

Submission to the BBC in relation
to



its Charter Review

October 2015

Background:

Conradh na Gaeilge is a democratic forum for the Irish language community. The organisation works on behalf of the Irish language throughout the island of Ireland and around the world.

The main aim of the organisation is to see Irish used as the ordinary language in Ireland.

From its establishment on the 31st July 1893, members of Conradh na Gaeilge have been active in promoting the Irish language in every aspect of this country's life, from legal matters, to education, to developments in the media and Irish language services.

Conradh na Gaeilge has been appointed by Foras na Gaeilge, the all island body responsible for the promotion of the Irish language, as one of the six lead organisations funded to develop the Irish language across the island. Primarily, the role of Conradh na Gaeilge is to protect the language, and to act as representatives and to raise awareness of the language.

There are 180 branches and many individual members of Conradh na Gaeilge. All members of Conradh na Gaeilge work hard to develop the use of Irish in their own areas. More information about the work of Conradh na Gaeilge is available at www.cnag.ie.

Introduction:

The BBC has a responsibility to ensure that it caters to the needs of all licence payers, including Irish speakers. The work that is carried out to ensure that the needs of Scottish Gaelic speakers and Welsh speakers illustrates that this is something which is understood by the BBC, and done very effectively when sufficient effort and resources are dedicated to providing these services.

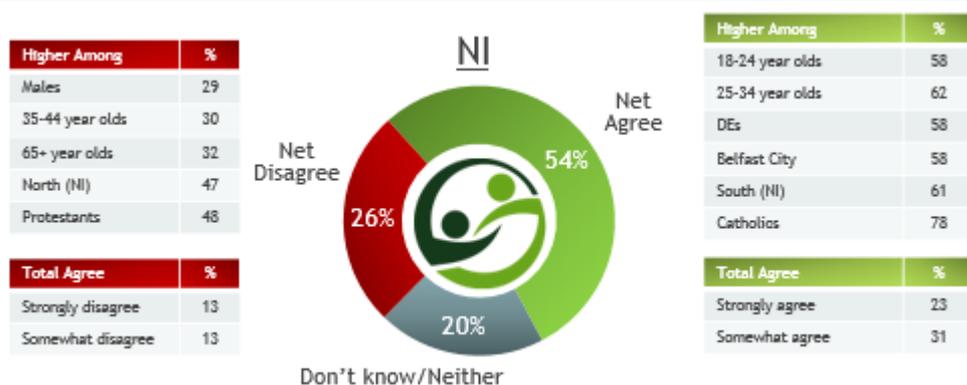
The Executive Summary of the consultation document begins by stating:

“The BBC currently has six very broad public purposes, which were set at the last Charter Review. All of the BBC’s activity should be working towards one or more of these:

1. *Sustaining citizenship and civil society;*
2. *Promoting education and learning;*
3. *Stimulating creativity and cultural excellence;*
4. *Representing the UK, its nations, regions and communities;*
5. *Bringing the UK to the world and the world to the UK;*
6. *Delivering to the public the benefit of emerging communications technologies and services.”*

The provision of a high quality Irish language service meets with each of these stated aims, and any failure to ensure the availability of a comprehensive and high quality Irish language service would mean that the BBC is failing in its aims, and in particular failing a large section of licence payers who are as entitled to have their needs met as any other licence payers would be. The table below reflects results of a survey conducted by Millward Brown and Conradh na Gaeilge in January 2015. The question asked of the participants was whether they thought that services should be made available through Irish to those who seek them.

“Do you agree that services should be provided through Irish for those who seek them?”



The results show that 54% of participants agreed with this, and that only 26% of those involved disagreed with this. These figures show that the provision of services through Irish, in addition to meeting the stated aims of the BBC Charter, reflects the opinions of those living here.

The programmes which are available through the BBC in Irish are very well received, and the Ofcom communications market report disclosed that, during 2013-14, programming supported by the Irish Language Broadcast Fund and the Ulster-Scots Broadcast Fund and broadcast by the BBC reached an audience of 660,000.¹ The high standard of programming which comes from the BBC Gaeilge unit is a testament to the skills of those working in that department, and shows the great potential which exists within the BBC to develop and expand this work in order to meet the needs of the Irish language community in a much more comprehensive manner.

Although there are some general commitments to Irish in the Good Friday Agreement 1998. Irish language broadcasting has less statutory protection than Welsh or Scottish Gaelic. Irish language broadcasting has none of the statutory protections afforded under the Communications Act 2003 and the BBC's Charter to Welsh and Scottish Gaelic; there is no mention of Irish in the Act or the Charter. Broadcasting, however, is not a devolved matter, with responsibility falling with the Department of Culture, Media and Sport. The absence of any locally administered and ratified legal protection for Irish should not, therefore, mean that the BBC neglects its commitment to the language, as stated in its charter. The Strategy to Enhance and Protect the Development of the Irish Language (January 2015) clearly indicated that the adequate provision of Irish language services is a central element to ensuring that the needs of the Irish language community could be properly met. Section 4.93 of the strategy states:

"The UK government should amend the Broadcasting Act 1990 and the Broadcasting Charter (2005) to place legal obligations on broadcasters to provide a quality local Irish language service."

The survey conducted by Millward Brown and Conradh na Gaeilge in January 2015 also showed that 48% agree that the government should provide more support for the Irish language, with only 28% disagreeing with this. This Charter Review provides an opportunity to properly cater to the needs of the Irish language community, even in the absence of such recommended legislation. Steps can now be taken to ensure that the discrepancies in funding and resources which are allocated to Irish among the other indigenous languages are addressed.

BBC Funding:

The BBC has not been delivering value for money as far as the Irish language audience is concerned. An adequate level of funding needs to be provided by the BBC for Irish language content across all platforms commensurate with that provided to the other indigenous languages with Part III status under the European Charter for Regional or Minority. A minimum of £10m pa would bring the BBC's commitment to Irish more in line with that shown towards Welsh and Scottish Gaelic.

¹ NI Assembly Question, AQW 41532/11-15, January 2015

BBC NI, with access only to opt outs on the main network TV channels and opt outs on its own Radio Ulster, all of which are primarily and understandably aimed at the English language audience, is not in a position to broadcast more than a very small amount of Irish language content. This does not relieve it of its responsibility to the Irish language audience. Funding should be provided by the BBC centrally to BBC NI, as happens in Scotland and Wales, which should then enter into arrangements with the Irish Language Broadcast Fund for the commissioning of content and with TG4 for the broadcasting of that content in Northern Ireland. These arrangements would mirror the situation in Scotland and Wales where indigenous language content is significantly funded by the BBC but broadcast on dedicated indigenous language channels. It would also maximise the benefits of the Government's policy of ensuring widespread availability in NI of the dedicated Irish language channel, TG4, as well as respond to Ofcom's proposals for broadcasting the indigenous languages of the UK. Similar arrangements could be set up with the existing dedicated Irish language radio stations serving Northern Ireland.

Investment:

The BBC makes use of dedicated and ring-fenced Indigenous Minority Language funding within the BBC's local budget and the assistance that is available from the Irish Language Broadcast Fund. This provides up to 75% of funding to broadcasters, meaning that BBC Northern Ireland invests approximately £1million per year in its Irish language programming. . This means that the BBC's spend on Welsh language television is quite possibly 200 times more than on Irish and its spend on Scottish Gaelic television about 10 times more than on Irish. In fact, in Northern Ireland the BBC is able to avoid taking on the responsibility it owes to licence fee payers because TG4 acts as the main provider of Irish language television for Northern viewers. (TG4 is funded by the Irish Government, the licence fee payer in the South and, to smaller extent, by the ILBF which funds some of its content). The 2011 Census showed that 11% of the population here have some knowledge of Irish, and that 1.1% of Scottish people speak Gaelic, which raises questions as to why one section of indigenous speakers are being catered for while the needs of another are being ignored

Indeed, the Irish language programming the BBC does provide is effectively subsidised by the ILBF, which puts up 75% of the cost of programmes it commissions. Compare this to Wales, where the BBC supports S4C with around £75m p.a. in direct funding from the licence fee with further content produced by BBC Wales for S4C worth around £20m p.a., and to Scotland, where the BBC provides a full channel, BBC Alba, and funding of around £5m (with MG Alba supplying around another £10m).

Figure 2.20 Other spend on other programming in the devolved nations: 2014



Source: Broadcasters.

Note: BBC S4C Statutory refers to the cost to the BBC of programming supplied to S4C by the BBC as part of their statutory agreement. ILBF/ USBF refers to additional production contributions by the Irish Language Broadcast Fund and the Ulster Scots Broadcast Fund. BBC S4C Statutory and S4C figures cover the 2014/15 financial year, ILBF/ USBF and BBC Alba figures cover the 2014 calendar year.

From Ofcom’s Communications Market Report: Northern Ireland, August 2015

The Irish language Broadcast Fund:

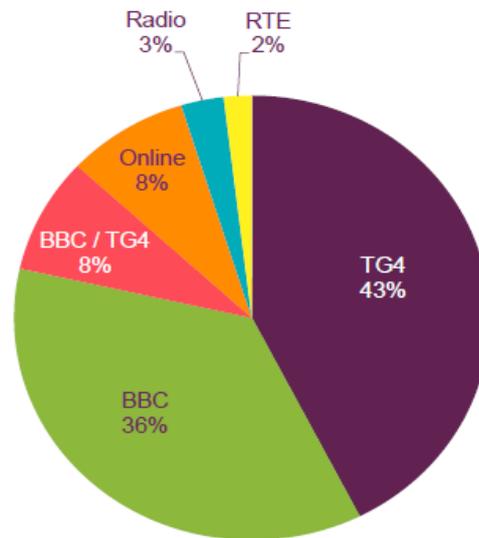
The Irish Language Broadcast Fund (ILBF) was launched in 2005. Since then it has established a reputation for funding high quality programming and for having trained a new generation of Irish speaking producers and is highly regarded by broadcasters, independent producers and regulators alike. Northern Ireland now has a highly skilled and critically acclaimed Irish language television production sector of scale.

ILBF Funding is currently only guaranteed until the end of 2016. It is possible that the Government, which is anxious to reduce public spending wherever possible, may see an opportunity to hand over the DCMS’s current responsibility for funding the ILBF to the BBC, in which scenario there is a compelling case for using the current Charter Review to make sure that the BBC increases its funding on Irish language content and brings its commitment to, and spend on, Irish into line with that which obtains for Welsh and Scottish Gaelic.

The ILBF spends £2.5m annually on Irish-language content providing a minimum of 55 hours of Irish language television, the majority of which is broadcast on TG4 and BBC NI.

In addition to this, in a series of focus groups which were carried out focussing on the services that are currently available to Irish speakers, one of the issues that was raised was the uncertainty of the future of Irish language broadcasting in the north. Due to the uncertain future of the ILBF, it is unknown what services will be available to Irish language audiences in the future, which creates uncertainty for the Irish language community and especially for those working in Irish language media production.

Figure 2.21 ILBF content funding recipients, by broadcaster / platform: 2014/2015



Source: Northern Ireland Screen

From Ofcom's Communications Market Report: Northern Ireland, August 2015

Radio:

In radio, the BBC provides dedicated, indigenous Celtic language stations in Wales and Scotland. For Welsh there is BBC Radio Cymru which broadcasts for up to 19 hours a day and has an annual budget of £12.8m. For Scottish Gaelic there is BBC Radio nan Gàidheal which broadcasts for at least 90 hours a week and has an annual budget of £3.7m. Wales and Scotland also have full-time English language services in the form of BBC Radio Wales and BBC Radio Scotland. BBC NI, on the other hand, has no dedicated Irish language service. Radio content in Irish (5-7 hours a week) is scheduled on the same BBC service (Radio Ulster) that provides English language radio programming. The funding for Irish language programming on BBC Radio Ulster is difficult to identify accurately as it is rolled into the overall cost of that station.

A similar policy could be followed for radio. It seems unlikely, simply on grounds of cost, that the BBC will establish a dedicated Irish language radio service. However, it has a long-established and experienced Irish language radio department which could provide resources and programming relevant to NI audiences to the existing Irish language radio services available to audiences in Northern Ireland - namely, RTÉ's Raidió na Gaeltachta and Belfast community radio station, Raidió Fáilte; the latter might be encouraged and enabled to broadcast on a NI wide basis.

Charter Review:

The consultation document briefly discusses how broadcasting supports the various indigenous languages of the British Isles; the paragraph devoted to this (see Box 6 of the consultation document below) makes no mention at all of the Irish language. However, it does raise the worrying prospect that the Government may seek in future to make a direct comparison between the cost of indigenous language services and that incurred by public service broadcasting in English, when such a comparison will always be to the detriment of the indigenous language, given the huge disparity in available audiences.

Box 6: Supporting the different native languages within the British Isles

In serving specific communities, the BBC's role in supporting the different native languages within the British Isles is particularly important. This is a small market with limited potential to be served effectively by commercial broadcasters, and therefore a key area where public funding can support underserved audiences. For example, S4C, the Welsh language broadcaster, currently receives public funding both via direct Government grant (£6.8 million per year) and also via the licence fee (£74.5 million per year). And Gaelic language broadcasting in Scotland is provided through BBC Alba, a partnership channel between the BBC and the Gaelic authority, MG Alba.

Nearly two thirds of minority language speakers in the UK say that the BBC supports their language.⁴⁶ But while the BBC and licence fee funded services are clearly an important pillar for indigenous language communities there are also challenges: audience reach has been falling across some indigenous language services over the last few years, particularly in Wales.⁴⁶ And these services come at a cost; cost per hour of indigenous language radio content in Scotland and Wales is considerably higher than cost per hour for English speaking content which raises concerns about value for money.⁴⁷

DCMS BBC Charter Review Public Consultation p 61

This lack of consistency in official views regarding Irish language broadcasting is noticeable within the BBC too. For example, whilst the BBC Northern Ireland's Management Review 2014-15 proudly refers to three of the Irish language programmes it had broadcast during the past year, *Bualadh Busk*, *Opry an Iúir* and *Scúp*, the Audience Council's Annual Review for 2014-15 makes no mention whatsoever of BBC NI's Irish language programming.

During the last review of the Charter ten years ago many people fully expected a much greater commitment to Irish to be required of the BBC. In fact, the BBC has been conspicuous by its failure to make any significant increase in its provision over the last ten years; if anything it has reduced its own spend on Irish language by taking advantage of the 75% funding it is able to draw on from the ILBF.

In the run up to the last Review of the BBC Charter, Ofcom, in its First Review of Public Service Broadcasting (2005), proposed that the indigenous languages of the UK would be best served through dedicated channels (like S4C in Wales and TG4 in the Republic) rather than the limited provision possible through opt-outs on the main networks.

In both Wales and Scotland the BBC, at the Government's behest, has adopted this suggested model and entered into formal arrangements with, in Wales, the existing Welsh language television broadcaster (S4C) and, in Scotland, with the Gaelic Media Service, (now known as MG Alba), to establish in 2008 a Gaelic television channel, BBC Alba. In Northern Ireland, however, while the BBC cooperates in a limited way with TG4, primarily in jointly commissioning a small number of programmes which both then broadcast (at different times), nothing similar has occurred.

Conclusion:

This Charter Review provides an opportunity for the BBC to address the inequalities in indigenous language programming and ensure that equitable services are provided in all regions. The Irish language community is growing and the demand and need for services to be made available through Irish is continually increasing. This is reflected in the 2011 census, the DCAL and NISRA Report on Attitudes Towards the Irish Language (2015). The BBC can no longer disregard its responsibilities to licence payers in terms of investment in Irish language programming. There is no reason why the Irish language wouldn't receive equitable treatment to other indigenous languages considering the appetite which exists for the production of such programmes.