

S4C guidelines on the use of Artificial Intelligence (AI) in the creation and delivery of content

Section A: Introduction

1. This policy applies to the use of AI in the creation and delivery of content - mainly by independent producers, but also by S4C's internal staff (for example when creating promos or content for social media and in digital news). S4C has separate policies which deal with the use of AI by S4C staff where it does not relate to the process of creating content, as well as in recruitment.
2. By clause 1.6 of S4C's General Terms this policy, including any amendments to it, is incorporated into all licenses.
3. In general S4C welcomes developments in the field of AI, and sees how AI can help us to work more efficiently and to promote creativity. However, we also realize that there are potential risks and disadvantages. We must therefore use it in a responsible way. We need to strike a balance so that it is possible to benefit from AI while ensuring that any use of it is safe and conscientious.
4. It is impossible, as AI is so widespread and developing so rapidly, and as so much is still unknown about it, to be prescriptive about its use.
5. As such, the intention of these guidelines - in line with other public broadcasters - is to set a framework.

Section B: The basic rule

6. Quite simply, S4C allows the use of AI by production companies when creating and providing us with content on two clear preconditions:
 - a. **Firstly**, the intended use **must** satisfy **all** of the principles below.
 - b. **Secondly**, written permission **must** be received from the relevant Commissioner before using AI in the situations set out in section D below. In order to ensure that that consent is informed, full written information must be provided to the Commissioner well in advance. An Online process should not be commenced without the discussion having taken place and the use having been approved. It should be clearly explained in the application why it is assumed that the use satisfies the relevant principles.

Section C: S4C AI principles

Principle C1: S4C's Mission and Values

7. The use must be consistent with S4C's mission and values. It cannot risk damaging S4C's reputation, and it must maintain the trust of the audience. Therefore, any use of AI must comply with Ofcom's requirements and our production guidelines and policies.

Principle C2: Creativity

8. The material must support human creativity, but it cannot replace it. It can only be used if the use of AI offers added value.

Principle C3: Transparency and avoidance of misleading

9. S4C and the audience must be aware of any use of AI in factual content or current affairs, including when collecting data. The audience should be informed simultaneously, either verbally or through a written notice on-screen - the exact method to be agreed in discussion with the Commissioner.

Principle C4: Inclusion

10. The use of AI must not lead to decisions that show a bias towards any person or group of people (see [diversity and inclusion](#)).

Principle C5: Safety and consent

11. Any information that is used or shared by AI platforms/tools must be kept secure.

12. Personal data must not be used without express permission.

Principle C6: Respect intellectual property

13. Intellectual Property belonging to another must not be used as a 'prompt'. You should not use any platform that has unreliable training models or is known to have used copyrighted material without permission. You must use all reasonable endeavours to ensure that any output material does not infringe any copyright laws.

Principle C7: Accountability

14. A clear record must be kept of the use of AI and the process followed when using it to create content using [this spreadsheet](#). The spreadsheet must be completed and submitted to S4C online no later than the delivery date.

Principle C8: Human Supervision and integrity

15. Any output that is created by AI must be checked, and the same principles of compliance and integrity applied as would be the case for any other piece of work. You should not solely rely on AI for assistance at any step in your process.

Section D: consent.

16. As there is no comprehensive definition of AI, and bearing in mind that elements of what is now known as AI (for example 'special effects') have been in general use for some time, S4C is:

- a. keen to avoid focusing too much on exactly what AI is and focus instead on the type of tasks it is used for, and in what context;
- b. recognize the need to be proportionate.

17. S4C's position is that there are two categories of use as follows.

18. Subject to the satisfaction of the principles in section C above, S4C will not expect producers to request permission in the following situations (“the First Category”):

- a. reasonable personal productivity e.g. transcription, summarizing.
- b. high level development work – e.g. research; mood board; presentation deck
- c. post-production in order to tidy-up, clarify (or make more clear) or improve quality where it does not involve creating any content from scratch, nor changing an individual's contribution in a way they are not happy with (or could reasonably be expected to object to).
- d. other post-production in content other than factual or current affairs e.g. VFX; reconstruction; add images.

19. AI should not be used without the written consent of the relevant Commissioner in the following situations (“the Second Category”):

- a. in factual content or current affairs to create anything on screen, whether visual or auditory, that does not exist or has not actually existed.
- b. to create any material, whether visual or auditory, which are essential elements of any production (whether from scratch or as an addition) - e.g. characters; voices; locations; key reference points.
- c. if the AI does anything that presenters, actors, writers or musicians would otherwise normally do, or anything that makes a material change to their performance or appearance. Clear and specific justification which demonstrates added value will be required for any such use.
- d. where any material or information owned by others, or any personal data, has been inputted to train the AI or used as a prompt.

20. Before giving permission the Commissioner will check the intended use with the Chief Content Officer and S4C's Head of Legal and Business. The Commissioner will copy the Chief Content Officer and the Head of Legal and Business when providing any permission.

21. If you have any question about the use of AI in the context of S4C commissions please contact cyfreithiol_legal@s4c.cymru.

22. Due to constant developments in AI, S4C will review this policy at least once every year.

S4C

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