

# Exploring the devolution of broadcasting:

## How can Wales get the media it needs?

March 2021



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## How can Wales get the media it needs?

March 2021



# About the Committee

The Committee was established on 28 June 2016. Its remit can be found at: [www.senedd.wales/SeneddCWLC](http://www.senedd.wales/SeneddCWLC)

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## Committee Chair:



**Bethan Sayed MS**  
Plaid Cymru

## Current Committee membership:



**Mick Antoniwn MS**  
Welsh Labour



**John Griffiths MS**  
Welsh Labour



**Carwyn Jones MS**  
Welsh Labour



**Helen Mary Jones MS\***  
Plaid Cymru



**David Melding MS**  
Welsh Conservatives

\*From 26 February 2020 - 8 January 2021 Helen Mary Jones was Acting Temporary Chair of the Committee.

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The following Member was also a member of the Committee during this inquiry.



**Delyth Jewell MS**  
Plaid Cymru

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## Chair's foreword

The supply of media content for Wales is inadequate. We don't have the provision of news and current affairs that Wales needs, hampering the political and civic life of our country. Other areas – such as children's content, comedy and drama – are also underrepresented, meaning we do not see ourselves reflected on our screens. Wales needs more power over broadcasting, to ensure that we can develop the media we need as a nation.

The growth of global streaming giants has led to a boom in content. But it has done little to provide more choice in programming that portrays the lives of the people of Wales specifically. Netflix's drama 'Sex Education', for example, provided welcome training for local people, but says nothing about the lives of people in the Wye Valley or the other south Wales locations where it was filmed. That may not have been their intention, of course. But even so, this makes it even more important for us as a nation to decide on our priorities, to support homegrown talent and productions, and show what Wales can achieve on a worldwide level, from big companies like Bad Wolf to Rondo Media, to Telesgop.

Public service broadcasting reflects and informs our lives and shores up a thriving Welsh production sector. These central economic and cultural arguments for funding public service broadcasting remain, despite the shift towards online delivery.

We are entering a period of seismic shift, as the traditional roles of public service broadcasting are re-evaluated in light of the growth of online streaming platforms. Wales needs powers in this area, as the needs of Welsh audiences are unique.

The committee agrees that the Senedd should gain powers over broadcasting. Views on the extent of that further devolution vary, with some favouring the full devolution of broadcasting powers to the Senedd, and others more limited new powers in specific areas. These views are informed by this and previous Committee reports which show that Wales does not have the media it needs to function as a successful nation.

The devolution of broadcasting to Wales could be viewed as a process rather than an event. The committee therefore believes the most germane question to ask is not "should broadcasting be devolved?", but "how much of broadcasting should be devolved?", and "how can Wales's voice in the broadcasting landscape be strengthened?".

The Welsh Government and the Senedd now have some limited oversight and public appointment roles in broadcasting, from appointing members of the Ofcom and BBC boards, to scrutinising our public service broadcasters ('PSBs'). The Committee thinks improvements for audiences can be secured by Wales having greater responsibility over broadcasting. These areas are outlined in this report, and include powers over public service broadcasting in the Welsh language, influence in setting the licence fee and a say in the conditions for the Channel 3 licence (currently held by ITV).

We have also identified a number of regulatory changes that would improve the media in Wales. These recommendations have largely been directed at the body currently responsible for exercising that function. So, for example, we have called for the power to require Welsh language content in commercial radio licences, and to include local production requirements in the next Channel 3 licence. With the devolution of powers to Wales, the recommendations in this report would apply to the relevant Welsh body holding those broadcasting regulatory powers.

There is a widespread feeling that the supply of media content for Wales is inadequate. It is up to all of us to contribute practical ideas to tackle this deficit. The recommendations in this report provide a starting point for this venture.

### **Bethan Sayed MS**

Chair of the Culture, Welsh Language and Communications Committee



## Recommendations

**Recommendation 1.** The Committee’s view is that enhanced broadcasting responsibilities for the Senedd and Welsh Government would materially improve media provision in Wales. The Welsh Government, UK Government and Ofcom should set out how the provision of media content for audiences in Wales can be improved..... Page 17

**Recommendation 2.** The Welsh Government should establish an ongoing central fund to support news journalism, with arms-length delivery and accountability to secure impartiality..... Page 17

**Recommendation 3.** Within current arrangements, we would like to see an independent funding commission established with distinct Welsh representation. Decisions made by such a body should seek consent from representatives of all UK nations. Welsh appointees to this Committee should be made by the Welsh Government and subject to a confirmation hearing in front of an appropriate Senedd committee. .... Page 29

**Recommendation 4.** The UK Government should devolve powers over S4C and other public service Welsh language broadcasting matters to Wales. .... Page 29

**Recommendation 5.** There should be a requirement for the Channel 3 licence in Wales to produce a greater proportion of network content in Wales. The Welsh Government should have a formal role in this process..... Page 42

**Recommendation 6.** The UK Government should legislate to enable an appropriate regulatory body to require Welsh language content as part of commercial radio licences in Wales, alongside introducing a regulatory category of “all-Wales news”. The Welsh Government should have a formal role in setting these requirements. .... Page 42

**Recommendation 7.** The UK Government should regulate global streaming services to strengthen the public service media ecosystem. Such regulation could include levies to fund public service content, or requirements to carry public service content. The UK government should consider extending levies to include other large online companies, such as search engines and social networking sites. .... Page 42

**Recommendation 8.** The Sixth Senedd should include a committee with media policy as a central part of its remit. This Committee should conduct confirmation hearings, if necessary in joint meetings with a relevant Westminster committee, with the Ofcom board member for Wales, the BBC board member for Wales and the chair of the S4C board. Ongoing scrutiny of these bodies, as well as other broadcasters, including the holder of the Channel 3 licence, should be part of its work programme. In the advent of further devolution of broadcasting powers to the Senedd, this Committee could play a further role in the regulation and financing of media provision..... Page 47

**Recommendation 9.** The Welsh Government should have an enhanced role in setting the terms of the next Channel 3 licence for Wales.....Page 48

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## 1. The supply of media content for Wales is inadequate

Global content growth has not led to growth in Welsh specific content, and offers only limited economic benefits to Welsh production companies.

### Global content growth has not led to a growth in content specifically for audiences in Wales

1. When considering what model of governance is best for Wales, we have to consider the rapidly-globalising nature of broadcasting. The industry is in a state of massive transition. Viewers are responding to the huge increase in media choice by moving away from traditional broadcast television to subscription video-on-demand (SVOD) services such as Netflix and Amazon Prime.
2. When S4C was launched in 1982 it was one of four television channels available in Wales. Now it is one of 70 Freeview channels: not to mention channels available through subscription packages, and online-only services like Netflix. The impact of digital disruption on broadcast media has seen:
  - A reduction in the reach of all the main PSB channels.
  - A reduction in the proportion of time spent watching broadcast TV, especially by young people. Only 42% of the video watched by people aged 16-34 in the UK in 2018 was broadcast content.<sup>1</sup>
  - A sharp growth in the take-up of SVOD services. Between 2015 and 2018 the number of UK homes with access to an SVOD service doubled. 54 per cent of Welsh households had access to an SVOD at the beginning of 2020.<sup>2</sup>
  - A massive growth in the content budgets of SVOD companies. Netflix and Amazon reportedly spend as much as £15 million per hour,

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<sup>1</sup> This figure, from Ofcom Media Nations 2019 has been used as the equivalent figure in Media Nations 2020 refers to April 2020, when the UK was in lockdown, and so is unlikely to be indicative of wider trends. The general trend of the shift from broadcast to on-demand viewing would suggest that this 42% figure is now lower.

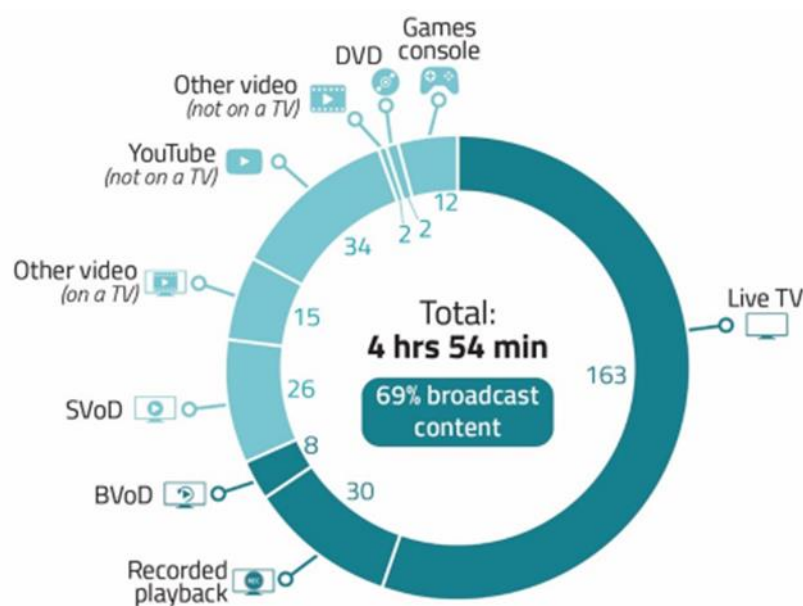
<sup>2</sup> These figures are sourced from **Ofcom Media Nations UK 2019 and Ofcom Media Nations 2020**

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compared to the BBC's indicative tariff of £1 million per hour for premium drama.<sup>3</sup>

3. The BBC launched its iPlayer in 2007. Since then, many have anticipated the death of “linear television” (i.e. television consumed as it is broadcast). However, despite a large shift towards non-linear services – including on-demand viewing of traditional broadcast television – most television is still viewed when it is broadcast.

### Total video minutes per day of all users aged over 16: UK, 2018



Source: Ofcom Media Nations UK 2019

4. On one level, the growth of subscription video-on demand services represents a growth in consumer choice, often of high-quality, high-budget content. However, when giving evidence to the Committee, media lecturer Dr Catriona Noonan described the “myth of choice” in video content, which is in effect constrained both by genre and access:

Particularly in Wales, I think there’s an interesting dynamic around this idea of choice. Yes, we have lots and lots of tv drama. I could spend all day, every day watching new, high-quality tv drama, and I can watch it across a lot of different services, but, actually, if you look at other genres, for instance, one of the other things that I look at is arts content, there’s less choice—less choice of UK, original content. So, there are areas of

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<sup>3</sup> House of Lords Communications and Digital Committee, **Public service broadcasting in the age of video on demand**

abundance and there are areas where I think that we're having restrictions, but often they get lost in the mix.

And the second thing I would say about choice is that to have this entirety—. For a Welsh audience to have the entirety of choices available, you have to have very deep pockets.<sup>4</sup>

- 5.** Huw Jones, former Chair of the S4C board, explained that the growth in content generally has not led to growth in Welsh language content. At the same time, it has created additional pressures for creators of Welsh language content:

Contrary to what has happened with regard to the English language, there hasn't been an increase in commercial product with regard to the Welsh language, because the cost of television and audiovisual content has increased, so the market doesn't provide Welsh language content, and one then has to be concerned that this pressure on the funding available to produce new content in Welsh is happening at the same time as the choice available in the English language has increased exponentially.<sup>5</sup>

- 6.** News is another genre that has not been provided, so far, by global streaming companies. As Hywel William from the Ofcom Advisory Committee said:

I don't think that Netflix have any intention of providing news and current affairs about Wales. That's simply not going to happen. That's the role of the public service broadcasters we have.<sup>6</sup>

- 7.** Professor of Creative Industries Ruth McElroy pointed out that SVOD productions that have taken place in Wales have provided economic, but not cultural benefits. Netflix's *Sex Education*, for example, is filmed in a variety of locations in south Wales, but:

There is no clear cultural representational value to that programme. However, it did give us an opportunity for some of the young people, who mostly come from the south Wales Valleys, [...] before they'd even graduated, to work on a Netflix production, which in terms of their CVs is really important.<sup>7</sup>

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<sup>4</sup> Para 133, CWLC Committee 20 November 2019

<sup>5</sup> Para 13, CWLC Committee 5 March 2020

<sup>6</sup> Para 18, CWLC Committee 5 March 2020

<sup>7</sup> Para 221, CWLC Committee 20 November 2019

**8.** However, “in terms of long-term revenue streams of independent production companies”, she felt, “there’s a real problem”.<sup>8</sup> Dr Noonan pointed out that most independent production companies in Wales are not large enough to work with the global streaming giants. Furthermore, she felt that SVODs’ business models limit the extent to which they offer benefits to independent production companies in three main ways:

The first one is the rights, about how they buy the rights and how they buy the rights internationally. So, if you do find yourself having a success, you’re not able to leverage that value across multiple markets. The second one is, from my knowledge, the independent sector rarely gets any information about how content has performed. And that’s a really important resource in terms of being able to determine market value. [...]

And then [...] the third one, what the Lords started pointing to is an overheating—that there’s an inflation of the costs and demands on talent. The thing about that third one, though, is we can do something about that in terms of training and development, as we’ve said. So, I think there are risks with independent production companies working with the SVODs and I think that there are certain ways that we can mitigate some of those risks, but a lot of them are just because they aren’t accountable in the way that public service broadcasters are, and we talked about that at the beginning.<sup>9</sup>

**9.** Ofcom’s Kevin Bakhurst highlighted the production boom spearheaded by global streaming companies, and the opportunities for large scale productions to be made in Wales:

There is an incredible enthusiasm amongst some of the really big companies [...] to produce in the UK, and there are some centres of excellence, and actually, Wales is clearly a centre of excellence for drama and high-end drama. [...] And in fact, their ambition to work in the UK is often only limited by the amount of studio space available and talent available.<sup>10</sup>

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<sup>8</sup> Para 222, CWLC Committee 20 November 2019

<sup>9</sup> Para 224-225 CWLC Committee 20 November 2019

<sup>10</sup> Para 29, CWLC Committee 20 November 2019



## Devolution will not be televised: the biggest shortfall is in news and current affairs coverage

**10.** Responses to the Committee's consultation and witnesses expressed a widespread feeling that the supply of media content for Wales is inadequate. Martyn Ingram, from production company Wales and Co, summed the situation up:

The market does not, for me, supply Wales with what it needs, and that is across the whole media. [...] So, I think there is a real sense for intervention in the market, as much as you can, and that has to be through some form of regulatory procedure.<sup>11</sup>

**11.** News and current affairs coverage was the biggest shortage identified. Angharad Mair, representing the National Broadcasting Council, a voluntary group set up to explore the future of broadcasting in Wales, told the Committee:

I don't know how the people of Wales receive their news. There aren't enough current affairs programmes. There aren't enough discussion programmes, especially in English.<sup>12</sup>

**12.** Consultees also cited other weaknesses in media provision for Welsh audiences. For example, Mudiad Meithrin (who provide Welsh-medium early years care and education in the voluntary sector) describe a shortage of children's programming, stating that "mae plant Cymru sydd yn gwyllo CBeebies yn derbyn rhaglenni heb unrhyw gyfeiriad at iaith, diwylliant, gwead cymunedol na daearyddiaeth Cymru."<sup>13</sup>

**13.** Responding to this comment, BBC Cymru Wales Director Rhodri Talfan Davies said that "The BBC in Wales has no real history in terms of children's output" and that "there is an opportunity there, and I think there's a fair point made in that criticism".<sup>14</sup>

**14.** Academics at Cardiff University have conducted research – commissioned by the BBC Trust and Ofcom, and peer-reviewed academic studies – about how network broadcasters report devolved issues. Professor Justin Lewis summarised the findings of this work in his consultation submission:

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<sup>11</sup> Para 140, CWLC Committee 11 March 2020

<sup>12</sup> Para 13, CWLC Committee 11 March 2020

<sup>13</sup> Mudiad Meithrin written evidence (Welsh only)

<sup>14</sup> Para 159, CWLC Committee 22 January 2020

- Across all UK network news broadcasters, coverage of devolved issues remains overwhelmingly focused on England.
- The audience in nations with devolution cannot therefore rely on network news for coverage of major issues like health and education.
- Broadcasters have largely failed to take the opportunities that devolution has provided to compare and contrast policy approaches across the UK's four nations.<sup>15</sup>

**15.** Cardiff University research was used to inform the BBC's King Report into BBC network news and current affairs coverage of the four UK nations in 2008. A follow-up study found that BBC news coverage had changed to become more accurate, and better reflected post-devolution politics in the UK.

**16.** The pandemic has increased the visibility of the Welsh news deficit. In our report into The impact of the COVID-19 pandemic on journalism and local media (September 2020) we stated:

The differences in lockdown measures across the UK have contributed to an increase in awareness of devolution but UK news providers have frequently published information that inaccurately reports issues that are devolved to Wales. Misinformation is damaging to democracy in Wales at the best of times, but during the current crisis it undermines efforts to tackle the disease in Wales.<sup>16</sup>

**17.** Throughout this Senedd, this Committee has carried out pieces of work that have identified deficits in media content for Wales. These include:

- In 2018 the Committee called the retreat of news journalism from Wales “a profound public policy issue, which policy makers at all levels, not least the Welsh Government, need to address as a priority issue”.<sup>17</sup>
- In 2017 the Committee said that the BBC should “provide an additional £30 million annually for English language drama and broadcasting about Wales”.<sup>18</sup> The BBC has since committed to investing an additional £8.5 million per year in English language programming for Wales.

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<sup>15</sup> Professor Justin Lewis, written evidence

<sup>16</sup> p15, Impact of the COVID 19 pandemic on journalism and local media

<sup>17</sup> Read all about it: Inquiry into news journalism, May 2018

<https://senedd.wales/laid%20documents/cr-ld11544/cr-ld11544-e.pdf>

<sup>18</sup> The Big Picture: The Committee's initial views about broadcasting in Wales, February 2017

<https://senedd.wales/laid%20documents/cr-ld10916/cr-ld10916-e.pdf>

- In 2017 the Committee said that cuts in funding for Welsh language broadcaster S4C “have been both severe and disproportionate” and are having “a lasting and severe impact on its ability to provide its service”.<sup>19</sup>
- In 2017 the Committee said that “the sort of laissez faire approach described by ITV Cymru Wales has not led to Welsh voices being adequately represented on the ITV network. The channel’s approach to commissioning has failed to capture the richness of Welsh communities and there are considerable aspects of Welsh life that are not portrayed either on ITV network or on ITV Cymru Wales”.<sup>20</sup>
- In 2018 it called for the UK Government to consider introducing a regulatory requirement for commercial radio stations in Wales to report on distinctly Welsh news, as well as local and UK news as part of its reform of commercial radio. In the same report it called for the BBC to explore options to enable a Wales opt-out on network radio services. Neither of these recommendations have been implemented.<sup>21</sup>
- In 2019 it called for the Welsh Government to develop a film strategy which, among other things, would “support Welsh language and other distinctly Welsh productions with a view to increasing the visibility of Welsh language and culture on the international stage”.<sup>22</sup>

**18.** Colin Nosworthy, from Cymdeithas yr Iaith Gymraeg, felt that this deficit in news coverage had serious consequences, telling the Committee:

I think the lack of information as to who makes the decisions is so serious that you’re putting the future of democracy at risk here in Wales.<sup>23</sup>

**19.** Ofcom’s Kevin Bakhurst noted that Welsh audiences feel the BBC ought to improve its representation and portrayal of Welsh life:

One of the really important things where we’ve said the BBC needs to do better is about representing and portraying the peoples of the

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<sup>19</sup> Outside the box: The future of S4C, August 2017 <https://senedd.wales/laid%20documents/cr-ld11157/cr-ld11157-e.pdf>

<sup>20</sup> The Big Picture: The Committee’s initial views about broadcasting in Wales, February 2017 <https://senedd.wales/laid%20documents/cr-ld10916/cr-ld10916-e.pdf>

<sup>21</sup> Tuning in: Inquiry into radio in Wales, December 2018 <https://senedd.wales/laid%20documents/cr-ld11993/cr-ld11993-e.pdf>

<sup>22</sup> Inquiry into film and major television production in Wales <https://senedd.wales/laid%20documents/cr-ld12524/cr-ld12524-e.pdf>

<sup>23</sup> Para 164, CWLC Committee 5 March 2020

United Kingdom, and also to the rest of the United Kingdom and to themselves. We know, from our research about audiences in Wales, that that's one area in particular that the audience in Wales thinks the BBC needs to do a bit better on.<sup>24</sup>

### Our view

The Committee is unanimous in its view that **the supply of media content for Wales is inadequate**. The growth of global streaming giants has led to a boom in content, but within narrowly confined genres. It has done little, if anything, to provide more content specifically for Welsh audiences.

The economic benefits of the growth of SVOD (subscription video on demand) production are welcome, but limited. It is unclear how many Welsh production companies are of a sufficient scale to work with these global giants. Those that do have little access to data – streaming figures, for example – to give them the market intelligence needed to thrive in this new world.

In 2019 the House of Lords Select Committee on Communications and Digital published its report Public service broadcasting: vital as ever. We affirm their central conclusion, that public service broadcasting remains vital. **Public service broadcasting provides culturally vital content that an open-market does not**. The rise of global streaming services provide a welcome addition to public service content, but does nothing to change this fundamental dynamic.

Similarly, public service broadcasters, which work collaboratively with production companies, are the bedrock of the screen industries in Wales. Whilst welcoming the economic benefits of, say, Netflix's *Sex Education*, we have not seen anything to suggest that streaming giants can replace this role.

The impact of broadcasters in Wales, both those providing public service and commercial content, needs to be measured, not only by the amount of spend, but also to the degree it meets the needs of the people of Wales, including reflecting Welsh stories from all its communities, promoting the Welsh language, and enhancing Welsh democracy.

Our inquiry revealed **widespread dissatisfaction with the supply of media content for Welsh audiences**. News and current affairs content was the biggest shortfall identified. We agree with this analysis, given the vital role that this content plays in a functioning democracy.

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<sup>24</sup> Para 41, CWLC Committee 20 November 2019

The Welsh Government has told us that it is prepared to consider investment in this area. We strongly welcome this shift in attitude, and call on the Welsh Government to establish an ongoing central fund to support news journalism, with arms-length delivery and accountability to secure impartiality.

A successor committee in the Sixth Senedd should also keep abreast of the work of the Llywydd in this area, following a letter to this Committee outlining her eagerness for the Senedd Commission to seek to address the democratic deficit.

But Wales is more than just a democracy, and other aspects of life need to be represented in our media. We are grateful to Mudiad Meithrin for drawing attention to a shortage of children's programming, and BBC Cymru Wales' Rhodri Talfan Davies for committing to look at this issue.

Over this Senedd, the Culture, Welsh Language and Communications Committee has highlighted a number of areas where Wales is badly served by the media, across television, radio and news providers; news and non-news content; and in both Welsh and English languages. The findings of this inquiry suggest that this view is shared by audiences in Wales.

**Recommendation 1.** The Committee's view is that enhanced broadcasting responsibilities for the Senedd and Welsh Government would materially improve media provision in Wales. The Welsh Government, UK Government and Ofcom should set out how the provision of media content for audiences in Wales can be improved.

**Recommendation 2.** The Welsh Government should establish an ongoing central fund to support news journalism, with arms-length delivery and accountability to secure impartiality.

## 2. Funding

Wales has not been served well by the current system for determining funding for public service broadcasting, where the UK Government can make decisions with little democratic oversight.

### The licence fee

**20.** The BBC is funded from a licence fee, payable – with exceptions – by anyone who wants to watch programmes online or on an online TV service. The use of this mechanism, rather than, for example, funding from a subscription service or tax, is intended to safeguard the BBC’s independence from government and the market. Since 2013, the majority of the funding for Welsh language broadcaster S4C has also come from the licence fee. S4C is due to be funded entirely from the licence fee from the next licence fee settlement period in 2022.

**21.** The exact amount of licence fee revenue raised in Wales is not known, but in its evidence for this inquiry the BBC estimated that £184 million, out of a total UK figure of £3,690 million was raised in Wales.

**22.** The BBC provided the following analysis of its spend in Wales:

#### BBC expenditure in Wales, 2018-19

	2018/19 (£m)
Network content	
TV	49
Radio	3
Online and Red Button	1
<b>Total network spend</b>	<b>53</b>
Local content	
TV-BBC One	25
TV - BBC Two	8
Radio Wales	15



	2018/19 (£m)
Radio Cymru	14
Online and red button	11
<b>Total local spend</b>	<b>73</b>
National Orchestra of Wales	5
S4C (BBC Wales programmes)	22
Development	1
Distribution	25
<b>Total</b>	<b>179</b>

Source: BBC [submission](#) to Culture, Welsh Language and Communications Committee inquiry into the Devolution of Broadcasting, 2019

**23.** In the same year (2018-19), S4C received £74.5 million of licence fee generated funding. This puts the total licence fee generated spend in Wales at £253.5 million, £69.5 million more than the BBC estimate is raised in Wales. However, this calculation includes BBC network spend in Wales, which also benefits audiences across the UK. Cymdeithas yr Iaith is the only body that has provided the Committee with a detailed proposal of what they think a devolved broadcasting structure in Wales should look like. Cymdeithas cites the Basque Country as an example of the devolution of broadcasting succeeding in a sub-state country, and notes the multiplicity of TV channels and radio stations provided by EitB – the Basque public broadcaster. EitB has five TV channels and five radio stations. Cyngor Cyfathrebu Cenedlaethol/The National Communications Council also calls for an increase in the number of broadcasting channels.

**24.** In his evidence to the committee, BBC Cymru Wales Director Rhodri Talfan Davies claimed that the licence fee funding for services for Wales alone was significantly higher than the equivalent figure in the Basque country. He also stated that the decision not to have the same volume of channels that EitB have was one made consciously by BBC Cymru Wales:

‘The truth is that the funding from the licence fee coming to Wales for national services for Wales- not the Doctor Whos and the Casualties, just for national services in Wales- is significantly in excess of the funding that’s going to the Basque services, it’s just that we choose to

deliver it with a single channel rather than three channels, or with one radio station rather than four, and those are decisions we've made in Wales. But the funding is significantly in excess, and for me, that's the elephant in the room in this whole conversation: in any question of devolution, do you end up with the web of funding and resources to continue to deliver at scale and quality?

**25.** This analysis has been disputed by Cymdeithas yr Iaith and requires further scrutiny due to the difficulties in comparing broadcasting systems across different nations.

### Wales needs greater influence in licence fee discussions

**26.** The level of the licence fee is set every 5 years or so by the UK Government following negotiations with the BBC. In November 2020 the UK Government formally began the process to agree the level of the licence fee from 2022. This is the first time that the licence fee will also cover all of the public funding provided to S4C. Whilst launching the licence fee renewal process, the UK Government announced a panel of ten media experts to “help shape the future of public service broadcasting”. Ofcom is already undertaking a similar piece of work, under the title, Small Screen. Big Debate.

**27.** Previous BBC Director-General Lord Hall has strongly criticised the manner in which previous licence fee discussions have taken place. He told the Commons Digital Culture, Media and Sport Committee in July 2019 that licence fee negotiations should not happen at such speed behind closed doors in the future, Lord Hall said.

I feel very, very strongly that this mustn't happen again,[ ... ] It happened in 2010 over a period of a few days, behind closed doors, and it happened again in 2015.

I think when it comes to 2021, next time it's negotiated, it needs to be in plain sight with parliamentary involvement in a way that allows proper debate to take place.<sup>25</sup>

**28.** Professor Justin Lewis noted that key decisions made by the UK Government – such as the licence fee settlement – would have been opposed by the Welsh Government. He states “devolving powers over broadcasting provide an

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<sup>25</sup> Government's TV licence fee decision was 'nuclear', BBC boss says - BBC News

opportunity to give the Welsh Government a seat at the table in areas like BBC licence fee renewal, or funding for S4C".<sup>26</sup>

**29.** The model of governance that he called for was distinct among evidence taken by the Committee. He described what could be called a 'federal model', where Wales has power over broadcasting, but uses this power to make decisions collaboratively with other UK nations about broadcasting at a UK level. He described his proposals which he felt would give the BBC more independence and stability:

I do worry about the role that Government plays in setting the level of the licence fee, because I think that compromises the independence of the BBC. But if the future of the BBC has to depend upon agreement of a number of different devolved Governments around the UK, then, actually, I think that that's going to lead to more compromise, it's going to lead to a more stable environment.<sup>27</sup>

**30.** He expanded on his view that devolution, in his mind, was a means to an end of securing Welsh input into crucial decisions about the future of public service broadcasting:

The prize here is not being able to suddenly regulate in all kinds of ways that would be complex and difficult. It's having a very clear Welsh voice that is listened to and has to be listened to in central Government decisions about UK-wide broadcasters, because, at the moment, all of that power rests in London about all of these areas and Wales can be completely ignored. So, devolution is a potential route to that. It doesn't guarantee it, but it's a potential route to it. It's a legally complex area. If there was another route to it, I could see that also being a useful way forward, but, at this point, devolution looks like the most obvious legal route to that.<sup>28</sup>

**31.** The House of Lords Select Committee on Communications and Digital has called for the introduction of "an independent and transparent process for setting the licence fee". Their proposals include the establishment of a BBC Funding Commission which would:

...consult widely on the BBC's role and functions, taking account of all its duties and privileges, and public expectations, before making a

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<sup>26</sup> Para 96, CWLC Committee 5 March 2020

<sup>27</sup> Para 121, CWLC Committee 5 March 2020

<sup>28</sup> Para 117, CWLC Committee 5 March 2020

recommendation to the Secretary of State. The BBC's responsibilities to serve both young and old audiences, to compete with big tech and to remain a source of soft power, require a generous settlement.<sup>29</sup>

**32.** When asked whether Welsh representation on a licence fee commission would address his concerns, Professor Lewis called this:

Quite a clever model, which both addressed issues about Wales and representation, but also addressed the independence of the licence fee.<sup>30</sup>

**33.** Martyn Ingram agreed to proposals for a federal model for devolution in the UK, saying:

Anything that can take Wales's case directly is good for me, and I think, sometimes, we're a little far away from the levers of power. I think devolution and bringing a political pressure, to be honest, to achieve the general consensus, I think, of what we need in Wales, I would see as definitely advantageous.<sup>31</sup>

**34.** Glasgow Caledonian University's Professor David Hutchinson, in his paper to the Committee, said that he can "see the case, politically and culturally, for trying to move to a federal model".<sup>32</sup> However, he notes that for either full or further devolution of broadcasting "to work properly it might well need to be accompanied by substantial change in the constitutional arrangements of the United Kingdom".<sup>33</sup>

**35.** The previous Culture Secretary told the Lords Communications and Digital Committee in October 2019 that she would "listen to the evidence on all sides" about the BBC becoming a subscription service. However, the Lords Committee says that it "found very little support for this model" during its inquiry, and concluded:

The licence fee is the guarantor of the BBC's financial independence and underpins its unique quality. A subscription model would

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<sup>29</sup> <https://publications.parliament.uk/pa/ld201919/ldselect/ldcomuni/16/1602.htm>

<sup>30</sup> Para 152, CWLC Committee 5 March 2020

<sup>31</sup> Para 143, CWLC Committee 11 March 2020

<sup>32</sup> Prof Hutchinson, written evidence

<sup>33</sup> Prof Hutchinson, written evidence

undermine the fundamental principle of universality that the BBC should be free-to-air.<sup>34</sup>

**36.** BBC Cymru Wales Director Rhodri Talfan Davies described the licence fee as the “least worst option”<sup>35</sup>. He said that moving to a subscription model was possible, but would change the fundamental nature of the broadcaster:

[...]there are lots of good creatives in the BBC who can do anything, but it wouldn't be the BBC, and it wouldn't fundamentally be an organisation that, in a sense, is uniquely committed, on a UK level, to serving everybody and giving value to all audiences.<sup>36</sup>

**37.** S4C Chief Executive Owen Evans noted that:

If you agree there's market failure, then a subscription model doesn't really tally with funding that type of activity.<sup>37</sup>

**38.** Martyn Ingram emphasised the particular importance of the licence fee debate for Wales:

Wales has a particular voice in that, because I think we're back to the market failure. If you do dismantle the licence fee in whatever form, I think the consequences for Wales and public service broadcasting could be really serious. So, I think it's really important that the Welsh perspective and the Welsh situation is heard through this debate<sup>38</sup>.

**39.** Whilst considering funding for public service broadcasting, it is important to remember that the competition posed by new streaming services to PSBs comes not just from their availability, but their massive content budgets. Netflix and Amazon can reportedly spend as much as £15 million per hour on production<sup>39</sup>. By comparison, the BBC's current indicative tariff structure shows a maximum spend of £1 million per hour for premium drama. S4C's comparable figure is £240,000.

**40.** Professor Hutchinson notes:

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<sup>34</sup> House of Lords - Public service broadcasting: as vital as ever - Select Committee on Communications and Digital (parliament.uk)

<sup>35</sup> Para 46, CWLC Committee 22 January 2020

<sup>36</sup> Para 46, CWLC Committee 22 January 2020

<sup>37</sup> Para 53, CWLC Committee 22 January 2020

<sup>38</sup> Para 172, CWLC Committee 11 March 2020

<sup>39</sup> House of Lords Committee report

If the Scottish, Irish or Welsh Assemblies wish to enhance broadcasting within their nations, then they really have to face up to the fact that they may have to find the cash themselves.<sup>40</sup>

**41.** A comparison is frequently made between funding for the BBC in Wales, and that in Scotland – which has a channel filled with content specifically for Scotland. BBC Scotland was **announced** by the BBC in February 2017, with a proposed annual budget of £30m (£19m of new money, and £11m from programmes previously made for BBC Two in Scotland).

**42.** BBC Cymru Wales Director Rhodri Talfan Davies discussed the different approaches taken by the BBC in Wales and Scotland when he gave evidence to the Committee in September 2018. He noted that the budget for BBC Scotland would be “almost identical” to the BBC Cymru Wales budget for English language television, and that:

I think it is absolutely appropriate that there is asymmetry in terms of how different nations want to spend their money. The view that we took very, very clearly was two things. One, that the market is moving, so the rise of on-demand players is very significant and we want to play big on the on-demand players. What do we know works there? We know that drama works there. So, that’s why Hidden, Requiem and Keeping Faith have their combined requests on iPlayer, to date, at 37 million. Drama is expensive but it plays well. Comedy plays; we’ve got a big season of comedy launching next week. The other thing we wanted to do is we wanted to put our content where the biggest audiences are. So, we deliberately focused in Wales on BBC One and we focused on getting our content particularly onto BBC Two at a UK level. So, all our focus is on delivering quality, raising the bar and getting our output to the biggest audiences.

When we talked about a channel in Wales, the issue that we came up with in Wales is (a) there isn’t audience demand, and you need to listen to and respect where audiences are, but the second thing was that—and S4C have to grapple with this—filling channels requires certain levels of volume, and I don’t think we’re really—we don’t want to be in the volume game, we want to be absolutely in a quality place. The reason Nick increases tariffs and the reason he can invest more in comedy and drama is because he doesn’t have to fill schedules. So, we have taken a different route from Scotland, but I suspect, in terms of

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<sup>40</sup> Prof Hutchinson written evidence



the audience return, for audiences here in Wales, and for getting us on the network, it's the right approach for us.<sup>41</sup>

**43.** However, in 2019-20 the BBC spent almost 70% more on English language local content in Scotland than it did in Wales. More was spent on BBC Scotland (£44m) than Welsh local content for both BBC1 and BBC2 put together (£35 million).<sup>42</sup>

**44.** Since 2010 the licence fee has been used to fund additional activity, from rural broadband rollout to S4C, reducing the amount of funding otherwise available to the BBC. Most recently, in 2019, the UK Government decided to stop funding licences for over-75s whilst passing the responsibility to decide on the future of this concession to the BBC. The BBC's decision to mitigate the impact of this UK Government cut – by providing free licences for those over 75 on pension credit – will still cost the BBC about £250 million by 2021-22. The Voice of the Listener and Viewer, (a charity representing the interests of audiences in UK), has calculated that the BBC's real (inflation-adjusted) public funding for services aired for UK audiences has been cut by 30% in the past decade.<sup>43</sup>

**45.** Professor Hutchinson describes the “unending pressures on the licence fee generated by the Westminster government”.<sup>44</sup>

### Cuts to S4C have been “severe and disproportionate”

**46.** In 2010, the UK Government both reduced funding for S4C, and changed the source of this funding. Previously, most of S4C's revenue was provided directly by the Department for Digital, Culture, Media and Sport ('DCMS') and linked to inflation. Since April 2013 the majority of that funding has come from the licence fee, with the DCMS continuing to provide a comparatively small grant (currently £6.8 million). S4C's commercial income represents approximately 2.5% of the broadcaster's overall income.

**47.** Current annual levels of public funding - £74.5 million from the licence fee and £6.8 million from DCMS – is fixed until 2021-22. Public funding for the channel following this period will be a matter for discussions preceding the 2022-23 to 2027-28 licence fee settlement period.

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<sup>41</sup> Para 96, CWLC Committee 26 September 2018

<sup>42</sup> BBC Annual Report 2019-20

<sup>43</sup> <https://www.vlv.org.uk/news/vlv-research-shows-a-30-decline-in-bbc-public-funding-since-2010/>

<sup>44</sup> Prof Hutchinson written evidence

**48.** S4C's funding has reduced from £102 million in 2010 to £81 million in 2018-19, a real-terms reduction of 37%.<sup>45</sup>

**49.** These cuts were criticised as being made through a political agreement in 2010 between senior UK officials at the BBC and UK Government in London, without proper consultation with Wales or S4C.

**50.** In 2017, in its report on the future of S4C (Outside the Box), the Committee said that cuts in funding for the broadcaster "have been both severe and disproportionate" and are having "a lasting and severe impact on its ability to provide its service".<sup>46</sup>

**51.** Former S4C Chair Huw Jones was asked whether he would support the devolution of powers over S4C, but not the rest of broadcasting:

I think the arguments are around either devolving broadcasting as an entity, or not devolving broadcasting. Devolving S4C would mean devolving the responsibility for funding S4C, and therefore, I come back full circle: right, where's the money coming from?

The S4C board is a body that exists with a single purpose, namely to provide a service—or services now—on the media through the medium of Welsh. It's a body that has the right to make its own decisions. There aren't many restrictions upon it. The restrictions on digital operation have been removed. The limitation on S4C is a limitation of funding. So, I don't move too far from that fundamental point. And for anyone who is arguing for the devolution of S4C alone, I would want them to prove what the benefit to the public would be of doing that.<sup>47</sup>

**52.** Llion Iwan, from production company Cwmni Da, similarly suggested that broadcasting should either be devolved in entirety, or not at all, rather than solely devolving responsibility for S4C. "If you're looking at broadcasting", he told the Committee, "everything should be included in that—all the media in the languages".<sup>48</sup>

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<sup>45</sup> Calculated using the Bank of England's Inflation Calculator

<sup>46</sup> <https://senedd.wales/laid%20documents/cr-ld11157/cr-ld11157-e.pdf>

<sup>47</sup> Para 70, CWLC Committee 5 March 2020

<sup>48</sup> Para 138, CWLC Committee 11 March 2020

## Our view

Decisions about funding, including how and where it is spent, are the biggest determinant of the volume and quality of public service broadcasting and the extent it serves the needs of Wales and Welsh audiences. **The UK, including Wales, has not been served well by the current system, where the UK Government can make decisions about the licence fee with little democratic oversight.** The BBC and S4C, who together provide the bulk of broadcast content specifically for Welsh audiences, have seen their funding substantially reduced over the last decade. Moreover, there is increasing uncertainty about the continued support of future UK Governments to the principle of a licence fee.

The Lords Select Committee on Communications and Digital has called for the introduction of “an **independent and transparent process for setting the licence fee**”, in the form of a “BBC Funding Commission”. We endorse the principle that public broadcasters’ funding should be set independent of the whims of the government of the day, and an independent commission may be one mechanism to achieve that. If this were to be done on a UK level, it would need to recognise that the licence fee also funds S4C, so this description as a “BBC” commission is inappropriate.

Given the Welsh language’s status as a minority language, Welsh language funding would need protecting with a statutory funding formula in any mechanism established. Such a funding formula could, for example, specify a minimum proportion of the licence fee that must be spent on Welsh language media content.

Seeking the input of an independent commission in setting the licence fee, or the allocation of other public funding for broadcasting, could help to ensure that the BBC and S4C serve the audience’s, rather than politicians’, interests.

Some Members of the Committee would like to see a fully devolved model for public service broadcasting, where licence fee – or other – revenue is wholly raised and spent in Wales. In such a model we would like to see a Welsh public service broadcasting commission established to insulate funding decisions from political interference.

Within current arrangements, **we would like to see an independent funding commission established with distinct Welsh representation.** The licence fee’s use for funding S4C would make this Welsh representation and a statutory funding formula for Welsh language broadcasting even more vital. Decisions

made by such a body should seek consent from representatives from all UK nations. If decisions are made without full consent, a statement should be laid explaining the grounds for the decision in the UK Parliament and the Senedd.

Talk of moving funding for public service broadcasting to a subscription model fails to address the purpose of public service broadcasting. The value of the BBC and S4C is that they provide content which we, as a society, deem necessary, but the free market does not provide. Replicating the business models of Netflix and Amazon Prime is no way to fill the gaps in provision that their services leave behind.

**The committee unanimously agrees that it is an anomaly that powers over S4C reside with Ministers in London, and not those in the country where the language of its content is largely spoken.** A traditional argument made for this situation is that it avoids disagreements in Cardiff about how much funding should go to S4C rather than other government priorities, such as health and education. But this is a specious argument, given that the Welsh Government already has to prioritise spending between departments.

Nevertheless, once S4C is funded by the licence fee, this argument evaporates. We heard an argument that if powers over S4C were devolved to Wales, this should only be if all other broadcasting powers were also devolved. This argument overlooks the extent to which broadcasting powers are now shared between UK and Welsh institutions.

An alternative position is that devolution of S4C should be part of a wider package of broadcasting devolution, including related Welsh language and broadcasting matters such as Welsh language and Welsh national news (both in English and Welsh) content on commercial radio and local television.

The Committee thinks that powers over S4C (such as setting a remit for the broadcaster, and ongoing accountability) and other public service Welsh language broadcasting matters should be devolved to Wales. As with all other publicly funded broadcasters, S4C's funding should be set by a body arms-length from government, with an 'Independent Licence Commission' as one potential option in seeking to achieve this. Some Members feel that this change should take place alongside further devolution of equivalent powers over English language broadcasting. It should be noted that this recommendation is part of a wider package outlined in our other recommendations which concern broadcasting in both the Welsh and English languages.

**Recommendation 3.** Within current arrangements, we would like to see an independent funding commission established with distinct Welsh representation. Decisions made by such a body should seek consent from representatives of all UK nations. Welsh appointees to this Committee should be made by the Welsh Government and subject to a confirmation hearing in front of an appropriate Senedd committee.

**Recommendation 4.** The UK Government should devolve powers over S4C and other public service Welsh language broadcasting matters to Wales.

### 3. Regulatory change

There is a debate as to whether commercial public service media providers, who face increasing competition from global streaming services, can bear the weight of additional regulation to provide more public service content. Two of the areas where we think regulation could secure more public benefits are Welsh language content on commercial radio and ITV network production in Wales.

**53.** None of the respondents to the Committee's consultation that called for the devolution of broadcasting saw it as an opportunity to reduce regulation. The provision of a greater supply of media content for Wales, or production in Wales, is therefore, in this view, to be secured by either direct funding or placing more requirements on media providers.

**54.** In the case of the directly-funded media (BBC and S4C) this is straightforward: whatever they are required to provide, subject to sufficient funding, they will. Other public service content (e.g. ITV and commercial radio) is secured by providing a scarce resource (a coveted slot on the electronic programme guide or a broadcasting frequency) to a commercial broadcaster in return for a set volume of public service content (such as local news). Whether more PSB content could be obtained from these commercial operators is therefore a case of whether they will, effectively, be happy to pay more for the resource they obtain by virtue of being a PSB.

**55.** Throughout our inquiry we heard a debate as to whether commercial media providers, who face increasing competition from global streaming services, can bear the weight of additional regulation to provide more public service content.

#### Does Wales get enough from the Channel 3 licence?

**56.** ITV Cymru Wales is the only privately-funded public service broadcaster in Wales. Across the UK there are 15 regional Channel 3 licences, which describe the terms on which the owner of the licence must operate. Other than the two Scottish licences - which are owned by STV - all of these licences are owned by ITV.



**57.** The Channel 3 licence for Wales requires ITV to provide four hours of news and 90 minutes of non-news programming for Wales every week. This licence was renewed in 2014 for ten years.

**58.** Until 2014, Wales was served by a dual Channel 3 licence which also covered the West of England. There was a significant drop in ITV's output for Wales in 2009, following Ofcom's second Review of Public Service Broadcasting. The cuts were agreed at that time because the regulator perceived a real risk that ITV might have chosen to give up its status as a public service broadcaster and hand back its Channel 3 licences. In 2014 the Channel 3 service for Wales was granted its own licence which runs to 2024.

**59.** The Committee discussed the value of the Channel 3 licence for Wales with Phil Henfrey, ITV Cymru Wales's Head of News and Programmes in 2016. He noted that the value of the licence has significantly dropped since the 1970s and 1980s, when a Channel 3 licence provided a monopoly in television advertising. As a consequence of this declining value, he suggested, Ofcom is able to place fewer public service obligations on the licence-holder. He told the Committee:

If people want more (public service content) – and I completely understand why people would want more – then how do you increase the value of that licence to whoever holds it? ... Ofcom looked at that in 2008-9. It didn't find any answers.<sup>49</sup>

**60.** Magnus Brooke, ITV Director of Policy and Regulatory Affairs, expanded on the commercial pressures that, he felt, limited the obligations that the broadcaster could take on:

We're competing with all of these players who have many of the same shareholders that we do, we need to continue to make a viable commercial return. And it does mean that it's difficult for us to take on obligations that don't make a profit.<sup>50</sup>

**61.** The Committee discussed with witnesses this tension between commercial pressures and public service obligations, more broadly than just relating to ITV. Cymdeithas yr Iaith Gymraeg suggested to the Committee that, in the event of devolution of broadcasting, more programming could be secured without the need for extra public funding. Heledd Gwyndaf said:

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<sup>49</sup> Para 169, CWLC Committee 6 October 2016

<sup>50</sup> Para 92, CWLC Committee 22 January 2020

I don't see that any additional resources are required to provide, for example, 50 per cent more programmes. One thing I don't understand is this fear that these commercial companies will pick up and leave.<sup>51</sup>

**62.** The National Union of Journalists ('the NUJ') suggested that the value of the Channel 3 licence in Wales should conceptualise the additional value to ITV of owning "all available Channel 3 licences":

Although ITV may try to argue that the same obligations are no longer affordable, it is worth noting that in 2016, ITV took over UTV, the Channel 3 licensee in Northern Ireland. In addition to funding very similar PSB obligations (368 hours of programmes, including 257 hours of news, 57 hours of current affairs and 44 hours of other genres, at a cost of 6.1 million in 2018) ITV has to write off over the eight remaining years of the licence £100 million spent on the acquisition of UTV (less €10 million raised through the resale of UTV's assets in the Republic of Ireland). It is clear that ITV attaches a premium to owning all available Channel 3 licences.<sup>52</sup>

**63.** On the other hand, the Ofcom Advisory Committee's Hywel William felt that since the PSB content required from ITV Cymru Wales "hasn't changed significantly since our second review of public service broadcasting" [...] "the regulator [Ofcom] has got that more or less right, in terms of the economic situation and the pressures on ITV".<sup>53</sup>

**64.** Ofcom's Kevin Bakhurst noted that, although he would not describe the Channel 3 licence as a "burning platform":

The value of the PSB benefits they [ITV] get in terms of spectrum or in terms of prominence on electronic programme guides is diminishing all the time as audiences change their habits.<sup>54</sup>

**65.** Similarly, Professor McElroy said:

The value of the [Channel 3] licence is not static and is changing, but I would say there's still value in that licence, and it's also very good to see ITV Wales continuing to operate with an ethos of public service broadcasting.<sup>55</sup>

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<sup>51</sup> Para 187, CWLC Committee 5 March 2020

<sup>52</sup> CWLC Devolution of broadcasting consultation response

<sup>53</sup> Para 54, CWLC Committee 20 November 2019

<sup>54</sup> Para 64, CWLC Committee 20 November 2019

<sup>55</sup> Para 166, CWLC Committee 20 November 2019

**66.** One area where Professor McElroy suggested that more public value could potentially be extracted from the Channel 3 licence in Wales was in establishing regional production quotas:

Thinking about how ITV might engage with the wider push towards regions and nations production would be useful. I think the success of those companies in Wales, in Boom, that do that already would be a good platform from which to begin that conversation.<sup>56</sup>

**67.** Ofcom's 2020 Media Nations Report looked at the different public service broadcasters' network production spend in Wales.

Proportion of qualifying network production in Wales, by PSB: 2015-2019

		2015	2016	2017	2018	2019
<b>BBC</b>	Spend (%)	7.1	5.8	6.7	6.3	8.2
	Hours (%)	4.9	4.3	4.4	4.6	5.4
<b>ITV</b>	Spend (%)	0.3	0.1	0.01	0.01	0.1
	Hours (%)	0.1	0.1	0.1	0.1	0.1
<b>Channel 4</b>	Spend (%)	2.0	2.8	2.2	3.4	2.4
	Hours (%)	2.6	2.4	2.7	4.2	4.6
<b>Channel 5</b>	Spend (%)	0	0.3	0.4	0.2	1.4
	Hours (%)	0.1	0.4	0.5	0.2	0.5

Source: **Ofcom Media Nations 2020 Wales**, data from Ofcom/broadcasters

**68.** Ofcom's Media Nation report shows ITV's network spend in Wales is consistently the lowest of all the PSBs, by both spend and hours.

<sup>56</sup> Para 180, CWLC Committee 20 November 2019

## Ofcom needs the powers to secure provision in the Welsh language on commercial radio

**69.** Ofcom currently does not have powers to require the inclusion of particular content – such as Welsh language requirements – in commercial radio formats. It only has the powers to approve or reject applications, and decide between competing applications.

**70.** Cymdeithas told the Committee that Radio Ceredigion, which in 2018 lost its Welsh-language requirements, “encapsulated” the problem with commercial radio regulation. As such, the story bears telling in some detail.

### **Radio Ceredigion: a case study in the loss of Welsh language broadcasting**

In April 2018 Ofcom re-advertised the FM commercial radio licence for Ceredigion after the operator of the licence, Radio Ceredigion Ltd, a wholly owned subsidiary of Nation Broadcasting decided not to utilise the fast track re-licensing process. Nation Broadcasting would have had to comply with the current Format and DAB obligations if its licence were fast-tracked or renewed when it expired in May 2019. By letting the licence expire, Nation took a calculated risk that no other bidder would compete for the licence and that the company could re-apply for the licence with a new Format.

The original Format included the requirement to broadcast “Regular and identifiable Welsh language programming” but in its re-application, the proposed format is for ‘a distinctive, Welsh-in-character service’.

In December 2018 Ofcom awarded the Ceredigion licence to Radio Ceredigion Ltd. In its application, Radio Ceredigion Ltd had said that, for the new licence term, it would replace the existing Radio Ceredigion service with a relay of the service provided under the South Wales licence (Nation Radio). Both Radio Ceredigion and Nation Radio are part of the Nation Broadcasting group.

In these circumstances it was not possible for Ofcom to dictate to the bidder any aspect of its proposed Format and character of service. Legislation gives companies bidding for licences the ability to design services as they see fit and the regulator’s power is limited to ensuring that successful bidders adhere to what was promised in their bids. Ofcom cannot direct licensees to broadcast a certain type of music, a given percentage of speech, to target a given demographic or in which language it should broadcast.

**71.** Cymdeithas' Heledd Gwyndaf lamented the loss of Welsh language content on Radio Ceredigion, saying:

It's encapsulated there in Ceredigion, because my generation remembers Radio Ceredigion as it should have been—local radio in the true sense of the word. And because of Ofcom regulation, that has been let go, and it's not local in any sense at all, in the name of commercial radio.<sup>57</sup>

**72.** Cymdeithas' Colin Nosworthy felt that Ofcom's lack of powers over the Welsh language was a regulatory gap that needs filling:

It's not part of Ofcom's remit to safeguard the Welsh language; they say that very clearly. They don't have a role in safeguarding the Welsh language or regulating on its behalf, so nobody's doing that work. So, if you want the Welsh language to disappear from the airwaves in commercial terms, that's what's happening and it's happening more often these days, because nobody has a remit to safeguard the language. So, that's one area where there is a clear need for regulation, because there isn't any.<sup>58</sup>

**73.** Angharad Mair from the National Communications Council ('the NCC') felt that the regulator, Ofcom, did not support the linguistic needs of the local community. She told the Committee that:

...because there isn't a strong regulator to ensure that a community radio service reflects the language of the community, what's happened is that that language has disappeared, and I think that is terrible in terms of the Welsh language.<sup>59</sup>

**74.** Nation Broadcasting's Martin Mumford noted that "The direction of regulation in commercial radio is towards deregulation". This is an issue the Committee explored previous in its inquiry into [Radio in Wales](#) (2018). Mr Mumford explained that "commercial radio, and particularly local commercial radio, is under a lot of pressure" and that:

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<sup>57</sup> Para 167, CWLC Committee 5 March 2020

<sup>58</sup> Para 169, CWLC Committee 5 March 2020

<sup>59</sup> Para 37, CWLC Committee 11 March 2020

That whole model is being challenged and, indeed, our group in Wales now is amongst the last in the UK to actually operate radio stations for individual counties with content relevant to each individual county.<sup>60</sup>

**75.** Given the commercial pressure his industry is under, Mr Mumford explained the possible impact of regulatory divergence between Wales and the rest of the UK, should broadcasting be devolved to Wales, and it pursued its own regulatory path:

I think that there is a danger that you might lose what you've got, because, if it becomes more difficult to run an organisation commercially, then commercial businesses take the route of least resistance. And there is some evidence of that. So, if you look in Scotland, under a previous set of UK-wide regulations, Global handed back one of the big licences for Glasgow because they were at that time required to provide pretty much all of their programming from the nations; it's actually part of the regulations that have changed. So, there is some evidence of where a high level of requirement for broadcasting from the nation could actually lead to licences being handed back, becoming uneconomic.<sup>61</sup>

**76.** Cymdeithas' Colin Nosworthy countered that:

It's very common worldwide that there are regulations in favour of minority languages in places such as the Basque Country and Catalunya. So, I would urge you not to listen to those capitalists whose only concern is profit.<sup>62</sup>

**77.** Professor Hutchinson, talking more generally about the impact of regulatory divergence on broadcasters states:

Competition from global streaming companies is a serious challenge to UK PSBs, and it is perfectly reasonable to suggest that any further broadcasting devolution within the UK would have to take account of any damage that might be caused to the existing PSBs.<sup>63</sup>

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<sup>60</sup> Para 23, CWLC Committee 5 March 2020

<sup>61</sup> Para 26, CWLC Committee 5 March 2020

<sup>62</sup> Para 170, CWLC Committee 5 March 2020

<sup>63</sup> Prof Hutchinson written evidence

## Global market: local or global governance?

**78.** The growth of subscription video on demand ('SVOD') consumption means that now, more than ever, Welsh audiences consume media from across the world. The extent to which, and how, this content is regulated therefore has a large impact on the services received by audiences in Wales.

**79.** In its consultation response, Radiocentre noted the global forces shaping broadcasting in the UK – with competition to the incumbent providers coming from streaming giants such as Spotify and Netflix. It says:

These increasing threats from global players require a swift and a coordinated response which, ultimately a centralised regulator is in the best position to undertake. Steps have already begun to address this nationally, which would mean that any policy shifts towards devolution in this area would potentially harm the UK's broadcasting sectors ability to compete both here in the UK and internationally.<sup>64</sup>

**80.** And that:

The worldwide nature of these challenges and the speed at which technology develops underscores the importance of the UK having a united policy.

**81.** It feels that the UK is best responding to these policy challenges collectively, rather than with separate broadcasting jurisdictions across the nations.

**82.** BBC Cymru Wales Director Rhodri Talfan Davies raised the question of which tier of governance is best at regulating global companies:

If you believe that the fundamental issue facing all public broadcasting in the UK is globalisation, what regime, what regulatory regime, is most likely to be robust in creating space for public media? It's interesting—it's the US federal authorities and it's the EU that have been the most robust in those relationships to this point. The UK is now going to have to step up, on leaving the EU, and take on some of that regulatory oversight. Would devolving to Wales assist in that process or not?<sup>65</sup>

**83.** The most common suggestion for regulating global streaming giants that the Committee heard was the introduction of a levy to fund public service

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<sup>64</sup> CWLC consultation response: <https://business.senedd.wales/documents/s97860/DoB08%20-%20Radiocentre.pdf>

<sup>65</sup> Para 118, CWLC Committee 22 January 2020



content. Cymdeithas proposed raising a levy on broadcasting and telecommunications companies, as well as tech giants such as Facebook and Google. In its vision, this new revenue would be used to help fund new broadcasting channels and online services. Such tax-raising powers are outside the current competence of the Senedd, and so would require either action at a UK level or further devolution to the Senedd.

**84.** In December 2020 Ofcom published its Small Screen, Big Debate consultation document on the future of public service media. Ofcom notes:

Industry levies on telecoms companies are used in both France and Spain. In Germany and France, levies on streaming services have been introduced, on the basis that while SVoDs are becoming an increasingly important part of national broadcasting systems, they are not required to support wider broadcasting objectives within respective PSM systems.

**85.** Professor Hutchinson felt that the case for taxing global communications giants was strong, but that it might be difficult to allocate this money to funding public service media in Wales:

The case for taxing the online companies such as Facebook and Google is a very strong one, but it might be rather difficult to hypothecate some of the revenue - if we can get our hands on it! - in the way which is suggested.<sup>66</sup>

**86.** A decision by a UK government to tax foreign-owned companies would likely feature in any trade talks between the UK and the relevant national government. Huw Jones referred to the realpolitik of taxing global companies when he discussed this issue with the Committee:

The US is opposed, so this is going to be part of the discussions between the US and the UK with regard to trade. France has tried to introduce the same kind of measure and Macron has had to roll back on that, but it is a live issue. The perception is that the commercial media, the vast majority of them emanating from the US, are taking advantage of the rest of the world's economies without paying sufficient tax, and that's a very fair question, I think. One would imagine that a solution will be found for that in due course. And if so, and if these markets are still increasing and if the funding is going to be substantial, then one should look at that as a way, perhaps, of adding to

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<sup>66</sup> Professor Hutchinson written evidence

the funding that is available for the public broadcasting elements that are never going to be funded commercially.<sup>67</sup>

**87.** Cymdeithas' Colin Nosworthy suggested that the growth of largely-unregulated global streaming services strengthened the argument for the devolution of broadcasting:

I think some witnesses from BBC and ITV said—that because Netflix exists it's some sort of argument against the devolution of broadcasting. It's quite to the contrary: it shows that we need a body in Wales to be that regulator and to insist that the Welsh language does have prominence on those platforms.<sup>68</sup>

**88.** He explained that he wanted regulation of online platforms in relation to the Welsh language:

The question is: who has responsibility now for ensuring that the Welsh language is on digital platforms such as Netflix and YouTube? The answer is nobody. Nobody takes the role of ensuring that there is greater content through the medium of Welsh on these platforms, and that is a huge problem in terms of the visibility of the Welsh language in people's everyday lives.<sup>69</sup>

## The Eastenders question

**89.** BBC Cymru Wales Director Rhodri Talfan Davies told the Committee that audiences in Wales want both distinctive Welsh content and UK network content, such as Eastenders:

We know that audiences in Wales want both UK services and Welsh services. Give them a binary choice of one or the other and you'll get a pretty short answer from them. So, how do you ensure that there's balanced provision in Wales between distinctive representation of Wales as a nation and that bringing together of the whole UK?

**90.** Similarly, Mr Talfan Davies noted that a UK-wide BBC benefited from economies of scale, giving the examples of bidding for 6 Nations rights and funding the BBC National Orchestra of Wales.<sup>70</sup>

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<sup>67</sup> Para 18, CWLC Committee 5 March 2020

<sup>68</sup> Para 241, CWLC Committee 5 March 2020

<sup>69</sup> Para 209, CWLC Committee 5 March 2020

<sup>70</sup> Para 166, CWLC Committee 22 January 2020

**91.** Professor Hutchinson raised the possibility of devolution being accompanied by increased costs to pay for BBC “common services”:

There is a case for further devolution of broadcasting power, including the power to decide the level of the licence fee and the funding for S4C, but it would still be necessary to face the fact that, as there would have to be payment to the UK BBC for common services, then the licence fee in Wales - as in Scotland - might have to be significantly higher than it currently is.<sup>71</sup>

### **Our view**

ITV Cymru Wales is a vital pillar of public service broadcasting, contributing much-needed plurality to the licence fee-funded provision of the BBC and S4C. It produces journalism of a high quality, that is rightly popular with viewers.

**The value of the Channel 3 licence has clearly diminished** since the days when it could deliver an almost captive audience to its commercial advertisers. It now must compete both for viewers and advertising revenue with a growing number of broadcasting and streaming competitors and online advertisers. Anyone who calls for an increase in the public service conditions attached to the Channel 3 licence must explain how this is compatible with ITV’s changing market position.

That said, ITV remains popular and successful and is, in the words of Ofcom, not a “burning platform”. It is therefore appropriate that it continues to provide a significant public service contribution in return for the Channel 3 slot in Wales.

ITV’s network spend in Wales is consistently the lowest of all the PSBs, by both spend and hours. The BBC has shown that it is possible to move production out of London and the south-east of England without compromising quality. Partly because of this, Wales has a thriving production sector. We think **it is now appropriate for regulation to require ITV to produce more network content in Wales**. The flourishing local production base means this should not be too arduous for ITV, and its failure to decentralise production under its own initiative means it is appropriate for the regulator to act to compel it to do so.

The loss of Welsh language requirements on Radio Ceredigion shows that the current framework for commercial radio regulation is not fit for purpose. Ofcom’s model of regulation rests on choosing between competing providers. This model does not work when, as is the case with Welsh language content,

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<sup>71</sup> Prof Hutchinson written evidence

the market offers no providers at all. **A regulatory body should have the power to require Welsh language content in commercial radio licences in Wales.**

The UK Government's deregulation of commercial radio has led to a watering-down of local content and has not benefited listeners in Wales. We repeat our call in this report, first made in our 2018 report into Radio in Wales for the UK Government to introduce a regulatory requirement for "distinctly Welsh" or "all-Wales news", as well as the local and UK-level news that already form part of commercial radio licences.<sup>72</sup> We call on a successor committee in the Sixth Senedd to scrutinise this sector closely, and call for appropriate regulatory changes to improve services for Welsh audiences.

As currently constituted, Ofcom can only act as instructed to do so by the UK Government through legislation. There is a reasonable scepticism about the UK Government acting to give Ofcom the necessary powers to require Welsh language content on commercial radio, given the UK Government's recent moves to deregulate commercial radio, and failure to act on our previous call for "all-Wales news" to be a regulatory requirement for commercial radio in Wales. However, the UK Government needs to recognise the distinct needs of radio audiences in Wales. Failure to act in this area will only give strength to the argument that Wales needs its own powers over radio regulation.

Commercial radio, as with other broadcasters, faces increased competition from global streaming services. Regulators should therefore consider the impact on the commercial value of an FM licence when introducing Welsh language requirements. We call on the UK Government to change the relevant legislation to enable Ofcom to act in this area as part of a wider review of the 2003 Communications Act.

**Welsh public service broadcasters currently face asymmetric competition from global streaming services.** Netflix, Amazon and Disney compete for viewers with the BBC and S4C, and advertising revenue with ITV. The value of the prominence granted to public service broadcasters on the electronic programme guide is diminishing day-by-day.

We therefore think it is appropriate that **global streaming services should be regulated to strengthen the public service media ecosystem.** Such regulation could include levies to fund public service content, or requirements to carry

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<sup>72</sup> Current regulatory requirements for commercial radio refer to local news and UK-level news. The Ofcom Advisory Committee proposed a regulatory concept of "all-Wales news", where commercial radio licences would include a requirement to report on Welsh national news: <https://business.senedd.wales/documents/s73961/RADIO01%20-%20Ofcom%20Advisory%20Committee.pdf>

public service content. The aim of such regulation should not be to turn these platforms into public service broadcasters, but to ensure the continued provision of high-quality content for Welsh audiences.

**Recommendation 5.** There should be a requirement for the Channel 3 licence in Wales to produce a greater proportion of network content in Wales. The Welsh Government should have a formal role in this process.

**Recommendation 6.** The UK Government should legislate to enable an appropriate regulatory body to require Welsh language content as part of commercial radio licences in Wales, alongside introducing a regulatory category of “all-Wales news”. The Welsh Government should have a formal role in setting these requirements.

**Recommendation 7.** The UK Government should regulate global streaming services to strengthen the public service media ecosystem. Such regulation could include levies to fund public service content, or requirements to carry public service content. The UK government should consider extending levies to include other large online companies, such as search engines and social networking sites.

## 4. A voice for Wales

The Welsh Government and the Senedd already have a number of formal roles relating to broadcasting, in what could be called “creeping devolution”. Still, the voice of Wales has not been loud enough, or heard clearly enough, to give Wales the media it needs.

**92.** Within the current framework, a number of bodies seek to speak for Wales on broadcasting matters. These include:

- Ofcom. Wales is represented in the UK communications regulator in the following main ways:
  - The Ofcom Wales team, based in Cardiff, represents Ofcom in Wales and Wales within Ofcom – managing relationships and communications with the general public and a wide range of industry stakeholders, including politicians, industry and the media. The decision-making authority within Ofcom resides with a range of decision makers, two of which, the Content Board and main Board, comprise of representatives from Wales, Scotland, Northern Ireland and England.
  - The Advisory Committee for Wales, composed of independent industry experts, advises Ofcom about the interests and opinions, in relation to communications matters, of people living in Wales.
  - The Ofcom board member for Wales. The Board is Ofcom’s main decision-making body and provides strategic direction for the organisation.
  - The Content Board Member for Wales. The Content Board is a committee of the main Board and it sets and enforces quality and standards for television and radio.
- Senedd Culture, Welsh Language and Communications Committee. This was established at the beginning of the Fifth Senedd, and has carried out inquiries into radio, S4C, film and major television production, news journalism, broadcasting in general and this inquiry

into the devolution of broadcasting. It also holds regular scrutiny sessions with the BBC, ITV and S4C.

- The Senedd has a Memorandum of Understanding with Ofcom which commits the regulator to consulting the “appropriate committees” of the Senedd on its Annual Plan, appearing before Senedd committees and laying its annual report and accounts before the Senedd. The Senedd also has a Memorandum of Understanding with the BBC which commits the broadcaster to laying its annual reports and accounts before the Senedd and appearing before Senedd committees.
- The Welsh Government is a signatory to the Memorandum of Understanding with Ofcom, which commits the regulator to meet with Welsh Ministers, consult the Welsh Government on its Annual Plan and gives the Welsh Government power to appoint the Welsh members of the Ofcom board. The Welsh Government also has a Memorandum of Understanding with the BBC and UK Government which commits the UK Government to consulting the Welsh Government on the BBC Charter review, and for the Welsh Government to lay the draft charter and framework agreement before the Senedd. The Welsh Government also invests in television and film production through a number of investment vehicles.
- House of Commons Welsh Affairs Committee. The Committee conducts pre-appointment hearings for the Chair of the S4C board and scrutinises relevant bodies, such as the BBC, and the UK Government on broadcasting matters.

**93.** Prof Hutchinson described the UK’s evolving constitution as “asymmetrical quasi federalism”.<sup>73</sup> He notes that “The same might be said of the accountability mechanisms faced by broadcasters, and the super-regulator, Ofcom”. He describes the distribution of power and activity around broadcasting in the UK between UK and devolved governments as “creeping devolution”, but that the “centralisation reflex” – whereby UK bodies, including the government, wish to consolidate power – “has not disappeared”.

**94.** He goes on to describe what he sees as a regressive move from the BBC to get rid of its audience councils. These were composed of independent volunteers, and scrutinised the work of the BBC in the UK’s composite nations:

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<sup>73</sup> Prof Hutchinson written evidence



Instead of Audience Councils we have sub-committees of the BBC Board, with no non-BBC representation on them. It really is quite strange that as political devolution has proceeded apace, the BBC has gone in the opposite direction. [...] Why the abolition of the successor bodies to the Broadcasting Councils, the Audience Councils, has not provoked a political backlash, given that it is completely contrary to the spirit of devolution, has greatly puzzled me.<sup>74</sup>

**95.** Huw Jones, former Chair of S4C, raised the question of who will speak for Wales on broadcasting matters, if the subject remains reserved to Westminster.

If there isn't a Welsh regulator, if broadcasting hasn't been devolved as a responsibility, where is the voice of Wales on issues related to broadcasting? Where is that going to be expressed? Where is the evidence gathered, as well as looking at suggestions of Cymdeithas yr Iaith with regard to funding? Who is going to drill down into those to look at how many of them stack up and how many don't? And it feels to me that broadcasting plays such a fundamental role in society that it isn't adequate for us to say, 'Well, it isn't devolved, so that's it, we'll leave the discussion to happen somewhere else'. There should be some way of bringing the parties together to discuss these issues. Because there is a tendency in Wales for us to be reactive. When something new happens in the world of broadcasting externally, then perhaps we'll get our act together and we'll get our Members of Parliament to debate the funding of S4C, instead of the work happening continually, and that there is some consensus created and there is continuous pressure, either through Ministers or by other means, to express the aspirations and the rights of Wales.<sup>75</sup>

**96.** When Euros Lewis, National Communications Council ('the NCC'), said that the NCC was a "movement that was drawn together to look at the issue of broadcasting in a radical way".<sup>76</sup> Angharad Mair added that the group meets "three or four times a year in order to [...] try and find solutions to the major issues facing broadcasting and devolution".<sup>77</sup>

**97.** The NCC's Angharad Mair described the absence of a body speaking for Wales on broadcasting matters:

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<sup>74</sup> Prof Hutchinson written evidence

<sup>75</sup> Para 28, CWLC Committee 5 March 2020

<sup>76</sup> Para 6, CWLC Committee 11 March 2020

<sup>77</sup> Para 8, CWLC Committee 11 March 2020

If we look at reports from Ofcom, it's very rare that they discuss Wales at all. There's a recent report here by the House of Lords looking into public service broadcasting. It's very hefty, but I think the word 'Wales' is only mentioned once, and that I think is the basis of the problem that we have currently.<sup>78</sup>

**98.** Nation's Martin Mumford said that "a greater level of scrutiny and intervention in the systems that already exist is perhaps going to give a better outcome"<sup>79</sup> than changing where the power over broadcasting lies in the UK.

**99.** Llion Iwan, from production company Cwmni Da, referenced the work of the Senedd in scrutinising broadcasting, saying:

you do already scrutinise and express views and publish detailed reports on broadcasting here in Wales. So the scrutiny's already happening, but the power isn't devolved, of course<sup>80</sup>.

**100.** The NUJ calls for the Welsh Government to be able to "contribute objectives" to the work of UK bodies. For example, it says that:

We propose that, subject to a vote in the Assembly, the Welsh Government should be able to contribute objectives for Wales in the overall requirements set out for the BBC in the next charter.<sup>81</sup>

**101.** The NUJ also suggests the Welsh Government should follow the same process to input into future Ofcom decisions on the Channel 3 licence for Wales.

## **Our view**

Wales's voice within the regulation of broadcasting is represented in a diverse number of places. But the inadequate supply of media content for audiences in Wales suggests that either this voice is not loud enough, or it is not being heard.

Since this Committee's establishment in 2016 it has published reports into the future of S4C, radio, broadcasting in Wales and news journalism. Were it not for this Committee, it is not clear where this detailed, Wales-focused analysis would take place. We are confident that we have raised the level of debate in this area, and have lobbied for significant changes and improvements across the board.

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<sup>78</sup> Para 22, CWLC Committee 11 March 2020

<sup>79</sup> Para 68, CWLC Committee 5 March 2020

<sup>80</sup> Para 133, CWLC meeting 11 March 2020

<sup>81</sup> CWLC Devolution of broadcasting consultation response

Public service broadcasting is entering a period of seismic shift, as the traditional roles of public service broadcasting are re-evaluated in light of the growth of online streaming platforms. Wales needs a distinct voice in this debate, as the needs of Welsh audiences are unique. We therefore suggest the following, as a minimum, as ways of strengthening Wales's voice in the debate about the future of public service media:

- **The Sixth Senedd should include a committee with media policy as a central part of its remit.** The Senedd has formal roles, contained in its memoranda of understanding with Ofcom and the BBC, to scrutinise these bodies. These roles could be carried out more effectively if Senedd Members had the opportunity to build up expertise in the issues facing public sector broadcasting and the media more generally.
- This Committee should conduct confirmation hearings, if necessary in joint meetings with a relevant Westminster committee with the Ofcom board member for Wales, the BBC board member for Wales and the chair of the S4C board. In the advent of further devolution of broadcasting powers to the Senedd, this committee could play a further role in the regulation and financing of media provision.
- Whilst current arrangements continue, **the Welsh Government should have an enhanced role in setting the terms of the next Channel 3 licence for Wales.** The strength of the Welsh Government's contributions would be enhanced by establishing an external expert group to advise the Welsh Government on media matters.
- This external group could also provide advice to the Welsh Government on how to improve the provision of news journalism.
- **The BBC should provide an improved, successor forum to the Audience Councils,** where the views of audiences in Wales can be gathered and contribute to the development of BBC policy.

**Recommendation 8.** The Sixth Senedd should include a committee with media policy as a central part of its remit. This Committee should conduct confirmation hearings, if necessary in joint meetings with a relevant Westminster committee, with the Ofcom board member for Wales, the BBC board member for Wales and the chair of the S4C board. Ongoing scrutiny of these bodies, as well as other broadcasters, including the holder of the Channel 3 licence, should be part of its work programme. In the advent of further devolution of

broadcasting powers to the Senedd, this Committee could play a further role in the regulation and financing of media provision.

**Recommendation 9.** The Welsh Government should have an enhanced role in setting the terms of the next Channel 3 licence for Wales.

**Recommendation 10.** The BBC should provide an improved successor forum to the Audience Councils, where the views of audiences in Wales can be gathered and contribute to the development of BBC policy.

## Annex A: List of oral evidence sessions.

The following witnesses provided oral evidence to the committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed on the Committee's website.

Date	Name and Organisation
<b>20 November 2019</b>	<b>Angharad Mair,</b> Tinopolis Cymru <b>Caitriona Noonan,</b> Cardiff University <b>Dr Ruth McElroy,</b> University of South Wales <b>Gareth Williams,</b> Rondo Media <b>Hywel William,</b> Advisory Committee for Wales, Ofcom <b>Robert Andrews,</b> Ofcom <b>Kevin Bakhurst,</b> Ofcom <b>Llion Iwan,</b> Cwmni Da <b>Martyn Ingram,</b> Made in Wales
<b>22 January 2020</b>	<b>Magnus Brooke,</b> ITV <b>Phil Henfrey,</b> ITV Cymru Wales <b>Owen Evans,</b> S4C <b>Rhodri Talfan Davies,</b> BBC Cymru Wales
<b>5 March 2020</b>	<b>Martin Mumford,</b> Nation Broadcasting <b>Huw Jones,</b> Former Chair of the S4C Board and Authority <b>Justin Lewis,</b> Cardiff University <b>Colin Nosworthy,</b> Cymdeithas yr Iaith Gymraeg

Date	Name and Organisation
	<b>Aled Powell,</b> Cymdeithas yr Iaith Gymraeg <b>Heledd Gwyndaf,</b> Cymdeithas yr Iaith Gymraeg
<b>11 March 2020</b>	<b>Angharad Mair,</b> Tinopolis Cymru <b>Euros Lewis,</b> National Communications Council <b>Llion Iwan,</b> Cwmni Da <b>Martyn Ingram,</b> Made in Wales

## Annex B: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on the Committee's website.

Reference	Organisation
<b>DoB 01</b>	Cardiff University
<b>DoB 02</b>	Response from an individual
<b>DoB 03</b>	Response from an individual
<b>DoB 04</b>	ITV Wales
<b>DoB 05</b>	Nation Broadcasting
<b>DoB 06</b>	Welsh Language Initiatives
<b>DoB 07</b>	Carmarthenshire County Council
<b>DoB 08</b>	Radiocentre
<b>DoB 09</b>	Undeb Cenedlaethol Athrawon Cymru
<b>DoB 10</b>	National Communications Council
<b>DoB 11</b>	Cylch yr Iaith
<b>DoB 12</b>	Merched y Wawr
<b>DoB 13</b>	Mudiad Meithrin
<b>DoB 14</b>	Response from an individual
<b>DoB 15</b>	Response from an individual
<b>DoB 16</b>	The Welsh Language Society
<b>DoB 17</b>	Equity
<b>DoB 18</b>	Response from an individual
<b>DoB 19</b>	National Union of Journalist
<b>DoB 20</b>	Response from an individual
<b>DoB 21</b>	Response from an individual
<b>DoB 22</b>	Response from an individual
<b>DoB 23</b>	BBC Wales
<b>DoB 24</b>	Response from individuals



Reference	Organisation
DoB 25	Response from an individual