

Dear Colleague,

## **BBC Royal Charter Review**

I am writing in response to the Department for Culture, Media and Sport's review of the BBC's Royal Charter and future funding arrangements, to set out the Welsh Language Commissioner's evidence on the importance of these decisions for Welsh language broadcasting and for the creative economy in Wales.

The Welsh Language Commissioner was established under the Welsh Language (Wales) Measure 2011 to promote and facilitate the use of the Welsh language. In exercising these functions, the Commissioner may offer advice and comments to any person. In that context, and as an independent advocate for Welsh speakers, I wish to emphasise that the provision and sustainability of Welsh language broadcasting must be treated as a core consideration within the Royal Charter Review.

Welsh language broadcasting is culturally, socially and economically significant, and it is overwhelmingly dependent on public funding. Although the Green Paper contains a clear commitment to sustainable funding for the BBC and S4C, there remains uncertainty regarding the details of future funding arrangements and the nature of the partnership between S4C and the BBC in a changing digital landscape. Any future funding model arising from the Charter Review that weakens the stability of public broadcasting through the medium of Welsh would present real risks to the prosperity of Welsh culture and language.

S4C and the BBC are the principal providers of Welsh-language broadcasting in Wales. S4C is the only Welsh medium public television broadcaster, operating across television and digital platforms, while the BBC is the sole provider of radio services broadcasting exclusively in Welsh. The BBC also has a statutory obligation to provide a minimum of 520 hours of Welsh language television content to S4C each year. Welsh language provision within commercial broadcasting remains extremely limited, reinforcing the central role of the BBC and the public funding system in meeting the needs of Welsh speaking audiences.

Welsh language broadcasting plays a vital role in normalising the language, providing daily opportunities for people to hear and use Welsh, and supporting both existing speakers and learners. This role is particularly important in the contemporary digital environment, where English language content dominates global media consumption. Whilst evidence demonstrates that Welsh language services are successfully reaching audiences, including younger viewers, there are clear challenges in terms of ensuring Welsh medium content is visible and easy to find. This is particularly the case as audiences are increasingly turn towards digital streaming services.

Beyond its linguistic and cultural importance, Welsh language broadcasting makes a substantial contribution to the creative economy in Wales. It creates demand for Welsh language skills, supports employment across the creative industries, and enables independent production companies and local supply chains to develop. This

contribution is particularly significant in communities where the Welsh language is strongest. Research commissioned by S4C demonstrates a strong economic return on public investment, highlighting the wider economic value of Welsh language broadcasting to Wales and the UK.

In the context of the Royal Charter Review, I would urge that Welsh language broadcasting is not assessed solely through a narrow “value for money” lens. Broadcasting in a minority language fulfils broader public purposes, including supporting linguistic rights, cultural identity, social cohesion and economic development. Future Charter and funding arrangements must therefore be designed to protect, strengthen and extend Welsh language provision, ensuring it can continue to adapt to digital change and contribute fully to the Welsh Government’s aim of reaching a million speakers by 2050, and doubling the daily use of the language.

Please see attached our response to the consultation questions.

Yours sincerely,

A handwritten signature in black ink, reading "Efa Gruffudd Jones" with a stylized flourish at the end.

**Efa Gruffudd Jones**

Welsh Language Commissioner

## **Introduction: The BBC's Mission and Public Purposes**

**Question 1. Do you agree or disagree that the BBC's current Mission and Public Purposes should remain the same?**

- Agree - The BBC's Mission and Public Purposes should remain the same
- Disagree - The BBC's Mission and Public Purposes should change
- Unsure or no opinion

**Question 2. To what extent do you agree or disagree that the BBC should have a specific Public Purpose to support economic growth?**

- Strongly agree - A Public Purpose aiming to support the growth of the creative economy should definitely be added.
- Agree - A Public Purpose aiming to support the growth of the creative economy should probably be added.
- Neither agree nor disagree - No opinion either way.
- Disagree - A Public Purpose aiming to support the growth of the creative economy should probably not be added.
- Strongly disagree - A Public Purpose aiming to support the growth of the creative economy should definitely not be added.
- Unsure

**Question 3. Which option, if any, most closely represents your feelings on whether the BBC should continue to provide a wide range of content and services that represent all audiences in a way that brings communities together, supports social cohesion, and helps build a unifying national story throughout the next Charter period?**

- **The BBC should do more to represent all audiences. The BBC should provide more content and services aiming to represent all audiences.**
- The BBC is doing the right amount to represent all audiences. Currently, enough is being done to ensure all audiences are represented. The BBC should continue to provide content and services aiming to represent all audiences.
- The BBC is not doing enough to represent all audiences, but no further action should be taken. Currently, not enough is being done to ensure all audiences are

represented. However, there are other areas the BBC should focus on instead of providing more content and services aiming to represent all audiences.

- The BBC does too much to represent all audiences. The BBC should provide less content and fewer services aiming to represent all audiences.
- No opinion either way
- Unsure

**Question 4. If you agree that the BBC should continue or do more to play this role, what options aiming to improve how the BBC reflects and represents all audiences do you support, if any? (Please select all that apply)**

- Producing more content that is distinctive to the UK
- Covering genres which are less covered by other broadcasters e.g. arts, minority language broadcasting
- Producing more content that brings people together around shared moments
- Sharing diverse voices and perspectives from all parts of the UK
- Improving on and off screen diversity
- Other, please specify

Welsh language broadcasting is extremely important in terms of the visibility of the Welsh language and daily opportunities for people to hear and use Welsh. The Welsh Government's Cymraeg 2050 strategy describes the key role of Welsh language broadcasting in the regeneration of the Welsh language in Wales and the importance public broadcasters in creating Welsh language content and raising awareness of the Welsh language.

- No changes are necessary
- Unsure or no opinion

## **Chapter 1: A trusted institution**

**Question 5. To what extent do you agree or disagree that new requirements on the BBC should be introduced so that the BBC does more to improve workplace standards?**

- Strongly agree - New requirements on the BBC to improve workplace standards should definitely be introduced.

- Agree - New requirements on the BBC to improve workplace standards should probably be introduced.
- Neither agree nor disagree - No opinion either way.
- Disagree - New requirements on the BBC to improve workplace standards should probably not be introduced.
- Strongly disagree - New requirements on the BBC to improve workplace standards should definitely not be introduced.
- Unsure

**Question 6. How, if at all, does the amount those working for the BBC are paid impact your view of the BBC?** When responding, you may wish to consider how much it impacts your trust in the BBC's outputs and whether it affects how much you engage with BBC services. [200 word open box]

**Question 7. To what extent do you agree or disagree that the BBC is currently accountable to the public?**

- Strongly agree - The BBC is almost always accountable to the public.
- Agree - The BBC is mostly accountable to the public.
- Neither agree nor disagree - No opinion either way.
- Disagree - The BBC is rarely accountable to the public.
- Strongly disagree - The BBC is almost never accountable to the public.
- Unsure

**Question 8. Which of the following options aiming to enhance the BBC's accountability, if any, do you support?** (Please select all that apply)

- Requiring the BBC to use consultative forums, such as citizens' assemblies, so that decision-making represents the public's views and voices
- Requiring the BBC to hear regional perspectives through new consultative frameworks or other structures, representing each of the UK's nations and/or regions
- Enhancing how the BBC conducts audience research to help inform decision making

- Strengthening requirements of the Board to ensure the BBC engages with the public in a meaningful way
- Changing the structure of the Board to enhance its effectiveness and accountability
- Changing the Board's appointment process, this could include reducing the government's role in board appointments to appointing the Chair only
- Clarifying the roles and responsibilities of board members, this could include setting out duties for the Chair
- Enhancing the role of the independent board members and their ability to hold the BBC to account
- Strengthening the external scrutiny of the BBC, this could include, for example, greater oversight by Ofcom or Parliament
- Other (please specify) [free text]
- No changes are necessary
- Unsure or no opinion

**Question 9. The government is considering targeted changes to increase transparency in the BBC to enhance BBC accountability over the next Charter period. Which options, if any, do you support?** (Please select all that apply)

- Improving the way the BBC communicates important information so it is clear, concise and able to be understood by everyone
- Requiring the BBC to communicate important information better to industry stakeholders, particularly to other UK broadcasters
- Requiring the BBC to communicate more information about its complaints process, particularly to those who submit complaints
- Requiring the BBC to communicate more information about the process for selecting which programmes should be made and broadcast
- Requiring the BBC to communicate more information about its editorial decisions
- Other, please specify [free text limited to 200 words]
- No changes are necessary
- Unsure or no opinion

**Question 10. Why, if at all, does the BBC's independence matter to you?** (Please select all that apply)

- It allows the BBC to be free from government or political influence in the content it releases
- It allows the BBC to be impartial when reporting on elections, government policies, and political parties
- It allows the BBC to hold government to account and/or be critical of government
- It allows the BBC to be editorially independent and make the final call on what stories to cover and how to cover them
- It allows the BBC to pursue its own agenda, without interference, so it can provide content that serves audiences across the UK
- Other, please specify [Free text]
- The BBC's independence does not matter to me
- Unsure or no opinion

**Question 11. What measures to increase the BBC's independence from government, if any, should be prioritised to support greater trust in, and engagement with, the BBC?** In your response you may wish to explain your reasoning and provide relevant evidence.

Continuing to safeguard the editorial and operational independence of the BBC and S4C is essential to ensure content that serves Welsh speakers.

We agree that engaging with the public is an important part of ensuring accountability and trust. We believe that engaging specifically with Welsh speakers, and especially young Welsh speakers, is essential towards understanding their experiences, views, and aspirations.

While the consultation document does not offer any specific options in terms of adjusting the length of the Charter, we believe that having a specific end date can lead to uncertainty. Providing long-term and sustainable financial certainty for the BBC and S4C is essential for Welsh-medium broadcasting. A more long-term and sustainable funding model would ensure that the BBC's and S4C's Welsh-language provision continues to thrive and continues to create economic and social value for Wales.

## Chapter 2: Delivering services for the public good

**Question 12. What, if anything, should the BBC focus on to ensure AI is used for the public good, and for the benefit of the wider creative industries?** Please select all that apply.

- Transparently explaining its own use of AI, for example, in the creation of content and services
- Having new requirements (for example, transparency obligations), to set the ethical standards for AI's use in public service media organisations
- Teaching audiences how to recognise where AI has been used, and to critically assess the reliability of information and content
- Helping audiences to use AI themselves, for example, teaching them basic prompting skills
- Find innovative uses of AI to drive efficiencies within the BBC and in the wider media sector
- Act as a bridge between AI companies and smaller public service media who have less time and money to negotiate, helping to support wider collaboration
- Other, please specify

Advances in technology and artificial intelligence offer exciting opportunities to increase the use of the Welsh language. Ensuring that the Welsh language is included within advances in technology and artificial intelligence is key. The BBC's commitment to digital innovation should be strengthened, including helping to develop Welsh language technologies. This would support the aim of the Welsh Government's Cymraeg 2050 strategy to ensure that the Welsh language is at the heart of innovation in digital technology and to make it possible to use the Welsh language in all digital contexts. We believe that this is particularly important in terms of ensuring favourable conditions to increase children's and young people's use of the Welsh language in the future.

- The new Charter should not introduce obligations around AI for the BBC
- Unsure or no opinion

**Question 13. What kind of programming, if any, do you think the BBC should make more visible on its platforms?** (Please select all that apply)

- News and current affairs programming

- Arts, religious and international affairs programming (sometimes referred to as 'underserved' genres)
- Children's and educational programming
- Programming showing different voices and perspectives from across the UK
- Locally relevant programming
- Other, please specify

It's vital that Welsh language programmes are visible and easy to find, especially as audiences increasingly turn to streaming. Digital media are increasingly important in the lives of children and young people today. There are significant challenges in attracting children and young people to watch, read and listen to Welsh content, especially given the influence of English language broadcasting and media. However, evidence gathered by the Welsh Language Commissioner shows that children and young people wish to watch, read and listen through the medium of Welsh. S4C's service for children and young people, as well as Welsh learners, must be highlighted. This is a key provision for supporting new speakers and promoting the use of the language. It can serve to demonstrate that the Welsh language belongs to everyone, even to viewers who do not speak Welsh.

We would be supportive of any efforts to ensure better digital visibility for the Welsh language, including the use of technology to ensure that Welsh content is visible to Welsh speakers and is easy to find.

- The new Charter should not require the BBC to make specific types of programmes more visible
- Unsure or no opinion

**Question 14. To what extent do you agree or disagree that the BBC should make greater use of third party platforms to share its content?**

- Strongly agree - The BBC should definitely make greater use of third party platforms to share its content
- Agree - The BBC should probably make greater use of third party platforms to share its content
- Neither agree nor disagree - No opinion either way
- Disagree - The BBC should not make greater use of third party platforms to share its content

- Strongly disagree - The BBC should definitely not make greater use of third party platforms to share its content
- Unsure

**Question 15. Reflecting on your response above, please explain why you agree or disagree that the BBC should make greater use of third party platforms to share its content.** Please provide relevant evidence, where possible.

The consultation discusses the question of using more third-party platforms, for example YouTube, to share BBC content. It is noted that this is particularly important for younger audiences who use less of the BBC's platforms and are therefore at risk of missing out on its vital public service programmes. Research by the Welsh Language Commissioner showed that very few children and young people reported that they watched television regularly. There was more reference to online viewing through platforms like YouTube. It is therefore likely that greater use of third party platforms would enable more people, especially children and young people, to discover and watch content through the medium of Welsh. We know that S4C already publishes their content on a range of third party platforms and that this is important in terms of promoting Welsh-medium content, and also in terms of expanding opportunities for people to watch Welsh-medium content.

Although we therefore see clear potential for the BBC and S4C to use such platforms, it is essential that appropriate prominence is offered to Welsh content on third party platforms. The Green Paper warns that there are financial challenges associated with running multiple distribution platforms and that other platforms do not share the BBC's commitment to informing, educating and entertaining. It is therefore important to recognise that there is a risk that third party platforms would not have the same commitment to offer Welsh language provision or give prominence to the language. We encourage the Government to consider these issues carefully and to take appropriate steps to ensure visibility for Welsh medium content.

**Question 16. What, if anything, do you believe would improve the value and relevance of BBC news and current affairs to you? This includes all BBC news and current affairs content, including its TV, radio and online news services, and local, national and international news outputs.**

- A renewed focus on accuracy and impartiality
- More clearly marking when content is news versus where it is opinion
- Robust and transparent editorial guidelines applied consistently

- Greater explanation of the editorial and journalistic decisions taken when reporting the news
- Greater transparency when mistakes and errors are made
- More effort to be made in taking into account the public's views in its news coverage
- Reporting more news stories which are local to you
- Reporting more international news stories
- Highlighting stories which are not reported by other outlets
- Other, please specify

We welcome the Green Paper's statement that an essential part of the ongoing Charter will be to prepare the BBC and S4C to provide relevant and high quality content to serve minority language audiences. It is stated that the BBC's Public Purpose 4 refers to reflecting, representing and serving the diverse communities of all countries and regions of the United Kingdom. It is vital that stories that reflect Welsh communities, including Welsh-speaking communities, are part of the BBC and S4C's news and current affairs services in Welsh (and in English in the case of the BBC). We support the Government's intention to consider the following areas, which are relevant to this principle:

- working in partnership with local news organisations and supporting a healthy information environment
- supporting the sustainability of broadcasting in minority languages.
- No changes are necessary
- Unsure or no opinion

**Question 17. Thinking about the next Charter period, what role, if any, do you think the BBC should have in ensuring UK citizens can recognise and access trusted and accurate information?** Please provide any relevant evidence to support your response.

We support the Government's objectives to ensure that the BBC provides reliable news and information and a healthy information environment where unbiased and accurate news is available to support healthy democratic debate and promote social cohesion. The Green Paper notes that the public often turn to the BBC for accurate information in times of crisis and that the aim is to ensure that everyone feels confident to trust the information they receive from the BBC. These principles are

very important to Welsh speakers and the BBC and S4C have a vital role to play in providing these services to them through the medium of Welsh.

**Question 18. The BBC's international output showcases the UK, its culture and its values to a global audience. This includes the BBC World Service, which seeks to provide access to trusted news around the world in an increasingly challenging international environment. To what extent do you agree it is important that the BBC continues to perform these roles internationally?**

- Strongly agree - The BBC must continue to provide this role internationally.
- Agree - The BBC should continue to provide this role internationally.
- Neither agree nor disagree - No opinion either way.
- Disagree - The BBC should not continue to provide this role internationally.
- Strongly Disagree - The BBC must not continue to provide this role internationally.
- Unsure

### **Chapter 3: Driving growth across the UK**

**Question 19. What, if anything, do you value about the BBC being UK-wide?** (Please select all that apply)

- Bringing people together from different communities across the UK, including its nations and regions
- Representing people from across the UK
- Telling local stories to a national audience
- Providing local news and information
- Money spent in local areas
- Stimulating local creative clusters (e.g. MediaCity in Greater Manchester, BBC's new headquarters in the West Midlands), including through supporting the independent production sector.
- Jobs and skills development for local people
- Other, please specify

The role of the BBC and S4C in broadcasting through the medium of Welsh is extremely important in terms of the visibility of the Welsh language and in normalising opportunities for people to use Welsh. Welsh-medium broadcasting provides news, information and entertainment for Welsh speakers. It also attracts and supports new speakers. It is essential to protect this provision and develop it.

We also appreciate the fact that the BBC and S4C operate in Wales and through the medium of Welsh, which gives the Welsh language an important economic foothold. The broadcast media in Wales value Welsh language skills at work and offer work opportunities in Welsh. The creative industries sector is an area of employment where there is a clear demand for Welsh speakers and it offers obvious opportunities for people to use Welsh at work.

Wider economic contribution from the Welsh language broadcasting industry includes supporting independent companies to grow and provide jobs for individuals across Wales. This economic contribution is particularly significant in those communities where there is a high density of Welsh speakers. The Welsh-medium broadcasting industry therefore contributes to the vitality of these communities.

- None of the above
- Unsure

**Question 20. (1) To what extent do you agree or disagree that the BBC should be required to spread more of its spending, activities, and decision-making across nations and regions of the UK?**

- Strongly agree - The BBC should definitely do more to spread its spending, activities and decision making across nations and regions of the UK.
- Agree - The BBC should probably do more to spread its spending, activities and decision making across nations and regions of the UK.
- Neither agree nor disagree - No opinion either way.
- Disagree - The BBC should probably not do more to spread its spending, activities and decision making across nations and regions of the UK.
- Strongly disagree - The BBC should definitely not do more to spread its spending, activities and decision making across nations and regions of the UK.
- Unsure

**Question 20. (2) Which option(s), if any, would you support for spreading the BBC's economic impact and role supporting the production sector across the UK nations and regions?** (Please select all that apply).

- Requiring the BBC to develop long-term strategies for regional creative sector development
- Further quotas or obligations for producing content outside London and the M25
- New quota targets for basing staff involved in commissioning content across the UK nations and regions
- Governance changes to give regional or local leads for commissioning content more control over their budget and decision-making
- Changing the rules so location is factored into decision-making around commissioning content from independent production companies
- Other: please specify

As we note in our response to question 19 the BBC and S4C create significant economic and social value for Wales, including jobs, skills and creative supply chains. We would therefore be supportive of any strategies or decisions that would mean more jobs, and more content being created in Wales. We would also welcome this economic and social value being spread across the country, further contributing to the economic and social sustainability of areas with a high density of Welsh speakers.

- None of the above
- Unsure or no opinion

**Question 21. What, if anything, do you think the BBC could do to fill skills gaps in the creative sector?** Please provide any relevant evidence, where possible.

The creative industries sector is an area of employment where there is a clear demand for Welsh speakers, particularly in the radio, interactive media, advertising, film and animation sectors. We therefore believe that there is potential for working in partnership with third party suppliers, education providers, and industry bodies to encourage Welsh speakers to train and develop careers in this important industry. Young people's awareness of career paths in the sector, the importance of Welsh language skills and the possibility of maintaining a career through the medium of Welsh in the field should be promoted. This is essential in order to support Welsh language broadcasting.

As well as encouraging Welsh speakers to work in the industry, the focus should also be on developing the Welsh language skills of the creative sector workforce in Wales. This would include opportunities to develop Welsh language skills during education and training, through apprenticeship programmes, and through Welsh learning opportunities offered by the National Centre for Learning Welsh.

**Question 22. If you represent an organisation that has worked with the BBC in the past, please share your reflections and provide evidence on your experience of how your partnership has worked and how it could be improved.** You may wish to consider how you aligned vision and goals for the partnership, trust, communication, transparency, decision-making, or other aspects of partnership working.

- **What went well?**

The BBC has been subject to the Welsh Language Standards since 2017, and as a result a regulatory relationship has existed between it and the Commissioner. In setting and implementing the Standards, a working relationship has developed based on transparency and on the willingness of both organisations to engage constructively.

It is important to note that the Welsh Language (Wales) Measure 2011 contains a specific exception in relation to broadcasting, which means that the Standards do not apply insofar as they relate directly to broadcasting content or activity. However, that exception does not extend to broadcast-related corporate, administrative, or public services—such as audience services, corporate services, or TV Licensing activities—where the Standards continue to apply.

The implementation of this exception in a clear and transparent way has required, in some cases, in-depth discussion to ensure a common understanding around the scope of the Standards and their practical application. When these expectations have been consistently understood, the regulatory relationship has been able to function effectively, enabling solutions that take into account the operational context of the BBC and at the same time ensure that the statutory duties of the Welsh language are maintained.

In this context, the BBC has been open about operational challenges—including those arising from its status as a British body operating in a wider context than many other public institutions subject to the Standards—as well as potential risks to compliance. Reaching agreement on compliance issues in such circumstances depends on clear and effective communication, and this has led, in many cases, to solutions that take into account the BBC's operational requirements and the Commissioner's statutory role as regulator.

The appointment of an independent company to act on behalf of the BBC in its communication with the Commissioner has contributed to greater consistency in the discussion and to a better understanding of the issues involved.

- **What could be improved?**

Although the Standards have been imposed on the organisation for some time, cases persist where the scope of the Standards and their relevance to specific BBC services are not always consistently understood. This can lead to differences in interpretation.

In addition, there have been challenges in some recent cases in terms of transparency and the sharing of information in a timely and sufficiently detailed manner, which has affected the Commissioner's ability to obtain full assurance about the progress being made towards discharging the statutory duties. While commitments have been set out to develop specific services and improve Welsh language provision to the public, the lack of clear timescales and detailed information has limited our ability to assess practical implementation and the steps being taken towards ensuring compliance.

**Question 23. If you are responding on behalf of an organisation with an interest in R&D (e.g. a production company, university, a technology hardware company), how would you like to see the BBC supporting innovation?** Please provide relevant evidence, where possible. In your answer, you may wish to consider any specific areas where you think it should focus its leadership; what point of the R&D lifecycle is the BBC's support most valuable; and how would you like the BBC to partner with organisations like yours in R&D.

- [Free-text box; 350 words]
- Unsure or no opinion

**Question 24. If you represent an organisation in the creative industries, please share your reflections on your experience of the current market impact regulation process and how it could be improved.** Please provide relevant evidence, where possible.

- What went well? [Free-text box; 350 words]
- What could be improved? [Free-text box; 350 words]

## **Chapter 4: Sustainable and fair funding**

**Question 25. To what extent do you agree that the licence fee should continue to fund a wide range of services and output that aim to inform, educate and entertain audiences?**

- **Strongly agree - The licence fee should definitely fund a wide range of services and output that aim to inform, educate, and entertain.**
- Agree - The licence fee should fund a wide range of services and output that aim to inform, educate, and entertain.
- Neither agree nor disagree - No opinion either way.
- Disagree - The licence fee should not fund a wide range of services and output that aims to inform, educate, and entertain.
- Strongly disagree - The licence fee should definitely not fund a wide range of services and output that aims to inform, educate, and entertain.
- Unsure

**Question 26. To what extent do you agree that the BBC should use the funding it receives through the licence fee to deliver a broad range of benefits to the UK?** This could include objectives such as investing in the nations and regions to drive growth across the UK, and developing skills that support the creative economy.

- **Strongly agree - The BBC should definitely use the licence fee to fund a broad range of benefits to the UK and the creative economy.**
- Agree - The BBC should use the licence fee to fund a broad range of benefits to the UK and the creative economy.
- Neither agree nor disagree - No opinion either way.
- Disagree - The BBC should not use the licence fee to fund a broad range of benefits to the UK and the creative economy.
- Strongly disagree - The BBC should definitely not use the licence fee to fund a broad range of benefits to the UK and the creative economy.
- Unsure

**Question 27. To what extent do you agree that the scope of the licence fee should be reformed to support the BBC's long term sustainability, which could involve requiring more households to pay but with each paying less?**

- Strongly agree - The licence fee should definitely be reformed to support the BBC's long term sustainability.

- Agree - The licence fee should be reformed to support the BBC's long term sustainability.
- Neither agree nor disagree - No opinion either way.
- Disagree - The licence fee should not be reformed to support the BBC's long term sustainability.
- Strongly disagree - The licence fee should definitely not be reformed to support the BBC's long term sustainability.
- Unsure

**Question 28. To what extent do you agree or disagree that BBC content or services should carry advertising, bearing in mind how this could provide a new income stream for the BBC, how it might impact the audience experience and the impact on other broadcasters?**

- Extensive advertising - The BBC should carry advertising on all of its content and services, including live TV and radio.
- Limited advertising - The BBC should carry limited advertising on some of its online content and services, but not on live TV or radio.
- No advertising - The BBC should not carry any advertising on its content and services.
- Neither agree nor disagree - No opinion either way.
- Unsure

**Question 29. Would you be willing to pay for a BBC top-up subscription service focused on premium and entertainment content, in addition to your licence fee, assuming it was a similar price to other popular video-on-demand subscription services?**

- Strongly agree - I would definitely be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.
- Agree - I would be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.
- Neither agree nor disagree - No opinion either way.
- Disagree - I would not be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.

- Strongly disagree - I would definitely not be willing to pay for a BBC top-up subscription service focused on premium and entertainment content.
- Unsure

**Question 30. To what extent do you agree or disagree that new concessions for households facing significant financial pressures should be introduced?**

- Strongly agree - The government should definitely introduce new TV licence concessions for households facing significant financial pressures, even if other households have to pay more or the quality of BBC services is reduced.
- Agree - The government should introduce new TV licence concessions for households facing significant financial pressures only if there are no negative impacts on the BBC or higher costs for other households.
- Neither agree nor disagree - No opinion either way.
- Disagree - The government should not introduce new TV licence concessions for households facing significant financial pressures.
- Strongly disagree - The government should definitely not introduce new TV licence concessions for households facing significant financial pressures.
- Unsure

**Question 31. To what extent do you agree or disagree that technology should be used to support compliance, for example by requiring households using BBC iPlayer to enter details from their TV licence?**

- Strongly agree - Technology should definitely be used to support compliance, for example the BBC iPlayer login system should definitely require households using the service to enter details from their TV licence.
- Agree - Technology should be used to support compliance, for example the BBC iPlayer login system should require households using the service to enter details from their TV licence.
- Neither agree nor disagree - No opinion either way.
- Disagree - Technology should definitely not be used to support compliance, for example the BBC iPlayer login system should not require households using the service to enter details from their TV licence.

- Strongly disagree - Technology should definitely not be used to support compliance, for example the BBC iPlayer login system should definitely not require households using the service to enter details from their TV licence.
- Unsure

**Question 32. Do you have any other views on the BBC's funding model that you wish to share?** In your response, you may wish to explain why you agree or disagree with the potential changes above or suggest a different funding model.

Broadcasting plays a vital role in the promotion of regional and minority languages around the world, and in Wales in particular. The UK Government has signed the European Charter for Regional or Minority Languages, and among the clauses that apply to the Welsh language is Article 11 – The Media. This section contains clauses that refer to important principles in the context of broadcasting in regional or minority languages.

It must be remembered that the Welsh language exists alongside a language that is dominant in global popular culture, especially when considering the influence of English language broadcasting and media. Welsh language broadcasting is dependent on those services that are funded by the licence fee. Commercial provision cannot be relied upon. This is clear from one side effect of the Broadcasting Act 2024, that Ofcom no longer has the ability to require commercial radio services to offer Welsh-medium services. The result of this is that some commercial radio services have ceased to broadcast in Welsh over the past few years.

Welsh language broadcasting is extremely important in terms of the visibility of the Welsh language and the normalisation of daily opportunities for people to hear and use Welsh. That role is absolutely key today given the prominence of digital media in our lives.

Not only does Welsh language broadcasting provide news, information and entertainment to Welsh speakers, giving a mirror and expression to their aspirations and lives, it also attracts and supports new speakers. It is essential to protect this provision and develop it.

S4C is the only Welsh-medium public television broadcaster and there is a close relationship between S4C and the BBC. The Broadcasting Act 1990 requires the BBC to provide no less than 520 hours of content to S4C each year. The BBC is also the main provider of Welsh-medium content on the radio, through Radio Cymru and Radio Cymru 2, and the only one broadcasting in Welsh only. Online, these two radio stations are available on BBC Sounds and S4C content on BBC iPlayer and on S4C Clic.

S4C's annual report for 2024/25 shows that the channel's weekly reach was 156,000 among Welsh speakers in Wales and 306,000 in Wales as a whole. Across the UK, the weekly reach was 454,000. Viewing figures on Clic and iPlayer were at record highs, with 669,000 hours on Clic and 3,807,000 on iPlayer.

The Welsh Government's Cymraeg 2050 strategy describes the key role of the broadcast media in the regeneration of the Welsh language in Wales and the importance of the role of public service broadcasters in terms of Welsh language content and raising awareness of the Welsh language.

S4C has established a language partnership with the Welsh Government and others to help deliver on the Welsh Government's commitment to reach one million speakers by 2050. This led to collaboration between the channel and organisations such as the National Centre for Learning Welsh. This has led to the development of bespoke resources for learners to accompany a number of relevant popular series. By working with Adnodd and other organisations, S4C is also helping to develop specific materials for Welsh education, supporting the curriculum in Wales.

Digital and broadcast media are very important in the lives of children and young people today. There are significant challenges in attracting children and young people to watch, read and listen to Welsh content, especially given the influence of English language broadcasting and media. However, evidence gathered by the Welsh Language Commissioner shows that children and young people wish to watch, read and listen through the medium of Welsh. S4C's online services are essential to attract young people to the service. Given the popularity of the Hansh service on Facebook, TikTok and YouTube, for example, the importance of these services in providing Welsh-medium content and experiences to children and young people must be emphasised. It should be ensured that the BBC and S4C communicate in the most effective way possible with children and young people to ensure that their Welsh-medium content is visible and attractive to them.

The broadcast media give the Welsh language an important economic foothold by valuing Welsh language skills at work and offering work opportunities in Welsh. The creative industries sector is an area of employment where there is a clear demand for Welsh speakers.

Wider economic contribution from the Welsh language broadcasting industry includes supporting independent companies to grow and supporting supply chains in areas across Wales. This economic contribution is particularly significant in those communities where the Welsh language is at its strongest. The Welsh language broadcasting industry undoubtedly contributes to the viability of these communities.

A report by Wavehill for 2024/25 shows that S4C has supported over 2,500 full-time equivalent jobs and contributed £150.3 million in gross value added to the Welsh

economy. This increased to 2,630 jobs and £161.3 million in gross value added across the UK.

We agree that the BBC should do more to disseminate its spending, activities and decisions across the countries and regions of the UK. We also agree that the BBC should develop long-term strategies for the development of the regional creative sector, emphasising the importance of the Welsh language in the context of any strategy for Wales.

We are concerned about the option discussed in the Green Paper to introduce an additional subscription service for the BBC, as it could create a risk that Welsh audiences lose access to Welsh language content. In summary, any decision that would result in less Welsh-medium provision would be detrimental to the prosperity of the Welsh language and its communities.

Welsh language broadcasting is dependent on publicly funded broadcasting services. Long-term financial certainty is crucial for Welsh language broadcasting, including S4C and Radio Cymru. Adequate funding must be provided to maintain a comprehensive, independent, high quality service and to ensure that innovation and contribution to the development of Welsh language technologies can be achieved. This is essential for Welsh speakers in terms of language, culture and economy, and their future prosperity.