



TG4 Compliance Policy

1

2

3

4

5

TG4 Compliance Policy

TG4 and programme makers must comply with the TG4 Compliance Policy and the TG4 Programme Standards & Journalism Guidelines.

Importance of Compliance

Content must comply with the obligations in the Broadcasting Act 2009 as amended by the Online Safety and Media Regulation Act 2022 (as it may be further amended from time to time) (the “Act”), and Coimisiún na Meán codes and rules together with any future changes to applicable laws, regulatory codes or rules.

Failure to comply with the obligations in the Act, or Coimisiún na Meán Codes or Rules, is a breach of the Act.

If a complaint is made by a viewer that there has been a breach of the Act/Codes or Rules and it is not satisfactorily addressed by TG4 the complaint may be submitted to Coimisiún na Meán.

Coimisiún na Meán may carry out investigations for the purposes of compliance and it can also impose financial sanctions (up to €20m) for failure to comply with the obligations. The investigative powers of Coimisiún na Meán are very substantial. The sanctions for failure to comply with the Act, Codes and Rules are very substantial.

If Coimisiún na Meán determines there has been a breach, in assessing the amount of the fine Coimisiún na Meán will have regard to many factors including the absence or ineffectiveness of internal mechanisms or procedures intended to prevent such a contravention and the fine must be proportionate.

TG4 has robust internal compliance procedures.

In respect of commissioned programming, production companies conduct an analysis of content compliance under each of the headings in the Compliance Form and they complete the form. Production companies deliver the Compliance Form to the Eagarthóir Coimisiúnaithe as part of the delivery material and this is required before the programme can be transmitted. The Compliance Forms are countersigned by the relevant Eagarthóir Coimisiúnaithe and are retained by TG4.

Content that is likely to be controversial is reviewed by appropriate TG4 personnel. This ensures that risks are assessed and managed appropriately. All content which is contentious goes through this internal compliance referral process. TG4 disables comments on online contentious content as appropriate. In respect of content which is not inherently contentious but which gives rise to problematic commentary the comments are also disabled on such content as appropriate. TG4 moderates live chats.

TG4 is not obliged to broadcast content and it can choose not to broadcast as required.

Continuous training ensures that TG4 staff are updated on the latest statutory requirements, regulatory codes and best practices.

Each member of TG4 staff is required to notify the relevant Commissioning Editor/ Head of News and Current Affairs (as applicable) of any possible compliance issues in the content which comes to their attention.

In the event of uncertainty in relation to an editorial matter TG4 staff can seek guidance from the Eagarthóir Coimisiúnaithe Comhlíontachta, the TG4 legal department or the Meitheal Eagarthóireachta. The Commissioning Manager/Head of News and Current Affairs is consulted on any unresolved issues and if issues remain unresolved the Director General makes a decision as Editor in Chief, as applicable.

In addition, TG4 engages with TG4's Audience Council which ascertains the views and interests of the general public with regard to public service broadcasting by TG4.

Independent production companies must produce and deliver content (which includes trailers, social media content, podcasts, written content and subtitles) in accordance with the programme commissioning contract signed with TG4. In addition, TG4 arranges for the subtitling of certain commissioned content directly with subtitling companies. TG4 and programme makers must comply with the TG4 Programme Standards & Journalism Guidelines, this Compliance Policy, the obligations in the Act and Coimisiún na Meán codes and rules together with any future changes to applicable laws, regulatory codes or rules. The production company must also comply with any guidelines issued by TG4 from time to time including the TG4 Code of Conduct for Suppliers of Commissioned Programmes.

Actions required from the independent production company:

- Familiarize itself with all applicable legislation including its obligations under the Act, the Coimisiún na Meán codes and rules and any future changes to applicable laws, regulatory codes or rules.
- Regularly attend training sessions organized by SPI including in respect of the Act and Coimisiún na Meán codes and rules, or otherwise inform itself of all applicable obligations if a production company is not a member of SPI.
- Regularly check the Coimisiún na Meán website to keep up to date with the latest requirements.
- Ensure content complies with the programme commissioning contract, applicable laws, the Act, Coimisiún na Meán codes and rules, the TG4 Programme Standards & Journalism Guidelines and this Compliance Policy.
- Deliver content in a timely manner to TG4 in accordance with the agreed production schedule in the programme commissioning contract.
- Assess content in light of each of the headings in the compliance form.
- Complete and deliver the compliance form to TG4 in accordance with the programme commissioning contract.
- In respect of contentious content it must also furnish the E&O insurance certification to TG4 on the signing of the programme commissioning contract.
- In respect of contentious content it must also ensure the production company's media lawyer reviews the proposed content throughout the production process, before submission to TG4 and after any required edits are made.
- In respect of contentious content it must also furnish TG4 with a copy of the sign off letter which will be issued by the production company lawyer to the production company, in respect of the transmission copy of the programme.
- While TG4 will work in consultation with the production company, the production company will make edits required by the Eagarthóir Coimisiúnaithe.
- Ensure balanced gender representation of participants in news and current affairs programmes.

- Seek clarification from the TG4 Eagarthóir Coimisiúnaithe Comhlíontacha on aspects of the TG4 Programme Standards & Journalism Guidelines and Compliance Policy in the event of any lack of clarity.
- Promptly provide such information, documentation, materials and assistance to TG4 as is required by TG4 in the event of a complaint.

Actions required from companies which dub, repackage and subtitle content and provide a billings/translation service:

- Companies which dub content on behalf of TG4 are contractually required to assess content in light of each of the headings in the compliance form and complete a compliance form in respect of each dubbed programme.
- Companies which subtitle or repackage content on behalf of TG4 are requested to notify relevant TG4 content personnel of any possible compliance issues in the content which comes to their attention.
- Companies which provide a billings and translation service to TG4 are requested to notify relevant TG4 content personnel of any possible compliance issues in the content which comes to their attention.

Review of the Compliance Policy

TG4 will review the Compliance Policy from time to time and update it as required.