

One Wales, Many Voices

Plaid Cymru submission to OFCOM's Second Public Service Broadcasting Review: Preparing for the digital future

OFCEOM's phase two review of public service broadcasting comes at a time when broadcasting in general, and television in particular, are in a critical moment of their evolution and development. Old economic models are dying and cultural power is shifting inexorably from broadcaster to the new consumer/producer. It is at one and the same time an exciting but unstable environment and one in which economic strains are as acute as the cultural and democratic possibilities are immense.

Traditionally, and certainly until the 1990's, the last decade of the last century, the terrestrial Broadcasters in the UK – a mix of public service and commercial – BBC, ITV and recently S4C/Channel 4 and 5 provided the dominant model. With the increase of digital channels on (D)TT and satellite this is no longer the case. With the emergence of on-demand and streaming on other platforms (computers and mobile devices) a new culture of broadcast content and marketplace has emerged and established itself, a situation that has polarized the issues of public service broadcast based on the license fee and economic pressures of commercial broadcasting. In this unstable position television – in the loosest sense of the word as content in the moving image of various genres from news and current affairs to drama, documentaries and entertainment – remains the coalface of the conversation about the future of public service content.

It must be noted that Wales has been well served by the traditional model and in many ways as a nation – despite the continuing problems of invisibility on the UK networks themselves – we have punched above our weight in mere population density terms. The existence of a second main language spoken by more than 20% of its population has been instrumental in this and thus the launch of S4C in 1982 gave Wales three mainstream broadcasters – BBC, ITV and S4C – with all it entailed in terms of representation, distinctive content economic benefits for Wales' GDP and the vitality of the creative and cultural industries' sector. With the developments and changes in broadcasting outlined above this position is now being challenged, in particular, through the curtailing of the public service activities of the commercial broadcaster ITV.

Whilst the dominant model of broadcasting is under pressure globally, in Wales the issue of plurality of voice has become the core issue. Television, as the sector which produces the majority of Welsh content in terms of output and reach, is where this trend is most visible. The proposed reduction in specifically Welsh output at ITV Wales raises the very strong prospect that ITV will stop providing public service content altogether in the next two to three years. Analogous tendencies can be seen in other media. Falling readership and advertising revenue is driving job losses and the closure of titles in an already weakened Welsh print media sector. The disappearance of the Western Mail and the North Wales edition of the Daily Post within the next decade is being openly discussed by media analysts. Commercial radio in Wales continues to report a difficult commercial environment. S4C faces falling revenue as a result of digital switchover; its decision to source its news services from the BBC also means that in this context of news and current affairs, it contributes little to plurality.

In the context of news it is quite conceivable that the BBC will become the monopoly medium for Welsh expression in both languages. This is borne out by its role as the only national radio station, in both Welsh and English, and the decision of S4C to source its news through the BBC, branded as BBC news, rather than independently or using BBC resources in partnership with other providers. Equally, Channel Four UK has demonstrated little demonstrable interest in broadcasting work from or about Wales despite its UK-wide remit.

The implication of the above is that the outcome of elections or the forthcoming referendum on law-making powers may well, on current trends, hinge on the editorial decisions of a handful of BBC executives. On all other media – print, radio and non-BBC digital output, Wales will become increasingly sidelined. This intolerable position will be the cultural equivalent of the democratic deficit that devolution was intended to address. Were this allowed to persist, the long-term health and viability of democratic devolution would itself be drawn into question.

There is a widespread consensus in Wales that a diversity of broadcasters with a plurality of voice and a diversity of content is an essential public service providing a bulwark against any monopoly of view or commercial skew. It allows the citizen to gain an informed and reasoned position and to benefit from information from a number of sources. This is, of course, primarily true in terms of news and current affairs, but also to a lesser extent in documentary, and in a deeper sense, also in arts and drama. We need a vibrant and plural indigenous media as a mirror to our reality, as an amplifier for our grievances and to help as interpreter for and between Wales and the

wider world. The need for diversity is particularly keenly felt in Wales: as Dai Smith has said, Wales is a 'singular noun, but a plural experience.'

There is significant concern that much of what little programming is available from an English-speaking Welsh perspective is threatened by the well publicised problems of the ITV network. Research conducted for the National Assembly for Wales in November 2008 suggests that a third of television viewers in Wales mainly receive information about Wales from ITV Wales, a little higher than the 26% figure quoted in Figure 23 of the consultation.

We are therefore disappointed by Ofcom's proposal to reduce the minimum requirement for non-news programming by ITV Wales and recognise that this will have a negative effect upon viewers in Wales and also upon the viability of the broadcast media industry. However, we do recognise the problems in which ITV Wales presently finds itself, and that, in 2009, license costs may shortly outweigh benefits, as noted in Figure 2.

The current crisis is also an important opportunity, notwithstanding the above, to re-evaluate the advantages and disadvantages of the traditional model. The dominant broadcast model tacitly required one broadcaster to do everything, to be the servant of all facets of the community catering for all tastes: attempting to provide the balanced viewpoint with impartiality and integrity. Even commercial broadcast has to a lesser extent followed this model particularly in relation to news, information and knowledge dissemination. There is broadly a journalistic consensus of the nature and purpose of this aspect of broadcasting.

However, as with any model that requires something for everyone there has been a historic compromise in relation to the macro and micro possibilities. That is that the drilling down of news and information to various localities has been limited and selective, as have been the varieties of perspectives on offer (so called opt outs, national or regional iterations, differing political views). This has been accepted as palatable, although unsatisfying, possibly due to the existence of complementary media gathering and dissemination sources, namely print.

With the shift from broadcaster to consumer/producer and from a terrestrial television broadcast model to a digital broadcasting environment the demand for appropriate news and local representation has become inadequate. Moreover with fundamental democratic changes occurring within the British Isles in the devolution of democratic power to the nations the dominant/monocultural perspective is not only exposed as inadequate but irrelevant to many

citizens. Hence, the fairly damning indictment of network representation of national diversity within the BBC by the King Report.

24 hour global news, you tube, peer to peer networks offer consumers a plurality of voice and a diversity of complementary content but for smaller nations and lesser heard voices unless they are on these platforms there is no presence and no distinctive and relevant local content.

To tackle this deficit it is important both to acknowledge that the 'traditional'/old model was always inadequate and is unsuitable for the current media climate. That is it would be a retrograde step once again to reconfigure a BBC/S4C type model to address the current situation in relation to English language television in Wales. More importantly, in a period of transition towards stability of the digital environment we need a more dynamic, flexible, contemporary and provisional model to address some of the specific areas where there appears to be a local market failure. A model that offers solutions for the present and the local but necessarily connected to the global and the future.

With this in mind we propose the creation of a National Media Agency as a commissioning body with a statutory duty to ensure high quality public service content in both languages across the full range of media in Wales from a plurality of networks.

The principal role of the agency will be to commission original content from media companies and organisations other than the BBC on a contestable basis.

While the current crisis in ITV has made the future of English language television from Wales the main focus of debate, we believe that the National Media Agency should have as comprehensive an ambit as possible. We envisage that the NMA should have responsibility to ensure content of sufficient quantity, quality, plurality and accessibility in television, radio, digital new media and print. This should involve both national and local provision. It should be open to existing organisations like ITV Wales or Media Wales wishing to sustain and enhance their current public service output but also to new entrants wishing to create altogether new platforms.

The Westminster Government has indicated its intention, in the context of its deliberations over the funding gap for Channel Four, a preparedness to bring forward early legislation on new funding models for public service content in a post-analogue world. The precise funding model that the Westminster Government opts for is not the most pressing issue as far as Wales is concerned. Of more critical

importance is the creation of a dedicated fund for Wales. This should not be based on a crude population share basis but reflect the national character of Welsh life, the additional requirements for a well-functioning media created by devolution and the existence of two languages. We estimate that to fulfil its obligations the NMA will require as a minimum a budget of £30 million per annum.

The establishment of the Agency will require primary legislation under the existing settlement which should be included in a new Communications Act before the end of this current Parliament. The definition of its remit should, however, be for the National Assembly for Wales to decide. Its accountability as a wholly publicly funded agency with an exclusively Welsh focus should be to Welsh ministers, and not to DCMS or OFCOM. The Assembly may choose to delegate to it decisions over related areas of expenditure e.g. the current £200,000 per annum grant provided to Golwg Cyf to establish an on-line newspaper in the Welsh language.

The Agency should be given the remit of encouraging synergies and economies of scale between existing providers while doing so in a way that encouraged the emergence of new entrants. One obvious area for new partnership models is news.

Here the BBC has a sophisticated and highly respected news gathering network, both local and global. Its ambition is for impartial and credible news content of relevance, that is topical, trusted and has integrity. This, in the spirit of partnership offered by the Director General, Mark Thompson, might be considered as the basis of a shared newsgathering resource. Clearly, the BBC has its own editorial perspective which will remain independent, but may be able to make available its newsgathering facilities and sources to a central pool for use by independent news providers supported by a new news hub, *Wales News*.

ITV (Wales) also has a distinguished news and current affairs reputation with a modest network of newsgathering, and it is important that every effort is maintained to sustain this in the short and medium-term even if it has to be paid for through the NMA and provided by other organisations, as suggested by Michael Grade, in the longer term.¹

¹ However, if ITV is unable to fulfil its license criterion we suggest, as recognised in the consultation document, that the license for Wales be separated from the licenses in other parts of the UK and that the NMA be empowered to commission productions for a new channel with a specific public service provision.

The idea of *Wales News*, a Welsh version of IRN/ITN, would be a radical new departure that would need effective funding. It would draw on a wide variety of information and newsgathering sources including local and community reporters (freelance) through to citizen journalism. Genuine independence of editorial from the BBC/S4C duopoly will offer Wales a distinctive perspective – in much the same way as Channel Four or Sky News does in England. It may be appropriate at the outset to partner with an existing UK or international news provider such as ITN drawing on first-class expertise, supplemented by local knowledge and intelligence and therefore providing a credible, trustworthy and blue-chip operation.

The question of how content is to be distributed is more complex in the digital age. The general principles of public service broadcasting – that it should be universally available which in practice still means prominence on the Electronic Programming Guides. All the current broadcasters retain an important role in ensuring plurality of voice and diversity of content through the access they can provide to platforms of delivery: ITV with its offer of guaranteed slots already referred to; a Welsh presence on Channel Four UK through a Welsh opt-out; and S4C agreeing to carry an independent integrated Welsh news service, covering both international and domestic news, in both Welsh and English on S4C and S4C2.

In return for relinquishing the rights to BBC news in the Welsh language, another area for possible collaboration could be broached which is that of a shared Broadcast Centre providing all of S4C's technical and broadcast services (and possibly to other public service broadcasters), freeing up the financial potential for S4C to part-fund the Independent news hub.

Representation and distinctiveness of voice are paramount as are issues of regulation and quality control. Both the BBC and ITV guaranteed a rigorous editorial and the Hub of Wales News would require that integrity. Its regulation – together with the National Broadcast Centre, the terms of access to which might raise competition concerns, might jointly be undertaken in partnership between the NMA and Ofcom. As we proposed during the passage of the Communications Act 2003, there does need to be a dedicated member from Wales on the Ofcom Executive Board in order to reflect the growing divergence of institutional arrangements across the nations of the UK.

Other Matters

Digital Inclusion

We believe it is essential that all areas of Wales are able to receive all possible available channels and that Wales should not be in any way disadvantaged, and that switchover should not take place until this can be assured.

Channel 4

After the digital switchover, Channel 4 will be available across Wales for the first time in the same format as it is available in England. We believe that Channel 4's current target of 3% production in Wales is too low and should, at the very least, reflect the population of Wales as part of the United Kingdom, which would be a minimum of 5% of production.

BBC

We welcome the announcement by the BBC to substantially increase the percentage of programming which is produced outside London, and, specifically, the increase in Wales, Scotland and Northern Ireland. However, we see no reason why their target of 17% production in these countries cannot be reached far earlier than their deadline of 2016, and we believe that these plans should be accelerated to achieve this figure sooner. We also believe that one of BBC's four television and one of its seven nation radio channels should be based in Wales.

Adam Price MP

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