

Cynulliad Cenedlaethol Cymru / National Assembly for Wales
Pwyllgor Diwylliant, y Gymraeg a Chyfathrebu / The Culture, Welsh Language and
Communications Committee
Radio yng Nghymru / Radio In Wales
CWLC(5) RADIO05
Ymateb gan Comisiynydd y Gymraeg / Evidence from The Welsh Language
Commissioner

1. Introduction

Thank you for the opportunity to contribute to the radio in Wales's enquiry. My contribution will relate specifically to the importance of radio to the viability of the Welsh language.

Broadcasting plays a central role in promoting regional and minority languages across the world and in Wales in particular. In a European context, the importance of broadcasting in protecting and promoting the use of minority languages is recognised in Article 11 of the European Charter for Regional or Minority Languages. It is also reflected in 'The Oslo Recommendations regarding the Linguistic Rights of National Minorities' which make four specific recommendations in relation to the media and broadcasting in minority languages. These recommendations highlight the importance of ensuring access for minority language speakers to broadcasting services which meet their linguistic needs. It also highlights how crucial that is to the viability of minority languages.

In this regard, radio continues to be crucial as a platform for Welsh medium content. For example, the review of the Community Radio Fund (2012) concluded that the community stations generate a range of benefits for their communities, including 'encouraging knowledge of and the use of the Welsh language in what were largely English speaking areas'.

This contribution will highlight the position of the Welsh language in the sector and draw attention to some important developments and challenges likely to affect it. It is noted that evidence is often scarce and that further research is required into a number of aspects. In that regard, the Committee's work is likely to fill an important gap and this is to be welcomed.

2. Welsh medium radio provision in Wales

The BBC is the main provider of Welsh medium content on the radio and the only one broadcasting exclusively in Welsh. Except for limited provision on commercial and community stations, until 2016 BBC Radio Cymru was the only choice for listening to the radio through the medium of Welsh. After a period of experimentation with the Cymru Mwy programme in 2016, Radio Cymru 2 was launched in January this year. The station will provide a lighter mix of music and entertainment. There are no local BBC Radio Cymru stations which reflect Welsh regions as it is the case in England.

In terms of analogue commercial stations, there are some radio stations where a format requires some Welsh medium or bilingual output (such as Capital FM in Caernarfon; North Wales Coast Capital FM; Radio Carmarthenshire/Scarlet FM; Radio Ceredigion; and Swansea Sound).

Currently, there are 10 community radio stations in Wales.¹ Môn FM and Tudno FM in the Llandudno area broadcast bilingually, and Point FM in the Rhyl area provides some Welsh medium content. There is no community radio which broadcasts solely in Welsh.

A license was awarded by Ofcom to Radio Beca in May 2012 to serve Ceredigion, Pembrokeshire and Carmarthenshire. However, the license was revoked three years later without the station having started broadcasting.²

3. Use and meeting needs

Listening trends over recent years suggest that fewer and fewer people listen to Welsh medium content on the BBC. In 2010/11, there were on average 150,000 listeners every week. Listening figures from the last quarter showed that there were 124,000 weekly listeners². Ofcom referred to a figure of 108,000 on average in 2017.³ It is important to highlight that BBC Radio Cymru's reach percentage⁴ compares favourably with other radio stations. The BBC Annual Report 2016/17 stated that Radio Cymru reaches around 4 per cent of the population of Wales

¹Ofcom, 'Communications Market Report: Wales', (August 2017), p. 43. ²

Ofcom, 'Communications Market Report: Wales', (6 August 2015), p. 55.

http://stakeholders.ofcom.org.uk/binaries/research/cmr/cmr15/2015_CMW_Wales.pdf

² http://www.rajar.co.uk/listening/quarterly_listening.php

³Ofcom, 'Market Report – Wales (2017)', p. 42 https://www.ofcom.org.uk/data/assets/pdf_file/0012/105006/wales-radioaudio.pdf

⁴The reach percentage indicates a percentage of the population aged 15+ within the TSA [Total Survey Area] who use the service weekly for a specific time [<http://www.rajar.co.uk/content.php?page=glossary>]

aged 15 and over – 16.7 per cent of the Welsh speaking population of Wales aged 15 and over.⁵ This, therefore, is a good result in comparison with the reach of English medium services, such as Radio Wales (14 per cent of the population of Wales) and even UK-wide services, such as BBC Radio 1 (17.5 per cent). However, this reach percentage has been decreasing over recent years, alongside the number of listeners. In general, it is likely that there has also been a decrease in the numbers listening to many of the commercial stations in Wales, including most stations that broadcast some content in Welsh, e.g. Radio Ceredigion's weekly audience decreased from 22,000 in September 2013 to 12,000 in September 2017. Again, it should be noted that there has been an increase in the Capital FM audience which serves North Wales and North-west England.⁶ Despite that, these figures do not provide a full picture of the impact of this on the users of Welsh medium content as only elements of these services are provided in Welsh. Further data is needed to understand the situation in this regard. As far as we know, there is also no data on the listening figures of community stations in Wales.

Another important issue is to what extent the provision available meets listener needs. One of the purposes of PSB is to meet the needs and interests of audiences⁷. The BBC's Royal Charter affirms that one of its public purposes is to reflect the diversity of UK communities, and support the regional and minority languages of the UK, including Welsh. In 2011, a review of BBC radio services, including those in Wales, was undertaken, which considered services and content, as well as partnerships with other organisations. For BBC Radio Cymru, the review stated that 'audience approval scores are slightly lower than for most other BBC stations in Wales'. At the time, the need to 'improve quality and increasingly to serve different audiences on different platforms' was identified. The importance of appealing better to the younger audience was also emphasised. In 2016–17, Radio Cymru scored 78.8 out of 100 in terms of user satisfaction. This is a small improvement in comparison with the previous year, but is not as good as the Radio Wales score (82.7).⁹ It would be good if the current inquiry examined how the BBC intends to improve this indicator. We also look forward to seeing what the impact of launching Radio Cymru 2 will be on future user satisfaction levels.

⁵ BBC, Annual Report 2016/17 (2017) p. 39 <https://downloads.bbc.co.uk/aboutthebbc/insidethebbc/reports/pdf/bbcannualreport-201617.pdf>

⁶ http://www.rajar.co.uk/listening/quarterly_listening.php

⁷ Section 264(4)(c) Communications Act 2003 ⁹

BBC, Annual Report 2016-17, p. 39.

In April 2017, Ofcom took responsibility for regulating the BBC, including how it performs against its public purposes. For these purposes, Ofcom produced regulating conditions⁸ and performance criteria⁹ as well as a data collection strategy for performance.¹⁰ It is hoped that the new regulating process will provide an even fuller picture of how provision in Welsh meets needs. In that regard, we look forward to future Ofcom review findings.

In accordance with the Communications Act 1990 and the Communications Act 2003, when awarding community radio station licenses, Ofcom must consider the social gain of these stations. Ofcom guidelines and the Community Radio Order (2004) indicate that this gain includes training provision and facilitating community discussion.¹¹ It can be argued that reflecting the language of the community being served underpins achieving these aims. However, under current legislation, Ofcom has no duty or power to impose specific requirements in terms of the Welsh medium content provided by the licensed stations. Welsh Government has repeatedly expressed a desire to see requirements like this being introduced.¹⁴ I am also not aware of evidence which shows to what extent the commercial and community radio provision which contains some Welsh medium content meets the needs of Welsh speaking listeners. In that regard, consideration should be given to Welsh Government's aspiration in its 2050 Strategy for Welsh to 'be relevant for everyone in Wales, regardless of whether they speak Welsh, English or other languages'¹². It would be interesting to know whether the investigation will give any consideration at all to the extent the content of radio stations which broadcast through the medium of English in Wales, whether they are community, commercial or public, contribute to the aspiration of Welsh Government, such as by broadcasting Welsh language songs and promoting Welsh language festivals and events, along with how that is achieved.

It is important to remember that the decline in radio audiences reflects to some extent wider changes in terms of preferences of modern audiences which also affect English medium radio services. Nevertheless, Wales continues to be ahead of other nations of the UK in terms of weekly listening hours and in terms of the percentage of listening hours on the BBC network at a UK-wide level (48 per

⁸ https://www.ofcom.org.uk/_data/assets/pdf_file/0022/107239/summary-regulatory-conditions.pdf

⁹ https://www.ofcom.org.uk/_data/assets/pdf_file/0016/107071/bbc-performance-measures.pdf

¹⁰ Ofcom, Introduction to Ofcom's Operating Framework for the BBC (October 2017) https://www.ofcom.org.uk/_data/assets/pdf_file/0030/99408/bbc-framework.pdf, t. 3.

¹¹ Ofcom, Review of the approach to community radio Key Commitments: Consultation (29 June 2010) ¹⁴ https://www.ofcom.org.uk/_data/assets/pdf_file/0018/72270/welsh_government_respons.pdf ;

<http://gov.wales/docs/drah/publications/130228response-to-comms-review-cy.pdf>

¹² Cymraeg 2050: A Million Welsh speakers (10 July 2017), p. 60 <http://gov.wales/docs/dcells/publications/170711-welshlanguage-strategy-en.pdf>.

cent).¹³ It could be argued therefore that radio continues to be an important and relevant platform for Welsh medium content. It is essential, therefore, that the fall in the use of this content on the radio is stopped and reversed. In that regard, further evidence is needed on the use of content available on local radio stations, and the extent to which this provision meets user needs.

4. Important developments and challenges

4.1. Reach and extent of provision

Radio Cymru 2 is a positive step towards increasing the choice of quality content for a Welsh speaking audience. Developments, such as the increase in the number of Radio Cymru broadcast hours during 2016–17 in comparison to the previous year (7,262 compared to 7,000), should also be welcomed. The increase is largely attributed to the additional provision of Radio Cymru Mwy. We trust that the provision will continue to grow as the new station, Radio Cymru 2, becomes established. Introducing Radio Cymru 2 is a significant step forward in terms of increasing the variety of provision.

Other developments, such as widening the reach of BBC Radio Cymru on DAB with the establishment of a new multiplex in North Wales in 2014, are also to be welcomed.¹⁴ This is especially important in the context of Ofcom's finding that 40 per cent of listening in Wales now occurs digitally.¹⁵ Because of this, transferring to DAB is also beneficial to commercial and community stations which broadcast some content in Welsh. However, Radio Ceredigion and other community stations are not yet available on DAB. Transferring to DAB is costly for small local stations, and the geographical reach of DAB multiplexes is too wide in comparison to the reach of these stations on analogue.¹⁶¹⁷ In 2016, Ofcom piloted a new solution to the problem, known as 'small-scale DAB'. The initial results were promising. However, it was stated at the time that there are challenges in terms of the reach of DAB, in several areas including in South-east Wales.²⁰ The Department for Digital, Culture, Media and Sport in Westminster is currently consulting on new

¹³ Ofcom, 'Communications Market Report: Wales', (August 2017), p. 45.

¹⁴ <http://www.muxco.com/multiplexes/northwales/>

¹⁵ Ofcom, 'Communications Market Report: Wales', (August 2017), p. 51.

¹⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/671660/Small_Scale_DAB_Consultation.pdf p. 5

Ofcom, Small-scale DAB trials: final report 2016 (2016), p. 1

https://www.ofcom.org.uk/_data/assets/pdf_file/0021/91371/SSDAB-Final-report-26-Sep.pdf ²⁰

Ofcom, Small-scale DAB trials: final report 2016 (2016), p.

¹⁷ https://www.ofcom.org.uk/_data/assets/pdf_file/0021/91371/SSDAB-Final-report-26-Sep.pdf

arrangements for 'small-scale DAB' licenses.¹⁸ It is essential that the future arrangements agreed enable local radio stations in Wales to flourish and attract new audience to their Welsh medium content.

It could be assumed that transferring to DAB would also widen the reach of smaller stations which broadcast some content in Welsh. However, there are significant costs attached to transferring to DAB. Ofcom is currently piloting a new solution to the problem, known as '*small-scale DAB*'. Initial results were promising. However, it was stated at the time that there are challenges in terms of the reach of DAB, in several areas including in South-east Wales.¹⁹

There are also other challenges in relation to the demographics of Welsh speakers. The normal broadcasting radius of community radio under Ofcom licences is 5km. This limits the reach of the service in rural areas, and therefore is likely to influence the situation of Welsh speakers in those areas. Ofcom recognised these challenges in allowing Radio Beca to broadcast over a wider radius in order to serve pockets of listeners across the area.²⁰ However, in the end the station wasn't launched. This example reflects the unique needs of Welsh speakers as media users. It is essential that these needs are considered as part of any review of the sector.

Also, there are other changes that are likely to influence the range of Welsh medium provision on commercial and community radio. Following the Digital Economy Act 2010, Ofcom has the power to allow commercial stations to share provision, and also to relax the duties on those stations in terms of localness requirements, subject to their transferring to DAB.²¹ At the time of considering the Act, the Welsh Language Board argued that any stations taking advantage of this option should also adopt a duty to provide content in Welsh, but Ofcom responded by saying that it doesn't have the power to enforce such duties.²² In February 2017, DCMS announced a consultation on proposals to further deregulate commercial radio in order to strengthen the sector.²³ We note that there hasn't been much attention to the impact of the Digital Economy Act 2010 on the Welsh language in relation to the latest proposals to further deregulate the sector.

¹⁸ Department for Culture, Media and Sport (2018)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/671660/Small_Scale_DAB_Consultation.pdf

¹⁹ https://www.ofcom.org.uk/_data/assets/pdf_file/0021/91371/SSDAB-Final-report-26-Sep.pdf

²⁰ https://www.cbaa.org.au/sites/default/files/3_3CMedia_Issue_8_johnson.pdf p. 18

²¹ https://www.ofcom.org.uk/_data/assets/pdf_file/0020/51284/localness_statement.pdf

²² https://www.ofcom.org.uk/_data/assets/pdf_file/0020/51284/localness_statement.pdf

²³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591508/RadioDereg-Final13Feb.pdf ;

4.2. Financial challenges

The above comments are linked to another challenge, namely the financial pressures on the sector. Under the Community Radio Order (2004) there have been significant legislative restrictions on the ability of community stations to raise commercial income. Following the relaxing of these rules in 2014, they can now raise up to £15,000 per year from commercial sources. It was argued that this is a positive step which is likely to support smaller stations, especially the stations in the North, such as Point FM, Tudno FM and Môn FM. Again, it was also argued that the revised cap was unlikely to significantly change the situation of community radio in Wales.²⁴ Also, it's possible that projects like Radio Beca would fail regardless, due to comparatively higher broadcasting costs in rural areas and a comparatively smaller population for the advertisements.²⁵

This highlights the central role of public support for community radio in Wales. Between 2008 and 2014, Welsh Government offered financial support to some stations through Community Radio Fund, but this support came to an end.²⁶ Ofcom continues to award a Community Radio Fund grant on behalf of DCMS, but there are few examples of support for stations in Wales.²⁷ In awarding grants for 2017–18, the Fund panel discussed Welsh language requirements, stating that the 'Stations for which the requirements apply should provide details about the effects of a grant upon the station's use of the Welsh language'.²⁸ However, the very small number of stations from Wales which receive the support mean that this consideration will not apply to many of them.

5. Workforce

According to the review of the Community Radio Fund (2012) 'a number of stations wishing to increase their Welsh language programming reported difficulties in recruiting Welsh speaking volunteers who had confidence to have their work broadcast or written material published on websites.²⁹ Obviously, the review has dated since its publication in 2012. It isn't clear to what extent Welsh medium and bilingual skills and training provision has dealt with these difficulties

²⁴ <http://www.iwa.wales/click/2015/11/potential-for-radio-in-wales/> ;

https://www.cbaa.org.au/sites/default/files/3_3CMedia_Issue_8_johnson.pdf ; IWA Wales Media Audit (2015).

²⁵ https://www.cbaa.org.au/sites/default/files/3_3CMedia_Issue_8_johnson.pdf , t. 24.

²⁶ <http://gov.wales/topics/culture-tourism-sport/media-publishing/broadcasting/community-radio-fund/?skip=1&lang=en>

²⁷ <https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/radio-broadcasters/community-radio-fund>

²⁸ <https://www.ofcom.org.uk/tv-radio-and-on-demand/information-for-industry/radio-broadcasters/community-radio-fund/community-radio-fund-grants-2017-18-R1>

²⁹ Welsh Government (2012) <http://gov.wales/docs/drah/publications/120724commradiofundreviewen.pdf> p. 15. ³³ Welsh Government, *Welsh language skills needs in eight sectors* (2014).

in the sector. Research from 2011 and 2014 shows demand for Welsh language speakers in the creative industries sector, especially in sub-sectors such as radio, interactive media, advertisements, film and animation.^{33 34}

There have been programmes over the years to meet the needs of the sector workforce. One example is the £4.38 million 'Skills for the Digital Economy' programme delivered between 2011 and 2015 with the financial support of the European Social Fund offering training in the creative field in order to promote a competitive industry in Wales.³⁰ The project set a target of 20 per cent participation by Welsh speakers.³¹ According to an interim evaluation it delivered well against that target between 2011 and 2013.³² However, the current evidence base needs to be updated in order to be able to plan more effectively for a bilingual workforce. This would benefit the radio industry as well as the entire creative sector and other sectors of the economy.

Introducing Radio Cymru 2 is a significant step forward in terms of increasing the variety of provision. Despite this, there are various challenges likely to hinder maintaining and increasing the range and diversity of current radio provision in Welsh, especially in terms of community and commercial radio. In order to better understand these challenges, we would support and encourage further examination of the following issues in relation to these stations:

- The viability and possible impact of transferring to DAB [4.1]
- The implications of the demographic nature Welsh speakers to the reach of the service in rural areas [4.1.]
- The possible impact of deregulating commercial radio on Welsh medium content [4.1.]
- The sufficiency of financial support currently available for community radio stations which broadcast some content in Welsh and the impact of Ofcom's emphasis on 'the requirements of the Welsh language' in awarding grants from the Community Radio Fund [4.2.]

³⁰ Interim evaluation of the Skills for the Digital Economy programme (10 January 2013) <http://gov.wales/funding/eufunds/previous/project-evaluations/digital-economy/?skip=1&lang=en> . Arad Research was commissioned to produce a final evaluation but we have been unable to find a public version of the document: <https://arad.wales/project/creative-skillset-cymru-final-evaluation-of-the-skills-for-the-digital-economy-programme2015/>

³¹ Creative Skillset, Diversity and environmental sustainability, http://creativeskillset.org/en/nations/wales/skills_for_the_digital_economy/diversity_and_environmental_sustainability

³² Interim evaluation of the Skills for the Digital Economy programme (10 January 2013) <http://gov.wales/funding/eufunds/previous/project-evaluations/digital-economy/?skip=1&lang=en>.

- The success of post-16 training programmes so far to grow a bilingual workforce to meet the needs of the radio sector and creative industries in general [4.3.]