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Dear Delyth Jewell

I am writing to correct the impressions given in the letter to yourself by Helgard Krause, Books Council of Wales CEO, dated 20 December 2023, in which she refers to broader priorities of the Council, outlined in their 5-year Strategy (2022-27) (<https://llyfrau.cymru/wp-content/uploads/2021/11/Strategic-Plan-2022-2027-P.pdf>). In addition, I raise a few additional broader points that I hope the Committee might consider in relation to funding decisions of Wales' book- and magazine publishing sector in the immediate and medium-term future.

In Ms Krause's letter, reference is made to incumbent funded bodies that were unsuccessful in autumn 2023's magazines franchise tender: clearly, these refer to Planet the Welsh Internationalist and ourselves, New Welsh Review. I happen to know that the editor of Planet has already written to you to raise some similar points to my own. Both myself and Planet's editor were present in the interview held by BCW for applicants for the next funding round (starting April 2024), as was (in the case of our own interview) NWR's finance and administration officer and NWR's Chair of the Board, the former National Librarian of Wales.

1. 'Incumbency'. Is Ms Krause's stated policy for BCW of 'challeng[ing] incumbency' (<https://llyfrau.cymru/wp-content/uploads/2021/11/Strategic-Plan-2022-2027-P.pdf>) an appropriate goal for a body set up to support what is widely acknowledged to be the fragile publishing industry of a small bilingual nation, one that is unique within the UK? Further, would the Committee consider the implications of this stated, quite radical policy, taking into account its risks and benefits in relation to the stability of the wider publishing industry in both languages? Perhaps the Committee may also wish to consider whether the idea of 'challeng[ing] incumbency', as presented in BCW's 5-year Strategy, is the most effective means of aiding diversity, considering our delicate publishing eco-system? How transparent is it for BCW to present 'incumbency' only in a negative light in the context of 'diversity', particularly since no comprehensive detailed audit has been conducted nor published recently by themselves regarding the present state of publishing clients in terms of diversity and inclusivity? I believe that there is a danger of tropes of 'diversity' and 'incumbency' being pronounced in order to hide funding decisions which would be more transparently regarded as being economic in motive.
2. 'Sustainability'. Ms Krause states in her letter: 'During the current tender round some, but not all, of the magazines, made the case that their business model was no longer sustainable. This would have remained the case even if the grant could have

been increased.’ This is (once again, as is the case with references to ‘incumbency’ outlined above) clearly directed at the two ‘incumbent’ unsuccessful applicants, ourselves and Planet. The definition set out in Ms Krause’s letter regarding ‘sustainability’ is vague (and in fact conflates the notion of *economic* sustainability with *ethical* sustainability in terms of labour terms and conditions) and was not communicated to applicants during the application procedure. It also seems to be at odds with the specific requirements for non-public funded income as defined in the BCW’s own guidelines for the 2024+ franchise. Their 2024+ funding round guidelines circulated in autumn 2023 stated: ‘The grant level for general and literary magazines will be aimed towards reaching a gearing ratio of 2:1 (i.e. BCW funding would provide up to two thirds of the total income of the magazine, with at least a third of income to be generated by the magazine publishers through sales, advertising revenue, sponsorship, contribution in kind etc)’. This ‘gearing ratio’ was established following a previous rigorous, transparent consultation review (2013: https://llyfrau.cymru/wp-content/uploads/2021/01/A_Review_of_English-language_Magazines_in_Wales_-_July_2013.pdf) of funding priorities conducted by the highly esteemed Tony Bianchi. Surely BCW’s definition of [economic] ‘sustainability’ should have been defined (for applicants) in the context of that ‘gearing ratio’ (2:1) stated in their own current application guidelines? In the case of New Welsh Review, our application satisfied that very gearing ratio as well as other milestones for economic stability; how, therefore, can the impression in all honesty be given that our application suggested we were ‘unsustainable’? If BCW were basing their decision on some other definition of ‘sustainability’ (for example a body’s being housed within a financially generous larger organisation or the provision of a commercial business plan), then that was not communicated at any stage by them during the application procedure. With reference to NWR, it is absolutely not the case that we would have been, in BCW’s vague term ‘no longer sustainable... even if the grant could have been increased’, and in any case how could BCW know of our intentions as they did not, at any point following their communication of their decision, open negotiations regarding any revised grant offer, either higher nor lower?

3. Ms Krause’s letter quotes, in reference to a question raised about the judgement process during application procedures for major clients: ‘Officers hold regular annual appraisal meetings with grant recipients’. But no BCW annual review-meeting took place with NWR during 2022 nor at any time in relation to the progress of the last two years of our franchise, despite frequent requests from NWR regarding the scheduling of the 2022 annual review meeting which would normally take place at the end of the year following the submission of our annual report.
4. Finally, we are concerned about what appears to be an emergent policy of communications and practice at BCW which suggests an apparently increasingly Machiavellian approach to clients. One example of this would be the failure of BCW to include NWR’s recently awarded New Audiences funded project of £15K in their 11 March 2024 announcement of this financial year’s funding projects and recipients, which was only rectified after two requests and even when rectified (<https://llyfrau.cymru/wp-content/uploads/2024/03/Crynodebau-Prosiectau->

Project-Summaries-2023-24-Mawrth-2024-1.pdf), introduced an erroneous element by adding 'Parthian Books' as the project's joint originators and recipients (a partnership between Parthian and NWR did become effective from late February 2024 but was not in place when New Audiences funding was applied for or received by NWR alone, a fact which BCW was wholly aware of). It is difficult to see these obstacles and apparent errors in any other light than that we should be 'chastised' for our public campaign (small in scale) about likely levels for our funding (alongside Planet we were part of the Save Welsh Magazines Open Letter campaign on working conditions prior to our application's submission). Taken together, all this may be contributing to a climate of fear across the sector in both languages. In turn, if allowed to develop, such fear could develop into self-censorship, damaging the fundamental principle of freedom of speech. This is especially concerning in relation to magazine and website clients, whose duty it is to report without prejudice on issues of the day, whether or not they are funded by a particular body or indeed depend on that body for services such as distribution, the loss of which could be detrimental to commercial viability and indeed, economic sustainability.

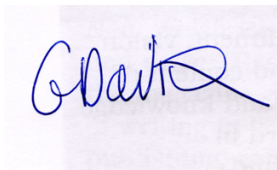
I leave on a personal note. I am a former Arts Council of Wales Literature Officer with nearly forty years of experience across our magazines and book publishing sectors as editor and publisher. This includes making literary translations from Welsh to English, mentoring, offering commercial online manuscript assessment as part of the rewards in a crowdfunder, and adjudications for writer's bursary, cross-art form major grant and literary prize submissions. My editorial success stories include prizewinning authors such as Jasmine Donahaye, Kerri ní Dochartaigh, Carole Hailey, Crystal Jeans, Rachel Trezise, Richard Gwyn, Hayley Long, Tristan Hughes and Gee Williams. Moreover I have helped shape New Welsh Review as a female-led outfit both in turns of leadership and of our contributors' pool. In addition to which, I am myself neurodivergent (living with ADHD) and have pioneered articles and debate from this perspective in my pages. These factors all make any superficial use of terms of diversity by funding bodies an especially galling matter.

I acknowledge that broader global changes are at play affecting our magazine sector in particular, and also that the Welsh government has shifting priorities (which to a great degree a funding body may feel they must follow in order to retain their own funding levels and grant-giving capacity). Those technological factors, however, were addressed in a comprehensive, timely, transparent and respectful fashion by the 2013 Bianchi report, following which new clients were introduced and all of us (regardless of the current state of our websites) committed to multi-format publication and have been constantly innovating as companies since then. But frankly, the way in which myself, my immediate colleagues and my valued compatriots in the wider sector have been treated during the transition to the next funding round for magazines is nothing short of appalling, in my opinion, and I know that my views are widely shared. Both Planet and ourselves were happy to help develop the next generation of publishing staff, with a particular view to sustaining priorities of inclusivity and diversity. All we did was hope for a bit more money to help the Council achieve those aims. Now it appears that they have listened retrospectively (that is after the horses have bolted) to those arguments by offering a new franchise for a literary magazine at a level of grant which ourselves, Planet and the third incumbent magazine, Wales Arts Review, would judge ideal (although NWR in fact did only request the required capped £55K

in our application). And yet we all three have been deliberately frustrated in applying for that fund through our being allowed, indeed, it appears, encouraged to go to the wall before any such application could be possible. What a waste of home-grown talent and cultural sensitivity built over years, what a waste of public resources, what a poor handling of a transition towards a more diverse publishing sector, all of which could have been spent on publishing projects but were in fact directed towards wholly avoidable redundancy and legal costs for winding up companies or putting them to sleep, as well as placing additional pressure on the staff of the Books Council itself who suddenly had to implement the consequences of these ill-advised decisions at a time when the Council itself was facing cuts and also would appear to be facing its own staff retention issues.

I look forward to hearing whether the Committee may be interested in taking any of these points on board.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gwen Davies', is centered on a light-colored rectangular background.

Gwen Davies
Editor, New Welsh Review
Publisher, New Welsh Rarebyte book imprint