

Diversity, Equality and Equal Opportunities Policy – July 2018

Introduction

S4C is committed to promoting and integrating equality of opportunity within all aspects of its business and recognises the benefits of attracting, retaining and motivating a diverse workforce. It encourages an environment where the entire workforce is valued and contributes to its mission to provide a high quality and varied 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 characteristic¹ 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.

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 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 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.

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;

¹ Section 149 of the Act refers to 8 protected characteristics being age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation.

- create conditions where all staff are treated with equal respect and are not subjected to unfair discrimination in any aspect of work life.

S4C does not allow discrimination on the grounds of sex, race, colour, disability, ethnic or socio-economic 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. 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.

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 or victimisation in any way;
- fostering a culture where compliance with this policy is embedded within the work of S4C;
- 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 his/her 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 will be responsible for the following:-

- 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 report of infringement of this policy by staff is treated seriously and in accordance with S4C's Grievance Policy and Procedures;
- 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 that 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;
- encourage 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;
- monitor and review its policies and procedures to ensure they are not discriminatory in their operation;
- monitor and eliminate any unlawful discrimination, harassment, victimisation and any other prohibited conduct within the workplace;
- communicate its policies to all job applicants, staff, freelancers, agency workers and third parties working on its behalf;
- ensure job advertisements are accessible to disabled people and ethnic minority groups in order to secure diversity in its recruitment procedures;
- 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;
- 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, the equalisation of opportunities 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 employees with a disability 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 to all employees and others who work within the organisation;
- 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 that it serves, and will establish a framework to monitor its content.

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 feature 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).

S4C Viewers and Users

S4C is committed to providing access (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), programme support material (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 and diversity.

Review

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

This policy is available in Welsh and in English and a copy in large print can be provided on application to Human Resources. When required, S4C will also arrange for the preparation of a braille copy and/or audio version of this policy.

Any comments or questions relating to this policy, or its operation, should be directed in the first place to S4C's Human Resources Department.