

Social Media Policy

Updated February 2024

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Note: Individual (as opposed to corporate) users of social media are directed in particular, and in the first instance, to section 11.

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 continue to develop its social media platforms in order that they are 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 content, brands and accounts ("S4C Assets").
- 1.4 Social media as referred to in this policy means all social media platforms, such as X (previously Twitter), Facebook, Instagram, YouTube, TikTok, blogs, vlogs, podcasts 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 and talent ("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 Digital Content Editor (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, <u>http://www.s4c.cymru/en/production/page/1154/guidelines/</u> ("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 and Assets should support S4C in: i) promoting S4C content, (ii) appealing to a wide channel audience, iii) strengthening S4C's relationship with its audience, and iv) increasing viewing and engagement figures. S4C wants to continue 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 audienceby having them spread over a large collection of Social Media accounts. By focusing ona 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 content 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 content 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 viathat 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 Digital Content Editor at the outset of the project/content / S4C Programme commissioning process.
- 4.2 Once the intended use has been discussed and agreed with the S4C Commissioner and the Digital Content Editor, 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 Digital Content Editor 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 Digital Content Editor.

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 arelaws 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 Digital Content Editor 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 and sub-brands

The S4C brand and sub-brands are important and valuable assets to S4C and ones which S4C is proud and protective of. When using Social Media, Producers agree not to do anything which might damage the S4C brands 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 brands and logo without obtaining S4C's prior written approval. Anyauthorised 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 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 S4C content, particularly when the target audience of that content 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 or comments (whether on social media or otherwise) regarding S4C or its content 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 Digital Content Editor and if that individual is not available, Producers must notify the S4C's Viewer'sHotline. Producers should ensure that they are familiar with S4C's Complaints Process: https://www.s4c.cymru/en/contact-us/page/17088/how-to-complain-to-s4c/.

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 or Assets should be engaging, timely and interesting (as far as possible), of a high picture quality and linguistically appropriate (in accordance with S4C's Language guidelines). 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 should be adhered to in appointing content to be included on its Social Media platforms. Specifically, but without limitation, 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 and wellbeing, privacy, harm and offence and the protection of under 18s. We refer to our <u>Compliance Guidelines</u> and our <u>Contributor Welfare Guidelines</u> in this regard.

6.1.3 Language

All content posted to Social Media platforms must adhere to S4C's Language Guidelines and the language, tone and nature of the Social Media campaign agreed with the S4C Programme Commissioner and Digital Content Editor.

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 (or 'retweet' as it was previously known) 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. S4C has a blanket licence covering specific use of commercial music by Welsh publishers on social media (contact S4C's legal department or PRS for Music for more information). Commercial music other than music by Welsh publishers will require specificnegotiation 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.

Under S4C's blanket licence, commercial music by Welsh publishers may only be made available in the UK. When publishing any other 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 andnotify 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. Producers should not post any commercial promotions on Social Media without having obtained prior authorisation from the S4C Digital Content Editor.

Producers may not enter into sponsorship arrangements with any third party in connection with Social Media platforms associated with S4C and/or S4C content 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 content unless Producers have the prior writtenconsent 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 CompetitionGuidelinesontheS4CWebsitehttp://www.s4c.cymru/media/media assets/2017.02.13Guidelines for Interacting orCompeting on S4C programmes .pdffor more information regarding prizepromotions.

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 higher duty of due impartiality under Section 6 of the OFCOM Code. During this period, when using Social Media in association with S4C/S4C content, 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.

During election periods, Faces and Editorial Persons (as defined in the S4C Programme Compliance Guidelines) should not compromise S4C's impartiality or integrity by expressing opinions on politicalissues 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 S4C Assets:

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 on- going 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 re- posting the defamatory comment could still be liable in the event of legal action.

6.7.4 Discrimination

Producers should not make any offensive statements which discriminate on the grounds of any of the protected characteristics set out in the Equality Act 2010, being age, sexual orientation, disability, religion or belief, race, culture, gender reassignment, pregnancy and maternity..

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 touse these platforms. Any material posted in relation to children's content 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/ S4C content, 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 anyother content which we deem to be inappropriate."
- 7.4 It shall be S4C's decision, in consultation with the Producer, whether to take down any content or not.

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 Designated Person, being .Elin Morris (Chief Operating Officer) or, in her absence, Iestyn Morris (Head of Legal).

9. Security

- 9.1 Producers must keep logs of all Social Media accounts which are linked to S4C Assets but are independent of S4C's Social media accounts and which have access to those accounts. This will be discussed with Producers when agreeing the Social Media campaign structure with S4C's Digital Content Editor.
- 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 S4C Assets have been hacked or have been accessed without authorisation, Producers must immediately take all reasonable steps to secure the Social Media accounts, remove any offensive material published and inform S4C's Digital Content Editor. Whilst discussing the structure of your Social Media campaign with S4C's Digital Content Editor, 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 which are linked to S4C Assets but independent 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 Digital Content Editor, 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 Assets, 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 Digital Content Editor 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 S4C does not seek to restrict personal use of social media sites by those who are working on S4C content. However, when making use of Social Media sites whether in a professional or personal/social capacity, individuals working on S4C content are expected to refrain from making statements that are, or could be, detrimental to the public image of S4C, its content or its services. It is important to avoid any perception that S4C's editorial decisions are influenced by personal prejudices or beliefs. Maintaining impartiality (both actual and perceived) in our editorial decisions is essential in order to serve and maintain the trust of our audience, whatever their political beliefs are. This is particularly relevant to the Faces of the channel (see below).
- 11.2 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 content and/or services with which they are involved on behalf of S4C.
 - The individual should comply with the requirements of this policy in its entirety,

including but without limitation the requirements in clauses 11.3 and 11.4 below.

11.3 <u>Requirements applicable to all individuals</u>

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 which bully or harass, discriminate on the grounds of a protected characterstic, and/or are offensive or indecent.
- 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 content, whether for S4C or their own purposes. The individual should also not infringe upon a person's privacy.
- The individual should not breach any third party copyright for example whencopying 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 a hateful and/or aggressive manner towards individuals particularly when discussing S4C content and/or activities. The individual should respond in a calm and fair way.
- The individual should not promote or give undue prominence to commercial goods or services.
- The individual should consult S4C before responding to any complaint about S4C or a S4C programme or content or service.
- If the individual has 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 publish, they should not publish it.

11.4 <u>Additional requirements applicable to Faces and Editorial Persons working on</u> <u>news or current affairs content</u>

11.4.1 When using personal accounts, a Face¹ or Editorial Person² who is contracted to work on **S4C news or current affairs content** (which, for the avoidance of doubt, includes *Ffermio*) will need to behave impartially and accurately as though the requirements in section 5 (due impartiality and accuracy) and 6 (elections and referenda) of the Ofcom code were applicable to social media and to them as individuals.

11.5 Additional requirements applicable to Faces working on S4C's Listed Series

¹ As defined in S4C's guidance on *Programme Compliance, Conflicts of Interest and Political Interests* (*May 2017, as revised from time to time*), namely "a presenter, reporter or interviewer on S4C or a regular commentator on S4C (including a Main Face)", where the meaning of Main Face is "a person who appears regularly on S4C, or over one or more of S4C's series, in a prominent role". Actors are not Faces for the purposes of this policy.

² Ibid, "a producer, editor or other senior person with influence over the content of a programme on *S4C"*.

11.5.1 When using personal accounts, a Face or Editorial Person contracted to work on one or more of S4C's Listed Series³ must behave impartially and accurately as though the requirements in setion 5 (due impartiality and accuracy) and 6 (elections and reference) of the Ofcome code were applicable to social media and to them as individuals in the following circumstances:

- (a) If there is a link between that which is being posted and the content being presented by the individual (e.g. there is a protest at an Eisteddfod from which a Face is presenting. Off air, but still on the Eisteddfod field, a picture is taken of the presenter wearing a t-shirt containing the logo or slogan of the protest group. The presenter posts the picture on soial media); or
- (b) If during an election period and that which is being posted relates to matters of political or industrial controversy, or matters relating to current policy, except where S4C has agreed otherwise in writing in advance.

11.5.2. Otherwise, Faces and Editorial Persons working on S4C's Listed Series may share an opinion on matters that are important to them, including on issues that are a matter of public or political debate, provided that they must **not**:

- (a) publicly support or criticise a political party;
- (b) publicly criticise a UK politician's character;
- (c) take an official role in a campaign group or be involved in raising money for political campaigns.

12 S4C Content – Using and Referencing Social Media

General

- 12.1 Producers must always seek S4C's approval before referring to Social Media linked to S4C Assets 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 whether 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.

³ the content listed by S4C in Appendix 2 to this policy (as amended from time to time)

- 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.
- 12.9 In addition to the Broadcasting Code, S4C's guidelines on undue prominence must also be complied with. These refer to prominence for political parties, issues and views (whether contentious or not) and charities.

Programme related material (PRM)

- 12.10 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.
- 12.11 "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.
- 12.12 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.
- 12.13 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.
- 12.14 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.

- 12.15 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.
- 12.16 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 Digital Content Editor* Heledd Williams <u>Heledd.williams@s4c.cymru</u> 07881 344299.

APPENDIX 1

SOCIAL MEDIA REPORTING FORM

(See overleaf)

Social Media Reporting Form

This social media reporting form works alongside our `S4C Child Protection Policy' (<u>http://www.s4c.co.uk/media/media assets/2018 S4C-Child-Protection-Policy.pdf</u>) whereby the following procedure should be taken:

STEP ONE	Make the S4C Designated Person (Elin Morris on 03305 880402) 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	

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	
S Т	EPS TAKEN Since becoming aware of the situation, what steps have you taken	
	NTACT	

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

Appendix 2

S4C's Listed Series

Cefn Gwlad Cyw Dechrau Canu, Dechrau Canmol Eisteddfod Genedlaethol yr Urdd Heno Pnawn Da Stwnsh Tywydd Yr Eisteddfod Genedlaethol Y Sioe Frenhinol Yr Wyl Cerdd Dant