take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- encourage and support persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

In order to promote diversity, equality of opportunity and fairness of treatment, S4C will:-

- foster a culture in which conforming with and promoting this policy is regarded as integral to the work of S4C, that it is adhered to at all times and applied fairly and consistently;
- create an inclusive, respectful working environment that promotes good relations amongst all staff. S4C believes, in particular, in the need to tackle prejudice and promote understanding;
- ensure that its commitment to equality of treatment covers all aspects of employment including recruitment, training opportunities, promotion, social facilities, working conditions and in the management and development of staff;
- ensure that all members of staff are fully aware, understand and embrace the principles outlined in this policy;
- arrange and provide training sessions for S4C staff on matters related to the aims of this policy;
- monitor and review its policies and procedures to ensure they are not discriminatory in their operation;
- monitor and eliminate any discrimination, harassment, victimisation and any other prohibited or unlawful conduct within the workplace;
- communicate its policies to all staff members, and make them available to all job applicants, freelancers, agency workers and third parties working on its behalf;
- ensure job advertisements are accessible to people who are disabled, D/deaf and neurodiverse, and to people from diverse ethnic backgrounds in order to secure diversity in its recruitment procedures;
- ensure that S4C advertises to reach as diverse a candidate pool as possible including people who are disabled, D/deaf and neurodiverse; people who are LGBTQ+; people from diverse ethnic backgrounds and people from lower socio-economic backgrounds;
- ensure that a procedure for resolving complaints of discrimination is in place and communicated to those who may need to use it;
- review its commitments and what has been achieved, plan ways of improving them and let staff know about progress and future plans;
- identify those posts where the ability to speak Welsh is essential or desirable and state the requirements in job advertisements;

- ensure that all persons responsible for staff appointments in S4C are able to assess the need for fluency in Welsh before appointing to any post in S4C;
- provide Welsh lessons and courses as required for staff who wish to learn or improve their Welsh; and
- take account of the recommendations in Ofcom's toolkit for broadcasters in relation to employment and training and report to Ofcom at least annually on our arrangements for promoting, in relation to employment, equality of opportunity and on the operation and effectiveness of such arrangements.

With regard to disabled people S4C will:-

- interview all applicants with a disability who meet the minimum criteria for a vacancy and consider them on the basis of their abilities;
- make every effort when an employee becomes disabled to make sure they stay in employment and are able to carry out their duties fully;
- ensure there is a mechanism in place to discuss, at any time, with disabled employees, what S4C and they can do to make sure they develop and use their abilities;
- take action to ensure that all employees develop the appropriate level of disability awareness needed to meet the commitments set out in this Policy;
- make reasonable adjustments to premises or to working arrangements where they put disabled employees at a disadvantage;
- ensure that, as far as is reasonably practical, but at least in accordance with legal requirements, S4C's buildings and facilities are accessible; and
- ensure that external training venues have disabled facilities (where they are needed) as well as induction loops etc.

The Equality Act (2010) prohibits unjustifiable direct and indirect discrimination on the basis of age, and prohibits harassment and victimisation of individuals of any age, whether young or old. The Act protects employees and other workers, apart from those who are self-employed.

S4C will report annually to Ofcom on its performance in relation to disability and equality of opportunity.

S4C will publish information about how S4C is complying with the general duty under the Equality Act 2010 and will set out objectives that should be achieved in order to promote the general duty.

## **For S4C Programmes and Content**

The Equality Act 2010 does not place obligations on S4C in relation to its content service. However, S4C will work with producers to promote a positive image of equality and diversity on screen across as wide a range as possible of S4C's programmes and content.

S4C will ensure that the content it commissions reflects the community and viewers it serves. S4C will establish a framework to monitor its content and takes steps to improve if that content is not representative.

S4C will work with its partners in the production sector so as to ensure that their own activities, both as content producers and as employers, are consistent with S4C's policy. S4C Commissioners will highlight this in their regular meetings with the sector.

S4C will encourage the sector to adopt good practice guidelines, and will ensure that all relevant information is made available on the S4C production website ([www.s4c.cymru/production](http://www.s4c.cymru/production)). S4C will also work with TAC to provide inclusion and representation training for the sector.

## **S4C Viewers and Users**

S4C is committed to providing access ([http://www.s4c.cymru/e\\_access.shtml](http://www.s4c.cymru/e_access.shtml)) and support services in relation to its programmes and content. This extends to the Viewers' hotline service, Welsh learners' services ([www.s4c.cymru/learners](http://www.s4c.cymru/learners)), programme support material ([www.s4c.cymru/cymorth](http://www.s4c.cymru/cymorth)) and information for its viewers and users.

S4C will ensure that it raises awareness about the importance attributed to and the activities carried out in the area of equality and diversity, and incorporates equality and diversity in all S4C's communication activities.

S4C will ensure that its services reflect and adapt to the requirements of its viewers and users. S4C will continue to work with and support partner organisations in ensuring and promoting equality, diversity and inclusion.

## **Review**

S4C will review this policy from time to time in order to ensure its effectiveness.

Any comments or questions relating to this policy, or its operation, should be directed in the first place to S4C's Diversity and Inclusion Officer ([amrywiaeth@s4c.cymru](mailto:amrywiaeth@s4c.cymru)).