

Task and Finish Group on the future outlook for the media in Wales

Response from the Welsh Language Society

The Welsh Language Society has been campaigning on broadcasting issues for forty years and has played a key role in the fight for S4C and for a Welsh language service on the radio. Since the Society first became involved in this area we have believed that Wales should have its own independent broadcasting service, which is independent of London and which gives due respect to the Welsh language as the native language of Wales. We therefore respond to this consultation with forty years of experience behind us.

1. Our vision

The presence of the Welsh language in the media is vital for everyone in Wales. The Welsh Language Society believes that everyone in Wales, whether they speak Welsh or not, have rights to the Welsh language. That is, not only the right to use and to learn the language, but also to listen and to see it. In addition, we believe that the inclusion of the unique Welsh language in the media serves to enrich and strengthen it. Therefore, the presence and comprehensive use of the language on TV, radio, the web and all other media is a key part of our vision as an organization.

This vision is not limited to the Welsh Language Society only. The main aim of the new Language Commissioner, who is soon to be established by the Welsh Government, is to safeguard the principle 'that people in Wales are able to live their lives through the medium of Welsh if they so wish.' This aim reflects the ambition outlined in the document, *Iaith Pawb*, published in 2003, that 'everyone across Wales is able to use Welsh in their social lives, their leisure time and in their business activities'.

The Welsh Language Commissioner will have a duty to serve everyone in Wales – whatever their age or linguistic ability. Learners have identified the importance of seeing and hearing Welsh on various media, including S4C, as this is the only contact some of them have with the Welsh language outside the classroom. As we increasingly turn towards the TV and the web during our leisure time, it is crucial that these services are all easily accessible in Welsh.

Challenges to the Welsh language

The Language Society anticipates that the census results will show a decline in the number of our Welsh speaking communities, namely those where over 70% of the population speaks Welsh. We believe that several factors affect the language of our communities and the ability to use Welsh in all aspects of life is necessary if the language is to survive as a thriving and living language.

Our communities, which are already vulnerable, are facing difficult times. As jobs are lost in every industry, companies who produce TV programmes, as well as the BBC, have announced job cuts. This is a cause for concern as we anticipate more cuts and more jobs losses. This means that more will leave our communities to find work, and because young people are affected most, they will be the first to leave.

Effect of the free market

The negative effects of the free market can be seen clearly in the context of local radio, where the Welsh language output has declined significantly due to lack of regulation. The history of Radio Ceredigion and Radio Carmarthenshire exemplifies what is happening. It has also highlighted a tendency for the market to undermine Welsh language initiatives, as the law does not protect the linguistic nature of these initiatives.

The failure of the market is one of the reasons S4C was established in statute. Before the existence of our only Welsh language television channel, Welsh language programmes had to compete with English language programmes for money and space in the schedule. We are concerned that the agreement between the BBC and S4C will cause competitive tension between the two languages, contrary to the message of bilingual equality which has developed during recent years, and that it is therefore a huge step back.

Devolving broadcasting to Wales

The recent changes and cuts to S4C and BBC Wales show that organizations at Westminster have no understanding of the unique needs of Wales.

There is a consensus across civil society that the proposed schemes for S4C will be of no benefit to the Welsh language or Wales in general. The plans for S4C have been criticized by leaders of the four main parties in Wales, the Welsh Affairs Committee, dozens of unions and language bodies. Tens of thousands of people have signed petitions, attended rallies and sent complaints to politicians. Instead of fighting the plans, the broadcasters sought to work within the limitations of the

misguided schemes agreed between the BBC Trust in London and the UK Government's Culture Secretary, Jeremy Hunt, at the last minute in October last year. In this respect, the Westminster Government and the broadcasters ignored the united voice of Wales.

Virtually no consultation took place with S4C or Welsh politicians during the process of planning to reduce the channel's budget. Furthermore, the new agreement between S4C, the BBC and DCMS was a fait accompli and was forced on the people with no democratic discussion held on the future of S4C. The willingness of the S4C Authority to co-operate in enforcing such an agreement was disappointing. In light of this lack of democracy, the Welsh Language Society has announced that we will now

focus on the putting pressure on the Welsh Government to insist that powers over broadcasting is devolved to Wales. We call on AMs and the broadcasting bodies to support this demand.

In addition, a situation is developing in the radio market where Welsh is becoming increasingly inaudible due to shortcomings of the regulatory regime. Rhodri Williams, Head of Ofcom in Wales, recently admitted:

"Our clear interpretation is that we have no power to do this [set linguistic conditions on radio licenses] "

[Pg. 4, Golwg, November 3rd 2011]

Having considered the intentions of the UK Government's Culture Secretary as regards the Communications Bill, we see again a lack of understanding of the Welsh context, with the emphasis on the free market and reducing regulation; policies that undermine the Welsh language. We believe that the moral right to decide on the future of broadcasting in Wales should lie with the people of Wales, and we need our democratic body here in Wales to be given the responsibility to avoid making foolish decisions with no consultation with civil society in Wales.

2. Digital Media

The importance of open source software to the Welsh language

We believe that the availability of open source software creates more opportunities for Welsh language initiatives to succeed. This pattern is exemplified by software such as WordPress, MediaWiki, Linux, Firefox and LibreOffice, where the best examples of the use of Welsh are to be seen.

The Government should invest in localization projects, such as the agored.com project where OpenOffice has been translated into Welsh with the help of public funds. The open source code ensures the freedom to re-use the code for other projects and purposes. For example, the work on OpenOffice enabled the same vocabulary to be used in the Firefox plugin (see <http://murmur.bangor.ac.uk/?p=14> for more information). Most localization projects currently depend on volunteers, and so the availability of Welsh language software is patchy rather than comprehensive.

On the web, content management systems such as WordPress and Drupal are being used frequently as the basis for websites for governments, organizations and companies. Therefore, content management systems and their themes and plug-ins must be considered as part of the web's infrastructure. Organizations, business, civil society and individuals can use the systems to publish content from Wales and in Welsh.

We therefore suggest that the Government should adopt a policy that favors the use of open source software in the public sector - the Assembly Commission could show

leadership in this context. We further believe that a fund should be established to promote the digital projects mentioned above that would contribute positively to the media as well as to the Welsh language.

Investing in a 'free culture' online

The term 'free culture' originates from the book *Free Culture* by Professor Lawrence Lessig, a prominent figure in the field of content. The Society believes that Welsh culture, on average, benefits from online content that is not constrained by strict copyright licenses. Therefore, we should, as a society, be in favour of releasing Welsh language content in a format which enables as many users as possible to read, watch and hear the language online.

The use of Welsh could be strengthened, and our language corpus could be developed and opportunities created to re-use the language on the web and beyond by creating opportunities to share Welsh language content or to invest in Welsh content projects.

For example, one of the reasons that Wikipedia had been so successful is because of its use of free licenses, namely GFDL and Creative Commons. Wikipedia contributors can participate with confidence as the license ensures freedom to export the content to be used for any purpose in the future. In the Basque country, the Government has taken the opportunity to invest in creating 10,000 articles in the Basque language on Wikipedia's Euskara platform:
<http://haciaith.com/2011/06/15/llywodraetheuskadi-yn-fodlon-talu-am-10-000-erthygl-ir-wikipedia-basgeg/>

As the Government considers investing in such projects, it should consider funding research projects involving the use of technology in Wales as this could improve Welsh and Welsh language provision in all mediums. Furthermore, it should consider establishing a Welsh-only online dictionary, as Welsh to English or vice-versa dictionaries are the only ones currently available. A Welsh dictionary of this nature would also contribute to the online language corpus and would contribute to improving its use within digital media.

Learners

We should be maximising opportunities to provide Welsh learning materials online, by releasing 'Welsh for Adults' learning notes on the web under a free license such as Creative Commons. We believe there are many advantages to releasing course material in such a way, such as helping learners to develop their skills, increasing the demand for professional lessons, assisting organizations and companies in the teaching of the language in the workplace. Any such steps would increase the demand for Welsh content in general.

DotCymru

The Welsh Language Society supports the campaign to create a Welsh domain on the world-wide web. In the Society's opinion, the domain should be given the Welsh name .cymru. The Society notes that .cymru is the most popular choice among the people of Wales, according to a survey by the economic consultancy LE Wales. (<http://www.walesonline.co.uk/business-in-wales/business-news/2011/11/09/internetdomain> name-for-wales-of-wales-could-help-business-91466-29742711 /)

We are concerned that providing the English domain .wales would only confirm the discrimination against the use of Welsh which exists in the digital economy at present.

3. The Welsh Fourth Channel (S4C)

Shortcomings

Although it appears that some form of financial security has been secured for S4C until 2017, the channel is still facing huge cuts, and the independence of the channel isn't guaranteed as one broadcaster is governed by another. Therefore, although we are certain that S4C will exist in the future, there is no certainty about the kind of future it faces. Unless changes are made to the published plans, we are concerned that both languages in Wales will have to compete for resources.

The fact that the discussions and agreement were conducted behind closed doors, excluding the audience and the people of Wales from the process, clearly shows how both bodies were thinking. S4C has departed from what the people had in mind when they were campaigning and demanding a Welsh language channel. When S4C was established the vision was that it would respond to, represent and serve the needs of the people. The channel achieved that vision for a period but by now it is seen as a body that tends to centralize work rather than use the opportunity to provide work and opportunities for people in their communities that would mean that S4C was something that was relevant and which belonged to the communities and was, therefore, closer to the people.

Devolution

We are calling for the devolution of responsibility over broadcasting because we believe that decisions that affect Welsh audiences should be made here in Wales.

Having seen the way the British Government and the BBC in London treated the channel, and the undemocratic agreement between S4C and the BBC, we are totally convinced that devolution of responsibility for broadcasting is now the only way forward.

Moreover we believe that S4C should, like the BBC, be placing itself within our communities thereby recognizing that it has a role to play in promoting the Welsh language economy in communities across Wales, and aiming to make them sustainable.

Viewing figures

The success of the channel should not be judged on its viewing figures, but rather on its contribution to the Welsh language. However, we welcome the fact that, according to figures for this year, there was an increase of 3% in the number of people who watch S4C and an increase of 54% in the number who watch S4C online. Having said that however, we accept that S4C could perform better, and we therefore call for a new S4C.

Beyond viewing figures, we should consider other statistics relating to the multiplatform environment, where the nature of the relationship between the producer and audience is different to that seen on traditional TV. For example, the audience can watch programmes on different platforms at any time and participate via Twitter, Facebook, games, comments, user-generated content etc.

A new S4C

We need a multimedia S4C which is accountable to its people. We also believe that S4C should be devolved across Wales and that it should recognize its role in the regeneration and sustainability of Welsh communities.

A wide cross section of people watch S4C. It gives children the opportunity to watch and feel that the Welsh language is normal because the characters and programmes that they watch on a day to day basis speak Welsh. This should continue beyond the early years age. There is still a tendency to link Welsh with school life and children 'grow out' of the Welsh language. S4C re-enforces this by producing plenty of programmes for young children but the variety of programmes for teenagers is inadequate, and this is something that needs to change.

As technology develops people watch TV in a different way and make far more use of the web and mobile phone technology etc. The Welsh language must be part of these developments or it will become irrelevant to the normal day-to-day activities of young people. A number of projects already exist, and S4C could be part of this by providing a small sum for development.

We are very keen for S4C to extend its remit to include the digital media, provided that additional resources available to achieve this, and become a media publisher rather than being limited to a TV channel only.

It is important to secure additional funding for these kind of developments. A significant percentage of the S4C Authority's funding formula should be identified for investment in digital media in order to build future audiences, ensuring that linear TV remains robust. A digital director should be appointed to develop this.

In summary, we call for a new S4C based on the following principles:

- **FINANCIAL SECURITY** – a television channel cannot be run without the security of adequate funding. We believe that a financial formula should be provided for S4C in statute based on inflation. This would provide the long term stability needed for it operate with confidence.
- **INDEPENDENCE** - The independence of Welsh language public service media is essential to ensure democracy and plurality in the media. S4C and the S4C Authority must be editorially, strategically and creatively independent of the BBC.
- **QUALITY** - A Welsh language media that is of equal quality to the English language media is crucial to the survival of the Welsh language.
- **DIGITAL** - Creating a diverse media ecosystem is essential to the future of the Welsh language. A significant investment in digital media is of upmost importance to ensure that Welsh is given its rightful place within all mediums.
- **COLLABORATION** - Collaboration between media organizations and beyond is essential to allow our media to be as robust as possible, but this collaboration must not compromise the independence of the Welsh provider.
- **DEVOLVING THE CHANNEL AROUND WALES** - We believe that the existing S4C headquarters at Llanishen is unsuitable for the media in Wales and that various aspects of the process of running a Welsh language public media service should be devolved.
- **A WELSH MEDIUM S4C** - The channel should be in Welsh only; this is what makes it unique among all other channels in the world

Finance

It should be emphasized that the current S4C agreement is only an interim agreement – it must be reconsidered by the time the 2017-2027 license is due for renewal. Westminster will be consulting on a new communications measure next year. Before deciding on the final arrangements for S4C, the independence of the channel and its funding formula must be secured in statute. The Welsh Government should lead this discussion.

Because of the massive cuts to the channel's budget, the Department of Culture in London but will contribute £7 million to S4C in the 2014/2015 financial year. This would not be a large amount to be devolved to the National Assembly for Wales and it would mean that control over the channel could be moved to Wales. The Welsh Government should start providing funding for the channel in order to demand a greater say in shaping the foundations for its future. Such a contribution could help secure the independence of the channel from the BBC by ensuring that Welsh politicians had some kind of control over the relationship.

Along with the broadcasting unions, we published a policy document supporting the call for a levy on private broadcasters and telecommunications companies in order to fund public broadcasting. According to research commissioned by BECTU and the NUJ, it is estimated that tens of millions of pounds could be raised by charging such a levy.

4. The British Broadcasting Corporation (BBC)

We are concerned about the recently announced cuts to BBC Wales. We believe this a threat to our democracy as well as to the life of our nation in the broader sense. We are also concerned that a number of major cultural and political programmes produced for S4C and Radio Cymru are under threat. While the BBC in London have done their utmost to protect Radio 4 they are making very little effort to protect Welsh services because they are not relevant to them. This is another example which strengthens the argument for devolution.

We believe that the BBC should ensure that Radio Cymru is a totally Welsh service. We have already mentioned the habits of young people, who are very much influenced by the media. It is necessary to protect and increase opportunities for Welsh groups, especially the younger ones, to be heard and to increase opportunities to discuss Welsh culture.

Compared to the BBC's English language website, its Welsh site is of an inferior standard, for example, there is no Welsh language sports service on the site now. We have also seen the corporation withdraw its public presence from the Urdd Eisteddfod. This is all cause for considerable concern as the corporation seeks to jointly manage our only Welsh language television channel.

The current structure of the BBC means that BBC Wales is just a branch of the BBC which is not actually given the freedom to operate independently of its British structure. By devolving powers, it would be possible to create a Welsh BBC which would enable the corporation to create a community structure and operate in various areas throughout Wales rather than being centralizing in Cardiff.

5. The Printed Press

We believe that a daily Welsh language newspaper is a vital element in strengthening the nation's identity and self-confidence; according to the European Union, this should be a feature of every language. Enabling people to read the news in their own language would be a huge step towards normalizing the language among the population of Wales. It would also inspire and encourage learners, and would be a step towards creating a situation where there is a healthy variety of Welsh and Welsh language journalism; something which is greatly needed in our devolved politics.

While we welcome the contribution of Golwg 360 to the language's online presence, it must be recognized that a large part of the population of Wales does not see the

world wide web from one end to week to another, because of financial reasons and the availability of services. Such people are to be found in all social classes and include all age ranges. People who do not work in front of a computer on a daily basis, are told that they do not have the right to see the information provided online. This is a small example of the inability to apply socialist principles to linguistic issues.

We believe that the existence of community newspapers are vital to the Welsh language at grass-roots level, and it is necessary to build on their current work, and to also digitize the newspapers.

6. Local Radio

The situation regarding the Welsh language on local radio is disastrous and has deteriorated significantly over recent years.

Firstly, we would argue that the term 'local radio' is meaningless in Wales as it is commercial companies who win licenses and manage the stations. They come from outside our communities and the service they offer is completely English in nature.

These problems were highlighted in the recent argument about Radio Ceredigion which is owned by Town and Country Broadcasting. Although a successful mass campaign was organized earlier this year against attempts to reduce the Welsh language output, we are now facing another attempt by the company, together with Ofcom, to remove any Welsh language provision by re-tendering the license. Ofcom refused to include a clause in their language scheme which would ensure that linguistic considerations would be included in local radio licenses. We therefore urge the Minister with responsibility for the Welsh Language in the Welsh Government to decide whether Ofcom's language scheme will include a clause on linguistic considerations.

Ofcom's language scheme.

We believe that only a Welsh organization can protect Welsh language services at the end of the day. But, failing this, we need changes in the law so that a Welsh authority can insist that every local radio station provides a Welsh language service, as recommended below in the context of local TV.

7. Digital Radio (DAB)

Long before we heard about DAB radio sets, a crucial decision by the BBC has caused serious problems many years later for listeners to Welsh radio.

It was decided to place Radio Cymru, Radio Wales and Radio Scotland in the same category as English BBC regional stations with the intention that these would be placed on a digital radio multiplex together with commercial radio stations instead of being on the BBC multiplex across Britain.

This has worked well in England but as commercial radio is weak in Wales in general, and there are problems regarding receiving digital radio in large parts of Ceredigion, Conwy, Gwynedd, Pembrokeshire and Anglesey, where a large percentage of the population listen to Radio Cymru, and this has been very damaging. We are still waiting to receive Radio Cymru on DAB in large parts of Wales because the model was set by the BBC centrally with no consideration of the unique national implications to Wales.

8. Local TV

Given the disastrous failure of commercial radio to ensure that Welsh is given its rightful place, we believe that local TV presents another clear risk to the Welsh language in the media. We believe that any local TV service should ensure that Welsh is given its rightful place. In those areas where Welsh is a community language, any local television service should be provided mainly through the medium of Welsh, and no local TV service in any part of Wales should be allowed to broadcast in English only.

Commercial Service

The market has failed to offer a TV or radio service which is worthy of Wales and it has failed the Welsh language (which is one of the reasons S4C was established). Even during the heyday of the independent regional companies who served the ITV network, Wales as a country was not considered to be large enough to be able to maintain its own service (that's why Wales & the West was HTV's license). If Wales was not a large enough unit to provide an independent television service how on earth are we expected to maintain a smaller service with hundreds of more channels competing against them?

Emulating the United States

It is clear that the Culture Secretary is basing his plans for local TV on the American model. It could be argued that such a service works there because the cities and local areas are much more powerful. There is close connection between TV and local democracy. TV therefore is used to discuss issues of concern to local citizens.

Local government in Wales does not wield the same power as the councils have very little power (who wants to watch a program that discusses on which day the bins are collected?). The body that has the equivalent power to that level of government in the United States, is the National Assembly for Wales, which receives very little attention in the Welsh media and even less in the British media.

Terrestrial broadcasting is expensive business

Television broadcasting is extremely expensive compared to new online methods. We must question how sensible it is to invest more in a service that's going out of

fashion, and that will not be available to a significant proportion of the audience anyway. Because of its landscape, Wales is more dependent on satellite and cable broadcasting than other parts of the UK, and local services are not likely to be available on these platforms.

Using money allocated to local services to create online services, and investing in faster connections in the countryside, would make far more sense and would bring greater benefits to more people.

Plans which benefit cities and towns

The plans presented are only suitable for urban areas as it is rural areas that suffer most from lack of access to digital and online services. Broadband provision should be improved consistently across the country before considering investing further in areas that already enjoy good digital provision.

A scheme which is hostile to the Welsh Language

It must be stressed very strongly that this is a scheme which is hostile to the Welsh language. In Wales we have already experienced the power of market forces in the field of local radio. Because of commercial pressures, local radio services like Radio Ceredigion have consistently reduced the number of hours they broadcast through the medium of Welsh. They are always trying to reduce the number of Welsh broadcasting hours. Those who are prominent in local radio in Wales are also leading in the field of local TV and it is their voices that are being listened to by the Minister. These are the very people who are undermining the Welsh language in our communities by ignoring the language on their local radio services.

It appears that Mr Jeremy Hunt has already declared at a meeting in Newport that Welsh will not be a condition for local TV stations and this will make them irrelevant to the lives of many in our Welsh communities. It is also further proof that this is not a scheme aimed at meeting the needs of Wales.

Rejecting the Tories' focus on competition

We reject totally the Tories' unhealthy emphasis on competition and we believe that 'integration' and 'collaboration' is far more appropriate in the Welsh (and rural) context. A policy could certainly be developed to promote community services, working with grassroots partners to serve their communities, but the current schemes propose a completely different and abhorrent vision.

If the worst comes to the worst

If this Anglicized scheme is forced upon us from London, we will need to secure some basic conditions such as a minimum percentage of hours for Welsh language broadcasting depending on the linguistic nature of the area, for example, 60% of the hours in Bangor and Carmarthen, 30% in Mold / Denbigh, and so on. This would

have to be established in the original licenses, ensuring that it could not be changed at the whim of a station's owners, and that the station focuses on the needs of the audience.

Without such a clause, the plans must be rejected as being totally inappropriate for Wales and the Welsh language

9. Rights of employees in the industry

We believe that a survey of employment practices in the broadcasting industry is needed. We understand that many employees are on short term contracts, with freelance employees on even shorter contracts, and that many work long and unsociable working hours. We believe that more permanent jobs should be created in the independent sector, and that broadcasters should insist that staff in the sector are employed on terms that are in line with best practice. Furthermore, employees should be educated as to the benefits of union membership.

10. Recommendations for the Westminster Communications Bill

We believe that the Communications Bill represents an opportunity to deal with many of the problems facing the media in Wales. We therefore recommend that the bill should include provisions for:

- Devolving power over broadcasting and telecommunications to the National Assembly for Wales to ensure expertise and the ability to make decisions on the future of broadcasting in Wales.
- Creating a federal system in the BBC - it is essential that the devolution of power takes place within the BBC, preferably by creating a federal system, in order to ensure fairness and balance.
- Empowering Welsh authorities in Wales to impose conditions on local radio and television licenses
- Establishing a funding formula for S4C based on inflation in order to safeguard the channel's future in the long term
- Raising a levy on private broadcasters and telecommunications companies to fund public broadcasting
- Widening S4C's remit to include the provision of Welsh language services on all mediums, rather than on television services only

The Welsh Language Society
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