



BBC Charter Review: Public Consultation

Arts Council of Wales submission

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Cyngor Celfyddydau Cymru
Arts Council of Wales



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Front cover:
BBC National Orchestra of Wales at BBC Hoddinott Hall
Dim Sŵn, Kizzy Crawford, Gorwelion/Horizons

Imagine...

1. Imagine Wales. And when you've done that – pictured it, heard it, enjoyed it, read about it, celebrated it – try to think of our country without song, the spoken word on stage and screen, without poetry and novels, and dance and sculptures and ceramics and paintings and images, and all of the living traditions that are making our contemporary culture so potentially dynamic. In raw fact, as well as in our imagination, there's no human Wales without art and culture, just as there's no heritage to pass on generation by generation without creativity.
2. If the duty of UK public broadcasting is to reflect the lives of people, we must expect it reflect the culture of Wales and the creativity of its people. The Arts Council of Wales 2014 Omnibus Survey of the Welsh public tells us that 4 in 5 adults and 3 in 4 young people attend arts events. And over a third of adults and 8 in 10 young people participate in the arts. Arts and culture matter to Wales.

Arts Council of Wales

3. The Arts Council of Wales is the country's funding and development agency for the arts. We are a Welsh Government Sponsored Body and a charitably constituted organisation. We also have a relationship with the UK Government's Department for Culture, Media and Sport because we distribute funding from the National Lottery.
4. In our *Inspire* strategy we outline three areas of focus. *Make* - supporting the creation of great art, *Reach* - reaching new audiences in new ways and *Sustain* - ensuring resilience of, and through, the arts. We believe that the BBC has an important role in all three of these areas. The BBC can work with the arts sector to support the creation of work and the creators, use their platforms to connect with the people of Wales, and co-invest with partners to make best use of public money to achieve greater impact.

The Arts and the BBC

5. Like the BBC, the Arts Council of Wales is a Royal Charter organisation. This reflects our public benefit remit. Alongside the Arts Council England, Arts Council Northern Ireland, Creative Scotland and the sectors we represent in our respective nations, we strongly believe that the BBC should reflect, support and advocate for the arts and the people who make it.

6. The BBC has had a long-standing reputation for the quality and range of its arts broadcasting. From drama to documentary, much of the BBC's arts programming has become synonymous with the cultural expression of the time – *Cathy Come Home, The BBC Television Shakespeare, Monitor, The Boys from the Blackstuff, The Old Grey Whistle Test, Play for Today (Abigail's Party, Blue Remembered Hills, Arena, I Claudius, Civilisation, Omnibus*. And the BBC's reputation as an enlightened patron of the arts can be seen in its support for the BBC Promenade Concerts and the BBC performing ensembles.
7. If the BBC's core mission is still to “inform, education and entertain”, then it must reflect cultural life in all its manifestations. Culture and the arts underpin public life. From arts and health to cultural tourism, public art to town centre re-generation, the arts bring meaning, authenticity and enjoyment to our everyday lives. They create and sustain jobs, enrich education services, bring people together, improve our quality of life. It is the universality of arts and culture that makes them so special, and it is the role of the BBC to respect that universality.
8. It is for this reason that we would disagree with the assertion contained in the Government Green Paper that the BBC is too large and too “diffuse”. Whilst “committed to both the future of the BBC and its underlying Reithian mission” the underlying assumption is that the scope of the BBC's output should be reduced. In our view this is not in the interests of audiences who continue to be best served by a universal and inclusive BBC. We believe that arts should be available across the BBC's output, not just pigeonholed as specialised, niche output. It should be present in all its forms across all the BBC platforms reaching all of its audiences - from Cbeebies to Radio 3.
9. We are also concerned with wider cultural issues – creativity, identity and diversity – fertile territory within which the BBC operates. By engaging more collaboratively with the cultural sector, we believe that the BBC could begin to make serious inroads into these areas as the cultural dimension of wider societal issues is widely acknowledged. Part of a public service remit as opposed to a market driven service in a 21st century democracy is to provide the platform for diversity and cultural voices. This needs to be through a re-invigorated public service remit – one that is less about a controlling perhaps Londoncentric editorial voice and more about demonstrating a responsibility to those involved in the contemporary make-up of culture across Britain.

The Wales context

10. Devolution in the UK means that the BBC needs to respond to the differing needs and aspirations of the nations. Up until now the BBC has appeared slow to delegate responsibility and power from London to its own 'nations'. We understand that Broadcasting isn't a devolved area and it is not for us to comment on this. However, in Wales many of the other areas of everyday life are devolved responsibilities and the BBC needs to be able to appropriately flex its structure and decision-making processes to better adapt to this.
11. The resources for programme-making and origination need to be appropriately distributed through the UK to ensure diversity and the voices of the nations and regions is reflected both within and beyond those nations and regions and not overly centralised.
12. Wales is also part of the UK so conversely there need to be ways that our stories are told as part of that wider UK mix – they need to reach network not just be broadcast to Wales.
13. Wales is a bi-lingual nation – legally, socially, culturally, and as individuals and communities. Nothing makes Wales more distinctive than the Welsh Language. The language provides the means to understand and enjoy an extraordinarily rich literature and culture. Creativity thrives on this and is a key component in continuing the Welsh language's vital role at the heart of Welsh life.
14. BBC Cymru Wales, along with S4C, must defend and promote vigorously the right of people to explore their own culture, their own creativity through the language of their choice. In an increasingly globalised world, we must see the Welsh language, alongside English, as a basic civic attribute as well as an inherited culture. If it's to flourish and grow, the Welsh language and culture will themselves have to offer the same levels of experimentation and responsiveness to global trends as is more widely seen through English language media. The BBC has played an enormously important role in Welsh language culture to date and it must continue to do so. Again, the BBC should position itself alongside other organisations with a vested interest in developing the Welsh language and play a key role as a major collaborator, particularly now as it is vested with budgetary responsibilities for S4C. This mandate for enshrining a commitment to the language and cultures of Wales should not be lost sight of in Charter Renewal.

15. It is essential that there is proper visibility of Wales nationally, and that the portrayal and representation of Wales is one that we would recognise. And we need to see greater investment, particularly in English-language, non-news and cultural production in Wales, for Wales. The resources available at the moment to the BBC in Wales impede its ability to draw on talent and to produce, for the people of Wales, cultural product produced in Wales. We also have concerns around the competitive element of production within the BBC which, if unregulated and unmanaged, could lead to production being concentrated once again in and around London.
16. The vitality and originality of the arts in Wales depends on the fresh flow of new ideas – new thinking that's conceived, developed and shared through the medium of Welsh. This makes it essential that we have strong, confident Welsh language broadcasters (in TV and Radio), publishers and film makers who are able to reflect the full diversity of contemporary Welsh society. To this end, it is important that S4C (which currently is funded by licence fee and BBC) and BBC services such as Radio Cymru are appropriately financed.

BBC Cymru Wales and the arts

17. In recent years we have seen a decline in capability of BBC Cymru Wales to deliver a cultural offer to Wales. Whereas funding of news and sport has been protected to some extent, Welsh arts, culture and drama - particularly on television - is barely existent. In the last year BBC Cymru Wales created 90 minutes of English language television drama (*Hinterland* – a co-production with S4C). In their 2014/15 annual report, Audiences Council Wales raised concern at the very limited portrayal of Wales through drama and comedy. In his address from Cardiff's Pierhead building last year, BBC director general Tony Hall remarked that: *"English language programming from and for Wales has been in decline for almost a decade."* He went on to say: *"It means, inevitably, that there are some aspects of national life in Wales that are not sufficiently captured by the BBC's own television services in Wales, and I would include comedy, entertainment and culture in those categories."*
18. Similarly coverage of the arts in Wales has been neglected. Quality magazine programmes such as *The Slate* are no longer being made. There is no 'arts show' in BBC Cymru Wales' television output and only a weekly half hour show on Radio Wales.

19. No other broadcaster is better placed to create quality creative content from Wales, to Wales, yet BBC Cymru Wales are not doing this. BBC Cymru Wales output does not reflect the creative Wales that it should.

Arts Council of Wales and BBC Cymru Wales

20. In Wales our relationship with the BBC Cymru Wales has many facets:
- as a distributor of public funds in Wales our activities are often the focus of media scrutiny
 - as a campaigning charity we try to persuade the media to do more to promote the profile of the arts in Wales - and from Wales
 - as an investor of funds into the cultural and creative sector we are contributing to the development of the wider creative economy in Wales (of which the media are a key part)
 - as a partner we work together to promote, and invest in, the arts and culture of Wales

Arts Council of Wales and BBC Cymru Wales in partnership

21. Arts Council of Wales and BBC Cymru Wales recognise that they are the two largest investors in publicly funded creativity in Wales. We share a strong commitment to deepening and widening audiences for the arts and creative sector. We're also passionate about developing and supporting the best creative talent. Through our joint endeavours we work to make Wales more vibrant, inclusive and economically dynamic.
22. In May 2013 Arts Council of Wales and BBC Cymru signed a public value partnership (PVP) agreement committing to exploring closer collaboration over three years. This demonstrates our joint determination to seek opportunities to work together to do more, better and maximise public funding.
23. The PVP has been a strong foundation for working together in Wales. Successes include our flagship music talent development project *Horizons/Gorwelion*; making communication more open to earlier spot and take better advantage of opportunities such as the WOMEX coverage and BBC Folk Awards in Cardiff and working on 'big moments' such as the projects across to mark the centenary of Wales' greatest author, Dylan Thomas 100.

24. Separately from the PVP, both bodies also fund BBC National Orchestra and Chorus of Wales. This unique arrangement enables Wales to have a truly national orchestra of outstanding quality as well as enable the orchestra to participate in exciting and important initiatives such as *Ten Pieces*. We must ensure that we retain a balance here – in terms of partnership funding and also the role of the Orchestra in reaching the people of Wales and its recording and broadcast duties.
25. Our partnership with BBC Cymru Wales is greatly valued. It is something we want to strengthen and build on to benefit arts and audiences in Wales. Ways in which we'd like to do this are:
- For BBC Cymru Wales - and the BBC more generally - to have a more collaborative attitude to working with arts organisations. This means not just looking to see how they can *help*, but how they can work as equal partners with the arts. Whilst we have seen some development in this area – such as working with National Theatre Wales on *Under Milk Wood* – it too often feels that the arts are the lesser partner. We believe that creative partnerships between artists/arts organisations and the BBC could produce wonderful outcomes if given time and resources with which to take root and flourish. The BBC needs to encourage processes that make such outcomes easier to achieve
 - By renewing our formal partnership with BBC Cymru Wales at the end of the current term. This second agreement will reflect what we have learnt in working together. It will outline priority areas of work.
 - To look again at how we can improve communications. In particular, how UK-wide strands of work such as BBC Music and BBC Arts involve and communicate with the nations. We all too often find out about initiatives after the launch when we and our BBC Cymru colleagues should have been engaged at inception. Wales misses out. How do we remedy this?
 - Continue to focus and act on areas of mutual priority. Digital skills (through a revaluated and refocussed *The Space*, and working on training and collaboration opportunities such as using Connected Studio model) encouraging participation in the arts (through *Get Creative* and profiling arts activity) and creating 'big moments' to grab the imagination through a variety of experiences, content and events (such as Dylan Thomas100 and forthcoming year of Roald Dahl)

- Better network the arts sector in Wales and BBC Cymru Wales and strands like BBC Arts and BBC Music. To facilitate understanding on both sides and making it more likely to spot an opportunity to collaborate earlier.

26. Our response to the questions posed in the consultation is set out in the attached Appendix. It is written from the viewpoint of the arts in a devolved Wales in 2015. It draws on our experience working with BBC Cymru Wales, the BBC nationally and our successes, frustrations and aspirations for the arts in Wales. Where we do not feel it appropriate to comment, we have not.

Appendix: Response to the Consultation Questions

1. Why the BBC? Mission, purpose and values

Q1 How can the BBC's public purposes be improved so there is more clarity about what the BBC should achieve?

Q2 Which elements of universality are most important for the BBC?

Q3 Should Charter Review formally establish a set of values for the BBC?

Public Sector Broadcasters (PSBs) – especially the BBC – occupy a special place in the public's affections and in public life. At its best, the quality, range and diversity of the UK's media are often cited as the envy of the world. But the mass media can also have a negative impact – homogenising culture, 'dumbing down' and on occasions allowing a small number of loud and strident voices to have disproportionate influence. A strong, vigorous democracy depends on a diversity of voices to reflect, challenge and debate the issues and concerns of our times. So it's the BBC's ability to reflect, celebrate and scrutinise society and its culture that's perhaps the quality that most needs to be protected.

Given this, we generally agree with the [six current public purposes of the BBC](#). In particular we'd highlight the importance of *Stimulating Creativity and Cultural Excellence* but also the huge role the arts should play in delivering the remits of *Sustaining Citizenship and Civil Society*, *Representing the UK, its Nations, Regions and Communities* and *Bringing the UK to the World and the World to the UK*.

The remit of *Stimulating Creativity and Cultural Excellence* should be wide in its coverage and representation of the arts and the channels and platforms in which it represented. Arts shouldn't be siloed but be present and integrated across output. The way the BBC works makes it possible to 'stumble upon' the arts in different mediums and formats. This is reflective of how the arts are present everywhere in our everyday lives and must continue.

We must consider the realities of devolution within the remit of *representing the UK, its Nations, Regions and Communities*. It is not just a case of the BBC making work that represents Wales or Wales 'warehousing' network productions. The BBC should be committed to work being made *by* Wales, *in* Wales and *for* Wales and beyond.

By this last point we mean that for BBC output to be reflective of contemporary UK, there should be ample opportunities for work made for and by and about Wales to reach network. The creative arts sector should be involved in the creation of such works.

When developing arts initiatives there needs to be earlier and coherent communication and engagement from BBC departments with BBC in the nations and key stakeholders like Arts Council of Wales. Involvement of the arts in Wales is too often an afterthought after initiatives have been developed elsewhere and then 'rolled out' to the nations. This is frustrating as a full and proper partnership in pursuit of joint aims would create vastly better results.

The BBC has long played an important role in education. We support their public purpose of *Promoting Education and Learning* and add that this should especially include creativity and the arts. Cuts in funding of formal arts education make this a particularly important resource. Our own action plan *Creative Learning Through The Arts*, in partnership with Welsh Government, seeks to place arts and creativity at the heart of schools in Wales, investing £20m over five years. There could be scope to explore synergies here.

In order to remain relevant, we support the general purpose of *Delivering to the Public the Benefit of Emerging Communications Technologies and Services*. The remit of which should continue to include working in partnership with other organisations to help all audiences understand and adopt emerging communications technologies and services. This is an area where the BBC much to offer to the arts. Arts organisations and artists need support to understand, adapt to and create work for emerging platforms. We'd like to see greater collaboration here.

We strongly support the **universality of the BBC** when it comes to the arts. When Raymond Williams famously said in 1958 "Culture is Ordinary", he immediately added "and that is where we must start." His intention remains exemplary: that there's nothing mysterious or exclusive about a whole society's need to share and participate in cultural achievements. Equally, societies that progress rather than wither on the bough eventually re-seed, re-direct and grow anew. Arts should be accessible to all and not a luxury for those that can afford it. We need a well-resourced public broadcaster that creates content relevant to the whole of society in the ways that people want to access. This means they need to remain technologically engaged.

We do not believe it is appropriate for us to comment on models for funding the BBC. We simply note that the mechanism of the Licence Fee has allowed the BBC to make content available free at the point of use on a range of alternative platforms.

In the changing context of online access to culture, young audiences in particular expect low-cost (or free) access to cultural material. However, the safety net of the Licence Fee enables the BBC the secure necessary to innovate and develop the next generation of new broadcast technology from the basis of public benefit rather than commercial gain. The BBC's development of the iplayer and iplayer radio has been exemplary and the BBC's role as a creator of new digital services is highly regarded by audiences.

We agree with the principle that the BBC should have a public **set of values**. This is the case for many public bodies. It is usual practice that it is the body, not the Government, who set these values.

Considering the seven values proposed in the consultation document, we would agree with *Independent, Impartial, High quality, Efficient/value for money, Distinctive and Diverse/representative*.

Whilst we generally agree with *Transparent*, perhaps *Open* would be a better reflection of the type of operation we'd expect and how it would be achieved (open data, open access, open source). It should be porous, not protective.

We note that in the BBC's Consultation paper, they also include *Innovation* as a value. We feel that this is an important value to include. The BBC, like all organisations, should seek to innovate to become better, more efficient and to stay relevant. Innovation is critical to a fit for purpose BBC. The BBC also has a role in assisting and supporting the arts in its innovation. It should open its archive and its data to others to use creatively.

We could also argue the case for two further values – *Creative* and *Collaborative*. Creativity should be at the heart of the BBC. It should also seek to be Collaborative; to work in partnerships with other providers, including the arts, to co-invest and co-create content. The traditional paternalistic model for the BBC should perhaps be replaced by a more maternal model - collaborating as an equal to nurture, support and encourage talent by becoming much more engaged and networked into the wider sector.

2. What the BBC does: scale and scope

Q4 Is the expansion of the BBC's services justified in the context of increased choice for audiences? Is the BBC crowding out commercial competition and, if so, is this justified?

Q5 Where does the evidence suggest the BBC has a positive or negative wider impact on the market?

Q6 What role should the BBC have in influencing future technological landscape including in future radio switchover?

Q7 How well is the BBC serving its national and international audiences?

Q8 Does the BBC have the right genre mix across its services?

Q9 Is the BBC's content sufficiently high quality and distinctive from that of other broadcasters? What reforms could improve it?

Q10 How should the system of content production be improved through reform of quotas or more radical options

To deliver a truly public service, the BBC must ensure that it provides content across digital platforms. It has to be free to evolve to the changing ways that society accesses content. This is highly relevant to today's audiences and the BBC's integral role is entirely justified.

In Wales we see the positive impact that BBC has had on the market and the creative economy. BBC Cymru Wales has long acted like an 'anchor tenant' with creative companies and practitioners flourishing around its bases in Bangor, Wrexham and Cardiff. It offers an important mix of opportunities to creatives who have portfolio careers in the arts. The arts share many of its technical staff – from set designers to sound engineers – and helps develop creative skills – from writers to composers. It is a huge catalyst for the creative sector in Wales. It is a major investor in the nation's creativity.

As we have mentioned previously, the BBC need to retain their position at the forefront of technological development. They also have a duty to support the technological development of the creative sector including the arts. We welcome the approach outlined in the BBC's consultation that they will make their platforms open to content created by others.

BBC Cymru Wales and network departments based in Wales such as the drama village have worked in partnership with organisations based in Wales to create work. We'd like to see more of this. Whereas we make no recommendation regarding quotas, we would like to see the BBC working more with arts organisations to produce work as well as continuing to support the development of independent companies to produce content. This will certainly also make the work of the BBC more distinctive and help spread economic benefit across the country.

The BBC is world renowned for the quality of its work. We welcome strands such as BBC Arts and BBC Music investing in arts and creativity. We would like to see this continued and developed, in particular with more involvement of the nations. The BBC is the main broadcaster for arts in the UK. This should remain the case and investment reflect this.

BBC Worldwide is an international shop window on our creativity, talent and society. It is important in terms of soft diplomacy and also, as a commercial arm, as an income stream for the organisation.

3. BBC Funding

Q11 How should we pay for the BBC and how should the licence fee be modernised?

Q12 Should the level of funding for certain services or programmes be protected? Should some funding be made available to other providers to deliver public service content?

Q13 Has the BBC been doing enough to deliver value for money? How could it go further?

Q14 How should the BBC's commercial operations, including BBC Worldwide, be reformed?

Although it is not for us to recommend how the licence fee should be paid for, it is clear that there need to be modernisation. However this is done - potentially by introducing a household licence - the licence must remain universal as free at the point of delivery is predicated on this principle.

In the BBC consultation document they indicate that they would wish to protect the level of funding in the nations. We very much support this. It will enable the BBC to create work in Wales, with Wales, that reflects Wales. This, of course, includes work in the medium of Welsh. As previously expressed, the BBC should recognise Wales is a bi-lingual nation, that there is the need for content to reflect this and that this is taken into consideration setting the funding levels.

We also believe that the budgets for arts content across the BBC channels and platforms should be protected. As we have stated, the BBC is a unique provider of such content and platforms.

We also recognise that, aside from the BBC, the licence fee pays for S4C. In a bi-lingual Wales it is vital to have the distinctive editorial 'voice' of S4C. S4C is in a unique position, as a public service broadcaster, to promote Welsh language culture and the use of Welsh language in new media. Alongside the BBC, S4C are a substantial investor in creativity in Wales. In addition, the commissioning model adopted by S4C has allowed the development of several creative industry clusters in Wales such as Caernarfon which has helped to sustain the economy of rural Welsh communities. Reductions in funding will have serious repercussions and unintended consequences. We have noted that BBC and S4C have found ways to work collaboratively and to co-invest in projects without compromising their editorial independence. We welcome this way of working.

Whilst we believe that the BBC do currently offer value for money, collaboration is an important way that this can be further improved moving forward. We echo Nesta's recommendations on how the BBC can become a more open and collaborative organisation. We do not want to direct funding from the BBC but would encourage the BBC to work with arts organisations to provide content and alternative viewpoints. Again, we welcome the BBC's indication of intent to do this in their own consultation document with initiatives such as Ideas Service, but hope that there will be more collaboration with smaller, non-London based arts organisations in the delivery of this. We believe that the BBC should work with the arts (and not just London based arts organisations) as an equal partner.

Our own experience of working in partnership with BBC Cymru Wales has been a positive one and one we wish to continue and expand.

We have already stated how the international profile of the BBC is an important way to promote the creativity of the UK. We also understand the need for public bodies to find and maximise alternative income streams. The BBC has real value outside the UK and this can be maximised to in turn be able to invest more in creative development.

4. BBC governance and regulation

Q15 How should the current model of governance and regulation for the BBC be reformed?

Q16 How should Public Value Tests and Service Licences be reformed and who should have the responsibility for making these decisions?

Q17 How could the BBC improve engagement with licence fee payers and the industry, including through research, transparency and complaints handling?

Q18 How should the relationship between Parliament, Government, Ofcom, the National Audit Office and the BBC work? What accountability structures and expectations, including financial transparency and spending controls, should apply?

Q19 Should the existing approach of a 10-year Royal Charter and Framework Agreement continue?

It is not for us to comment on the details of the model of governance and regulation of the BBC but we do believe wholeheartedly that the BBC should retain its independence. We do, however, believe that there would be merit in ensuring that Welsh Government and the National Assembly for Wales are represented properly at Ofcom.

We reiterate that the BBC should be more 'open' as an organisation – automatically making data available for all to use.

We also again suggest that the BBC become a more collaborative organisation. These, along with the other values discussed early, should be the guiding principles of the organisation.

Finally, the BBC needs to constantly evaluate how it can better engage with its stakeholders, including the arts sector in Wales.

Concluding comments

The main points that we would like to see addressed through the current process are for the BBC to:

- **support the arts** – They can help us to understand and appreciate new dimensions of expression or experience, enriching our quality of life. The BBC should invest in the arts. It should also remember to look beyond London and **genuinely engage the nations** when developing narratives and content.
- **widen access and develop new audiences** – Universal in access. It needs to adapt to new platforms and the arts and creatively should be present across all these platforms.
- **understand Wales, today and in the future** – bilingual, post-devolution, creative, international in outlook and diverse in its people and how it makes and accesses content.

- **create work in Wales, by Wales for Wales and beyond** – we want to see a profile for Wales that promotes our nation as a vibrant and creative society. Creative activity doesn't only make Wales attractive and contemporary to ourselves, it makes us distinctive and desirable in the eyes of others. Content produced in and of Wales – and achieved at the very highest standard – is the best promotion of the culture of today's Wales
- **encourage innovation** – public funding provides the security to innovate and take risks – new challenges, new opportunities. It is vital that the BBC is allowed to continue to do this in order to be fit for purpose. It also has a responsibility to support others - including the arts – to innovate with them
- **be genuinely collaborative** – we don't need a paternal BBC, but an open and equal partner willing to collaborate with creative producers in the widest sense.
- **value our partnership with BBC Cymru Wales** – we want to continue working closely together through a partnership agreement and acknowledge their crucial role in sustaining the creative economy all over Wales.