

Cover sheet for response to Invitation to comment on measuring plurality across media

BASIC DETAILS

To (Ofcom contact): Ben Clarke
Name of respondent: Dr Ian Johnson
Representing (self or organisation/s): Plaid Cymru
Address (if not received by email):

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Name Ian Johnson Signed (if hard copy)

Invitation to comment on media plurality

Conclusions and Recommendations

- 1. It may appear that, with hundreds of television channels, radio channels, a range of daily newspapers and widespread broadband internet access that there is no concern with plurality in Wales. However, this fails to recognise that the overwhelming majority of this media is not indigenous to Wales and, with the exceptions noted below, fails to cover issues which relate specifically to Wales.**
- 2. There are therefore two principal issues which affect media news and current affairs plurality in Wales – the democratic deficit which occurs as a result of significant parts of the media offering no news or current affairs coverage about Wales and issues surrounding limited plurality within those media which do provide Welsh news and current affairs coverage. We believe that these may amount to market failure, and recommend that action is taken to rectify this failure.**
- 3. We would recommend peak-time news programmes in English to be broadcast by the main Welsh television channels to illustrate news from a Welsh point of view within the UK and international context, answering questions of democratic deficit and ensuring plurality.**
- 4. Although Welsh news and current affairs on the radio are well presented by the BBC in both Welsh and English, there is room for improvement from commercial stations. This includes news and content broadcast in both languages around Wales.**
- 5. No single daily print media publication serves Wales as a whole. Without this over-arching scrutiny from a cross-Wales perspective, it is arguable that Wales is a news ‘not spot’.**
- 6. A decision to close or change either of the ‘regional’ morning newspapers or the single Sunday newspaper would dramatically further weaken the ability of the media in Wales to scrutinise political events in Wales and lead to a democratic and plurality deficit – especially with the broadcast media dominated by a single public broadcasting organisation.**
- 7. News and current affairs provision in Wales is therefore vulnerable to market exit in English language press media.**
- 8. This is of particular importance as the ownership of these media is outside Wales and previous editorial and financial decisions have shown a greater interest in share price and dividends than in the Welsh media.**
- 9. An initiative of the previous Welsh Government was the support of an alternative Welsh language news website, administered by the Golwg**

magazine as golwg360.com, to provide an alternative news provision to that found via the BBC.

10. S4C has recently published a report on digital media, but concerns have been expressed that the 2003 Communications Act legislation regarding the statutory duties of S4C may have a limiting impact. This should be addressed in preparatory work for any future Communications Bill.
11. As S4C, the only Welsh language channel, will shortly become a recipient of licence fee funding, the channel should be made available free-to-air throughout the UK so that Welsh speakers around the UK can view programming in Welsh.
12. We recommend that responsibility for broadcasting regulation etc. in Wales should be fully devolved to the Welsh Government.
13. We support the creation of a Welsh Media Commission to assist in ensuring the existence of quality media and a plurality of sources through public service broadcasting.
14. The National Assembly for Wales is currently undertaking an investigation into the future of the Welsh media. We would ask that when the group reports, Ofcom takes note of its findings.

Introduction

16. I would like to thank Ofcom for their invitation to comment on media plurality. Although I shall approach the issue in general, I shall also make specific reference, as suggested, to the position of Wales with regard to media plurality.

UK media plurality

17. We are generally happy with the definitions of media plurality laid down with regards to the United Kingdom as a whole, although we would like to see more strictly enforced guidelines on the 'public interest' criterion for intervention in a merger between media enterprises which presumes in favour of an investigation.
18. We welcome the continuation of national (by which the UK is referred) cross media ownership rules, restrictions on broadcast licenses by owners whose influence may cause concern and rules ensuring Channel 3's news provider to be independent of the BBC, not under the control of political and religious bodies, and suitably well funded.

Wales

19. Wales has a population of approximately 3 million people, including 600,000 Welsh speakers. It is a bilingual country whose media must reflect this reality.
20. There is a democratically elected National Assembly for Wales which shows great interest in media issues, but does not have responsibility for media regulation as this resides at Westminster under the terms of the Government of Wales Acts in 1998 and 2006.
21. Wales has its own sporting identity and institutions and coverage of Welsh sport should be included within definitions of media plurality, even though this is not a present cause for concern and will not be discussed further within this submission.
22. The governance of Wales, the activities of the National Assembly for Wales as well as Welsh representatives in other institutions and the behaviour and effectiveness of cross-Wales bodies are all particular issues with regards to news and current affairs in Wales.
- 23. It may appear that, with hundreds of television channels, radio channels, a range of daily newspapers and widespread broadband internet access that there is no concern with plurality in Wales. However, this fails to recognise that the overwhelming majority of this media is not indigenous to Wales and, with the exceptions noted below, fails to cover issues which relate specifically to Wales.**
- 24. There are therefore two principal issues which affect media news and current affairs plurality in Wales – the democratic deficit which occurs**

as a result of significant parts of the media offering no news or current affairs coverage about Wales and issues surrounding limited plurality within those media which do provide Welsh news and current affairs coverage. We believe that these may amount to market failure, and recommend that action is taken to rectify this failure.

Television in Wales

25. Presently there are four television channels which show content intended for and representative of Welsh audiences – BBC1 Wales, BBC2 Wales, ITV Wales and S4C. The first three channels broadcast exclusively in English and the latter, since the switchover to digital, broadcasts exclusively in Welsh, replacing a mixture of language which had been broadcast under analogue. S4C is the only Welsh language channel in the world. Previously a second S4C2 channel had been broadcast, concentrating on political affairs and cultural programmes.
26. Of these four channels, only S4C consistently broadcasts content intended for a Welsh audience with programmes on the remaining three channels limited to segments throughout the day, often news and current affairs programmes.
27. As digital switchover took place earlier in Wales than in many parts of the UK, there are now a large number of established channels broadcast in Wales through Freeview, cable and satellite, the overwhelming majority of which do not broadcast content of any nature which is particular to a Welsh audience.
28. Under the terms of the agreement between BBC and S4C, ten hours per week of programming is provided by the BBC for broadcast on S4C. Much of this is news and current affairs. Some additional current affairs programming is also provided by ITV Wales and by independent companies commissioned by S4C.
29. Viewing figures provided to the National Assembly for Wales broadcasting sub-committee by Geraint Talfan Davies of the Institute for Welsh Affairs estimated that the viewing of the major nightly news programmes were approximately 500,000 for the main news programme on BBC1 Wales, around 275,000 for the main news programme on ITV1 Wales and 75,000 in Welsh for the main news programme on S4C.
30. It is clear therefore that the Welsh news produced by the BBC (in both English and Welsh) is viewed by more than that produced by other sources.
31. The position of ITV Wales has been fragile in recent years, with a decreasing 'regional' output to the extent that ITV Wales was recommended as one of the pilot Independently Funded News Consortia (IFNC) under the plans of the previous Labour government. Significant cuts have been made to the station's Welsh output over many years with a perceived drop in quality.

32. It may be that the channel 3 news provision in Wales, which is independent of the BBC, is not suitably funded to provide an alternative to the BBC news and current affairs provision.
33. BBC Wales is currently in the process of making savings. The final impact upon quality of the final product is yet to be defined.
34. The greatest concern is regarding the role of the BBC Trust within S4C, following the completion of the Public Bodies Bill and changes which are being made to the organisation of S4C.
35. During parliamentary progress of the Bill, there has been great concern about maintaining the editorial independence of S4C and any proposed role of BBC Trust members on the channel's managerial boards and in the discussions surrounding an operating agreement.
36. There is concern within Wales that there is not a plurality of news and current affairs programming within Wales, in either English or Welsh, as a result of the pre-eminent position of the BBC news and current affairs departments within Wales. The proposed further sharing of backroom resources as a means of cutting costs may further this concern.
37. There is further concern that viewers in Wales do not receive sufficient Welsh news from their news sources given that the broadcast news content of the main channels which broadcast in Wales is largely geared towards an English audience – as noted by the King Report of 2008 which criticised the anglo-centric news production system.
- 38. We would recommend peak-time news programmes in English to be broadcast by the main Welsh television channels to illustrate news from a Welsh point of view within the UK and international context, answering questions of democratic deficit and ensuring plurality.**

Radio

39. There are two cross-Wales radio stations, Radio Wales and Radio Cymru, both of which are part of the BBC, the former in England and the latter in Welsh. These produce regular news and current affairs programmes on radio for up to 20 hours per day.
40. As a result of mergers and license changes, there has been an increase in commercial stations which broadcast across large parts of Wales. However, their news and current affairs output is small in contrast with that of the BBC. These are usually part of a wider stable of stations organised from an anglo-centric perspective and this can impact upon their view of the news agenda if not actual broadcast content from non-Welsh sources.
41. Although some regional commercial stations broadcast in Welsh, these stations are under commercial threat and there have been attempts to have the terms of the license changed by companies wishing to take over stations.

42. In effect, the news and current affairs programmes broadcast for a Welsh audience, in either language, are dominated by BBC productions.
43. However, this must again be contextualised within a media situation where the majority of listeners in Wales are listening to news and current affairs which are being made within a British or anglo-centric newsroom.
- 44. Although Welsh news and current affairs on the radio are well presented by the BBC in both Welsh and English, there is room for improvement from commercial stations. This includes news and content broadcast in both languages around Wales.**

Print media

45. There are two morning Welsh newspapers, the Western Mail, which serves a primarily south Wales circulation area, and the Daily Post, which serves a primarily north and mid Wales regions.
46. The Wales on Sunday is published on a Sunday.
- 47. No single daily print media publication serves Wales as a whole. Without this over-arching scrutiny from a cross-Wales perspective, it is arguable that Wales is a news 'not spot'.**
48. Regional papers which are published throughout the day also exist – the South Wales Argus in Gwent, the South Wales Echo in the Cardiff and Valleys region, South Wales Evening Post covering Swansea and west Wales and the Leader series in Wrexham and surrounding areas.
49. There is a strong patchwork of local weekly titles across Wales, some of which are part of wider news-gathering networks or publication stables owned by corporations outside Wales.
50. All of the above titles are published in English. Only the Western Mail could be considered as a 'quality' newspaper.
51. Weekly Welsh language publications include Y Cymro and Golwg. Both publications have low circulation figures which can be measured in the low thousands, with Golwg advertising a regular circulation of between 2,800 and 4,000.
52. As with broadcast media, the democratic deficit in Welsh news and current affairs is clear from the public's choice of morning newspapers with the Daily Post and Western Mail only the sixth and seventh most purchased newspapers. The five largest selling morning newspapers cover all news from an English perspective, as they publish Scottish versions of their titles.

53. There is further concern as both of these Welsh newspapers, and the Wales on Sunday, are owned by the same commercial proprietor – the Trinity Mirror group, who are also the owners of the South Wales Echo and a series of weekly publications.
54. Despite taking a more inclusive multi-media stance, there have been a substantial number of jobs lost at Trinity Mirror newspapers in recent years, weakening journalism in Wales. An estimate from the National Union of Journalists in Wales is that between 2003 and 2011 there has been a loss of almost 50% of editorial positions at Media Wales.
55. As one company owns such a significant market share of newspapers within Wales there is a clear possibility of market failure and editorial influence upon newspapers. The NUJ in Wales warn that the Western Mail may become a weekly newspaper, while others have warned of a merger with the south Wales Echo.
- 56. A decision to close or change either of the morning newspapers or the single Sunday newspaper would dramatically change the ability of the media in Wales to scrutinise political events in Wales and lead to a democratic and plurality deficit – especially with the broadcast media dominated by a single public broadcasting organisation.**
- 57. News and current affairs provision in Wales is therefore vulnerable to market exit in English language press media.**
58. This is of particular importance as the ownership of these media is outside Wales and previous editorial and financial decisions have shown a greater interest in share price and dividends than in the Welsh media.
59. Assessment of the demand for a Welsh language newspaper was conducted by the previous Welsh government and was found not to be financially viable.

Digital media

60. Although there are fewer cost barriers towards use of the internet as a news and current affairs forum, the reality is that pre-existing news-gathering institutions have a brand and content advantage over newer entrants.
61. Thus the BBC (in English and Welsh) and Wales Online, the internet site of the Trinity Mirror newspapers (in English), are the most important websites for Welsh news and current affairs content.
- 62. An initiative of the previous Welsh Government was the support of an alternative Welsh language news website, administrated by the Golwg magazine as golwg360.com, to provide an alternative news provision to that found via the BBC.**
63. Golwg360.com claims to publish around 30 news stories per day and attract 5,000 unique visitors each day – a greater number than magazine copies.

64. S4C has recently published a report on digital media, but concerns have been expressed that the 2003 Communications Act legislation regarding the statutory duties of S4C may have a limiting impact. This should be addressed in preparatory work for any future Communications Bill.
65. The lack of Welsh news and current affairs provision and debate has been consistently noted within academic and political circles and is believed to have led to a more pluralist 'blogosphere' online, with the Welsh political blogs that complete this hole being better regarded than their counterparts from other devolved parts of the UK.

Welsh media outside Wales

66. Some Welsh produced media is available to audiences outside Wales in a variety of media – including BBC Wales television channels, BBC Radio Wales and Radio Cymru and S4C (on Sky), as well as the digital media published in or about Wales.
67. As contributors to the license fee, viewers from Wales should be able to receive public broadcasting in any part of the UK.
- 68. As S4C, the only Welsh language channel, will shortly become a recipient of licence fee funding, the channel should be made available free-to-air throughout the UK so that Welsh speakers around the UK can view programming in Welsh.**

Further comments

69. The treatment of S4C in the Public Bodies Bill and the failure to discuss a Welsh issue with the appropriate bodies in Wales, including S4C themselves, service users and the Welsh Government shows that Welsh broadcasting matters are not considered the most important to the Department for Culture, Olympics, Media and Sports.
- 70. We recommend that responsibility for broadcasting regulation etc. in Wales should be fully devolved to the Welsh Government.**
71. In their report on Public Service Broadcasting in Wales in 2009, the National Assembly for Wales has previously recommended the establishment a Welsh Media Commission which would commission and ensure news and non-news programming initially for transmission on ITV and further content for other services and media.
- 72. We support the creation of a Welsh Media Commission to assist in ensuring the existence of quality media and a plurality of sources through public service broadcasting.**

73. The National Assembly for Wales is currently undertaking an investigation into the future of the Welsh media. We would ask that when the group reports, Ofcom takes note of its findings.

Ends.

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About the author

Dr Ian Johnson is Plaid Cymru's Head of Research at the Houses of Parliament. He is a published academic on minority language media with recent conference presentations on the bilingual use of social media and the Welsh language and political blogosphere in Wales.