

*Championing
excellence and diversity
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



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**RESPONSE BY THE VOICE OF THE LISTENER & VIEWER (VLV)
TO THE BBC TRUST SERVICE REVIEW OF
BBC NATIONS' RADIO & NEWS ON TV AND ONLINE**

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INFORMATION ABOUT THE VLV

Voice of the Listener & Viewer Limited (VLV) represents the citizen and consumer interests in broadcasting and speaks for listeners and viewers on the full range of broadcasting issues. It uses its independent expertise to champion quality and diversity in public service broadcasting, to respond to consultations, to produce policy briefings and to conduct research. VLV has no political, commercial or sectarian affiliations and is concerned with the issues, structures, institutions and regulations that underpin the British broadcasting system. VLV supports the principles of public service in broadcasting. It is a charitable company limited by guarantee (registered in England No 4407712 - Charity No 1152136).

EXECUTIVE SUMMARY

1. VLV considers Nations content crucial for benefit of society and democracy across the whole of the UK as the transition inherent in devolution progresses.
2. VLV believes that any proposals to improve delivery of content for audiences in the Nations should focus on television and radio platforms, rather than rely unduly on online provision. VLV believes that BBC proposals to rely more heavily on the internet to deliver its mission undermines the principle of universality which has always underpinned BBC services. Not all regions of the UK have access to superfast broadband and not everyone can afford such provision.
3. With reference to recent proposals by the BBC announced in September 2015, which relate to local and nations news: VLV welcomes the ambition of the BBC to better support local, regional and national news across the UK. Therefore, we welcome the BBC's proposals to work in partnership with local and regional news organisations to provide improved services for the public. We support the proposal for a shared data journalism centre and news bank and for strengthening BBC news in Scotland, Wales and Northern Ireland.
4. VLV would welcome further research from the BBC Trust into proposals to institute national daily news bulletins for Scotland, Northern Ireland and Wales. While we support the principle that audiences in the Nations should have bulletins which reflect their devolved status, we are concerned that the provision of BBC network news should not be undermined by fragmentation.
5. VLV members would welcome serious consideration of how to deliver more English language content for Welsh audiences.

6. VLV urges the BBC Trust to examine provision by BBC Radio Scotland which is perceived to failing to deliver high quality content for its audience.

INTRODUCTION

7. VLV members value the work of the BBC Trust in ensuring that the views of licence fee payers are taken into account and we therefore welcome the opportunity to comment on the BBC Trust Service Review of BBC Nations' radio & news on TV and online.
8. In order to prepare this submission, VLV consulted with VLV members and associates in each of the Nations. We hope that the conclusions we have drawn from this research will provide a useful contribution to the BBC Trust's Review.
9. Devolution presents new challenges for the BBC in ensuring that audiences in each of the four UK's Nations are provided with services which are tailored to ensure that their needs are met, especially in news and current affairs which are crucial for democratic engagement.
10. The current constitutional position is more difficult than it has been ever before for the BBC. While retaining its role as the 'glue' which binds the UK together, the BBC also needs to address the needs of a more fractured population, with competing interests, at a time of financial constraints.
11. VLV therefore welcomed the statement made by Lord Hall on 18 December 2015:

"As devolution continues, we believe that the BBC may need to adapt our services to ensure that they fully reflect and report the increasing divergent policies of the UK, with more aspects of public policy devolved....I believe that there is now a much stronger case for providing a different mix of news and current affairs to our audience."¹

12. From evidence gathered in the Purpose Remit Surveys commissioned by the BBC Trust, it is clear that many audiences in Scotland, Northern Ireland and Wales are widely appreciative of BBC services, but there are areas of content designed to engage and inform these audiences which could be improved.
13. It is clear from Ofcom evidence that media consumption habits in each of the Nations varies which makes the challenge for the BBC in ensuring equitable delivery to all the audiences of the UK more complex.

While growth in the use of the internet has affected all the Nations and regions of the UK, there are some key areas where the devolved Nations display different media behaviour to the UK, and to England, which reflects

¹ Letter from Tony Hall to the Welsh, Northern Irish Assemblies and Scottish government, December 18th 2015

the different contexts of each Nation. For example, in Scotland in 2013, the internet was cited as respondents' main source of news about their Nation, after both TV and newspapers, while it was second after TV in Northern Ireland (11%) and Wales (13%); more than 60% of respondents in Northern Ireland and Wales cited television as their main source of news about their Nation, and 80% in Scotland. People in Scotland also watch less audio-visual content online than those in other Nations of the UK, or the UK average, although the level of broadband penetration is in line with the UK average.²

14. We agree that the need for independent, impartial and insightful news provision by the BBC has never been greater³ and that trust is more of an issue in today's media landscape where there is a surfeit of information but it is difficult to know which information to trust.
15. News which is specific to a local or regional area is a crucial aspect of public service broadcasting and one which Ofcom has identified as not performing as well as it should. The BBC plays a very important role in sustaining citizenship and democracy by providing local, national and regional news on radio, television and online and VLV would want this aspect of the BBC's services to be maintained and strengthened. VLV considers that news and current affairs should be sustained as a priority to ensure the delivery of democratic benefits to UK society despite the recent licence fee settlement which puts further financial constraints on BBC operations.

BBC proposals for the next Charter Period

16. VLV welcomes the ambition of the BBC to better support local, regional and national news across the UK in its proposals announced in September 2015.
17. We acknowledge that the BBC's current proposal is for additional news content to be initially provided on a new BBC News homepage for each Nation and the future creation of an interactive digital service for each of the Nations of the UK. VLV welcomes the opportunities online platforms offer to provide more context and detail on stories and believe the BBC should continue to provide its online news offering to support its broadcast services, but that its primary focus should remain on television and radio services. VLV believes there is convincing evidence that the migration away from traditional television and radio is happening more slowly than was expected and therefore the BBC should focus its primary effort on delivering content to audiences in the Nations via television and radio, the platforms which listeners and viewers value most highly.
18. VLV welcomes the BBC's suggestion that it should work in partnership with local and regional news organisations to provide improved services.

² PSB Review 2015 para 1.3

³ *British, Bold Creative*, BBC, September 2015, pg 62

19. VLV believes the current provision of BBC radio is excellent and would not want to see this provision undermined by its plans to provide new ways to listen to the radio. If the current BBC online proposals are additional to current linear broadcasting, then we welcome them.

Audience satisfaction in the Nations

We note the following evidence provided by the most recent Purpose Remit Surveys:

20. **General Performance:** Participants from England and Northern Ireland were more likely to rate the BBC's performance against its Public Purposes highly than those from Wales or Scotland. Participants from Scotland tended to give the lowest performance scores, while the scores of those from Wales varied.⁴
21. **Native Languages:** Welsh speakers in Wales were more likely to agree the BBC supports their native language (60%) than those in Scotland who speak Scots/Scottish Gaelic (51%), or those in Northern Ireland who speak Irish/Ulster Scots (53%). However, with an importance score of 78%, the satisfaction of Welsh speakers in Wales shows a relatively large performance gap (the gap between the importance and performance scores for that statement) of -18.⁵
22. **Understanding politics:** VLV notes data which indicates that responses to the issue of coverage which helps audiences understand politics in their Nation/region varies from 51% in Scotland, the lowest score, to 65% in Northern Ireland, the highest score.⁶

How well does the BBC serve audiences with radio, news and current affairs programmes made specifically for audiences in Northern Ireland, Scotland and Wales?

Sports coverage

23. VLV notes that sports coverage for Scottish, Welsh and Northern Irish audiences is wide-ranging and constitutes a large proportion of output in the Nations, however, we believe that the BBC to ensure that the recommendations of the Davies Report (2009) on Listed Events are achieved. There is some dissatisfaction among VLV members that some of the national football and rugby team games are only available at an extra cost via subscription platforms. Such games are part of the national culture and the Davies report was clear that they are important beyond their market and monetary value.

⁴ Purpose Remit Survey, Scotland, June 2015, pg 26

⁵ Purpose Remit Survey, Scotland, June 2015, pg 48

⁶ Table 5.1, Purpose Remit Survey, Scotland, June 2014

Scotland

24. This month VLV jointly hosted an event, Scotland: Public Service Broadcasting & The Broadcasting Landscape, with RSA Scotland, CCPR and SMCA in Glasgow. There were two panels of speakers and we heard from both Bill Matthews, BBC Trustee for Scotland, and Ken MacQuarrie, Director of BBC Scotland. VLV's response to the Review of provision in Scotland is informed by what was said at this event.
25. VLV notes that *'In the overall measures of the BBC's performance, participants from Scotland gave the least positive scores of the four UK nations'*⁷ and that responses to the delivery of the citizenship purpose show a less positive score in 2014 - *the average performance gap in the Citizenship purpose was much larger in Scotland (-11) than in the other nations (England: -4; Wales: -5; Northern Ireland: -2)*.⁸
26. This lower level of audience satisfaction in Scotland exists despite the volume of public service broadcast provision of content specific for Scottish audiences being higher than that of the provision in the other Nations.
27. Ken MacQuarrie suggested at the recent conference in Glasgow⁹ that this discrepancy between delivery and appreciation could be partly to do with higher audience expectations. As one VLV member suggested, "It is a truism that the more the audience knows about a subject, the more able they are to analyse, assess and deconstruct the elisions and exceptions made in reporting the story around it. This has the effect of making the audience more media literate and able to sense the compromises in news being a construction."
28. It is clear from recent statements by both the Director General, Tony Hall, and Ken MacQuarrie that the BBC is currently considering how it might strengthen and improve its services for Scottish audiences, including television and radio news provision, as well as online content with more personalised front pages for the BBC home page, news site, the iPlayer and the BBC sport website.¹⁰ VLV welcomes these commitments and looks forward to seeing more detailed proposals in due course.

News:

29. It is clear that BBC news provision in Scotland, along with that in the other UK Nations, needs to be more responsive to devolution and across the UK there needs to be greater thought about how to engage younger audiences with news.
30. A number of our members highlighted that there was dissatisfaction with BBC reporting of the Scottish independence referendum campaign and that the if BBC is to regain the trust of the audience, there needs to be serious attention to and

⁷ Purpose Remit Survey, June 2014, pg 8

⁸ Purpose Remit Survey, June 2014, pg 18

⁹ VLV/RSA/ CCPR/SMCA Event, January 13th 2016, University of Glasgow.

¹⁰ Scottish Parliament, Education and Culture Committee, Oral evidence session 12 January 2016

changes in the provision of news and current affairs in and across Scotland. Some argued for a 'Scottish Six' bulletin or its equivalent and VLV would welcome further research from the BBC Trust on this issue to explore whether it would be practicable to institute such a change without undermining the BBC's provision of network news. VLV considers that the primary reason for considering one Nation-specific bulletin each day is that domestic stories provided by UK network news are not always relevant to audiences in the Nations where they concern issues and policy areas which have been devolved from central Government.

31. Additionally, it has been suggested that when a Scottish report or story is of UK national and international interest, it should be reported on in network news bulletins by a journalist from BBC Scotland, not by a journalist sent from London.

Radio Scotland:

32. Our respondents all noted that there is a perceived reduction of quality in the output of BBC Radio Scotland. This echoes concerns expressed by Ofcom:

The ACS shares the widespread concern that has been aired in Scotland about the poor quality of BBC Radio Scotland's output. While commercial radio is seen as being particularly successful in Scotland, it should be noted that in many rural areas there is limited access to commercial radio, so for these audiences the BBC is effectively the sole service provider.¹¹

33. One VLV member suggested that Radio Scotland is handicapped by having to be all things to all people, trying to be a combination of Radio 4 and Radio Clyde, and failing to compete well enough with either.
34. The issue of a perceived reduction in the quality of Radio Scotland's output is one which VLV considers needs urgent attention.

BBC Alba:

35. VLV believes that BBC Alba makes a very important contribution to broadcasting in Scotland. It provides extremely good value for money considering its relatively small budget. It is our understanding from audience research that it demonstrates reach well beyond Gaelic speakers, provides intelligent international content and perspectives which strongly refute any aspersions that such programming is parochial. We note, however, that there is no weekend news in Gaelic and a lack of content for children and young people which could be addressed if resources could be made available.

Online:

36. VLV welcomes the announcement that the BBC is planning a Scottish BBC home page. One member commented that on the current site one has to navigate to find the news which is inconvenient and VLV therefore recommends that the news pages

¹¹ Ofcom Advisory Committee for Scotland written evidence to Scottish Parliament Education and Culture Committee Inquiry - BBC Charter Review, October 2015, para. 7

in the new Scottish home page should be more clearly signposted. The blog by BBC Scotland Political Editor, Brian Taylor, was particularly praised as ‘a model of clarity, impartiality and sound analysis, together with humanity and wry humour and this alone makes the site worth reading’.

BBC Radio nan Gaidheal:

37. VLV has no comments to make about the output of BBC Radio nan Gadheal.

Northern Ireland

Audience Satisfaction

38. While generally audience satisfaction with BBC Services in Northern Ireland appears to equal that of English audiences and is generally higher than the satisfaction found in Scotland and Wales, VLV notes with concern that the Nations, regions, and communities (NRC) purpose was the worst performing purpose in the most recent Purpose Remit Survey in Northern Ireland, with its statements receiving an average performance score of 55%.
39. This purpose was considered relatively important by many participants, therefore it had an average performance gap of -13, the largest of any purpose and identifying it as a key area for improvement.¹²

BBC Radio Ulster/Foyle:

40. VLV members appreciate the output of BBC Radio Ulster/Foyle, much of which provides engaging and accessible content across a range of subjects and format relevant to those living in Northern Ireland. There were no recommendations made to improve this output.

BBC News and Current affairs on television:

41. VLV members were broadly very complimentary about BBC News and current affairs on television in Northern Ireland. One respondent said that if you live in Northern Ireland you have no excuse for not encountering high quality news and current affairs which is relevant to the nation. They said that there is plenty of coverage of events in the Stormont Assembly in *Stormont Today* and *The View*, *Spotlight* provides in-depth stories behind the headlines and *BBC Newsline* provides news relevant to the Nation as a whole.
42. It was questioned by one interviewee whether there would be enough news from Northern Ireland to justify a whole hour of a six o'clock bulletin designed specifically for Northern Ireland although investigation of this proposal would be welcomed.
43. The only recommendation made was that, as the transition due to devolution progresses, the BBC could work harder to reflect the new, more complex demographic make-up of Northern Ireland. It was suggested that it is perhaps easier to rely on stereotypes of the past, when the ‘two tribes paradigm’ dominated,

¹² Purpose Remit Survey Northern Ireland, June 2014, pg 23

whereas today the political, social and cultural context of Northern Irish society is more multi-faceted than it was a decade ago. There are issues such as gender, sexuality, and identity which are not covered as often as might be expected considering the changes which have taken place in Northern Irish society and more of such content would be welcomed by audiences in Northern Ireland.

Wales

44. VLV considers the BBC's role in providing content which is relevant and engaging for Welsh audiences very important in order to sustain democracy in the nation.
45. Ofcom research shows that Wales is served less comprehensively outside the BBC than any of the other UK nations.¹³ Wales does not have any national newspapers and nor do any of the English daily newspapers have Welsh editions as they do in Scotland. Additionally, we note that provision in Wales by ITV has been reduced since 2009.¹⁴
46. Giving evidence to the House of Lords Communications Committee, BBC Wales' Head of Digital and Strategy Rhys Evans said, 'It's fair to suggest that modern Wales as an artefact has largely been created by the BBC. Because only the BBC brings together north and south, east and west, and has given Wales that cultural space; that democratic space.'¹⁵
47. VLV notes research published by the Welsh Institute of Affairs in its *Wales Media Audit 2015* which indicates that there has been a decline in spending on television content for Wales since 2007.¹⁶ BBC English language television provision has been reduced significantly in recent years – a 15% reduction in output since 2008 and a 25% budget cut since 2005-06.
48. In light of the media market context of Wales, VLV considers it crucial that the BBC ensures its services in Wales in both English language and Welsh language are sustained and possibly extended to ensure the BBC encourages democratic engagement following devolution.

Audience Satisfaction

49. VLV notes with concern evidence in the most recent Purpose Remit Survey in Wales that the 'Nations, regions and communities' purpose was the worst performing purpose among Welsh participants, receiving an average performance score of 47%, '*identifying it as a key area for improvement in Wales*'.¹⁷
50. With regard to the citizenship purpose, we note that participants from Wales (61%) were less likely than those from England (65%) and Northern Ireland (65%) to have a positive perception of the BBC's performance in the Citizenship purpose, although they remained more positive than participants from Scotland (57%).¹⁸

¹³ Ofcom PSB Review 2015, para 1.31

¹⁴ IWA Wales Media Audit 2015 | EXECUTIVE SUMMARY

¹⁵ Oral evidence to the Lords Communications Committee, 29 October 2015,

¹⁶ IWA Wales Media Audit 2015, Executive Summary

¹⁷ Purpose Remit Survey Wales, June 2014, pg 24

¹⁸ Purpose Remit Survey Wales, June 2014, pg 19

News:

51. When surveyed, it was suggested by VLV members in Wales that Welsh speakers in Wales are well provided for by news on Radio Cymru and S4C and that they have far better provision of content which is relevant to them than those who rely on the BBC's English language services in Wales.
52. In light of this, VLV would therefore welcome more research on whether a daily Welsh Six o'clock bulletin in English language might be instituted on BBC One Wales without undermining the BBC's provision of network news. This could provide a different perspective from that provided by the UK network bulletin, combining international, British and Welsh news and providing full coverage of events in the Welsh Assembly.
53. Another recommendation made by a member was that Radio 2 could have "opt-out" news bulletins that would boost the reach of news about Wales on BBC radio by 750,000 Welsh listeners each week.

Radio Cymru:

54. Radio Cymru was broadly praised for providing a comprehensive service for Welsh speakers.

Current Affairs:

55. From our research there appears to be a strong appetite for a Welsh opt out, similar to that in Scotland, during *Newsnight* which would provide an opportunity to explore the stories of the day in Wales in more depth and supplement the *Sunday Politics Wales* programme.
56. The decline in current affairs content for English speaking audiences in Wales was highlighted by those we spoke to who would like to see more BBC current affairs content which is relevant to audiences in Wales as a devolved nation.

Online:

57. In light of the lack of provision of national print media in Wales, some respondents highlighted attempts to produce live news websites for Wales which have been of limited success, only running, for example, during office hours. There was consensus among those we spoke to that more could be done online, in both English language and Welsh language, to counteract the deficit of print news provision and address the lack of understanding of devolved politics in Wales.

How well are these programmes performing against commitments set out their services licences?

58. As stated above, it is VLV's view that while there is much to be commended in the provision of news and current affairs content for Scotland, Northern Ireland and Wales, there are deficits in provision which need to be addressed, namely:

59. There is a need for increased provision of news and current affairs content in English language on BBC One in Wales and on BBC Radio in order to ensure that audiences in Wales have access to high quality, impartial, engaging content which is relevant to their lives.
60. VLV would welcome consideration of the development of English language daily Scottish and Welsh news bulletins if this didn't undermine the delivery of BBC network news.
61. VLV would urge the BBC to explore ways in which it can improve the service provided by BBC Radio Scotland.

Are these services well-positioned to deliver their service licence commitments in the future as viewing and listening patterns change and technology evolves?

As stated above:

62. VLV considers that more resources should be devoted to providing news and current affairs provision in English language in Wales. This content should be available online, on television and on radio.
63. We believe that audiences in Scotland and Wales might benefit from a daily news bulletin produced in their nations as long as this doesn't undermine the delivery of BBC network news.
64. We welcome BBC Executive proposals to improve delivery of content to the nations on its websites with a new home page and news page for each nation.

Should the service licences be changed to update existing commitments or add new ones?

65. Where required, the BBC One Service Licence should be changed to include provision of a Scottish and Welsh daily bulletin if research demonstrates that this will be practicable and not undermine BBC network news provision, as well as more provision of English language current affairs for Welsh audiences.