

Audience Council Wales Response to Digital Britain

Preface

The BBC Royal Charter establishes the Audience Council for Wales (ACW) as the voice of the audience in Wales. The Council regularly holds outreach events with members of the BBC's audiences in Wales to hear their views about the BBC and the media in general in Wales. The feedback received at such events has informed this response to the *Digital Britain* report.

The ACW believes that any proposals for changes arising from the current debate relating to the media in Wales must be guided by the needs and requirements of the audience. The Audience Council also considers that any proposals for change should take account of the distinct media landscape in Wales, which does not have strong printed press or strong commercial radio sectors. In that context it notes that all forms of broadcast media are significant in the delivery of public service content of all kinds in Wales in both Welsh and English, but that not all existing public service content is accessible to all Welsh licence fee payers because of problems relating to reception and distribution.

The Council believes strongly that any changes in public service broadcasting (PSB) arising from the current debate should concentrate principally on securing public value and equity of access for audiences; plurality and competition have value only if these are secured first.

The Council has given careful consideration to the *Digital Britain* report in the context of its deliberations over the past year on the National Assembly for Wales Broadcasting Committee's report on the future of PSB and the National Assembly Communities and Culture Committee report on broadcasting. Due to the relatively fragile nature of the media in Wales the Audience Council is acutely aware of the potentially profound and detrimental consequences for audiences and civic society in Wales of any changes arising from the current debate.

It seems clear to the Council that the future of television made in Wales for Welsh audiences is at a critical point. In scrutinising the proposals that have been made regarding PSB in Wales the Council has judged them according to whether they contribute to ensuring that people in Wales are provided with a meaningful range of quality television, radio and online content in both languages in the future.

Audiences remind the Council at its outreach events across Wales that the present PSB situation is far from adequate and has deteriorated significantly in recent years. Whilst the *Digital Britain* report appears to be concerned with preserving the status quo in Wales a more radical approach to delivering public service broadcasting and securing universal access to such provision is needed as the Council is told regularly in its engagement with audiences. The Council feels that if legitimate audience expectations are to be met the recent decline in overall investment in English language television programming in Wales must be reversed.¹

¹ Recently, in an open letter to the UK Government on what they see as the crisis in English language television for Wales, leading figures from Welsh cultural and political life said "We must retain a capacity to talk to each other in our majority language, whether in drama, comedy,

While some will undoubtedly make the point that the proliferation of TV channels with the advent of digital television has increased plurality, the Council has seen little evidence that this additional provision in either news or non-news TV output has led to any increase of programming aimed at a Wales audiences or has increased the understanding of audiences of contemporary Wales.

Plurality

The ACW has been made aware of audience concerns about the threat to plurality in the context of news and current affairs provision in Wales and shares these concerns. It emphasised that plurality in news provision in Wales was more important than plurality of regional news in England in the context of devolution and the pivotal role of the National Assembly in deciding policy in health, education, transport and other key areas of public policy.

The Council is aware of the potentially greater democratic deficit which could exist if ITV Wales were to stop broadcasting news from Wales. *Wales Tonight* on ITV Wales reaches 250,000 viewers each week (15' consecutive reach) who do not watch *BBC Wales Today*. The weakness of indigenous press and media and alternative sources of news from Wales means that the loss of ITV Wales news has the potential to seriously compound this democratic deficit.

Audiences place great value on English language non-news programming of all kind produced specifically for Wales and currently provided by ITV Wales and BBC Cymru Wales and the Welsh language programming on S4C. The viewing figures show that there is a keen demand for programmes made in Wales for Wales. The Council considers the gradual withdrawal of ITV Wales from producing programmes addressed to a Wales audience a very serious issue in the context of the PSB debate. It believes that everything possible must be done to secure and foster general programming in the English language to complement and compete with that provided by BBC Cymru Wales.

The Audience Council for Wales continues to support the BBC's work to develop partnerships with other broadcasters in the context of news, where facilities and raw material could be shared, which could both create value for other broadcasters and add value to the licence fee.

The ACW is also clear that there should be no dilution of the editorial or operational control of the BBC. A consistent theme in the Council's public engagement is audiences demand that the Corporation's independence should be zealously guarded. It also believes that securing public value for audiences must be the key focus of any outcomes of the current debate. Plurality and competition only have value if they secure that.

documentary, entertainment, satire or arts programmes. The crisis in Welsh English language broadcasting has been brought about by the gradual, and now terminal decline in ITV Wales programming, and by severe cuts at BBC Wales. A consequence is that the annual value of television programming for Wales in English will have been reduced by £25m a year by 2012. That decline must be halted and reversed."

Broadband

The ACW warmly welcomes the commitment in *Digital Britain* that broadband should be universally available. This should mean that it is genuinely universal at a high enough speed to enable proper access to those services that demand significant bandwidth. Where people have no adequate internet access they are deprived of a huge and growing amount of PSB on-line content available on this platform and television content available through BBC iPlayer for example on bbc.co.uk.

The lack of availability of broadband services in many parts of Wales and the inadequate speed of the service on offer, when it is available, is an issue constantly brought to Council's attention by audiences as something that impoverishes their lives. While percentage coverage appears high, the reality is that many rural communities find themselves marginalised both geographically and technologically and this may worsen in future as technological developments are likely to be broadband dependent (such as the BBC iPlayer on the Freesat platform). The geography of Wales is a factor which contributes significantly to social exclusion and Council feels that there is a danger that the *Digital Britain* proposals fail to address those issues in the wider debates on social inclusion and community cohesion, of which digital inclusion is an important part.

DAB

DAB has long been a matter of serious concern to audiences in Wales and thus to the Council – not least since Wales' national radio stations, BBC Radio Cymru and BBC Radio Wales, are not available through DAB in many parts of the country. This is particularly acutely felt since audiences in some of the stations' significant heartlands – north-west Wales and the south Wales valleys respectively – cannot access the stations by this means.

The Council is deeply worried therefore at the references in the *Digital Britain* report to the possible 'switch-off' of FM and AM services, and to increasing DAB coverage to match current FM coverage. FM coverage for BBC Radio Wales is inadequate with only about 65% of the population of Wales able to receive the station on FM; indeed Radio Wales' large audiences in the south Wales valleys cannot receive the station on FM or DAB, relying instead on poorer quality AM service. Approximately 55-60% of people in Wales are currently unable to receive BBC Radio Wales or BBC Radio Cymru on DAB and about 70% of Welsh speakers are unable to receive BBC Radio Cymru on DAB. Any discussion about plurality of provision is redundant where the principal public service broadcaster's services, the only national radio services in Welsh or English in Wales, are far from being universally accessible. There is still some way for the BBC to go in improving the reception of its existing services to its licence fee payers before contributing to broadband roll-out and is an issue upon which the ACW continues to make the strongest possible representation to the BBC Trust.

Licence Fee top-slicing

The Council is deeply concerned at the potential impact of licence fee 'top-slicing' – i.e. the allocation of a portion of the licence fee for any purposes other than those of the BBC. Council members are consistently told by members of the audience that they recognise and appreciate the direct link between payment of the licence fee and the provision of the BBC's services. At meetings with licence fee payers their sense of ownership of the BBC is

strongly evident. Research shows that support for the BBC is stronger in Wales than in the other nations of the UK. Wales has the highest share of the high BBC approvers of all the nations of the UK at 46%. In the most recent survey conducted by the BBC Trust 86% in Wales agreed that “I would miss the BBC if it wasn’t there”, 1% higher than the UK as a whole. There has also been an increase in feeling that the BBC offers good value for money in Wales and only one in ten adults in Wales would like to change the BBC significantly, which is lower than the other nations of the UK.

The Council is strongly of the opinion that any move to undermine this direct link could leave the BBC open to government influence and would thus have a grave negative reputational impact on the Corporation as well as lessening accountability. As well as the potential for compromising the BBC’s independence it would raise the alarming prospect of the licence fee being viewed by audiences as general taxation. It would damage the strong relation of trust between the BBC and licence fee payers. On behalf of audience in Wales the Council is committed to supporting the BBC Trust and its Chairman in opposing any developments such as this.

The Council considers that past precedents demonstrate that where similar links have been broken, the funding has become dispersed amongst an increasingly wide ranging number of projects or organisations. Consequently it considers this matter a key constitutional question. There is a danger that top-sliced funds promised for commercial broadcasters’ journalism could end up subsidising the dividends of their share-holders.

The implications of top-slicing would be that either the BBC would get less funding or that the licence fee would go up with the first being the most likely outcome. There is a real danger therefore that the BBC in Wales would have even less funding available in future to produce quality television programming aimed at Welsh audiences.

As a member of Council said recently *“the protection of the BBC’s quality of output is paramount and there is a huge risk to this quality if we have any ‘creaming off’ of the BBC’s funds.”*

Digital Switchover Help Scheme Under spend

The Audience Council for Wales is concerned at the way in which any possible under spend on the *Digital Switchover Help Scheme* continues to be presented as a ‘licence fee surplus’. This it considers to be misleading since this funding was always intended as additional to the core licence fee, was never intended for core BBC services and was specifically intended for the purpose of assisting those who required assistance with digital switchover - a ‘once in a generation’ change akin to the introduction of colour television.

It is as yet unclear whether there will in fact be any surplus to the funds ear-marked for this scheme, and with more than three years to go before digital TV switchover is complete in all parts of the UK it seems to the Council to be premature to be allocating this money for other uses.

However, if there are surplus funds available once the DSHS has come to an end, then the Council recognises that current research shows that licence fee payers strongly favour having any under spend returned to them through a reduced licence fee.

If this option is rejected, then Council believes that the use of these funds to promote the universal provision of broadband would be consistent with the BBC's Public Purposes, specifically "helping to deliver to the public the benefit of emerging communications technologies and services".

~~*