

Sharon White
Ofcom
Riverside House
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3 May 2018

Dear Ms White

BBC thematic review of representation and portrayal

As a committee, we welcome the news that Ofcom is conducting a review into how the nations, regions and diverse communities of the UK are represented and portrayed in BBC TV programmes. The under-representation of Wales in BBC productions has been well-documented in Wales for a number of years, by committees of the National Assembly, the Welsh Government, stakeholders such as the Institute of Welsh Affairs and the Director General of the BBC himself.

The gravity of the situation in Wales is such that it has been recognised by senior BBC senior management on a number of occasions. Lord Hall, the BBC's Director General, has long acknowledged the problem of funding for English language broadcasting in Wales. In May 2016, in a letter to the Secretary of State and First Ministers of the devolved nations, Lord Hall stated that "the funding for English language content made in Wales for a Welsh audience has dropped to unsustainable levels". Lord Hall acknowledged the problem at a reception in the Assembly back in 2014, admitting that "English language programming from and for Wales has been in decline for almost a decade".

We therefore recommend that whilst conducting this work you familiarise yourselves with the evidence taken, and recommendations made in the following reports by committees of the National Assembly for Wales:

- The Big Picture (CWLC, 2017
<http://www.assembly.wales/laid%20documents/cr-ld10916/cr-ld10916-e.pdf>). Recommendations in this report included:
 - "We recommend that there should be no reduction in the current proportion of network spending in Wales, and that it should do more to reflect and portray Welsh society and perspectives."
- Inquiry into the BBC Charter Review (Communities, Equality and Local Government Committee, 2015
<http://senedd.assembly.wales/mgIssueHistoryHome.aspx?Ild=13600>)
Recommendations in this report included:



- "We recommend that the BBC develops specific and measurable targets for portrayal of Wales in its network programming. It should report annually on progress against these targets".
- "We recommend that the BBC puts in place arrangements to decentralise commissioning to ensure that network commissioners for the nations and regions are based in those nations and regions".

We would also like to make the following points in reference to the draft terms of reference that Ofcom has issued in relation to this review:

Wales must be included as one of the "different groups" about which you intend to gather qualitative and quantitative data. We have previously been told by Lord Hall that "every network genre in television now has a portrayal objective" and that this is "monitored quarterly, the data is looked at with Rhodri [Talfan Davies - Director BBC Cymru Wales] and other directors from nations with Charlotte Moore (Director of BBC Content), meeting to go through that analysis".

We have pushed the BBC for the release of this portrayal data, to enable independent scrutiny by this committee and other stakeholders, so far without luck. We therefore urge Ofcom or the BBC to collect and publish the full data - not simply the names of television and radio shows - used by the BBC to measure portrayal.

We welcome your intention to look at production processes. This chimes with the previous recommendation from the Communities, Equality and Local Government Committee for the BBC to decentralise its commissioning arrangements. We suggest that you investigate how the BBC's decision to resurrect the post of BBC Director of Nations and Regions, with the consequence that the Director of BBC Cymru Wales will lose membership of the executive body running the BBC, supports the need to increase the portrayal of Wales on the BBC. As a Committee, we fail to see how this move can have done anything other than weaken Wales's voice on the BBC Board.

We would also like to raise several questions. The terms of reference state that this review will look "primarily at television". Will representation and portrayal on BBC radio be covered by a separate piece of work? We are currently conducting an inquiry into radio in Wales, and would encourage Ofcom to pay attention to this work as it progresses. Secondly, no mention is made in the consultation document of news: is this covered by this review? There have long been issues about the misrepresentation - or omission - of Welsh issues on BBC network news, and we would like Ofcom to clarify how it will address this issue in its new role as the BBC's first external regulator.

We will follow this work closely, and look forward to future opportunities to contribute. In previous correspondence (attached) we expressed concern that Ofcom was being too cautious in setting the regulatory conditions for the BBC



under its new operating licence. We continue to urge Ofcom to be bold in using its new powers to create a structural shift in improving the representation and portrayal of Wales on the BBC.

I am copying this letter to Jonathan Rose, Acting Director, Ofcom Wales for information.

Yours sincerely

Bethan Sayed.

Bethan Sayed AM
Chair

