

**Written evidence submitted by Dame Rosemary Butler AM, Presiding Officer of the National Assembly for Wales to OFCOM's Third Review of Public Service Broadcasting:**

**Background/Remit:**

As Presiding Officer of the National Assembly for Wales, one of my core duties is to ensure that the people of Wales are able to play a full and robust part in the democratic process.

That means making sure they are able to fully engage with the work of the Assembly whether that be through the committee structure which scrutinises Welsh Government policy and legislation, or directly with their own Assembly Member.

As in any functioning democracy the media must play a central role in that process.

However, Wales is unique in the UK in terms of its media landscape and media consumption habits. There are only six daily regional newspapers in Wales. The regional newspaper model is in serious decline across the UK and Wales is no different, with circulation figures falling rapidly. The problem is compounded by the fact that only two of the Welsh daily newspapers staff the Assembly with a full time journalistic resource.

Furthermore, a large number of people in Wales consume their news and current affairs solely through network programmes and channels, or through London-centric UK newspapers/websites.

At worst these platforms often ignore Wales altogether, at best they report policy developments in England as though they apply to Wales when the government here has often decided to pursue a very different direction.

I have called this the "Democratic Deficit" and have been attempting to address it through a campaign over the past three years, working with the BBC in particular.

The importance and necessity of Public Service Broadcasting (PSB) is, in my view, more acute in Wales, particularly as tax-varying and borrowing powers are now being devolved to the National Assembly.

That is why it is important that OFCOM gets, first-hand, the perspective of the National Assembly and why I submit the following evidence to the third review of PSB.

**Dame Rosemary Butler AM**

**Presiding Officer, National Assembly for Wales.**

## Overview:

I will not answer, specifically, each of the 15 consultation questions contained in the document as I believe that some of the areas you explore in your review are for others to address.

Instead I will focus on those questions that I believe relate directly to the PSB landscape in Wales, and in particular news and current affairs output which relates to Wales and the work of the National Assembly.

Specifically, I want to explore what I believe to be a deficit in reflecting Welsh affairs and Welsh life at a network level in particular, at a time when the whole of the UK is undergoing huge constitutional change.

My submission will therefore focus on:

**Question 2:** Have we identified the key differences in Northern Ireland, Scotland and Wales?

**Question 3:** Do you agree with our assessment that the PSB system remains strong overall?

**Question 4:** Given the resources available, to what extent is the system meeting the needs of as wide a range of audiences as practicable?

**Question 5:** Given the resources available, does the PSB system deliver the right balance of spend and output on programming specifically for audiences in Wales, Scotland and Northern Ireland and programmes reflecting those nations to a UK-wide audience?

## Evidence:

**Question 2:** Have we identified the key differences in Northern Ireland, Scotland and Wales?

The review recognises some of the core differences in the media landscape in Wales compared to other parts of the UK. However, I want to add further context to that analysis, in particular the impact it has on the ability of Welsh audiences to consume news and current affairs, and in particular political news and programming, that relates directly to Wales.

### *Paragraph 2.93:*

The fact that we now have a Wales-only licence for Channel 3 is a good step forward and acknowledges the different governance arrangements, in terms of programming provision, in place for English regions and Wales, and addresses the need to promote a national public service agenda in Wales.

I believe it will also contribute significantly to the sustainability of media plurality which is vital to enable increasing civic engagement with the work of the National Assembly, and provides security over provision of Welsh programming.

However, I do have concerns about previous decisions taken over the level of PSB provision required in the licence, which I will address further in my answer to Question 5.

*Paragraph 2.93:*

The review notes that radio listeners in Wales are more likely than the UK average to listen to BBC network radio.

Indeed, the number of Welsh listeners of Radio 2 exceeded the One million mark for the first time in 2014. Radio 1 and 2 are also very popular stations in Wales.

Yet, a Welsh listener tuning into a news bulletin or current affairs programme looking at policy issues in devolved subject areas, such as health or education, would often find that no reference is made to the fundamental policy direction of the Welsh Government compared to Westminster (what I have called the “Democratic Deficit”).

**Is there now a case to be made for news opt-outs at a Nations level on these stations to ensure that this issue is addressed?**

*Paragraph 2.97:*

The fact that people in Wales buy or read more UK newspapers than local or Welsh national newspapers is the fundamental reason why PSB provision in Wales is so important.

Just over 130,000 (Source: ABC figures) buy one of the six daily newspapers in Wales.

Estimates put the figure that read a UK title every day in Wales at upward of 600,000 (Source: Newsworks), all titles which rarely relate the Welsh public policy landscape to their Welsh readership.

### Questions 3, 4 & 5:

I will group these questions together and answer in the same section because in terms of the Welsh perspective I believe they pertain to the same discussion, that is:

- **Does the PSB system remain robust enough to deliver the public service requirements of the Welsh audience, ensuring that it reflects and informs them about the diverging public policy and political landscape post-devolution?**

### The BBC:

When I look at news, current affairs, drama, comedy and factual programming at a Wales and UK network level, the BBC's output is authoritative and provoking and, I believe, meets the fundamental goals of the BBC Charter.

It was with great concern that I wrote to the Chair of the BBC Trust and Director of BBC Cymru Wales in 2012 about the cuts being proposed to political programming on BBC Wales, at a time when we recently had enhanced legislative powers conferred onto the Assembly following the "Yes" vote in the 2011 referendum.

It is incongruous that - at a time when more powers have been devolved to Wales - there is less coverage and challenge of its political life.

Furthermore, the BBC's Director General, Lord Tony Hall, made a speech at in April 2014 where he revealed that since 2006/7, BBC Wales's budget for English language TV programmes has fallen 18% from £24.6m to £20.2m in 2012/13.

Lord Hall admitted that some aspects of Welsh life were not "sufficiently captured by the BBC's own television services in Wales".

I also ask at this juncture, where are the network programmes that reflect Welsh life? Yes we have many key BBC dramas, such as Casualty and Doctor Who filmed in Wales, but where are the dramas actually set in Wales? It seems to me that these are missing from our screens.

That means viewers are missing out on programming, whether it be current affairs, drama or comedy that reflects Welsh life to Welsh and UK audiences, at both a network and regional level.

As outlined above, this problem is further compounded by BBC Network's news and current affairs approach to the nations of the UK, and in particular Wales, what I have called the "Democratic Deficit".

That is, UK media institutions, including the BBC, have struggled with devolution. That manifests itself in the way it covers fundamental policy differences in public policy approaches in the devolved nations - often failing to report that stories about policies on devolved issues, such as health and education, only apply in England.

In Wales that is a particular problem because large sections of the population access their news and current affairs through the UK media, including network BBC programming. It means the BBC's Welsh audiences are often given a misleading picture of their public services and how they are delivered.

The BBC has responded positively to criticism on this issue, by making it clearer that certain stories about schools and hospitals only apply to England, but I believe that there is still a long way to go.

For example, Wales was affected severely during the last winter flooding in 2014. But reports on BBC network news continuously referred to what the Environment Agency was doing to tackle the floods without making clear to viewers that in Wales the equivalent responsibilities lie with Natural Resources Wales (NRW). This had the potential to create confusion for audiences in Wales about who was delivering their public services, and particularly so given that this was an emergency situation faced by a relatively new agency (NRW was established in 2013).

This is repeated across all policy areas that are devolved to the National Assembly, such as health, the environment, housing etc.

While on one edition of Question Time in Newport, in February 2014:

- there was only one panellist from Wales;
- neither the Welsh Government or the National Assembly were represented;
- there was only one issue discussed that was primarily Welsh; and
- there appeared to be widespread confusion among the panellists of the difference between the Assembly and the Welsh Government.

The Welsh viewer pays the licence fee, the same as everyone else in the UK, but there is a perception we are often short-changed.

**I would, therefore, ask the review to consider:**

- **whether Wales is properly represented and reflected in network news, current affairs, factual or drama programming;**
- **the rapid decline in terms of the funding given to English-language programming in Wales (it has reduced from £24.6m to £20.2m since 2006);**
- **the Silk Commission's recommendation to establish a devolved governance body within the UK Trust framework; and**
- **how to formulise the arrangement whereby the Chair of the BBC Trust (or any future governance body) and the Director General regularly appear before a National Assembly Committee to give evidence about the BBC's relationship with, and provision for, its Welsh audience;**

## **ITV – Channel 3**

Whilst the fact that there has been a 31 per cent reduction in Welsh programming on ITV Wales since 2008 is a cause of great concern, it is pleasing to see that Welsh news and current affairs output has remained pretty constant, albeit at levels that I believe are still too small.

We must not forget that the amount of current affairs programming, and in particular political programming on Channel 3, has been cut sharply since the National Assembly was established in 1999. We are now in the process of devolving tax-varying and borrowing powers to the Assembly, and there's a possibility even more powers could be on their way – yet we have less programming reporting the Assembly's work.

**I would urge OFCOM to ensure that the amount of news, current affairs and non-news programming contained within the all-Wales licence for Channel 3 remains at current levels to ensure that the PSB provision reflects the increased powers being devolved to the National Assembly.**

**I also ask whether that provision should, in fact, be increased?**

ITV at a network level has the same issue as the BBC, in that network news and current affairs programmes often ignore the Welsh perspective altogether or fail to inform Welsh audiences that public policy decisions made in Westminster, about devolved areas such as our schools and hospitals, often don't apply in Wales.

Furthermore, there is little or no non-news network programming filmed in or reflecting Wales. In ITV's case Wales would appear not to exist if we looked at drama content in particular.

## **S4C:**

In 2011-12, S4C received £101 million in funding directly from the DCMS. Following the Comprehensive Spending Review in 2010, that funding was reduced to around £7 million per year from 2013-14, with the BBC Trust providing £76.3 million via the licence fee. The BBC's element will further reduce over the next few years, down to £74.5 million in 2016-17. Overall, the changes have meant that S4C has faced budget reductions of 36 per cent in real terms since 2010.

S4C executives have said that "any further cuts would be detrimental to the economy and would cut the core service to the quick". The uncertainty around funding for the channel past Charter renewal in 2017 is also a matter of great concern in Wales.

The S4C Authority and the BBC Trust have an Operating Agreement that has set out the relationship between the two broadcasters since the UK Government decided that S4C would be primarily funded from the licence fee from April 2013 onwards.

BBC Charter renewal will, therefore, clearly have implications for both the way S4C is funded and for the Operating Agreement.

**I would support the Welsh Language Commissioner's view that if a new Royal Charter is agreed, "S4C should retain its editorial and managerial independence from the BBC as agreed in the Operating Agreement".**

**I believe it is essential that S4C must continue to be funded at a level which will allow it to continue to meet the Welsh language broadcasting needs of the people of Wales.**

### **Conclusion:**

As I have outlined the media landscape in Wales is unique in comparison to the rest of the UK, and the other devolved nations in particular.

The failure of the UK media, and large sections of our own media, to properly report Welsh political life to their Welsh audience means that many in Wales aren't fully informed of the work of the National Assembly for Wales, or wider Welsh civic and cultural life.

It means that the need for well-funded quality Public Service Broadcasting in Wales is perhaps more acute than other parts of the UK.

A main part of my role as Presiding Officer is to ensure that the people of Wales are fully engaged with the work of the Assembly and wider Welsh political debate.

That is why I submit this paper to OFCOM's review and I hope that my concerns are considered in this PSB review.