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**S4C'S DISABILITY EQUALITY SCHEME**  
January 2010

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## **PART 1 - INTRODUCTION**

### **1. Key Principles**

1.1 *S4C is committed as an employer and in the provision of goods, facilities and services to fulfilling its obligations under the Disability Discrimination Act and Communications Act. S4C believes that, as a public service broadcaster, it has a role to play in promoting diversity, equal opportunities and fair treatment. Although the provision of S4C's content service is not within the scope of the legislation, S4C is committed to promoting and integrating these principles throughout its business and, since it was established, S4C has provided a television service that reflects the diversity of the community it serves.*

*S4C has recently announced a positive campaign to raise awareness of and promote the full range of diversity in its content and access services and to promote and celebrate diversity both on and off screen. S4C will work together with its partners in the production sector in order to ensure that their own activities, both as content producers and as employers, are consistent with S4C's aspirations.*

1.2 *This scheme sets out S4C's obligations under the Disability Discrimination Act and Communications Act and how it intends to fulfil those obligations and the commitments which S4C has adopted in order to promote and maintain equality of opportunity for disabled people in everything which S4C does. In so doing S4C intends to meet the expectations of its employees, viewers, suppliers and the regulatory authorities.*

1.3 *Part 1 of this scheme introduces the key principles and the relevant legislation. Part 2 relates to S4C's commitment as an employer. Part 3 relates to S4C's commitment as a provider of services, goods and/or facilities. Part 4 relates to the obligations of S4C's employees. Part 5 relates to the arrangements for the review and publication of this scheme and S4C's related commitments. Part 6 of this scheme sets out how S4C will consult with disabled persons in relation to its duties and activities. Annexure 1 clarifies the meaning of disability. Annexure 2 contains a review of S4C's performance over the last 3 years in implementing the Disability Equality Scheme which it published in November 2006. Annexure 3 contains specific actions for the next 3 years. A separate Action Plan is also published annually.*

1.4 *This scheme covers the period from 4 December 2009 to 3 December 2012.*

### **RELEVANT LEGISLATION**

1.5 **The Disability Discrimination Act 1995 and the Disability Discrimination Act 2005** (an Act to amend the Disability Discrimination Act 1995; and for connected purposes) (**"Disability Discrimination Act"**)

1.5.1 The Disability Discrimination Act makes discrimination on the grounds of disability unlawful in most circumstances. S4C has a duty in two key areas:

- employment; and
- the provision of goods, facilities and services.

1.5.2 The Disability Discrimination Act defines a disabled person as "*someone who has a physical or mental impairment which has a substantial or long term adverse effect on his/her ability to carry out day-to-day activities*". Further guidance on the meaning of disability is set out in the document entitled "Appendix: The Meaning of Disability" appended to the Code of Practice on Rights of Access Goods, Facilities, Services and Premises issued by the Disability Rights Commission.

1.5.3 In relation to the disability equality duty included in the Disability Discrimination Act S4C must publish a Disability Equality Scheme and when carrying out its functions have due regard to the need to:

- promote equality of opportunity between disabled people and other people;
- eliminate discrimination that is unlawful under the Disability Discrimination Act;
- eliminate harassment of disabled people that is related to their disability;
- promote positive attitudes towards disabled people;
- encourage participation by disabled people in public life; and
- take steps to meet disabled people's needs, even if this requires more favourable treatment.

'Due regard' means that authorities should give due weight to the need to promote disability equality in proportion to its relevance.

- 1.5.4 The consequences of non-compliance apply to both S4C and its employees. A breach of the Disability Discrimination Act is actionable as a tort and damages may be awarded and may include compensation for injury to feelings. Failure to publish and implement a Disability Equality Scheme may also lead to legal action against S4C.

## 1.6 The Communications Act 2003 ("Communications Act")

The Communications Act provides that in relation to disability discrimination the S4C Authority has a duty:

- 1.6.1 To observe the code for the time being in force drawn up by Ofcom relating to television services for persons with hearing or visual or dual sensory impairments. (The code currently in force is the Code on Television Access Services.);
- 1.6.2 (After consultation with Ofcom, and more recently, the Broadcast Training and Skills Regulator) to make suitable arrangements for promoting, in relation to employment, the equalisation of opportunities for disabled people; and
- 1.6.3 (After consultation with Ofcom and more recently, the Broadcast Training and Skills Regulator) to publicise, review and (at least annually) publish its observations on the current operation and effectiveness of such arrangements.

## **PART 2 – S4C'S COMMITMENT AS AN EMPLOYER**

### **2. Key Principles**

- 2.1 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 aims to adopt policies and practices that will maximise the abilities, skills and experience of all its staff. It encourages a culture where all employees are valued and contribute to S4C's mission to provide a high quality and varied programme service.
- 2.2 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.
- 2.3 S4C does not tolerate unfair discrimination on the grounds of disability, gender, race, colour, ethnic or socio-economic background, age, family circumstances, marital status, part time or full time workers, religion, political persuasion, sexual orientation, use of language or other irrelevant distinction and is committed to work with diversity in a positive way. S4C welcomes and encourages applications from groups if underrepresented including people with disabilities. The principles of fair and open competition will apply and appointments will be made on merit.

### **Recruitment and Employment**

- 2.4 S4C will:-
- 2.4.1 interview all applicants with a disability who meet the minimum criteria for a vacancy and consider them on abilities;
- 2.4.2 make every effort when an employee becomes disabled to make sure they stay in employment and are able to carry out their duties fully;
- 2.4.3 ensure there is a mechanism in place to discuss, at any time, but at least once a year, with disabled employees, what S4C and they can do to make sure they develop and use their abilities;
- 2.4.4 take action to ensure that all employees develop the appropriate level of disability awareness needed to meet the commitments set out in this scheme;
- 2.4.5 make reasonable adjustments to premises or to working arrangements where they put employees with a disability at a disadvantage;
- 2.4.6 ensure that, as far as is reasonably practical, and as a minimum to comply with legal requirements, S4C's buildings and facilities are accessible to all employees and others who work within the organisation;
- 2.4.7 ensure that external training venues have disabled facilities (where they are needed) as well as induction loops, etc;
- 2.4.8 remain committed to achieving the two tick disability symbol which is awarded by the Employment Service on an annual basis to employers who actively encourage the employment of disabled people.

## Training

- 2.5 S4C recognises the need for this scheme to be understood and put into practice on a daily basis by staff. Diversity and equality will therefore be a central element of the training provided to all members of staff. Additionally, staff may seek advice and guidance from S4C's Human Resources team.
- 2.6 S4C will provide the following information and training to staff:-
  - 2.6.1 diversity and equality training for all staff;
  - 2.6.2 job specific disability awareness related training for Human Resources staff and other relevant staff;
  - 2.6.3 training in effective recruitment and selection for appointing managers;
  - 2.6.4 disability training for new staff included in the induction programme;
  - 2.6.5 training/work experience placement opportunities.

## **PART 3 – S4C’S COMMITMENT AS A SERVICE PROVIDER**

### **3.1 The Provision of Goods and/or Facilities**

The provision of services includes the provision of goods or facilities. This includes provision in the UK of services to the public, or to a section of the public.

### **3.2 No Discrimination**

3.2.1 S4C will not discriminate against a disabled person by treating him/her less favourably, for a reason relating to his/her disability, than S4C treats others, where the treatment cannot be shown to be justified.<sup>1</sup>

3.2.2 Examples of discrimination could include refusing to provide any service to a disabled person which is usually provided to members of the public, providing a lower standard of service to a disabled person or offering a service on worse terms than those offered to other people.

### **3.3 Reasonable Adjustments**

3.3.1 S4C will make reasonable adjustments to enable disabled people to use its services where failure to do so would be unjustified. This duty includes considering the following:

- (i) Changing practices, policies and procedures;
- (ii) Providing auxiliary aids and services;
- (iii) Overcoming a physical feature which makes it impossible or unreasonably difficult for a disabled person to make use of S4C’s services by removing, altering or avoiding it or by providing services by alternative means.

3.3.2 Broadly, consideration of whether an adjustment is reasonable would include an assessment of the following:

- (i) The effectiveness of the adjustment;
- (ii) The cost and availability of resources and any unreasonable disruption it might cause.

3.3.3 In each year S4C will prepare the Action Plan setting out its commitments for the year ahead. In each year S4C will provide an equal opportunities report to Ofcom.

3.4 The Ofcom Code on Television Access Services applies to S4C. S4C regularly reports to Ofcom and the S4C Authority on success and compliance with the code. Going forward S4C will report to Ofcom’s co-regulator for equal opportunities, the Broadcast Training and Skills Regulator (BTSR). S4C will include further targets on access to its services by disabled persons in its Corporate Plan and in the Action Plan. In particular, S4C is committed to achieving the annual targets set by Ofcom for the provision of subtitling, signing and audio description in its television services.

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<sup>1</sup> Less favourable treatment will only be justified under the Disability Discrimination Act where certain limited conditions are satisfied and advice should be sought from the Legal Team in all circumstances where it is believed less favourable treatment may be justified prior to taking or failing to take any action.

## **PART 4 - OBLIGATIONS OF EMPLOYEES**

### **4.1 Awareness of this Scheme**

S4C will ensure that all of its employees are trained about and are aware of this scheme and S4C's Diversity and Equality Policy. Staff should support this scheme and accept that there is equal opportunity for everyone in all aspects of work life and should promote the principles of inclusion and equal opportunity for all of S4C's viewers and everyone to whom S4C supplies services. Staff should not be party to situations that could lead to unjustified discrimination or harassment. All staff will have to demonstrate that they have read and understood this scheme.

### **4.2 Operate in accordance with this Scheme**

All employees have a responsibility for ensuring that the principles of inclusion and of equality of opportunity are upheld and for the implementation of best equality practices. Any infringement or report of infringement of this scheme or the Diversity and Equality Policy by any member of staff will be treated seriously and in accordance with the S4C Disciplinary and Grievance Procedures.

### **4.3 Inform Human Resources of Disability**

All employees are requested to inform S4C's Head of Human Resources in the event that they are or become disabled in order that S4C can ensure that it meets its obligations, including where appropriate the obligation to make reasonable adjustments to premises or working arrangements to ensure that such employees are not disadvantaged.

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.

### **4.4 Dealing with the Public**

All members of staff who deal with the public or are involved in any way in the provision of services to the public are expected to:

- treat disabled people fairly, with respect and not less favourably than other members of the public unless different treatment can be justified on health and safety grounds or is otherwise justifiable;
- consider in respect of the provision of services the accessibility of those services to the public and the reasonable adjustments which might be made to make such services more accessible, consulting with disability interest groups/organisations where relevant, and promoting awareness of the availability of the television access services to potential users;
- consider and where appropriate refer and/or action any requests by disabled people for any reasonable adjustment to be made e.g. for information to be provided in a particular format or presented in a particular way or for help in completing a complaints form.

## **PART 5 - PUBLICATION, REVIEW AND REPORTING**

### **5.1 Publication**

S4C will publish a Disability Equality Scheme every 3 years. S4C will publish an Action Plan in relation to Disability Equality annually. In addition S4C's commitments and targets in relation to its programme services (as set out in the Code on Television Access Services) will be published in S4C's annual Programme Policy Statement. Further commitments will be published in S4C's Corporate Plan.

The S4C Authority will publish the findings of its review on the progress made in fulfilling the commitments and achieving the targets in relation to S4C's programme service in its annual review of the Programme Policy Statement for the preceding year and in the quarterly updates published on-line in relation to S4C's Corporate Plan and in relation to this Disability Equality Scheme in the S4C Annual Report (which is laid before Parliament).

### **5.2 Review**

The S4C Authority will conduct an annual review which will measure the impact of S4C's activities on disability equality and which will follow consultation with stakeholders and viewers and information about S4C's performance. The S4C Authority will make recommendations where appropriate for improving performance. S4C will set out in its annual Action Plan the arrangements in any particular year for gathering information but the review by the S4C Authority will include:

5.2.1 An annual review of this Disability Equality Scheme. This review will be assessed by the Personnel and Remuneration Committee of the S4C Authority and contain details on:

- Impact of the Action Plan for the preceding year.
- **Recruitment practices** to ensure that job opportunities are accessible to disabled people (e.g. advertising, selection and assessment procedures).
- **Equal opportunity information** from existing and new employees. The purpose of this is to ensure that S4C monitors numbers of employees with a disability and ensure that those employees with a disability are adequately supported and to assess and put in place any reasonable adjustments.
- **Result of Internal Audit** by independent auditors of all policies and practices to ensure that they are fully inclusive.
- The steps taken to involve disabled people in the development of the Scheme and the result of information gathering and use of such information.
- The effectiveness of the operation of S4C's Action Plan in the preceding year and recommendations for subsequent plans and schemes.

5.2.2 Regularly review progress in meeting the commitments and targets set out in the Disability Equality Scheme (and its Annual Action Plan), the annual Programme Policy Statement and in the Corporate Plan and publish the results of its review as stated at 5.1. above.

5.2.3 In addition to the annual review the S4C Authority will undertake a detailed review of the Disability Equality Scheme and publish a new Disability Equality Scheme every 3 years.

5.2.4 In accordance with 5.2.3 above, the S4C Authority has undertaken a detailed review of the Disability Equality Scheme published in December 2006 (as revised in November 2008). The main findings of its review are set out in Annexure 2.

5.2.5 The findings of the reviews referred to in 5.2 will be taken into account in the Action Plans for the next three years. In particular, those Action Plans will include the specific actions listed in Annexure 3.

## 5.3 Reporting

S4C will report to Ofcom or the BTR (as required) at least annually on its arrangements for promoting, in relation to employment, the equalisation of opportunities for disabled people and on the operation and effectiveness of such arrangements.

The Executive will report to the S4C Authority every quarter and annually on compliance with the targets set in the Action Plan and the Corporate Plan in relation to this scheme.

The S4C Authority will publish within its Annual Report (which is laid before Parliament) the result of the review, setting out the matters noted at 5.2 above, and any other relevant matters.

## 5.4 Versions of Scheme

This scheme is available in Welsh and English and a copy in large print is accessible on-line or can be provided on request. S4C will, on request, arrange for a braille copy and/or audio version of this scheme to be prepared.

## 5.5 This Disability Equality Scheme is approved by the S4C Authority.

## **PART 6 - CONSULTATION**

In each year S4C will look at the extent to which this Scheme, the Action Plan and the services S4C provides take account of the needs of disabled people. To enable S4C to fulfil these duties, it will consult with stakeholders and persons representing the needs and views of disabled persons to gather evidence about the extent to which S4C's services meet the needs of, and how best to maximise the benefits to, disabled people. These consultations and other reviews and impact assessments will feed into the annual review of the S4C Authority.

In preparing this scheme S4C took account of the information provided to it by the Employment Service in relation to equality of employment of disabled persons and to the guidance issued by Ofcom in their toolkit for broadcasters and in their Code on Television Access Services. S4C's Access Services team is in regular contact with disabled groups in relation to their views on S4C's access services. S4C welcomes the views of persons with disability and encourages as wide a cross-section of people as possible to attend and participate in its regular public meetings with viewers.

## **ANNEXURE 1**

### **THE MEANING OF DISABILITY (AS APPENDED TO THE CODE OF PRACTICE ON RIGHTS OF ACCESS GOODS, FACILITIES, SERVICES AND PREMISES ISSUED BY THE DISABILITY RIGHTS COMMISSION WITH A COMMENCEMENT DATE OF MAY 27 2002)**

#### **The meaning of disability**

This Appendix is included to aid understanding about who is covered by the Disability Discrimination Act. A Government publication 'Guidance on matters to be taken into account in determining questions relating to the definition of disability' is also available.

#### **When is a person disabled?**

A person has a disability if he/she has a physical or mental impairment, which has a substantial and long-term adverse effect on his/her ability to carry out normal day-to-day activities.

#### **What about people who have recovered from a disability?**

People who have had a disability within the definition are protected from discrimination even if they have since recovered. (Though those with past disabilities are not covered by the provisions relating to improvements to dwelling houses detailed in Chapters 18 and 19).

#### **What does 'impairment' cover?**

It covers physical or mental impairments; this includes sensory impairments, such as those affecting sight or hearing.

#### **Are all mental impairments covered?**

The term 'mental impairment' is intended to cover a wide range of impairments relating to mental functioning, including what are often known as learning disabilities.

#### **What is a 'substantial' adverse effect?**

A substantial adverse effect is something which is more than minor or trivial. The requirement that an effect must be substantial reflects the general understanding of disability as a limitation going beyond the normal differences in ability which might exist among people.

#### **What is a 'long-term' effect?**

A long-term effect of an impairment is one:

- which has lasted at least 12 months;
- where the total period for which it lasts is likely to be at least 12 months; or
- which is likely to last for the rest of the life of the person affected.

Effects which are not long-term would therefore include loss of mobility due to a broken limb which is likely to heal within 12 months and the effects of temporary infections, from which a person would be likely to recover within 12 months.

#### **What if the effects come and go over a period of time?**

If impairment has had a substantial adverse effect on normal day-to-day activities but that effect ceases, the substantial effect is treated as continuing if it is likely to recur; that is if it is more probable than not that the effect will recur.

## **What are 'normal day-to-day activities'?**

They are activities which are carried out by most people on a fairly regular and frequent basis. The term is not intended to include activities which are normal only for a particular person or group of people.

However, someone who is affected in such a specialised way but is also affected in normal day-to-day activities would be covered by this part of the definition. The test of whether impairment affects normal day-to-day activities is whether it affects one of the broad categories of capacity listed in Schedule 1 to the Disability Discrimination Act. They are:

- mobility;
- manual dexterity;
- physical co-ordination;
- continence;
- ability to lift, carry or otherwise move everyday objects;
- speech, hearing or eyesight;
- memory or ability to concentrate, learn or understand; or
- perception of the risk of physical danger.

## **What about treatment?**

Someone with impairment may be receiving medical or other treatment which alleviates or removes the effects (though not the impairment). In such cases, the treatment is ignored and the impairment is taken to have the effect it would have had without such treatment. This does not apply if substantial adverse effects are not likely to recur even if the treatment stops (i.e. the impairment has been cured).

## **Does this include people who wear spectacles?**

No. The sole exception to the rule about ignoring the effects of treatment is the wearing of spectacles or contact lenses. In this case, the effect while the person is wearing spectacles or contact lenses should be considered.

## **Are people who have disfigurements covered?**

People with severe disfigurements are covered by the Act. They do not need to demonstrate that the impairment has a substantial adverse effect on their ability to carry out normal day-to-day activities.

## **Are there any other people who are automatically treated as disabled under the Act?**

Anyone who has HIV, cancer or multiple sclerosis is automatically treated as disabled under the Act. In addition, people who are registered as blind or partially sighted, or who are certified as being blind or partially sighted by a consultant ophthalmologist, are automatically treated under the Act as being disabled. People who are not registered or certified as blind or partially sighted will be covered by the Act if they can establish that they meet the Act's definition of disability.

## **What about people who know their condition is going to get worse over time?**

Progressive conditions are conditions which are likely to change and develop over time. Where a person has a progressive condition he will be covered by the Act from the moment the condition leads to an impairment which has some effect on ability to carry out normal day-to-day activities, even though not a substantial effect, if that impairment is likely eventually to have a substantial adverse effect on such ability.

## **Are people with genetic conditions covered?**

If a genetic condition has no effect on the ability to carry out normal day-to-day activities, the person is not covered. Diagnosis does not in itself bring someone within the definition. If the condition is progressive, then the rule about progressive conditions applies.

## **Are any conditions specifically excluded from the coverage of the Act?**

Yes. Certain conditions are to be regarded as not amounting to impairments for the purposes of the Act. These are:

- addiction to any substance;
- seasonal allergic rhinitis (e.g. hay fever), except where it aggravates the effect of another condition;
- tendency to set fires;
- tendency to steal;
- tendency to physical or sexual abuse of other persons;
- exhibitionism;
- voyeurism.

Also, disfigurements which consist of a tattoo (which has not been removed), non-medical body piercing, or something attached through such piercing, are to be treated as not having a substantial adverse effect on the person's ability to carry out normal day-to-day activities.

## **ANNEXURE 2**

### **THREE-YEAR REVIEW OF EFFECTIVENESS OF S4C'S DISABILITY EQUALITY SCHEME PUBLISHED IN DECEMBER 2006 (AS REVISED IN NOVEMBER 2008)**

The S4C Authority has reviewed the implementation and effectiveness of S4C's Disability Equality Scheme published in December 2006 (as revised in November 2008) for the period from November 2006 to November 2009. This Annexure contains a summary of the main findings of the S4C Authority.

#### **1. Programmes**

The S4C Authority considered an independent review which it commissioned from the Thomson Foundation and Monitoring and Research Unit of the University of Aberystwyth on the portrayal of disabled persons on screen in S4C's commissioned programmes.

The S4C Authority also considered the quarterly and annual reports which it received from management on the fulfilment of the annual Action Plan to implement the 2006 Scheme.

The S4C Authority has concluded that, over the 3 year period, S4C has commissioned numerous programmes which promoted a positive image of persons with disability on screen. These included factual, sports, children's, news and drama programmes.

Where a concern arose regarding the nature of the portrayal of a disability in a particular series, S4C decided that the portrayal did not conform with S4C's desire to promote a positive image of people with disability on-screen. As a result, some scenes were edited before transmission.

#### **2. Working with other organisations**

In January 2008, S4C became a member of the Employers Forum on Disability a body which aims to help its members achieve disability confidence, in order to gain understanding of disability in the workforce and best practice. By doing so S4C become a member of BCIDN (Broadcasting and Creative Industries Disability Network). Membership of BCIDN has also allowed an useful insight into disability issues tackled by other broadcasters and production companies, especially in the Spark Events workshops.

S4C also collaborates with the organisation Access to Work to gain a better understanding of disabled persons' requirements.

#### **3. Access Services**

S4C's targets for access services were increased over the 3 year period and exceeded the targets set by Ofcom (which appear in brackets below).

<b>Access Service</b>	<b>Subtitling</b>	<b>Audio Description</b>	<b>Signing</b>
2007	76.3% (71%)	8.3% (8%)	2.03% (2%)
2008	86.2 (73%)	10.85% (10%)	3.3% (3%)
2009	92.05% (75%)	11.96% (10%)	4.19% (4%)

In addition, Welsh subtitles were provided for 10 hours per week of original programming. The English and Welsh subtitles were also made available on-line on S4C's on demand service **Clic**.

## 4. **Website Accessibility**

S4C's Website Production Guidelines require all new websites produced for S4C to comply with requirements recommended by the WAI (Web Accessibility Initiative) and WCAG (Web Content Accessibility Guidelines). S4C undertakes continuous testing of commissioned websites for compliance.

## 5. **Consultations**

S4C consults with disabled people in order to receive their feedback on S4C's services. Consultation can take the form of seminars and/or on-line research to discuss S4C's access services and provide information on S4C's services, action plans and future activity. Appropriate stakeholders are invited to participate.

Three access seminars were held over the 3 year period, providing an insight into the S4C access services and technological developments.

An Audio Description campaign took place for 6 weeks in 2008 to draw attention to, and highlight the advantages of, the service for the blind and partially-sighted people. This received positive feedback and responses.

S4C conducted a survey/consultation on its access services in 2009 and the results were published internally for actioning.

## 6. **Promotion of Services**

S4C ensures that information on its access services is widely available and easily accessible by disabled persons. The access services are promoted as part of its communications plans e.g. on the website, trails and 'stickers' on screen, in the press and in S4C's **Sgrîn** magazine.

S4C won a major prize at the Design Week Awards 2008 for its innovative on-screen campaign promoting its bilingual subtitling and video-on-demand services. The adjudicators at the awards, organised by Design Week magazine, praised the "high quality" of all the entrants but said that the S4C entry, which used a pop-up book as a device to explain how to access services, "clearly stood out".

In December 2009, S4C for the first time launched an audio version of its viewers' magazine **Sgrîn** for blind and partially-sighted people. 175 copies of the CD were distributed via the Talking Books network in Wales. It was also made available from the S4C Viewers' Hotline or to listen or view on the S4C website [www.s4c.co.uk/sgrin](http://www.s4c.co.uk/sgrin)

## 7. **Public meetings and events**

S4C ensured that arrangements and all reasonable adjustments were made to ensure that disabled persons were able to attend public meetings of the S4C Authority and other S4C events or tours.

When arranging events, the locations were assessed to ensure access to all, and a risk assessment was provided and consideration given to disabled persons. A signer was available on request and S4C has a mobile induction loop. S4C consulted on views on the accessibility of its public events during the events themselves.

## 8. **S4C Premises**

S4C regularly audits and assesses its buildings to comply with Part III of the Disability Discrimination Act.

S4C has complied with the requirements for wheelchair access and designed the desk for the reception in Cardiff to comply with the present rules and regulations designed to aid wheelchair visitors. A new disabled lift has been installed at S4C's Cardiff office and further adjustments have been made to the building to assist disabled staff and visitors.

S4C's Caernarfon office is new, and from the outset complies with current regulations. The offices are on the second floor, with good lift access to that floor from the ground floor entrance.

A portable loop induction system is available for internal or external meetings.

S4C's main switchboard has a Text Relay facility to be able to take calls from textphone users.

## 9. **Training and recruitment**

S4C continues to work with disabled staff in order to provide training and make any adjustments or suitable changes to assist them to continue their work.

A questionnaire was circulated to all staff in order to ensure that S4C meets its requirements for disabled members of its workforce. S4C assessed the conclusions and acted on the issues and comments raised.

The Human Resources staff, reception and some administrative staff have received sign language training to communicate with deaf visitors.

S4C actively promotes job opportunities for disabled people. All advertisements placed in the press include the 'Positive about disabled people' logo. Every effort is made to advertise posts to as wide an audience as possible, including relevant disability websites.

S4C is a contributor to the work of the BTR, the Broadcast Training and Skills Regulator. As of April 2009, BTR has taken on from Ofcom the co-regulatory remit for equal opportunities. BTR aims to bring together expertise and skills from across the broadcast industry to help encourage and improve the equality of opportunity and diversity within the industry.

## 10. **Disability Standard**

S4C demonstrated its commitment to becoming disability confident by taking part in the Disability Standard, a management tool offered by the Employers' Forum on Disability (EFD) to enable organisations to measure their performance on disability and put in place appropriate action plans. S4C received a diagnostic report from the EFD in 2009. The report found that S4C had made most progress in the following areas:

- Motivating S4C and its staff to make progress on disability equality;
- Putting in place policies and procedures to enable disabled service users to fully access S4C's services.

The report found that further work needs to be done to:

- Assess the impact of the actions S4C has taken towards becoming disability confident and using the impact assessment to ensure that policies and procedures continue to work effectively;
- Develop a long-term culture of being disability confident.

The recommendations of the report have been taken into account in identifying the action points set out in Annexure 3.

## **ANNEXURE 3**

### **FUTURE ACTIONS**

As noted in paragraph 5.1 of this scheme, S4C will publish an Action Plan annually containing specific actions to ensure that S4C's commitments in this scheme are implemented. The reviews referred to in section 5.2 of this scheme identified the specific actions set out below. The annual Action Plans will include these actions.

#### **1. Programmes**

Work with producers to promote increasingly a positive image of persons with disability on screen across as wide a range as possible of S4C's programmes.

S4C believes it has a powerful role to play in promoting diversity, equality of opportunity and fair treatment and will review the terms on which it commissions content so as to ensure that the production sector is committed to promoting and integrating the principles of diversity and equality in all aspects of its business and content.

#### **2. Communications**

Ensure that facilities are in place to enable persons with a disability to communicate with S4C through the S4C Viewers Hotline or otherwise, including via Text Relay.

Develop and adopt access guidelines for S4C's publications and incorporate these in S4C's Brand Guidelines.

Continue to provide audio versions of **Sgrîn**.

Keep all of S4C's websites under regular review to ensure that any relevant new standards and current good practice on website accessibility are reflected in S4C practices.

#### **3. Public meetings and events**

Continue to ensure that persons with a disability can attend and participate in all public meetings and events held by S4C and consult on the accessibility of these events.

#### **4. S4C Premises**

Continue to monitor and ensure compliance with the Disability Discrimination Act and amendments to it in relation to all S4C's premises.

Routinely conduct accessibility audits throughout all premises. Assess and, in so far as possible, act upon any recommendations.

#### **5. Employment**

Regularly review the success of any employment initiatives undertaken to encourage disabled applicants.

Circulate a questionnaire to S4C staff annually to ensure that S4C meets its requirements for disabled staff. Assess the conclusions and act on issues and comments raised in so far as possible.

Build specific responsibility for disability into managers' performance goals.

As part of S4C's talent management process, include an evaluation of the action taken by managers to support S4C's disability goals.

Keep and regularly review an ongoing database of requests for reasonable adjustments, in what timescale the adjustment was met, the type of adjustment and its effectiveness.

Conduct exit interviews and highlight any reasons for leaving that might be disability related for monitoring and follow-up action.

In order to inform future policy, regularly review absence levels and the reasons for absence, including long-term sick leave, paying particular regard to workplace contributors such as mental health and stress and physical illness and injury.

## 6. **Training**

Provide training for all S4C staff to understand this scheme and S4C's Diversity and Equality Policy, S4C's legal obligations and the duty of reasonable adjustments as to disabled people.

Provide additional training to staff who have contact with the public or arrange events, to ensure that they understand the implications of this scheme.

Continually review the requirement for training where circumstances or legislation change.

## 7. **Working with other organisations**

Continue working with and have membership of S4C's disability partner organisations.

Review periodically the organisations promoting awareness and good practice in the area of disability and consider whether it would be beneficial for S4C to join any other organisations.

## 8. **Awareness and promotion of S4C's services**

Continue to promote S4C's access services and to foster an understanding of diversity matters relating to disability in accordance with its recently adopted Diversity and Equality Policy.