



Professor Medwin Hughes DL
Vice-Chancellor

24: IX: 17

I write to confirm that the Panel established to review Welsh Government's support for publishing and literature in Wales has now completed its consideration of the responses received regarding the recommendations and conclusions presented to you as Cabinet Secretary. The Panel received three detailed responses namely from Literature Wales [LW], The Arts Council of Wales [ACW] and The Welsh Books Council [WBC]. The representations received represented a diverse set of opinions regarding the content and nature of the report and the recommendations presented for your consideration. Our main comments are included in this letter and additional notes are presented for your consideration in the accompanying attachment.

The Panel acknowledges the positive and constructive nature of the forward-looking response from WBC, which does not request or require further clarification of any points made by the Panel in its report. We have also noted the concerns presented by both LW and ACW and their claim that the report does not offer a fair review of the current position regarding publishing and literature in Wales. It has also noted the views strongly expressed by both LW and ACW that the comments and recommendations made by the Panel lack an evidential base and that no supporting evidence has been considered to validate a number of the recommendations made. Similarly the Panel has noted the response of the WBC and the enthusiasm with which it has welcomed its findings and its recommendations.

This is the first independent review commissioned by the Welsh Government which seeks to review the Government's overall engagement with, and investment in, publishing and literature. The Panel was aware that significant investment of Welsh Government funding has over the years been allocated to this activity and therefore appropriate consideration was given to the inter-relationship between different stakeholders as they engaged in their respective functions in promoting literature and publishing.

The number of responses received to the Panel's request for evidence highlighted the significant interest in this subject area. The nature of such responses clearly represented and articulated a diverse set of opinions and reaffirmed to the Panel that the current stakeholders associated with the production of literature and publishing held strong, passionate and forceful views regarding the current arrangements. This is not a sector which considers the current arrangements to be fit for purpose.

The Panel presented over 50 recommendations for your consideration. These ranged from detailed proposals regarding structural changes and additional support initiatives to proposals regarding organisational changes for key stakeholders.

Panel's response to the comments received

In presenting its views LW did not offer any specific comments on a number of recommendations apart from those which focused upon its own organisation. The key focus of its deliberations was to discredit the general structure and tenor of the report. ACW, on the other hand, accepted and endorsed a number of the recommendations presented. However, in the same tenor as LW, it noted its concerns regarding the contents and in particular the recommendations which focused upon Literature Wales and ACW's own oversight of the organisation. The Panel took note of the very different position WBC took as it warmly welcomed the report and acknowledged the wide ranging recommendations presented.

The Cabinet Secretary should be made aware that this is the second independent report which has been commissioned during the last three years on aspects of publishing and literature in Wales. The first report was commissioned by Arts Council Wales/Wales Arts International (WAI) and Literature Wales. The report was produced by ARAD Research and stands as an independent opinion on a number of issues relating to this review. Although funded through public investment, the ARAD report was not published. The Panel was informed that any interested party could request further information and access through WAI.

In the context of the comments received by both LW and ACW, the Panel considers that the findings and concerns expressed in this independent review should now be placed on public record. Several of these concerns have been reaffirmed in the comments and recommendations made by the Panel to the Cabinet Secretary. **They reaffirm through completely independent research and stakeholder engagement that changes are required to maximise the efficiency and impact of the promotion of literature and publishing in Wales.**

The context of the independent review by ARAD Research was to consider the development and support needed to grow new markets and profile for Wales' literature and how internationally connected the literature sector was in Wales. It was also tasked with examining the collaborative links between key organisations and institutions which supported the promotion of literature both within Wales and internationally.

The Panel received the ARAD Research report as key independent evidence and triangulated the numerous comments and recommendations with other presented evidence. Whilst endorsing a number of positive attributes associated with the publishing and literature work in Wales the report identified significant issues which were worthy of attention. The Cabinet Secretary should be fully aware of some of the key comments of this independent report commissioned by ACW/WAI and LW. Of particular importance, the Panel noted the following in the ARAD report:

"... there is a perceived need for more cohesion, better connectedness and greater complementarity between those key organisations. Stakeholders considered that a current lack of structure and clarity regarding current roles, partnerships and funding arrangements in promoting and supporting the literature sector at an international level was inhibiting potential success."

"... there is a perceived disconnect between key organisations' respective international activities. For some stakeholders this situation is exacerbated by a lack of communication and sharing of strategies between organisations."

"...The resulting lack of synergies and opportunities for joint work and promotional activities were considered a missed opportunity."

With regard to the role of Literature Wales, the ARAD report stated:

“The decision of Arts Council of Wales to concentrate powers and roles within Literature Wales over the last few years is not regarded as a positive move for the sector by the majority of stakeholders who contributed to the study.”

“The views were part of wider concerns outlined by many stakeholders regarding this process which has, in the opinion of one contributor, created a ‘monopoly of funding and resources’ to the detriment of the overall development of the literature sector in Wales.”

“The balance of opinion was that Literature Wales has not yet ‘developed into a key player internationally’ and needs to demonstrate greater expertise and understanding of international partners and market opportunities ... there was a perception from some stakeholders that the quality of international engagement work such as residencies and study visits developed and provided through Tŷ Newydd has declined since its incorporation into Literature Wales.”

The report identifies concerns regarding the current structures which support literature and publishing:

“The lack of synergy and partnerships between organisations was linked by some stakeholders to a lack of current support structures for the sector.”

Commenting on the international context, the report notes:

“...that there is now no official representation of Wales and Welsh writing at major international events.”

and

“Publishers, organisations and writers believe this is a missed opportunity to sell books and promote authors as well as develop a strong brand for literature from Wales, raise its profile and change perceptions at the top level.”

The Panel noted the specific comments made regarding the need for far greater integration between key partners:

“Given the artistic and commercial value of international engagement stakeholders considered it essential that an overarching strategy, based around more effective partnerships between the main representative organisations, is put in place.”

“Any new overarching strategy for the literature sector in Wales should therefore be clear about roles and functions of all organisations involved and ensure that all stakeholders work towards a set of shared goals.”

It is worthy of note that ARAD Research also identified, as did the Panel, the need for redefining the roles and functions of organisations which supported literature and publishing – be that within a Welsh or international context.

“There are currently a range of organisations in Wales supporting literature at an international level... this support can be ad hoc and lacks coherence and strategic drive. ... Delivery of a coherent and inclusive international

strategy thus requires a rethinking of the organisational and structural system for literature in Wales.

...the current lack of coherent partnerships and a consistent strategy within the literature sector in Wales is affecting Wales' capacity to engage at an international level."

"The roles of key players such as Literature Wales, Wales Arts International, Wales Literature Exchange, the Welsh Book Council ... should therefore be re-assessed in the light of their existing capacities and future strategic goals at an international level. Individual organisation expertise and roles should be better defined and linked to developing common goals to deliver better synergies in supporting international engagement."

"A stronger focus is required on the commercial side of promoting literature from Wales alongside the more creative residencies and exchanges."

In highlighting the above independent conclusions presented by ARAD Research, it should be noted that the Panel did not base their comments and recommendations solely on the evidence of one document. However, the ARAD report does clearly demonstrate that the claims made by both LW and ACW that the general conclusions and findings of the Panel on the current state of the Welsh literary and publishing sector were completely wrong and at odds with other assessments is simply not recognisable. **ARAD and the Panel have identified common issues and concerns.**

Both LW and ACW refer in their responses to their concerns regarding the Panel's statements about LW's governance and management. In its representation, LW claims that the Panel has not reflected appropriately upon the evidence received. The Panel can give a firm assurance to the Cabinet Secretary that a detailed and thorough consideration was given to all evidence presented.

The Panel acknowledges that a key focus of LW and ACW comments on the report were the Panel's concerns regarding the various management, strategic and governance arrangements of LW. It makes no apology for that. **This is a National Company which has received over £4.8 million from public funds and has been classified for the last six years as an institution which carries the highest risk category within the ACW framework.** In the context of public expenditure the Panel considered such a focus to be appropriate. This focus did not mitigate the Panel's understanding or recognition of other key attributes associated with LW. This was attested in the report when it was stated "based on the evidence received from LW and the diverse comments on the organisation, the Panel recognised the significant work LW has undertaken ... bursaries, writing squads, the National Poet and Young People's Laureate."

The Panel was also mindful of the fact that ACW had a 'duality of interest' with regard to this client stakeholder. The creation of LW in 2011 was a key policy development for ACW which brought together Academi and Ty Newydd as a result of the ACW's Investment Review 2010 in order to deliver an integrated strategy to support the promotion of literature in Wales. In reviewing and evaluating the evidence presented by ACW the Panel had a particular regard to 'triangulating' the evidence and evaluation of LW presented by officers of ACW.

In evaluating the current management and governance arrangements of LW, the Panel noted the reports presented by ACW itself as the designated sponsored body, including its analysis of LW in its most recent Investment Review, which is not in the public domain. It acknowledged

and took note of the fact that ACW considered LW as an organisation which it wished to be presented as “still evolving” and which was considered as “a new organisation”. It also took account of the narrative presented that ACW was engaging with LW to rectify any developmental issues. The Panel recognised such representations and took note of such views.

However, the nature and clarity of some of the reporting comments by ACW on LW did not alleviate the Panel’s concerns regarding a number of strategic issues relating to LW.

The claim is made that the Panel did not offer a measured view of LW. This is not the case. The evidence presented led the Panel to a view that, whilst acknowledging a number of successful initiatives, key fundamental issues were not right within the organisation. It based its judgement upon evidence received from stakeholders including ACW itself. Several examples could be presented, however the Panel presents the following as examples of the concerns identified:

“There is work to be done to address what appears to be a more vocalised perception of the organisation as one that is not always as collaborative, or as open as it could be.”

“The route for consulting the sector to ensure that strategy reflects and anticipates current needs and ambition is perhaps not always clear.”

“We feel that Tŷ Newydd is not performing against Literature Wales’ Business Plan and that the submitted development plan is limited in scope and strategic vision.”

“The current position appears to indicate that clear lines for financial monitoring, ongoing programme evaluation and internal communication are not embedded as we would expect – this is a cause for concern and has been the subject of both Board discussions and focussed meetings with ACW.”

[EXTRACTS FROM EVIDENCE PRESENTED BY ACW]

The Panel noted the following concerns expressed by ACW on support for writers:

“After four years of shaping its strategic priorities we do not see compelling evidence of a coherent approach to writer development that fully reflects the Business Plan narrative.”

“We do not have evidence that there is a coherent and strategic approach to evaluation, which would in turn offer strong rationales for future programming decisions.”

“We welcome LW’s vision for the future...Overall, the artistic offer over the years has continued to be innovative, diverse and as inclusive as possible. Whilst there are few questions about the quality of each individual activity and project, we have not yet seen evidence of a forensic examination of the current programme against LW’s strategic objectives and full sense of the cumulative benefits.”

[EXTRACTS FROM EVIDENCE PRESENTED BY ACW]

The Panel noted the views from ACW regarding a need for the Board of LW to engage in a greater level of debate to drive forward the organisation.

“Whilst we applaud the commitment of the Board and its support of the senior management team and staff we expect it to engage in a greater level of debate to drive forward the strategic direction of the organisation. It is essential that

confidence is engendered at Board level to constructively challenge and explore, and to come to informed decisions based on a range of options.”

“Moving forward, we would like the organisation to take a more comprehensive strategic approach, with clearer evaluation and rationalisation.”

[EXTRACTS FROM EVIDENCE PRESENTED BY ACW]

Further evidence was considered by the Panel from ACW when it discussed LW’s approach to developing and supporting strategic partnerships. The Panel noted that ACW identified concerns in its monitoring reports:

“As we would expect from a national company with a diverse programme development of literature in Wales ... and urge LW to consider how they fit into the wider literary landscape.”

“It is disappointing to us that this is not always reciprocated by LW in its dealing with us.”

“Overall we would like to encourage a more positive tenor to the relationship of staff and board members at LW with ourselves.”

There are occasions when this is not as positive as it might be within the leadership team and we feel that the organisation can adopt an attack/defence line as its default position.”

“We value open and honest dialogue.....however, there are times when discussions have had, on LW’s part, an inappropriately assertive tone to them.”

“We urge LW to consider how it communicates with officers in the future.....”

[EXTRACTS FROM EVIDENCE PRESENTED BY ACW]

It should be noted, that ACW in its response acknowledged that there are issues to be addressed in relation to LW. The claim is made that they are in hand. The Panel carefully considered the numerous comments received from the stakeholder review as well as from independantly commissioned and sponsored reports which drew attention to concerns relating to this organisation. It sought to evaluate such issues and take account of the fact that the organisation developed over time. However, the Panel eventually came to a judgement that there were systemic issues which needed to be considered and dealt with, hence the recommendations that certain functions currently undertaken by LW be taken forward by the Welsh Books Council.

LW in its detailed response to the Cabinet Secretary claims that it was unclear how the Panel could conclude there were issues relating to governance and strategy. It claims that there was “no supporting evidence to validate any of the misinformed claims about its governance”. It also affirms that since 2011 no concerns have been raised by any party regarding LW activities. That is **not** the case, as the Panel came to appreciate through the evaluation of evidence presented. Neither is the judgement correct that “LW has never been given anything other than a clean bill of health”, as stated by LW in its response.

In addition to the evidence cited above, the Panel took consideration of further evidence presented by the ACW when it cited an opinion in relation to LW’s engagement with the recent Investment Review. Again the Panel also took note of the numerous positive comments expressed by ACW about the organisation it created in 2011.

The Panel could understand and appreciate the positive narrative presented by ACW as it reflected upon its own success in dealing with a strategic issue in establishing a single company. The Panel noted the comments: "LW is a product of the last Investment Review, emerging as one of the Council's most important strategic initiatives There is much for LW to be proud of." The Panel's report reaffirmed the views of ACW regarding "the wide-ranging programme of activities" and how it "continued to reflect the diversity of the organisation's role and the communities it serves."

However, the Panel could not disregard the overall evaluation comments presented as evidence for consideration. Key areas of concern are identified by ACW regarding strategy, leadership and management.

"The quality of Literature Wales' planning is undoubtedly improving. But even the most recent iteration of the business plan has, in our view, some deficiencies in its approach and reasoning. Although the organisation presents us with a raft of activities and projects, we do feel, however, there are persistent issues around strategic thinking, leadership and planning that have not yet been satisfactorily addressed. There is a lack of a cohesive strategic framework to underpin the company's activities and programme. Three issues in particular need examination- Literature Wales' overall approach to strategic planning, its attitude towards partnership and collaboration and realising the full potential of Tŷ Newydd. That Literature Wales has not been able, yet, to find a settled role for Tŷ Newydd is frustrating."

[EXTRACT FROM EVIDENCE PRESENTED BY ACW INVESTMENT REVIEW]

In particular, the Panel noted the specific comment by ACW regarding the tendency in LW to focus upon identifying new initiatives without fully appreciating mission engagement.

"At times we have felt that LW has tended to aggregate to itself new tasks and projects rather than assessing which are most directly relevant to its mission.

It has looked for profile but not necessarily evaluated how its activities will help develop the sector:

A smaller staff core would limit LW's capacity to manage projects and initiatives directly and this might encourage the organisation to pursue developmental strategies that invest in the capacity of the sector, rather than the capacity of Literature Wales."

[EXTRACTS FROM EVIDENCE PRESENTED BY ACW]

Such strategic insight on behalf of ACW led the Panel to consider whether it would be wise to review the scope of activities currently undertaken and whether there were greater synergies and efficiencies of scale to be had by comparing functions as they stand across LW and WBC.

The Panel also took note of the comment made regarding the 'culture' of LW.

"There is an element of protectionism in the way that the company perceives its work and role. Supporting a stronger, more cohesive sector is often the key role for a national company - this is essential for both the future of LW and the vitality of the literature."

[EXTRACT FROM EVIDENCE PRESENTED BY ACW]

In reviewing all the evidence presented, the Panel took particular note of the final opinion expressed by officers in the Investment Review statement. In acknowledging that LW's

application to the investment review presented the Arts Council with “something of a dilemma” and that isolated activities were deemed exciting, of good value and aligned with wider priorities, the view was expressed however:

“...there is a lack of a coherent strategic framework and we have concerns about whether the organisation has adequately demonstrated the level of strategic leadership we would expect from a national company.”

[EXTRACT FROM EVIDENCE PRESENTED BY ACW]

The Panel noted the evidence presented which questioned the level of strategic leadership demonstrated by LW.

The evaluation of such significant evidence and detailed evaluation led the Panel to the view that it was appropriate to recommend changes to roles and processes linked to LW. **It is also worthy of note that ACW itself considered whether the time was right, in light of such comments about LW’s activities, to adopt a different strategy.** The final opinion offered states:

“The choice for Council [ACW] would seem to be to keep faith with the evolution of the organisation in its current form or to require a different strategy that offers clearer benefits to the literature sector.”

[EXTRACT FROM EVIDENCE PRESENTED BY ACW]

The Panel did not present such recommendations regarding LW lightly nor without thorough consideration of the evidence presented. Finally, it acted upon what the ACW itself suggested in the inference that a different strategy might be required to benefit the wider literary sector. As attested by ARAD Research and by external stakeholders this was a view which was held by several different organisations and individuals within the publishing and literature world.

It should also be noted that the Panel took particular attention of the comments made by ACW in its RFO Radar Report which clearly stated that ACW itself would consider withdrawing revenue funding from LW should it not see improvement in LW’s performance as a National Company.

“...some existing RFO’s are considered to be performing beneath their optimum levels and will be following a well-defined programme of proposed improvement ... If there is no significant improvement in performance following this, then it is likely that revenue funding will be withdrawn in the following year.”

The Cabinet Secretary should be aware that Literature Wales was one of four RFO’s identified in this category and the only National Company. Such evidence as cited above clearly demonstrates why the Panel considered that there were significant issues to be addressed. Here you had a national company which had been classified at the highest level of risk - red - by ACW. It had remained at that highest level of risk for SEVERAL years. Throughout this period LW continued to receive public funding and over £4.8 million had been transferred to them. This is the company which ACW itself questioned **“had adequately demonstrated the level of strategic leadership we would expect from a national company.”** In such a context it is reasonable for an independent Panel to conclude “that LW did not contain the right composition of skills and experience to run a body spending public money.”

Both LW and ACW raised concerns regarding the perceived “narrow” view taken by the review Panel of literature. This is not the case. The report specifically states “literature in Wales has a rich tradition and a contemporary vibrancy which should be celebrated and supported”. The Panel also specifically stated that policy development regarding both publishing and literature was key to growing the creative industries, “...to help develop copywriters for the web games writers, script writers for film and television, animation as well as fiction writers whose creations

may be exploited across platforms.” The Panel acknowledged the wide ranging opportunities available for celebrating and furthering literature.

A key priority for the Panel was to consider the nature and opportunities of the interrelationship between publishing and literature. LW claim that the Panel’s discussions were too narrow in focussing upon a “commercially-driven” interpretation of the writer. In the same context ACW notes that the Panel did not address adequately the decline of the publishing industry. In fact the report was explicit in its comments: “If government sponsored support for publishing in Wales is to have more commercial benefit, it must be informed by a sufficient understanding of the contribution of the publishing industry and literature to economic development, which hinges critically on the generation of Intellectual Property [IP] – original work which has copyright value. This also involves developing infrastructure for publishing businesses and talent development of writers in Wales.”

The report contains numerous examples of how the Panel identified relevant opportunities to address the decline in the economic value of the Welsh publishing industry. These include comments and recommendations regarding the development of cross-platform production opportunities for the publishing and distribution of literature, support for start-up companies, overseas business development opportunities, revision of procurement regulations and further investment in bilingual interactive platforms.

Both LW and ACW question the appropriateness of the recommendations that certain functions should be transferred from LW to WBC. It is claimed that no systematic evaluation is evident in such recommendations. The Panel was mindful of the requirement to maximise the ‘value added’ of any government intervention offered either for the creation, promotion or production of literature. It considered that such activities should be seen within a single continuum of talent development, enhancing writers’ skills and, where appropriate, maximising the public value of such intellectual property as created by writers. It is worthy of note that WBC in its response to the Panel’s recommendations, captured the very core of the issue:

“grants/bursaries to writers are most productive when tied directly to an assessment of the likely market impact performance of the work that is being financially supported and when combined with mentoring and training opportunities.”

In times of financial austerity, there is a demand for all public bodies who receive funding to consider how best to maximise the financial contribution made by a Governmental body. The evidence cited in the report clearly demonstrated that there was no meaningful engagement between LW and WBC, and that ACW had very little engagement in any discussions to secure ‘best value’. This is not conducive to good practice and does not offer the Welsh Government an appropriate return on public investment. Closer co-ordination and planning would allow for far better synergy and economic and cultural return on investment. Apart from ACW’s own concerns regarding the strategic overview of writer development: **“we don’t see compelling evidence of a coherent approach to writer development,”** the Panel took the view that more co-ordination of talent development and training were required. This would drive forward greater efficiency, facilitate the publishing and literary sector and above all, the promotion of the intellectual property of literary works in Wales. Such promotion of IP would, in turn, have an influence upon the economic development of the arts in Wales, on the sustainability of talent development as well as on social engagement and reaching new audiences.

In reviewing all the information presented as part of this review the Panel was mindful of its responsibility in evaluating such information in accordance with the key principles set out in the UK HM Treasury Handbook - The Green Book - which gives a clear direction not only to Government but also to all public bodies in receipt of funding. The Green Book is a key reference point for all who receive Welsh Government support. The Panel considered both LW and WBC against several of the published standards. In the context of LW, and mindful of the internal reports presented by ACW over several years, the Panel had concerns regarding

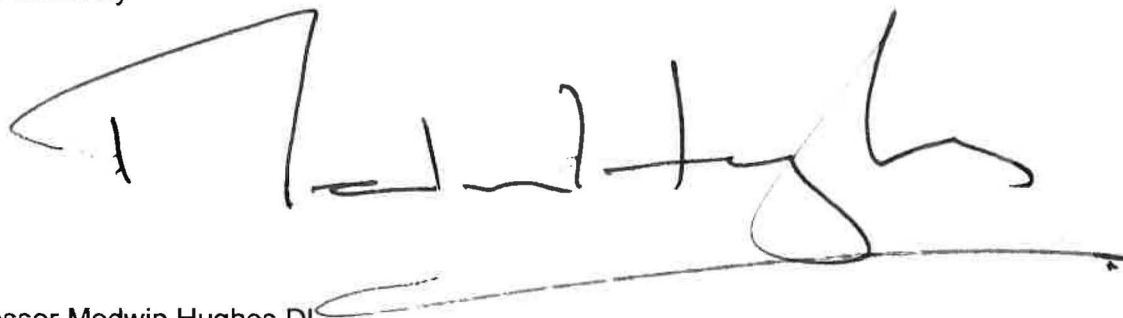
the organisation's maturity to deliver some of the key standards. In particular, the Panel noted standards such as: "work cooperatively with partners", "operate with regularity in its transactions", "have a governance structure which transmits and implements decisions", "takes a balanced view...to managing opportunity." The Panel has already cited in this response examples of issues raised by ACW as part of on-going monitoring reports over the six year period of receiving public funds.

Whilst responding to the numerous issues raised by LW and ACW, the Panel also wishes to place on record that it did recognise and appreciate the fact that LW had played an important role in developing a literature strategy for ACW during the last six years. Without the creation of LW, ACW would not have delivered a national programme for the promotion of literature. It could be argued that ACW's credibility in this area, as a Government Sponsored Body which supported literature, depended significantly on this organisation. Any recognition of failure at LW could be interpreted as criticism of the sponsoring body. It is therefore understandable that ACW would wish to continue to support its own initiative. The Panel recommended that ACW continues to work with LW following the transfer of functions to WBC to review the core mission and function in partnership with other key stakeholders.

Conclusion

Given that this response will be the final formal statement by the Review Panel, it is requested that this letter and the accompanying attachments be made available for information in the Members Library. To date, Panel members have not responded in public to any comments made regarding the review. However in any future public engagement, Panel members would wish to cite, where appropriate, the information presented here for your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Medwin Hughes', with a long horizontal line extending from the end of the signature.

Professor Medwin Hughes DL

Literature Wales concerns about the independent review of support for publishing and literature – response from the review Panel

Issue As put forward by the relevant stakeholder organisation.		Amendments to the report or recommendations?
<p><u>The evidence base</u></p> <p>Interpretations expressed by the Panel are not supported by evidence. Counter arguments and contrary evidence are not offered to balance and reason criticism.</p> <p>For example, the Panel recommends that LW improve governance and accountability.</p> <p>The evidence which was presented to the Panel does not support these statements</p>	<ol style="list-style-type: none"> 1. The Panel considered a wide ranging collection of presented evidence and sought to triangulate information from both stakeholder comments and official documentation received by Welsh Government Sponsored Bodies. 2. <i>Refer to formal letter presented to the Cabinet Secretary which highlights key issues and examples of evidence re LW and identified issues re management and governance.</i> 3. <ol style="list-style-type: none"> a. Not all the evidence the Panel considered “was presented” to us by LW or other bodies. Some it obtained itself, e.g. from LW and others’ websites. b. Not all evidence which informed the Panel’s considerations is detailed in the report. Some of the high profile people who have commented very negatively on the report have complained strongly about its (excessive in their view) length. Some of the information we considered was provided on an in confidence basis by LW and ACW. c. LW refers to a number of ‘management’ documents presented for consideration. The Panel considered such documents but still identified concerns. This was reinforced by ACW in evidence presented, “persistent issues around strategic thinking, leadership and planning...”. The Panel considered several examples of management practice and structures appropriate for such an organisation, e.g., the 	

	<p>Irish writers centre which had both an inclusive and commercial approach to governance and management.</p> <p>4. As noted in the letter presented to the Cabinet Secretary ACW had a duality of interest with regard to LW. After meeting ACW, while not doubting their good faith, the Panel did not regard ACW as a wholly independent source of advice on LW. ACW had a major role in the creation of LW. ACW is theoretically accountable for nearly all the public funding that LW receives. Over 4.8 million has been distributed to LW over the last six years. Throughout that period LW has been classified as within the HIGHEST RISK CATEGORY. ACW shared with the Panel some of the struggles that they had had with LW which did not, in our view, reflect well on elements of the LW leadership and culture. Some of the evidence of this is in the report. [For more detail see also the evidence cited in the letter presented to the Cabinet Secretary and also the Panel's response to ACW comments].</p> <p>5. The Panel took the LW Chair's refusal to engage with it as a poor example of leadership, especially for the leader of a national charity receiving significant sums of WG funding via ACW. LW presents correspondence between the Chair of LW and the Panel. From June 2016 until November 2016 it was not possible to find a common date with only a comment "...it's unfortunate that our schedules couldn't dovetail this time..."</p> <p>6. The comments made by the Panel re the Chair stands – that the Panel "was extremely disappointed"</p>	
--	---	--

	<p>that he did not see fit to engage. “Disappointment” – no more no less.</p> <ol style="list-style-type: none"> 7. The drafting of the LW Business Plan 2016-19 gave a number of impressions that the leadership and governance of LW is perhaps too strongly in the hands of its senior management (SMT). 8. For example, the first substantive paragraph on page 19 (“Our Structures”) describes the CEO and 5 other SMT members (and indicates there are 22 staff in total). Only after this, in the next two paragraphs, is there a description of the chair/directors/trustees. 9. Another example is the “Milestones and Monitoring” section on page 21 which contains references to activities by the Board in relatively passive terms , eg “receiving” this and that, while (again in the first paragraph before the Board is mentioned) it is the SMT which reviews progress towards the Activity plan quarterly and management accounts quarterly. No doubt the Board is less passive than this drafting implies, but the drafting does not seem to accord them the leadership role which seems dominated by the CEO and SMT. As the only ACW “National Company” which has been assessed as “red” by ACW, the Board might have been expected to be offering more leadership and support to staff. 10. ACW themselves identified issues in this context and their evidence reaffirmed such concern. “Additional areas of concern ...around the development of LW staff handbook, which has highlighted issues within the organisation and its process.” “...there has been a lack of strategy to frame and guide the multiple projects LW has delivered” 	
--	--	--

	<p>11. For further examples of evidence of issues re management and governance refer to letter presented to Cabinet Secretary.</p> <p>12. The Panel noted from the papers presented by LW how the Board engaged with officers. The Board meets only 4 times a year. If it has also strategic away-days and subcommittees, (e.g. audit and risk, staff remuneration) their lack of mention in the business plan again indicates that the drafters of the 3 year business plan do not accord sufficient importance to them. The Panel recognised that individual Board members were given specific responsibilities however the “test and challenge” as required within such a charity was not evident. This is highlighted by ACW in evidence: “we expect it to engage in a greater level of debate to drive forward the strategic direction of the organisation.” The value of non-executives in a small organisation like this is the wider horizons that they collectively have on some issues, including many aspects of corporate governance, especially those beyond LW.</p> <p>13. The balance of LW’s business plan's contents reflect perspectives which are too inward-looking. For example, page 21 says that all staff are involved in the creation of the business plan. What about the role of external stakeholders?</p> <p>14. The drafting of the LW risk register the Panel saw in 2016 was poor - many risks were not risks or were not sharply enough drafted in terms of threats to LW, being expressed more as issues.</p>	
--	---	--

	<p>15. On page 1 the risk scoring is incorrect. For example, the residual risk (not "assessment") for the very first risk is not 5 (2 + 3) but 6 (ie 2 x 3). This error is repeated through the documents. Not critical in itself, but combined with the poor quality of much of the drafting of the descriptions of risks, impact and "control measures", led the Panel to think that the SMT and others working on risk management may have a skills deficit which the Board (which owns this document) had not picked up either.</p> <p>16. On page 4, the first risk under the heading "Reputation", that "Increased public profile and greater ambition may lead to negative attention and perceived dilution of purpose." This reference, especially with the inclusion of the word "ambition" reinforced the Panel's developing view that LW is not a body which welcomes interest in its own organisation [something reinforced by the lack of any significant governance documents, annual or financial reports etc, on its website]</p> <p>17. The Panel was surprised that ACW were relaxed about this when we raised it, and seemed to regard this risk register as acceptable without serious challenge in a charity it funds heavily.</p> <p>18. Judging by their biographies on the LW website, a number of the Board members have some sort of management experience, a few of them more substantially. But not one is described as having a professional finance qualification, although Elizabeth George is described as a solicitor, but without describing what sort of legal experience she had. Since we considered this there have been some changes to membership (as the LW CEO told us they</p>	
--	---	--

	<p>hoped to do) but the only new appointee who appears (from the information on the LW website) to bring substantial high level experience of corporate governance is the head of the National Trust in Wales.</p> <p>19. The Panel wonders if LW still needs to review the range of skills it has in its governance structures, so as to provide better support and constructive challenge to its staff in finance, IT, HR and other corporate governance areas as well as literature matters? Not all would have to be on the full board if there were one or more sub committees. Should LW have a sub-committee for Ty Newydd?</p>	
<p><u>The evidence base</u></p> <p>There are omissions and inconsistencies in the evidence base in terms of desk research and the individuals and organisations consulted.</p> <p>Who was consulted and why? The Panel chose not to consult with organisations outside of the traditional publishing world, including the different types of organisations and groups LW works</p> <p>A neutral voice expressed by those not standing to lose or gain from the recommendations is missing.</p>	<ol style="list-style-type: none"> 1. The review was structured and taken forward within the limited budget which was made available. The Panel offered an open invitation for any organisation to engage and did not choose not to consult with anybody. This was not a review concerned only with the functions for which ACW passes WG-provided funds to LW. 2. The consultation exercise provided an opportunity for any organisation or individual who wished to comment to do so. Over 800 did, including libraries etc., but clearly not many in some of the categories listed did so. The Panel understands that some organisations encouraged their stakeholders to consider responding. Did LW? 3. The Panel did not seek to identify any particular type of “voice” as suggested by LW. It would not have been appropriate to do so. Individual Members of the 	

	<p>Panel took the opportunity to triangulate several of the issues with a wide range of stakeholder groups. For example attending Creative Writing for Dyslexia workshop, attending grassroots writing fairs in Penfro and also Rhondda, Tenby and Carmarthen. Attendance at co-programming and web designing events and also external events outside Wales to sample writer development in order to have a wider perspective.</p>	
<p><u>The evidence base</u></p> <p>The Panel has not considered some significant research, and presents little analysis of some of the evidence submitted.</p>	<ol style="list-style-type: none"> 1. LW'S concerns are focused upon their defence and, subsequently fail to focus on the key issues within the report, which were to consider the seismic shift and disruption in publishing and literature which has occurred in the last 15 years through digital developments. 2. Reference is made of not referring to all of LW activity. The focus was upon the overall confidence that the Panel had in LW. The Panel did not think LW's governance or continued public funding for its full overall remit gave sufficient confidence for best overall use of public funds. That was not a comment on every individual activity. 3. Considerable context on the position of publishing was provided in the early part of the report. Indeed the main reason that the Panel recommended a further wide ranging review of this sort in about 5 years' time was that the future in reading habits, literature and publishing are so hard to predict. Clearly more context and theoretical models could be presented. Further research could be commissioned. However within the budget – this was not possible. 	

The evidence base

Certain opinions expressed are also presented as a consensus, rather than one perspective refuted by others.

LW is described as having “*a sense of entitlement*” (p 61), which ACW contradicts (p 66) whilst questionnaire respondents praise LW’s approach (p 146-8) without mentioning a sense of entitlement in the quoted criticisms (p 148-152).

It is unclear who believes that LW has a sense of “entitlement”, why they hold this belief, and why this has been selected as ‘evidence’ to the exclusion of other opinions.

1. The Panel believes that the Chair and leadership of LW demonstrates a sense of entitlement. This view was informed by a range of factors, including:
 - The refusal of the Chair to engage with the Panel
 - The difficulties ACW had experienced with oversight of the use of the public funds it gives LW.
 - The lack of accessibility on LW’s website to many types of governance information (eg annual report and accounts)
 - Based on documents received and discussions with LW and ACW, the seemingly unquestioned assumption by both that LW would continue to be responsible for Ty Newydd and that large sums of public money would be found to subsidise it.
2. Had the Panel still been drafting its report in the last few weeks, it would have taken much of the tone and content of LW’s responses, (and those of one or two LW allies) to reinforce its view that the values of LW include a sense of entitlement and lack of openness. Most of the questions in its response to the Cabinet Secretary are not open questions but essentially unsubstantiated statements.
3. Such concerns as identified by the Panel were also identified by ACW in the evidence presented. This has been noted in the letter presented to the Cabinet Secretary. Submitted evidence by ACW noted: “... **we have not seen as much collaboration and openness from LW in order to build trust ...**” “**We**

	<p>feel that the organisation can adopt an attack/defence line as its default position” “there is work to be done to address what appears to be a more vocalised perception of the organisation as one that is not always as collaborative, or as open as it could be.”</p>	
<p><u>The evidence base</u></p> <p>The report’s evidence is opinion-led; it does not offer a balanced analysis of views triangulated with an array of third party reports and testimony, documentation, and quantitative statistical data.</p> <p>A limited number of these underrepresented types of evidence are listed and featured in the report’s Annex but never referenced (e.g. LW’s Management Board minutes) and a considerable number are missing (see point 1.2.2. above).</p> <p>The Review states that it pursued an “<i>evidence-based approach</i>” (p 7). Evidence is defined in law as the available body of <i>facts</i> indicating whether a belief is valid. Opinions are therefore not evidence without empirical data to support them.</p>	<ol style="list-style-type: none"> 1. The Panel did consider third party reports – some which had been commissioned by LW from public funds and then not made available for public consideration e.g. ARAD. Information presented by stakeholders was triangulated re Government reports and also Sponsored Body reviews e.g. ACW annual review and Investment Review report. The Panel did not reach all of its conclusions based on evidence which would satisfy the criminal justice system. However, it does feel they would all, as a minimum, satisfy the civil justice test of the balance of probabilities. 2. The definitions of what constitutes evidence vary greatly. LW seems to adopt a much narrower approach than the Panel. 3. LW’s comment implies that the Panel had initial views which they set out to evidence in the report. The reverse was the position, ie evidence (in a wider sense than LW’s) was considered leading to Panel conclusions. Had the Panel not had concerns about LW’s values and governance, it would have mentioned them only briefly and made no significant recommendations. 	

<p><u>The evidence base</u></p> <p>There is little analysis of alternative models, with reference to other countries.</p> <p>Annex 7 in the report provides a chance to analyse and compare models outside Wales. However, the content is restricted to publishing information and there is no consideration given to funding and support models, work in disadvantaged areas, social benefits etc.</p>		
<p><u>The evidence base - Questions arising:</u></p> <p>a) Why was LW put under a level of scrutiny not applied to other organisations?</p> <p>b) What was the sampling strategy behind who was consulted and why?</p> <p>c) What was the rationale behind adopting certain opinions over others, and why was significance evidence omitted?</p>	<ol style="list-style-type: none"> 1. LW was not placed under a level of scrutiny which was not applied to other organisations. The recommendations for WBC clearly demonstrated that the Panel took time to consider issues within that organisation as well. In addition, WBC was put under considerable scrutiny by the 2014 review undertaken of it, and this was available to the Panel, and is now in the public domain. Reviews of certain LW activities have taken place, but none looking across so widely. In addition, the Panel did not have full confidence in the ACW's role in relation to LW, as the report indicates, eg in relation to the application of the national company model to LW. 2. With regard to any sampling strategy the Panel drew up a list, and in addition the consultation exercise was open to all 3. The Panel did not favour certain opinions over others. It arrived at its own opinions, having considered all the opinions offered to it. 	

<p><u>The connection between the evidence and the recommendations</u></p> <p>There is no coherent connection between the evidence cited and the recommendations affecting LW.</p> <p>It is unclear how the Panel believe transferring LW activity to WBC (p 77) would improve the publishing and literature fields in Wales No reasons are given, nor is evidence provided as to why this change is needed</p> <p>There is no evidence to support why LW is not satisfactorily delivering these activities - their proposed transfer seems instead to derive from more general points about governance, accountability and strategic planning, which, as discussed in this submission, are inaccurate and not supported by evidence.</p>	<ol style="list-style-type: none"> 1. The Panel was clear that in relation to the public funding of LW, its concerns about LW's governance, the delivery of some (but by no means all) of LW's activities and ACW's oversight, that the status quo should not be recommended as the preferred option. 2. The Panel also took note of the concern expressed by ACW regarding lack of clarity and direction re writers' scheme. It came to the view that far greater synergy between writer development, on-going professional development and publishing would deliver far more for the sector. 3. It is worthy of note that WBC in their response articulates a very clear strategy in this context. 	
<p><u>The connection between the evidence and the recommendations</u></p> <p>The impact of transfer of activity from LW to WBC is not analysed.</p> <p>There is also no breakdown of what this proposed transfer would achieve, how it would benefit the sector, how long it would take to achieve, what outcomes it would achieve against WG targets, and what the accompanying risks would be (centralisation, emphasis on economic output as opposed to encouraging artistic and creative risk-taking, expertise, loss of established partnerships, loss of art-form status in Wales and</p>	<ol style="list-style-type: none"> 1. The Panel was clear that the transfer of some of the current functions undertaken by LW to WBC would offer far greater synergy and deliver a more joined up service for both the writer and publisher. Consideration was also taken of some of the key recommendations in the ARAD report and due reference to some of the CONCERNS expressed by ACW. 2. The Panel was sufficiently concerned about indefinite continued public funding towards many of LW's current functions that it proposed removing some of them from LW (and so also indirectly from ACW broad oversight). It did not consider the detailed 	

<p>therefore opportunities including attracting funding from beyond Wales' borders).</p> <p>There is also no acknowledgement that such a transfer could change the purpose and nature of the transferred activities.</p>	<p>practical implications of this. It was very concerned that the status quo should not continue largely unchanged and unchallenged. The Panel also noted that ACW had also considered reviewing their own current strategy re investment with LW and had noted their comments to the ACW Board: "If there is no significant improvement in performance ... then it is likely that revenue funding will be withdrawn in the following year...". The Panel noted that ACW's position was to accept and acknowledge the fact that LW had a number of issues to be addressed and continue with their own strategy – any changes could be interpreted as a key failure by ACW themselves and the distribution of over 4.8 million since 2011. The key issue therefore was either to continue with the status quo or propose structural changes which would offer an opportunity to enhance the current structure and provision.</p> <p>3. If such recommendations were to be accepted, presumably an implementation plan involving LW, WBC, ACW and WG would be needed, with the potential for refinement in the light of more detailed examination of the implementation issues.</p>	
<p><u>The connection between the evidence and the recommendations</u> <u>Questions arising:</u></p> <p>a) How did the Panel come to the conclusions presented as recommendations?</p> <p>b) What evidence is available to substantiate these conclusions, and the overall benefit of the recommendations to the sector?</p>	<p>1. The Panel considered and evaluated the information presented and offered a range of recommendations which addressed a wide range of issues and policy opportunities for WG.</p> <p>2. The evidence received by numerous stakeholders and also through other reports reaffirmed the fact that the current infrastructure does not offer best value for the Welsh Government. The current investment made by the Welsh Government is not delivering maximum value for money – there is no overview strategy and no</p>	

<p>c) Why did the Panel not consider the practical, financial and administrative actualities behind the proposed recommendations?</p>	<p>adequate structures or assurance to offer the Welsh Government confidence in the current arrangements. Refer also to comments made in letter presented to Cabinet Secretary.</p> <p>3. The actuality the Panel did consider was its view that the prospects of LW improving sufficiently in a reasonable length of time to justify indefinite receipt of almost £1m pa were outweighed by the likely benefits of significant changes, notwithstanding the risks associated with all major change.</p>	
<p><u>Inaccurate Representation of Literature Wales</u></p> <p>The Panel's representation of LW's remit, programme of activity, governance and financial analysis is inaccurate.</p> <p>The representation of LW's governance and reporting mechanisms do not reflect the evidence provided.</p>	<p>1. The Panel's concerns about LW in its current form as a major recipient of public funding in this field are described elsewhere in this paper.</p> <p>2. With regard to governance and management, refer to the content of the letter presented by the Chair to the Cabinet Secretary.</p>	
<p><u>Inaccurate Representation of Literature Wales</u></p> <p>There is an inaccurate analysis of LW's budget and expenditure.</p> <p>For example:</p> <ul style="list-style-type: none"> - LW is criticised for not attracting funding from other sources (p 63), yet LW accrued over £200k in additional grants during 2016/2017. - <i>"The Panel was surprised to identify that 75% of LWs' budget was spent on its own staff's salary costs"</i> (p 63). This is untrue and the actual figure, in line with the past 	<p>LW is not a public body, but a registered charity. ACW's oversight of it relates only to the public funding element it provides. It is always desirable for charities which are heavily dependent on public funding to increase the diversity and quantum of their non-public funded income. This comment applied equally to WBC.</p> <p>The Panel received figures from LW which were given in August 2016 as a record of LW 2016-17 budget. That showed £968,905 Total Public Funds. It also showed "Total Other Charitable</p>	

<p>three financial years, is 44%-47% over the next three years - as detailed in the budgets shared with the Panel.</p>	<p>Income" of £130,700 of which £127,900 was course fees.</p> <p>Total Commercial Income of £32,100 is shown additional to both the above, of which a further (and different):£24,500 is course fees.</p> <p>Public funds plus the two types of course fees add to £1,121,305 out of a total budgeted income of £1,205,585.</p> <p>The Panel noted that course fees are heavily indirectly subsidised by the £110,000 plus pa of public funds ACW gives to help balance the books at Ty Newydd.</p> <p>The Panel based its comments on the 2016-17 budget figures. This was the best breakdown presented.</p> <p>The Panel accepts that the drafting of the sentence quoted on page 63 regarding staff costs is wrong and incomplete. The final drafting should have had reference to staffing and other related costs e.g. premises and running costs. The complete text is included and will be amended. The source for the % figure was a combination of a LW 2016-17 to 2018-19 budgets document sent by LW to the Panel secretariat on 23rd June 2016 and the response of the LW Deputy Chief Executive of 10th August 2016 to a query from the Panel sent to the Panel's secretariat.</p> <p>That email said "The majority of the Administration income is from the ACW revenue grant, with some additional income from royalties and membership."</p>	<p>Proposed wording to replace the sentence quoted by LW .</p> <p>"The Panel was surprised at the proportion of public funding received by LW which is devoted to its own staff costs and associated costs. In 2016-17, the ACW Revenue Grant to LW were budgeted to be £717,163, royalties £2,200 and membership fees £8,500, ie a total of £727,863. Staff Costs were budgeted to be almost £570,000, ie approx. 78% of the £727,863. In addition,</p>
--	--	---

	<p>In the budget document received from LW in 2016, the ACW Revenue Grant was £717,163, royalties £2,200 and membership £8,500 (i.e. a total of £727,863). “Staff Costs” were described as £569,110 (excluding premises, premises running costs, appointment and running costs, professional and legal, etc which added to an additional £150,000plus). £569,110 as a percentage of £727,863 is 78%</p> <p>The incorrect drafting itself had no effect on the conclusions drawn. It was intended to provide context about LW especially as LW offers so little numerical information on its funding in the public domain (eg none on its website until mid 2017)</p>	<p>about £150,000 was budgeted for other largely staff related costs, eg premises and their running costs.”</p>
<p><u>Inaccurate Representation of Literature Wales</u></p> <p>Much of LW’s core activity is omitted or underemphasised, particularly its work in broadening active participation.</p> <p>The presentation of LW’s programme focuses on Tŷ Newydd, Wales Book of the Year, Support for Writers and Live Literary events (p 61-62): a selection of activity which represents approximately 30% LW’s work</p> <p>This demonstrates the Panel’s lack of understanding and knowledge of LW’s remit and full programme of work. The Panel chooses not to consider sector-leading and award-winning projects. In its omission of these projects, the Panel fails to address fully WG’s support to literature.</p> <p>LW has delivered WG agendas throughout its broad programme of activity. These were all reported in full to the Panel, both in person and in the documents</p>	<p>1. When it came to expressing its conclusions, the Panel focused on areas where it felt change was needed or questions needed to be pursued. It did not intentionally disregard specific areas of activity – it decided to focus on the generic issues of concern. It did, however, take note of the evidence received by ACW regarding LW’s tendency of not focusing upon the core mission. “...the company has not found it easy to settle into a focused programme of strategic activity. ...At times it has seemed as though LW feels it needs to control all developmental activity itself, rather empower others to share the load. The danger is that LW will accrete to itself additional responsibilities without first assessing their relative strategic importance or the possibility of another organisation better placed to deliver that activity. This has not resulted in the strategic fleet-of-foot facilitator that we had originally envisaged.” “LW undoubtedly plays a key role in developing</p>	

<p>presented, and both ACW and WG commends LW's community engagement (p 66).</p> <p>However, this work is minimised by the Panel in the overview of LW (p 26-30) and not mentioned in the interview description (p 59-63).</p>	<p>literature in Wales. BUT WE FEEL, OVERALL, THAT THERE HAS BEEN A LACK OF STRATEGY TO FRAME AND GUIDE THE MULTIPLE PROJECTS LW HAS DELIVERED.” [Bold set by Panel] [Extract of evidence presented by ACW]</p>	
<p><u>Inaccurate Representation of Literature Wales</u></p> <p>LW's programmes are misunderstood and inaccurately presented.</p> <p>Of the LW programmes that are discussed, there are many inaccuracies and misrepresentations.</p> <p>-</p>	<p>The Panel does not regard the employment of professional writers, in itself, as a reason to provide large annual subsidies for Ty Newydd.</p> <ol style="list-style-type: none"> 1. The Panel knew that LW had no existing plans to run a literature festival itself. However, it was also of the view that LW should not be given public funds to run, itself, a Literature Festival in the future, and that it was worth making this point in the sort of review which is not likely to happen more than once every 5 years, possibly less often. 	
<p><u>Inaccurate Representation of Literature Wales</u></p> <p>There are numerous examples of contradictions and confusion in the criticisms levelled by the Panel.</p> <p>For example:</p> <ul style="list-style-type: none"> - The discussion of the value of attendance and participation in literary activity is contradictory - The report also recognises the social value of participation, saying that it plays <i>“an important role...in promoting a more just and equitable Wales”, “builds resilience and self-confidence”, “enhances the opportunities to build individual and group confidence and fosters key generic transferable skills”</i> (p 74). This is contrary to other statements such as <i>“events are</i> 	<ol style="list-style-type: none"> 1. The Panel took the view that there was an over emphasis on attendance at events by ACW in the indicators it used and published in relation to LW. Engagement with reading and literature should not disregard the act of personal reading. 2. The Panel does believe that events are of value, as it believes the report indicates. That does not mean that they should be delivered by LW. 3. The Panel believed that both ACW and LW gave events too much emphasis in the statistics used, as compared with readers. <p>The general point that the Panel is making here is that both ACW and LW fund events where literature and reading are</p>	

<p><i>important tools for literature, audiences and writers, but they are not the primary means of mass literature consumption; success in increasing engagement with Welsh literature should not principally be measured in [attendance numbers].” (p 80-81).</i></p> <ul style="list-style-type: none"> - The discussion of support for writers offered by WBC and LW lacks in-depth analysis, which leads to a lack of clarity on the support available. The functions of each organisation’s support mechanisms are presented starkly - The statement that “ACW funds book festivals and reading events in the same way as LW” (p 67) does not give an accurate portrait of the funding available for literature activity in Wales. Information available publicly on the ACW and LW websites offers information in detail regarding funding schemes for different types and scale of activity. 	<p>significant elements. Many readers may not realise this. Those who wish to know more can explore further.</p>	
<p><u>Inaccurate Representation of Literature Wales</u></p> <p>The representation of the intended discussion between the Chair of LW and the Panel is inaccurate.</p> <p>In the first paragraph of the section on LW (on p 59), the Panel presents an inaccurate report of the circumstances surrounding the process of arranging the meetings with the Chair of LW, claiming: “<i>Panel members were extremely disappointed that the Chair of LW, an organisation whose activities and staff are mainly funded by the public sector, was unable to make arrangements to meet with the Panel.</i>”. The sequence of written correspondence supplied as evidence in this submission (see Appendix vi) reveal the true circumstances. LW Directors and Executive submitted vast evidence for the</p>	<p>The information is not inaccurate. The Panel requested several dates for a meeting. The Chair could not make himself available. A deadline for seeking a meeting had to be agreed in order for officers to start drafting the report. The Panel was told that his staff spoke with his authority and voice. The Panel remains firmly of the view that the Chair of a well led national charity in receipt of well over 75% of its income from the Welsh Government (via ACW mainly) would engage directly with a Panel appointed by the Welsh Government to advise it on the field with which it is concerned. He or she should make time. There is a certain arrogance in such positioning within a governance role of a charity receiving public money. Ideally, the Panel would have hoped to have established some level of rapport (though not necessarily agreement) with the LW Chair.</p>	

<p>Panel to consider, both in person and electronically (p 89-90). Directors and Executive also made repeated offers to discuss any further questions or clarify any points which were unclear.</p>	<p>Clearly this did not happen. The Panel noted their “disappointment” – no more – no less.</p>	
<p><u>Inaccurate Representation of Literature Wales</u></p> <p><u>Questions arising:</u></p> <p>a) Why are LW’s remit, activities and budgets inaccurately presented?</p> <p>b) Why did the Panel misrepresent the circumstances surrounding the arrangements of meetings with LW?</p> <p>c) Have these inaccurate representations influenced the Panel’s recommendations?</p>	<p>LW’S remit, activities and budgets were considered and presented appropriately.</p> <p>The Panel did not misrepresent arrangements with LW.</p> <p>The Panel drafted their recommendations in good faith after considering the information presented.</p> <p>Some corporate governance documents (eg annual reports) and corporate financial information is found on many websites of many, especially well run, organisations predominantly funded by public funds. As of mid 2017, there is absolutely none on LW’s.</p>	
<p><u>The view of the literature landscape</u></p> <p>The definition of literature as a process for publication is narrow and out of synch with the understanding of the wider cultural sector.</p> <p>The Panel attempts to validate its view on literature by referencing the 2011 DCMS report ‘Creative Industries Economic Estimates: Full Statistical Release’</p> <p>The Panel has misunderstood DCMS’ definition</p> <p>The Panel’s definition of literature is in marked contrast to the understanding of the arts and wider cultural sector and is out of synch with the contemporary literary.</p>	<p>The Panel does not concur with this view. It noted within the report the wider relationship between the author, publishing and the creative industries and their value to the economy. It could not be clearer in its view than when it expressed: “Policy on literature and publishing may be regarded as key to growth in the creative industries, to help develop copywriters for the web, games writers and scriptwriters for film, TV and animation, as well as fiction writers whose creations may be exploitable cross platform.”</p>	

<p><u>The view of the literature landscape</u></p> <p>The Panel's definition, in its application in the report, is problematic in several ways:</p> <p>It disregards significant contemporary literary forms.</p> <p>It presents a limited, commercially-driven, understanding of a 'writer'.</p> <p>The Panel disregards the recognised value of participatory practice.</p>	<ol style="list-style-type: none"> 1. The Panel would dispute this – see comments in the report re talent development for web and game writers, script writers for film, TV and animation as well as fiction writers. [Page 10]. Commentators independent and not uncritical of all of the report (eg Lefi Gruffudd) have disagreed with this LW complaint. 2. LW refers to a limited view within the report of the writer linked to the commercial world. The Panel considered the economic context and the need to further economic investment linked to the creation of literature and publishing as a key feature of the report. Welsh Government investment in the promotion and creation of literature and its further publication does have a clear commercial context. That does not imply, of course, that literature should not be supported for clear cultural and identity reasons. 3. The Panel took an eclectic view of the writer – be that for the web, games, script for film, TV or fiction. It took the view that a key purpose for such an agency as LW would be to maximise the opportunity for young talent development so that they could further develop their skills. Professional development, talent pathways, analysis of different types of writers – and the extent to which they have commercial potential ,literary aspiration or wish to write for therapeutic or leisure interest should help state funding be spent where it can be most effective and have greatest impact. 4. The Ty Newydd 2016-19 Business Development Plan says on page 26 that in 2015, 61% of residential course participants were from England, 31% from 	
--	--	--

	<p>Wales; that many participants were retired people with “high disposable income”; and that 7 English public (ie private) schools went on residential courses at Ty Newydd. None of this would be objectionable if such wealthy or non Wales based participants were paying as a minimum the full total costs of owning, maintaining and running Ty Newydd, and staffing it.</p> <p>5. However, these figures suggest that the precious public funds which directly or indirectly subsidise Ty Newydd and its courses are helping a very significant proportion of individuals who are not at all economically or socially excluded, and/or very often not from Wales. LW’s plan recognised this situation needed to improve but did not envisage a time when they would reduce the ongoing subsidy they receive from ACW of £110,000+ specifically for Ty Newydd, plus potential additional amounts if deficits are made after the £110,000+ (as was budgeted for 2016-17 at £10,277 on page 20 of the Ty Newydd Development Plan)</p>	
<p><u>The view of the literature landscape</u></p> <p>The Panel disregards LW’s core vision.</p> <p>Because of the way it has defined literature, the Panel repeatedly criticises LW’s vision and strategy. For example, <i>“the Panel felt that the missions and goals of the organisation were unclear – and to ‘serve people, to serve everyone’ is unrealistic and vague”</i> (p 63). This comment misrepresents LW’s mission and also contradicts ACW’s view that “there is now a clear focus on what [LW] aim to achieve” (p 65).</p>	<p>The Panel’s comments on page 63 are based on its reading of LW’s published strategy and discussion (which became heated) with the Chief Executive.</p>	

<p><u>The view of the literature landscape</u></p> <p><u>Questions arising:</u></p> <p>a) How did the Panel come to its definition of literature?</p> <p>b) Why was the wider literary ecology not considered?</p> <p>c) Has this narrow definition influenced the Panel's recommendations?</p>	<p>The Panel did not seek to offer a narrow definition of literature. It celebrated the diverse and wide ranging opportunities for the writer and articulated that in the examples it noted for further growth in the creative industries. Consideration was given to the wider ecology of the literary world but due focus was given to the economic growth potential of text as IP within a wider digital publishing context.</p>	
<p><u>Conflicts of Interest of Panel Members</u></p> <p>LW asks the Cabinet Secretary to consider how the Panel adhered to the NOLAN Principles, including any record of declared conflicts of interest.</p> <p>-</p>	<p>Nolan Principles were adhered to and declarations of interests were clearly made and recorded. Due process were followed.</p> <p>Welsh Government officials were engaged throughout and had overview of process and engagement.</p> <p>The Panel was appointed to be independent, but not completely without knowledge or experience.</p>	
<p><u>Conflicts of Interest of Panel Members</u></p> <p><u>Questions arising:</u> (NOTE: Letters below as per LW paper.)</p> <p>a) What was the criteria for selecting members for the Panel and who authorised the selection?</p> <p>c) In what way did the Panel members register their Conflicts of Interest?</p>	<p>These are questions for the WG not for the Panel.</p>	

<p>d) Why were the Conflicts of Interest not included in the published review?</p>	<p>At every meeting members had an opportunity to state possible areas of interest for the record. Due care was given to possible conflict of interest. Throughout the engagement officers were in attendance.</p>	
<p><u>Addressing the Terms of Reference</u></p>	<p>The Panel has considered and offered a view on the Terms of Reference as presented</p>	
<p><u>Addressing the Terms of Reference</u> <u>Questions arising:</u></p> <p>a) How were the Terms of Reference agreed and why?</p> <p>b) Why did the Panel not address equally key elements of the Terms of Reference?</p> <p>c) Why have recommendations been presented without a framework to support them?</p>	<p>a. For WG to lead on</p> <p>b. The terms of reference did not call for an uniformed measured response</p>	

Arts Council of Wales concerns about the independent review of support for publishing and literature – response from the review Panel

Issue As put forward by the relevant stakeholder organisation.	Response from the Panel Narrative response.	Amendments to the report or recommendations?
<p><u>The evidence base</u></p> <p>We cannot endorse a number of the Panel’s findings.</p>	<p>A message for the Cabinet Secretary not the Panel</p>	
<p><u>The evidence base</u></p> <p>1. The Panel doesn’t address adequately the root causes and effects of the reported decline in the economic value of the Welsh publishing industry.</p> <p>Key issues aren’t examined in sufficient detail. E.g. - A Western Mail report on the Creative Industries (7 June 2017)</p>	<p>A vague non-specific and unexplained comment, except for the view that the report did not examine matters in sufficient detail.</p> <p>The report has been criticised for being too long. The Panel did not have limitless time and other resources. The Panel included comments and recommendations regarding the need to focus upon strengthening the current infrastructure to grow the economic capital of the generation of IP – original work and the production of IP through publishing and digital format.</p> <p>ACW refer to a statement in the Western Mail - The Panel concluded its report before 7th June 2017 – date of issue of statement re creative industry.</p> <p>The Panel found it interesting for a document criticising the Panel’s rigour to highlight a tabloid newspaper’s second hand account of an unidentified source.</p>	

<p>The Report usefully poses two key questions:</p> <ul style="list-style-type: none"> • Is this funding [for Publishing and Literature] helping to grow publishing infrastructure? • Is this funding contributing to talent pathways for writers? <p>Unfortunately none of this is satisfactorily answered.</p> <p>The Panel’s recommendations would carry more weight if the report demonstrated that it understood the reasons for the current performance of the publishing sector, and that it had a clear sense of how the recommendations would reverse the downward trend. A number of actions are proposed. But in the absence of an appropriate analysis of context, it’s difficult to feel confident that these are the right steps to take.</p>	<p>The report was not an academic treatise. It did note and consider the decline noted in the literary and publishing landscape of Wales. It explained the paucity of data in some areas. While not devoid of analysis and explanation of this context, it was not the Panel’s role to satisfy “demands” for “some attempt at analysis and explanation”.</p> <p>In posing two generic questions regarding growing the publishing infrastructure it is clear to see from the recommendations that the current model is not fit for purpose. ACW would be aware of such a view. It would have received an independent view from ARAD which stated clearly that there were issues to be addressed. With regard to LW, the Panel noted that ACW themselves questioned whether they should review their own strategy after six years of engagement. “The choice for Council would seem to be to keep faith with the evolution of the organisation in its current form, OR TO REQUIRE A DIFFERENT STRATEGY THAT OFFERS CLEARER BENEFITS TO THE LITERATURE SECTOR.”[Bold and capital print presented by Panel] Extract from evidence by ACW.</p> <p>Such extraordinary decline was clearly demonstrated in the report – see comments about Amazon</p>	
---	---	--

<p><u>The evidence base</u></p> <p>2. This is a Publishing and Literature Review. The greater part of the Review concerns itself with Publishing. The definition of Literature used throughout the report is restrictive and narrow. The report seemingly fails to recognise (especially in Annex 1 of the report) that the Literature landscape is a complex and rich one.</p> <p>The report also fails to fully acknowledge Literature in contexts beyond the written page</p>	<p>ACW here considers the Panel’s analysis of context inadequate but gives no clear reasons why it does so. It has decades of experience in this field to inform it.</p> <p>Literature is not narrowly defined – it is presented in such a way that allows it to be used to support a wide range of activities and professional /commercial outputs.</p> <p>The Panel does not disagree with LW that the way writers create and share work has diversified and that talent development is essential – hence the need for further development in this area as noted in the report for writers linked to the web, game writers, script writers for film, tv, animation as well as fiction writers – all noted and celebrated within the report.</p> <p>The word “fully” here acknowledges the fact that ACW accepts that the report does acknowledge issues in this area. In addition, its recommendation for WG to commission another exercise in this field in 5 or so years’ time was made precisely because of the continuing diversification of the modes of creation and engagement. Interestingly, ACW does not include the increasingly sophisticated world of self-publishing in its list of examples here. Perhaps because LW (as well as WBC) has been slow to consider this element of diversification?</p>	
<p><u>The evidence base</u></p> <p>3. The analysis presented in the report of the relationship between the creative industries and the cultural sector is partial and incomplete.</p>	<p>The Panel made reference to the relationship between the creative industries and the cultural/educational sector. Clearly the argument can be crafted that any overview review is “partial” and “incomplete”. However over 50</p>	

<p>The Panel doesn't explain, with sufficient clarity, the extent to which the Welsh Government's social and cultural objectives for public investment merge with economic imperatives.</p> <p>The report risks perpetuating the myth of a separation between "soft" cultural activity and "hard" economic outcomes.</p> <p>The rather narrow examination of creative industry models which describes subsidised activity as a "Welfare" model of negative economic value is unhelpfully</p>	<p>specific recommendations are made which, if accepted, will have a significant impact. Some of the recommendations focused upon greater clarity of investment – in particular education and multi-sector engagement. The Panel could point to numerous examples of text and recommendations which refute the statement by ACW. One high profile commentator (Lefi Gruffudd, a publisher) quoted from the report to refute the ACW point here in a recent article in Golwg.</p> <p>ACW does not approve of a narrative which refers to "welfare" support. Without welfare support – as defined as "where subsidy is required " it would not be financially viable to support the current infrastructure for publishing in Welsh. Government investment is essential to continue the excellent work which has been seen by key stakeholders. All activities in this field require creativity and resources in cash and kind.</p> <p>At no point did the Panel focus on "negative economic value" as a good or bad thing. As a working assumption the Panel took the view that a considerable range of activities were extremely desirable for the good of Wales and its people.</p> <p>Where the market could deliver these without public funding, well and good. Where it could not, continued public funding to "close the gap" in costs was justified (our working assumption being at broadly the current level, quite something in current times). Hence the need for an honest view of the continuing need for "welfare" support within the current context.</p>	
--	--	--

	<p>The Panel was aware of and considered the various models and numerous reports cited by ACW. It focused on behavioural economics and network theory as these are new disciplines which bring fresh perspectives as to how subsidy can create impact and change. It was felt that greater focus should be placed by both ACW and LW on impact analysis.</p> <p>The Panel does not see how its report is at odds with the quote noted by ACW. ACW places culture above economics, when both have to work together as productively as possible and not in opposition</p>	
<p><u>The evidence base</u></p> <p>4. The ‘evidence’ presented in the report does not support many of the Panel’s key findings.</p> <p>Important aspects of the research methodology lack analytical and statistical rigour. There’s with little or no correlation between the information provided and the conclusions drawn.</p> <p>The large number of responses to the Review’s consultation is both striking and significant. However, it’s a common mistake to assume that large numbers of responses in and of themselves provide statistically credible evidential value. They do not.</p>	<p>The Panel refutes this – it could point to numerous examples. Which recommendations do not carry background evidence or relevant commentary?</p> <p>Ultimately, readers of the report (including the Cabinet Secretary) have to decide whether they broadly trust the Panel’s use of the evidence it received or not, and indeed the good faith with which the Panel went about its work.</p> <p>It is “a common mistake”, as ACW says, to assume large numbers provide “statistically reliable evidential value”. This is not a mistake the Panel made. It applied its combined, varied experience and skills to all the evidence, of which the responses to the consultation were one element. The placing of information about the consultation in the report helped satisfy one aim that the Panel was determined to pursue – openness.</p> <p>The Panel took specific note of the significant comments received by ACW which demonstrated their numerous concerns relating to LW. It is also true for the record that</p>	

	<p>the Panel received and considered very positive statements regarding LW in their attempt to deliver the ACW strategy for the promotion of literature. In considering such statements the Panel also had regard to the general view expressed by ACW that LW was a “young company” working through teething issues and that all that was required was additional time and overview. A judgement however had to be made. The class question to be answered was – was it reasonable after six years and over £4.8 million investment by Welsh Government that a national company was still classified at the highest risk level? In addition to that even after six years of guidance and support by ACW the sponsored body itself was now questioning whether the time was right for a change of strategy and questioning continuation of revenue funding as a result of performance . The Panel considered that change was required and presented recommendations to support such a view.</p>	
<p><u>The evidence base</u></p> <p>5. There are unhelpful inconsistencies in the way that important comparative information is presented.</p> <p>The description of the work of the Welsh Books Council (pp14-21) differs vastly in form and content to that for everyone else. (The Panel could draw on knowledge of the 2014 Welsh Government review of the Welsh Books Council.) The same format should have been used consistently – without this, the Panel risks demonstrating a ‘bias’ that perhaps it didn’t intend.</p>	<ol style="list-style-type: none"> 1. WG (as the accountable body for the public funding received by WBC) chose, in 2014, to commission a review of WBC. All those the independent consultant met (including ACW and LW) received the report from WG shortly after WG received it; and it was placed in the public domain as an annex to the Panel’s report. 2. Having been the most powerful force in the creation of LW, and mindful of the ARAD recommendations the Panel would have expected, after 6 years of life (and building on predecessor arrangements which ACW funded) for ACW to have had commissioned an independent report 	

	<p>itself to review the work and governance of LW across the board. Such a report should have been published.</p> <p>3. There would be more information about LW (and ACW's oversight of its funding of LW) if it would have been possible to have further strategic dialogue with the Chair. The failure of LW to seek more proactive engagement with the Panel as an opportunity for Wales' literature was a disappointment to the Panel.</p>	
<p><u>The evidence base</u></p> <p>6. Significant changes are proposed to the delivery of existing activities with no assessment of whether the changes are likely to work.</p> <p>A single solution is advanced with no systematic evaluation of their benefit or of the extent to which it would meet social, cultural and economic goals. We can find no evidence that an Equalities Impact Assessment has been undertaken.</p> <p>Radical proposals suggest decisive action and as such have an allure</p> <p>It's also essential that the right functions are located with the right organisation, a judgement that needs to take account of knowledge, expertise and 'fit'.</p> <p>The report talks in general terms about events, but not at all about participation and engagement..</p> <p>The failure to assess properly the various options means that there's a very real risk that the Panel's</p>	<p>The report is intended necessarily to be of a very different nature to the 2014 report in relation to implementation of any recommendations presented to the Cabinet Secretary.</p> <p>The Panel did not believe in change for change's sake. It did, reluctantly, conclude that the status quo was not a serious option to be recommended. The Panel did not undertake an equalities impact assessment.</p> <p>Each recommendation implemented (many of which ACW and LW are forcefully urging the Cabinet Secretary not to accept), would need to be the subject of fleshing out and further discussions. For the benefit of literature in Wales, the Panel would hope ACW, LW, WBC and other stakeholders would approach such work constructively and productively.</p> <p>The Panel, being independent of, but in process terms answerable to, WG, did not take WG endorsement of any activities by LW or WBC as automatically meaning that they were beyond question.</p>	

<p>recommendations could exacerbate rather than alleviate the perceived deficiencies in current arrangements with a loss of current momentum.</p>	<p>ACW’s “exacerbation” point reinforces the Panel’s view that ACW is unlikely to achieve sufficient improvements at LW in a reasonable timescale. The Panel might have agreed with ACW here if it had been presented with compelling evidence that the identified shortcomings in LW’s governance and culture would decline rapidly from here onwards.</p> <p>The Panel took note of evidence presented by ACW with regard to proposing changes. It noted the view expressed by ACW that LW demonstrated “persistent issues around strategic thinking, leadership and planning and the lack of a cohesive strategic framework to underpin the company’s activities and programme.”</p> <p>The Panel noted the view expressed by ACW that LW “had tended to aggregate to itself new tasks and projects rather than assessing which are most directly relevant to its mission.” “It has looked for profile but not necessarily evaluated how its activities will help the sector.”</p> <p>The Panel also noted the views by ACW regarding their concerns for nurturing support for writers. - “... after a REDUCTION in staff by LW ... four years of shaping its strategic priorities, we do not see compelling evidence of a coherent approach to writer development that fully reflects the Business Plan narrative.” [Extract of evidence presented by ACW]</p> <p>The sum total of evidence led the Panel to the view that a more integrated strategy would be of benefit and would offer greater support for writers and the professional sector. This view was triangulated with the numerous comments received.</p>	
---	--	--

<p><u>The evidence base</u></p> <p>7. The financial implications of change are not examined.</p> <p>It is impossible to assess whether the recommendations represent good value for money – the first pre-requisite of the responsible stewardship of public funds. There is no due diligence process to support the proposals.</p> <p>The proposed transfer of responsibilities from Literature Wales to the Welsh Books Council would be highly disruptive and have significant cost, either in terms of the requirement to enact ‘TUPE’ arrangements or through the loss of jobs. The implications of this are not considered.</p> <p>The very long list of recommendations directed at the Welsh Books Council suggests that the Panel believes the organisation has matters to address. And if additionally the Books Council is to see a significant expansion of its current activities, that could only happen if this growth was appropriately funded. There would either need to be additional public subsidy from the Welsh Government, or funding, currently allocated to cultural and social outcomes would have to be diverted</p>	<p>The Panel notes comments by ACW re stewardship of public funds – it was for that reason that the Panel had concerns regarding the continual distribution of public funds, [over £4.8million,] to a national company which had been classified as red risk for six years. The status quo was not an option.</p> <p>A global financial assumption is stated in the report, ie a working assumption (not endorsed or otherwise by WG) of no significant change in either direction in overall WG funding of WBC+LW. A change project team would be needed to develop and refine any recommendations which the Cabinet Secretary accepts. That is where a proportionate level of due diligence would be needed.</p> <p>Claims are made by ACW that any change would be “highly disruptive”. There is no evidence to support this. No-one on the Panel would want to see unnecessary loss of jobs. But the provision of jobs is not an end in itself. Nor do either of these two charities have an entitlement to long term continuation of public funding simply to avoid job loss in their own staffs.</p> <p>Short term, there would inevitably be some diversion of management attention from core work. Long term there would be a very good prospect of organisational structures which would more than compensate for any short term loss of momentum. Over 5 years this would probably deliver more in total towards WG priorities than status quo and also deliver it with more transparency.</p>	
---	--	--

<p>away from their current purposes. This would not meet the Government's policy priorities.</p> <p>The report suggests that the future costs might be met by a re-routing of existing funding, including from the National Lottery. The report completely misunderstands how Lottery funding works and how the Arts Council operates as a Lottery distributor. The approach set out in the report is mistaken in fact and incorrect in Law.</p>	<p>This is for refinement during implementation. The Panel did not have the time and resources to bottom out all the legal ramifications.</p> <p>Clearly operating Lottery distribution in an ultra vires way is not something the Panel would have recommended but neither should ACW use it to resist any change to current arrangements. After all, LW came into existence only 6 years ago, over 2 decades after Lottery distribution to the arts in Wales. Any refinements needed to implement a change in Lottery funding currently delegated to LW would not automatically affect the recommendation relating to the far larger sums of WG funded grant which ACW gives LW each year.</p>	
<p><u>The evidence base</u></p> <p>8. The report contains errors that could have been corrected through a formal process of clarification and fact-checking.</p> <p>The need to remedy errors after the event undermines confidence in the report and in the authority of the Panel. The unusual degree of secrecy accompanying publication of the report is inexplicable</p>	<p>The Panel does not recognise the reference to secrecy.</p>	

<p>the development of Literature Wales as an organisation – the report makes disparaging comments about the appropriateness of Literature Wales’ Board and governance despite never having observed these matters at first hand. Arts Council officers do attend Board meetings. In our evidence to the Panel we were frank in identifying the challenges that Literature Wales faces. However, the report creates the clear impression that Literature Wales is an organisation teetering on the edge of crisis, unfit to receive public funding. We categorically disagree with this opinion.</p> <p>As we had noted in our advice to the Panel: “Shaping its [Literature Wales’] vision and priorities has taken time given that bringing together different organisations has its particular challenge. Settling governance and board matters has required care, as has the definition of a fresh approach to strategic goals. However, we felt there was merit in taking the time to get this right.”</p> <ul style="list-style-type: none"> • the Arts Council’s monitoring of Literature Wales – as a distributor of public funds we must expect our actions to be scrutinised. The robust and accountable management of funding is one of our most important responsibilities. The report draws heavily on information provided by us to the Panel. This information sets out in some detail our assessment of Literature Wales’ many 	<p>The Panel did not say or imply that LW was teetering on the brink of crisis. If it had, it would have either recommended urgent rescue (with strict conditions and much tighter oversight than ACW seems to deliver) or cutting its funding completely at the earliest opportunity.</p> <p>The Panel also envisaged an ongoing role for LW involving some public funding</p> <p>With regard to issues relating to LW re management and strategy refer to the letter presented to the Cabinet Secretary.</p> <p>The Panel noted the overall view expressed by ACW:</p> <p>“... there is a lack of a coherent strategic framework and we have concerns about whether the organisation has adequately demonstrated the level of strategic leadership we would expect from a national company”</p> <p>Not clear what this means</p> <p>The Panel noted the clear views expressed by ACW regarding allowing time however - 6 years in and counting millions of pounds already invested and, in the Panel’s view, insufficient prospect of significant</p>	
--	--	--

<p>achievements, but also where more work was needed. We also explained the risks associated with Literature Wales’ developing programme of activity.</p> <p>As an organisation that is still evolving and establishing itself, we would obviously wish to keep them under close review (as we do with a number of other organisations). We had provided the Panel with a careful and rounded view of the basis for our analysis of risk and the context within which these judgements are made. None of this was reflected in the report.</p> <p>Literature Wales’ status and responsibilities as a national company – the Panel is confused about Literature Wales’ national role</p> <p>The more relevant point of comparison would have been the objectives required of national companies, regardless of art-form or mode of operation. Again, we carefully addressed this issue in our submission to the Panel:</p> <p>“To be ‘national’ is a privilege, not an assumed right. It brings with it a particular obligation to be an exemplar in every way: creating work of national and international significance; showing leadership in developing the arts in</p>	<p>improvements such a position would not be acceptable as status quo. This would not be acceptable in almost any other context.</p> <p>The Panel did not find the ACW to be as open as it would like in its role of holding LW to account. This is behind some of the recommendations which aim to bring more transparency to the ACW/LW governance relationship, and transparency to LW governance more generally.</p> <p>ACW officials, according to its own documentation, had experienced what was clearly unacceptable behaviour from senior members of LW as ACW struggled to conduct its very proper role of holding them to account. The consequences for LW seemed minimal.</p> <p>The Panel notes LW is the only “national company” on ACW’s red list, 6 years after its creation.</p> <p>The Panel was fully aware of the criteria set by ACW re national company status – however it questioned how rigorous ACW themselves evaluated such criteria in relation to LW.</p> <p>“It brings with it a particular obligation to be an exemplar in every way” ACW expectation</p> <p>Six years classified as high risk – the only one within the ACW portfolio.</p> <p>ACW evaluation: “we have concerns...whether LW has adequately demonstrated the level of strategic</p>	
--	---	--

<p>Wales; nurturing the partnerships and relationships that will develop new artists; building the arts audiences of the future. Our recent Investment Review has reinforced these expectations.”</p>	<p>leadership we would expect from a national company”. “there is an element of protectionism in the way that the company perceives its work and role”</p> <p>The Panel questioned whether this and other concerns demonstrated EXEMPLAR evidence.</p> <p>The Panel noted the independent comments by ARAD which stated: “The decision of ACW to concentrate powers and roles within LW over the last few years is not regarded as a positive move for the sector by the majority of stakeholders who contributed to the study.” “...created a monopoly of funding and resources to the detriment of the overall development of the literature sector in Wales.” And “The balance of opinion was that LW has not yet developed into a key player internationally... there was a perception ... that the quality of international engagement work Had declined since its incorporation into LW.”</p> <p>ACW – “showing leadership in developing the arts in Wales “</p> <p>The Panel noted evidence cited: “ ...there is work to be done to address what appears to be a more vocalised perception of the organisation as one that is not always collaborative or as open as it could be.”</p> <p>Numerous other examples could be given cited from evidence – mainly from ACW internal reports – is this the exemplar standard acceptable by ACW?</p> <p>With regard to comments re Ty Newydd the Panel is not sure what point ACW is making here.</p>	
---	---	--

<p>Tŷ Newydd – the Panel has struggled to understand the role and function of Tŷ Newydd. Its description of Tŷ Newydd as being “mainly aimed at ‘retired hobbyists’” seems especially egregious and fails to recognise the support of some of the most eminent practitioners in their field</p> <p>Current courses Tŷ Newydd – a number of which are fully booked – can be seen here: http://www.tynewydd.wales/courses-retreats/</p>	<p>When it met the ACW chair and CEO it was apparent that there has never been an independent, thoroughgoing review (without prejudice to resulting conclusions) of the option of ending continued heavy year on year subsidies from ACW to LW for Ty Newydd’s courses (alongside other options).</p> <p>Our terms of reference charged us to look at inclusivity for the whole of the population of Wales. At Ty Newydd we found in the figures given to us by LW (from 2015) that 61% of residential course attenders were from England and 7 private fee paying schools in England had sent pupils on courses. This would not be a matter of concern in an establishment funded without public subsidy. But that is far from the case here.</p> <p>The Panel read significant evidence cited in internal reports by ACW noting concerns re LW activity here – these were cited in reports from 2014/5 -16. “We feel that Ty Newydd is not performing against LW business plan and that the submitted development plan is limited in scope and strategic vision. ...The current position appears to indicate that clear lines for financial monitoring, ongoing programme evaluation and internal communication are not embedded as we would expect- this is a cause of concern ...” Although ACW states in 2016 report that LW had made progress on issues it still remained an issue for detailed consideration.</p> <p>In discussion with the Panel, ACW clearly stated that one option would be for ACW to take over the funding role of WBC from WG, rather than the more subtle wording in their document. The Panel did not regard either as rapacious but as a genuine contribution to debate.</p>	
---	--	--

<p>strategic arrangements for the financial support of Publishing and Literature – given the manner in which our evidence is presented in the report, one could be forgiven for thinking that the Arts Council is advocating a rapacious take-over intended to absorb Welsh Books Council’s funding and responsibilities. We are not.</p> <p>For the avoidance of doubt, we repeat in full the original evidence submitted to the Panel:</p> <p>“...we’re not persuaded – on the grounds of cost, operational efficiency or ethos – that adjustments of this type would bring meaningful additional benefit.</p>	<p>The Panel decided, however, that the way to deal with cultural and governance issues at LW was not to also bring some or all of WBC’s publicly funded functions under ACW oversight.</p> <p>The Panel did not ignore the detail of their “careful strategic assessment”. It simply did not agree with placing any more responsibility for publicly funded support for literature through ACW.</p> <p>The Panel believed that in the medium and longer term, more transparency in the whole field would prove a stronger basis for productive relations, especially in a field involving a group as widely scattered as writers</p>	
<p><u>The evidence base</u></p> <p>9. Adverse reaction to the report within the Publishing and Literature sectors is already</p>	<p>It is clear that the focused engagement by LW to question the validity of the report and in particular the recommendations regarding any change to their status or</p>	

<p>challenging the authority and competence of the Review.</p> <p>We're aware that the shortcomings of the Panel's work are being widely discussed. (Two influential articles by Jasmine Donahaye in "Nation.Cymru" and Gary Raymond in "The Wales Arts Review" are broadly representative of the comments being expressed.)</p>	<p>activities has drawn interest. This is particularly true as the Panel has noted several of the key individuals who have received sponsorship by LW supporting their claims. Panel members have seen roughly as much positive reaction as negative. Compared with the numbers LW and WBC serve, or even the numbers responding to the consultation, well reported reactions in main stream and new media are miniscule in number. The Panel does not think the mistake should be made of confusing the volume and vehemence of reaction for its quantity and quality.</p> <p>The Panel is also reminded of the criticism cited in evidence by ACW regarding LW: "... we feel that the organisation can adopt an attack/defence line as its default position..." The Panel notes the comments by ACW.</p> <p>The Panel could refer to authors such as Jon Gower and Brian John among those with more positive views about the report. The Panel notes that Gary Raymond is located in close proximity to LW and that Jasmine Donahaye's article in Nation.cymru refers to the shortcomings of ACW, LW and to a lesser extent WBC "Support for writers certainly can't get much worse than it's been with Literature Wales in recent years" and included some positive comments in her television interview.</p> <p>The Panel notes that LW has described ACW as an independent body which is critical of the report. Clearly ACW is not independent.</p>	
<p><u>POSITIVE COMMENTS THAT MAY NEED SOME RESPONSES</u></p>		
<p><u>The evidence base</u></p>		

<p>1. The value and potential of the Wales Book of the Year Awards needs to be fully realised.</p>	<p>The Panel notes the views by ACW regarding a number of specific recommendations.</p>	
<p><u>The evidence base</u></p> <p>2. We welcome the importance that the Panel attaches to the international research commissioned by the Arts Council and Literature Wales.</p>	<p>The Arad report stands as an independent piece of commissioned research which has reaffirmed several of the key issues and concerns noted by the Panel. This report was commissioned through public money. It was never made available to the public. Why?</p>	
<p><u>The evidence base</u></p> <p>3. We agree with the Panel’s identification of the importance of new digital opportunities, but it would have been helpful if these could have been better articulated.</p>	<p>The report cites examples of key areas for consideration for digital innovation.</p>	
<p><u>The evidence base</u></p> <p>4. The importance of greater access and engagement is recognised, but poorly described.</p>	<p>The Panel noted and considered issues relating to inclusion and access. Reference is made to the role of key stakeholders in this area. The Andrews report was noted and considered by the Panel.</p>	
<p><u>The evidence base</u></p> <p>5. Further work is needed to explain how other areas of Government activity could contribute to furthering the development of Publishing and Literature.</p>	<p>The Panel noted the numerous areas where WG funds related activity. The recommendations highlighted one key area – education – clearly others could be also included.</p>	

<p>.</p> <p>There would appear to be confusion around the position within the Review of academic publishing.</p> <p>.</p> <p>More attention should have been given to the potential role to be played by libraries.</p> <p>These are issues of obvious relevance to this Review.</p>	<p>There was no confusion regarding academic publishing.</p> <p>The Diamond Review had no authority or mandate over the terms of reference of this review exercise. The Panel agrees that a separate evaluation by the appropriate Cabinet Secretary should consider the implications for funding academic publishing – and in particular through the medium of Welsh. This was not the role of this Panel.</p>	
<p><u>The evidence base</u></p> <p>6. We accept that Literature Wales has still to fulfil the potential of its founding vision.</p>	<p>ACW Extract from evidence submitted stated:</p> <p>“...we have concerns about whether the organisation has adequately demonstrated the level of strategic leadership we would expect from a national company.”</p>	
<p><u>The evidence base</u></p> <p>7. We’re ready to work positively with all relevant parties to agree practical and affordable proposals that best meet the Welsh Government’s objectives.</p>	<p>Noted</p>	

Recommendations	Reasons	Policy Implications
1. The Welsh Government should continue to provide financial support to the industry in both the Welsh and English languages.	Confirmation that funding be continued in line with WG Financial guidelines and Green Book financial controls re designated bodies	Recommendation supports WG priorities as defined in Taking Wales Forward 2016-2021 and other key policy statements approved by WG
2. Support should continue to be provided for both print and digital materials, but digital provision and strategy needs to be significantly improved.	Reinforce need for continuation re current infrastructure but highlight priority investment area for enhancing digital innovation- such activity would further enhance digital connectivity and inclusion.	Need to invest in more innovative models and relate investment to WG digital priorities. Opportunity to link arts/education policy objectives with digital strategy set by WG
3. The importance of appropriate funding from the Welsh Government should be reaffirmed, to promote and encourage innovative opportunities for both literary development and publishing in Wales.	Confirmation of “appropriate “funding – in order to safeguard financial support for publishing and literary developments within future budget discussions.	Panel aware of the possible additional pressure on budgets and the importance of placing a marker for the arts in future discussions.
4. These are key areas of investment which align fully with the Welsh Government’s commitment to the Well-being of Future Generations (Wales) Act 2015 and directly support the strategic priorities set out in its Programme for Government (PfG) <i>Taking Wales Forward 2016-2021</i>	Confirmation for WG that any investment relates to agreed priorities within key policy statements.	Appropriateness of funding for designated activities which supports Government priorities.
5. The Welsh Government should seek agreement from the Welsh Books Council (WBC) that it will	Proposal to refine current system in order to deliver best value and economic and cultural impact.	Strengthen infrastructure and allow WG to have more of a strategic overview of investment. Currently from a policy context –

<p>take on some of Literature Wales' (LW) current functions, including:</p> <ul style="list-style-type: none"> ○ Book of the Year (with the aim of increasing its commercial impact, including consideration of the marketing approach required) ○ Bursaries ○ Literary Events / Writers on Tour ○ Provision for children and young people 	<p>Number of possible areas noted for consideration</p>	<p>no overall accountability and limited impact assessment re policy.</p>
<p>6. This would require additional funding from the Welsh Government, which should be offset by a corresponding reduction in the funding provided to the Arts Council of Wales (ACW) for these purposes (which it currently passes on to Literature Wales).</p>	<p>Initial marker re possible redistribution of WG funding to deliver structural changes.</p>	<p>Need to consider drafting of any remit letter re further priorities for either ACW or any other body.</p>
<p>7. Where the above functions rely on third party funding (e.g.; National Lottery funding currently awarded for the delivery of bursaries), agreement should be sought with the Arts Council of Wales, Literature Wales and the Welsh Books Council that ACW and LW will not reapply for this funding at the end of the current award, and will instead support an application from the</p>	<p>Initial marker for early engagement with relevant bodies.</p>	<p>Need to review current models of engagement and secure clarity re process and engagement if proposal is taken forward.</p>

<p>WBC for the funding needed for delivery of this function in future.</p>		
<p>8. If the Welsh Books Council's purposes are expanded on this basis, the following would then need to be considered (by the WBC):</p> <ul style="list-style-type: none"> ○ A change of title to reflect additional responsibilities ○ Appropriate presence at a regional level across Wales ○ A clear and focused digital strategy ○ A clear strategy to promote inclusion across Wales, building on its existing child poverty strategy ○ A talent development strategy 	<p>Opportunity to review and enhance current activity and build upon WBC activity and brand. This would allow to build greater synergy between fragmented parts currently supported from different budgets. Specific recommendations which support key WG priorities</p>	<p>Strengthen critical mass – address concerns identified by key stakeholders. Allow WG to develop a more holistic approach to relevant policy initiatives. Strengthening the current infrastructure and demonstrating greater value for money and connectivity of policy development.</p>
<p>9. Once agreed, the Welsh Government would need to reflect the above changes in a revised grant award letter to WBC and a correspondingly revised remit letter to ACW (removing the duties and funding being transferred to WBC).</p>	<p>Procedural statement</p>	<p>Securing good governance accountability relating back to stated WG priorities as agreed by Cabinet Secretary</p>
<p>10. With these structural changes, the following would remain with ACW / LW:</p> <ul style="list-style-type: none"> ○ Ty Newydd Writing Centre 	<p>Initial view of key activities which LW could focus upon and deliver</p>	<p>Need for ACW to review their policy re support for literature and offer more clarity of engagement.</p>

<ul style="list-style-type: none"> ○ Other cultural events and festivals delivered by ACW 		
<p>11. The sector as a whole, from micro-enterprises right through to larger companies, needs to develop a more comprehensive focus on innovation, entrepreneurship and connecting with new audiences and readers:</p> <ul style="list-style-type: none"> - <i>The sector in Wales should take full opportunity of new initiatives which further enterprise and innovation in digital technology, marketing and publishing.</i> - <i>Opportunities should be actively sought for cross-arts collaboration with artists and entrepreneurs in other creative industry sectors - particularly in local and regional hubs, to further support an inclusive agenda.</i> - <i>The publishing industry in Wales should also look for collaboration opportunities with businesses in other sectors of the digital economy in Wales (e.g.; e-commerce, insurance etc.).</i> 	<p>Generic recommendations which support the need for the sector to engage far greater in economic and innovation opportunities.</p> <p>Further evidence of strengthening the commercial capital of the sector and build IP potential in order to enhance profile and secure best value for Government investment.</p> <p>Encouragement for more creative collaborative working across sectors – regional hubs to support inclusion.</p>	<p>Delivering on WG policy re innovation, enterprise and the arts.</p>

<p>12. The Welsh Books Council should develop a refreshed, wide-ranging mission to identify and deliver the right support needed for books from Wales in either language, in all regions of Wales - acknowledging that the interventions needed will often be different for Welsh and for English and also for different contexts (e.g.; geography, demographics, stakeholders, audiences etc.).</p>	<p>Recommendation for self-critical review by WBC to reflect a wider role as a key national provider.</p>	<p>Securing that National Bodies reflect the priorities of WG as stated in policy statements. Embracing cultural diversity and celebrating the languages and cultures of Wales.</p>
<p>13. With this comes a need for the WBC to review the nature and capacity of the Executive and the governance arrangements, to ensure that both are appropriate to allow the WBC to take its new, expanded mission forward.</p>	<p>Enhancement of capacity and on-going internal review.</p>	<p>Evidence of good governance and assurance re requirements for Public Bodies</p>
<p>14. The WBC needs to develop different levels of risk appetite across different functions, to allow for greater managed risk taking and innovation where appropriate. For example, this approach could improve the effectiveness of marketing within and outside Wales; it would also allow the WBC to do more to incentivise publishers to find hits.</p>	<p>Further enhancement of processes</p>	<p>Evidence of good governance and assurance re requirements for Public Bodies</p>

<p>15. Develop a robust digital strategy and increase digital engagement, including but not limited to:</p> <ul style="list-style-type: none"> - <i>Supporting the sector as a whole to take full opportunity of new initiatives which further enterprise and innovation in digital technology, marketing and publishing.</i> - <i>Enabling the sector to find and exploit collaboration opportunities with businesses in other sectors of the digital economy in Wales (e.g.; e-commerce, insurance etc.).</i> - <i>Engagement with relevant industry bodies in these other sectors in Wales, to consider whether further development of existing skills and expertise is needed to facilitate collaboration with the publishing industry.</i> 	<p>Enhance digital activity and foster new initiatives which will allow sector to take full advantages of technology developments.</p> <p>Enhance digital activity and foster new initiatives which will allow sector to take full advantages of technology developments.</p> <p>Enhance digital activity and foster new initiatives which will allow sector to take full advantages of technology developments.</p> <p>Opportunity to develop skills – technology and digital focus. Liked with sector priorities</p>	<p>Reinforce WG policy re digital inclusion and enterprise and link with arts portfolio</p> <p>Reinforce WG policy re digital inclusion and enterprise and link with arts portfolio</p> <p>Reinforce WG policy re digital inclusion and enterprise and link with arts portfolio</p> <p>Link arts developments/ publishing with skills- opportunity to further apprenticeships</p>
<p>16. Set out and implement steps to improve marketing and increase the commercial reach of publishers</p>	<p>Clear evidence of more integrated marketing across sector and build capacity re publishing ecosystem</p>	<p>Policy implication re creative industries cluster and also support for micro publishing especially bilingual rural areas.</p>
<p>17. Develop and implement a clear strategy to encourage and develop talent across Wales, including (but not limited to) identifying and advising on possible career paths</p>	<p>Enhance skills and professional development. Address concerns re current support and offer integrated pathway</p>	<p>Reinforce WG commitment for skills development and professional schemes linked to sector priority- support bilingual training</p>

for writers/authors in Wales, addressing barriers to entry where they exist and ensuring access to appropriate and effective professional development.		
18. Enhance quality assurance processes even further and embed best practice in this area across its new, expanded range of activities.	Further refinement of process	Enhance good practice re governance linked to WG Green Book Treasury Statement
19. Consider and implement plans to support more innovative / entrepreneurial publishers and writers.	Enhance culture linked to enterprise and innovation- build capacity	Support WG policy enterprise, micro business development, welsh in the workplace
20. Consider whether specific, tailored support may be required to meet the needs of micro-enterprises.	Enhance culture linked to enterprise and innovation- build capacity	Support WG policy enterprise, micro business development, welsh in the workplace
21. Consider and implement plans to enable and encourage cross-arts collaboration with artists and entrepreneurs in other creative industry sectors - particularly in local and regional hubs, to further support an inclusive agenda.	Encourage enhancement of current practice and develop new models of engagement	Supporting evidence of activity with impact for cross- arts activity- in line with current art policy for cross sector work.
22. Increased presence at a regional level across Wales, including north-east Wales and south-east Wales.	Regional access	Supporting WG policy for more inclusive and open access presence for WBC across Wales

<p>23. Develop and implement a clear strategy on inclusion, building on the existing child poverty strategy; this should set out how the WBC will support and enable activities across Wales that promote inclusion, including working with libraries and other delivery mechanisms.</p>	<p>Enhancement of current activity building upon best practice re WBC, LW and other groups. Building capacity and awareness</p>	<p>Enhancing WG policy inclusion \widening access and linking arts/education initiatives with child poverty policy and strategy. More integrated offer and clearer impact potential. Evidence of more activities to deliver value for money</p>
<p>24. Investigate the impact of the arrangements in wholesaling within the publishing sector in Wales and other parts of the UK (most notably in England) and develop proposals to address the negative impacts of this.</p>	<p>Commercial improvements which would help booksellers</p>	<p>Economic capital and supporting investment growth – key re bilingual micro publishers and supporting rural economy and linking with new opportunities</p>
<p>25. WBC support for book fairs should not be limited to Wales, although in-Wales activity is important and should continue.</p>	<p>Strengthen brand Wales and international activity</p>	<p>WG international strategy – branding and cultural enhancement. Commercial potential of wider access to literature and publishing</p>
<p>26. The WBC should support the development of missions to key international book trade fairs in the UK and overseas, to establish trading links and build capacity in the publishing sector in Wales. The costs and benefits of these should be reviewed each year and, more fully, after 3 years.</p>	<p>Strengthen brand Wales and international activity</p>	<p>Cultural trade dimension to current WG - missions and build capacity. Brand Wales</p>

<p>27. Develop and increase the training provision for publishers (in areas such as business management, protecting and exploiting IP, marketing etc.)</p>	<p>Enhance professional service across sector and offer key skills which are required for further development of the publishing ecosystem</p>	<p>Reinforce WG commitment to professional training and work base learning as noted by Cabinet Secretaries</p>
<p>28. Encourage publishers in Wales to establish an umbrella organisation for English-language publishers (similar to Cwlwm Cyhoeddwr Cymru for Welsh Language publishers), and / or investigate the benefits of joining one of the existing, UK level representative organisations</p>	<p>Further enhancement of current infrastructure support building upon good practice</p>	
<p>29. Seek to improve the links between the sector and the mainstream media in Wales. The strengthened organisation should have stronger relationship with the Public Service Broadcasters across both languages.</p>	<p>Enhance digital connectivity and invest in new multi-platform developments</p>	<p>Reinforce current policy of maximizing greater digital connectivity and allowing more creative engagement across media platforms</p>
<p>30. Review the in house services currently provided by the Welsh Books Council to publishers (e.g.; editing, design). Consider on an individual basis whether these services should continue - at the current level or at all?</p>	<p>On-going enhancement of services and furthering more enterprise opportunities within the community – new micro business</p>	<p>Reinforcing WG commitment to enterprise – building capacity for new micro businesses – bilingual opportunities for economic development in the sector area</p>

<p>31. Develop and implement proposals to increase the level of funding from both private and third sector sources (in consultation / partnership with LW or others, where appropriate).</p>	<p>Further refinement of income stream potential- maximizing economic value potential</p>	<p>Build upon WG commitment to further enterprise opportunities</p>
<p>32. The Welsh Books Council should continue to administer the tender to provide the Welsh-language daily online news service</p>	<p>Technical support</p>	
<p>33. Identify gaps in existing data on the publishing sector in Wales and take steps to address these data gaps, developing a complete and regularly updated baseline of data to inform future policy considerations (e.g.; across Wales and by region: total number of employees in full-time / part-time / freelance employment; total numbers of books published; total numbers of sales).</p>	<p>Refine data capture to inform future policy and support sector</p>	<p>More information made available to support policy development</p>
<p>34. A clearer focus on engagement with literature is needed (having mandated LW to deal with it, ACW itself does not seem to consider it in depth or as a priority).</p>	<p>Refinement of critical debate and engagement on literature and its importance Secure more partnership work</p>	<p>ACW to review model of engagement</p>
<p>35. ACW should review the scope, scale and delivery of the support for literature that it funds, in</p>		<p>Review of ACW current activity – strategy over last six years</p>

<p>consultation with LW, WBC and other stakeholders. This should include the following:</p> <ul style="list-style-type: none"> - <i>Defining a new, more focussed core literary 'mission'; one takes account of the transfer of key functions from LW to WBC and sets goals that place a much greater emphasis on outcomes.</i> - <i>Revisiting LW's relationship with authors and writers in Wales. This should include issues of representation, providing accessible resources and how best to support the professional development of authors and writers, on an adaptable, 'needs led' basis, in an environment where the world of creative writing is changing rapidly.</i> - <i>Can LW become an 'enabling' organisation, as intended?</i> - <i>Reconsidering the roles of both ACW and LW in supporting literary festivals. LW especially is meant to be an enabling body</i> - <i>Reconsidering whether 'national company' status is appropriate for LW, following the transfer of key responsibilities to the WBC.</i> 	<p>Strengthening the focus on literature – building a more focussed approach. Responding to concerns by stakeholders</p> <p>Offering more clarity for LW – what is the core mission- responding to ACW concerns and dealing with them</p> <p>Responding to concerns and lack of integrated strategy. No unified structure in place and issues therefor e re demonstrating full value for money</p> <p>Clarity for the role of LW</p> <p>Refinement of current roles and duties Responding to issues identified by ACW themselves re role of LW Greater clarity roles and responsibilities</p>	<p>Refinement of ACW overview</p> <p>Refinement of current activities – allowing WG to have more clarity re investment and impact</p> <p>Further refinement of ACW process/engagement</p>
---	---	---

<p>36. Better communication is required between ACW and WBC – a Memorandum of Understanding should be developed to help underpin and achieve this.</p>	<p>Greater clarity and transparency of expectations and targets</p>	<p>Improve WG overview and accountability of bodies</p>
<p>37. Strengthen oversight of LW's governance and accountability and improve monitoring of what is being achieved with the funding ACW gives to LW / literature.</p>	<p>Enhancement of process and governance Responding to evidence – see ACW</p>	<p>Assurance to WG re governance and due process linked to standards e.g. Green Book</p>
<p>38. ACW should put its grant award letter to LW into the public domain in the interests of transparency.</p>	<p>Good governance practice</p>	<p>Assurance to WG re governance and due process linked to standards e.g. Green Book</p>
<p>39. The 2016 ARAD report 'Research into international working in the literature sector in Wales' should be published in full (it is currently only available on request to Wales Arts International; only the Executive Summary is in the public domain).</p>	<p>Good governance practice</p>	<p>Assurance to WG re governance and due process linked to standards e.g. Green Book</p>
<p>40. We welcome the recommendations of the ARAD report, which should be kept under review to ensure they are delivered upon.</p>	<p>Enhancement of infrastructure in Wales and also international context</p>	<p>Strengthen international strategy and brand Wales abroad</p>
<p>41. We welcome ACW's response to the ARAD report, in which it acknowledges its role in delivering against the report's</p>	<p>Procedural comment</p>	

<p>recommendations and commits to specific actions to ensure that organisations come together as needed to do so.</p>		
<p>42. Funding for previously core functions including Book of the Year, Bursaries, Literary Events / Writers on Tour and provision for children and young people to be moved to the WBC (via the provision of additional funding to the WBC from the Welsh Government for that purpose, offset by a corresponding reduction in the funding provided to the Arts Council of Wales (which it currently passes on to Literature Wales for these purposes).</p>	<p>Procedural /accounting comment linked to transfer of service</p>	
<p>43. Where the above functions rely on third party funding (e.g.; National Lottery funding currently awarded for the delivery of bursaries), Literature Wales and the Arts Council of Wales should not seek an extension of this funding at the end of the current award. They should instead actively support an application from the WBC for the funding needed for delivery of this function in future.</p>	<p>Procedural comment – the Panel notes that the drafting here is incorrect re process – the need however for engaging in a conversation stands.</p>	

<p>44. Improve governance and accountability</p>	<p>Enhancement of current offer-responding to issues</p>	<p>Assurances to WG re appropriateness of activity and management in line with Green Book</p>
<p>45. Strategic planning needs to be refined</p>	<p>Enhancement of current offer-responding to issues</p>	<p>Assurances to WG re appropriateness of activity and management in line with Green Book</p>
<p>46. Detailed analysis should be undertaken of how LW's budget is currently distributed</p>	<p>Good governance, Details should be made available on LW and ACW websites.</p>	<p>Assurances to WG re appropriateness of activity and management in line with Green Book</p>
<p>47. Consider how to support more innovative / entrepreneurial writers.</p>	<p>Enhancement of current offer and support more innovation</p>	<p>Deliver on WG directives on enterprise</p>
<p>48. As necessary, develop and implement proposals to increase the level of funding from both private and third sector sources (in consultation / partnership with WBC where appropriate). Working with ACW, critically re-consider the role of Ty Newydd – funding that currently goes to Ty Newydd could go to more effective and relevant training and skills initiatives elsewhere. <i>(It appears that ACW and LW have never considered whether the ACW's ongoing annual subsidy to LW for Ty Newydd - of well over £100,000 - is valid in terms of outcomes achieved. Nor have they</i></p>	<p>Refinement of current processes and business models to deliver greater added value</p>	<p>Secure best value of investment</p>

<p><i>considered alternatives - e.g.; whether they should divest themselves of Ty Newydd. LW and ACW both seemed unwilling to acknowledge</i></p>		
<p>49. Working with ACW, critically reconsider the status of The Welsh Academy.</p>	<p>Responding to issues raised in stakeholder engagement</p>	
<p>50. Support mechanisms such as Overseas Business Development Visit Support (OBDV), which enable businesses to undertake business development visits relevant to overseas markets, should be amended so as to allow consideration of applications from publishers to attend and have a formal presence at international book trade fairs, especially London (which is focussed on overseas markets despite being held in the UK) and Frankfurt.</p>	<p>Strengthening international activity and further business development</p>	<p>International trade mission opportunities Revision of current WG policy</p>
<p>51. This will require appropriate value for money considerations for the sector (i.e.; lower than current Welsh Government guidelines for other industries), acknowledging that the potential arising from initial attendance will usually have a</p>	<p>Technical recommendation re current methodology</p>	<p>International trade mission opportunities Revision of current WG policy</p>

<p>payback over the longer rather than the immediate term.</p>		
<p>52. Amend the grant award letter to WBC to reflect the recommendations set out in this report; correspondingly, amend the remit letter issued to ACW, removing the duties and related funding being be transferred to WBC.</p>	<p>Technical comment</p>	
<p>53. It is vital that publishing and literature are considered in the development of the new curriculum.</p>	<p>Establish new opportunities for sector with investment and developments in education – key for curriculum and welsh language support and further digital strategy</p>	<p>Reinforce WG policy re-education and Welsh language</p>
<p>54. Strengthen opportunities for Welsh publishers on procurement framework.</p>	<p>Technical issue supporting greater business opportunity for publishers</p>	
<p>55. Papurau Bro should continue to be administered by the Welsh Government's Welsh Language Division</p>	<p>Technical comment for administration issues for WG</p>	
<p>56. Building on the recommendations of the ARAD report, support is needed for the translation of Welsh language literature into English - as a bridge language as well as a target audience – and also for the translation of literature from Wales</p>	<p>Refinement of current work and building more capacity. The last sentence of the recommendation is directed to WG as possible future action.</p> <p>The last sentence refers to action for WG.</p>	<p>Enhance international offer and build brand Wales with a clear focus on key recommendations from Arad</p>

<p>into other, international languages. This could have cultural as well as economic benefits and add value to the development of the new curriculum. The Welsh Government should consider options for providing or facilitating this support.</p>		
<p>57. Approx. five years from now the Welsh Government should commission another exercise broadly similar to this one to look widely across the field again, in light of the experience of the next five years and the ever-developing prospects for the future.</p>	<p>On-going review</p>	<p>Allows WG to have external view</p>