



**Save Kids' TV**  
**Response to Ofcom Consultation:**  
**PSB Phase 2**

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## Introduction

Save Kids' TV (SKTV) is a coalition of parents, producers, artists, educators and others concerned about screen-based media for children in the UK. This document sets out our response to Ofcom's PSB Phase 2 consultation.

Although we appreciate the fact that this is a review of PSB as a whole, SKTV is concerned that the element of urgency expressed by Ofcom in its 2006 review of children's programming has been excised from the Phase 2 documents, and that the children's issue has been marginalised. It is in therefore in danger of being overshadowed by other issues facing PSB, such as news and nations and regions. We are concerned that this loss of momentum could well lead to a less than satisfactory conclusion: a matter of too little too late.

## Our Response

As regards the specific solutions proposed by Ofcom our responses are as follows:

We acknowledge the importance of plurality of provision, and endorse the view that the BBC should not be a monopoly provider of PSB content for children. We support Ofcom's comments regarding the BBC, but would go further in seeking to protect children's programmes from erosion. We believe that when there is overall pressure on programming budgets, children's programmes become an easy target. We are also concerned about the potential cost implications of the move to Salford, and the potential and unforeseen negative impact this may have on programming budgets, in spite of reassurances to the contrary. We are concerned that without competition the BBC will be encouraged into cutting back children's budgets further so that the available funding can be used to compete more effectively where it is deemed to be needed, such as in the provision of daytime programming for adults, or in prime time where "family programming" might be said to be a suitable alternative to programmes made exclusively for children. Family programmes are not children's programmes. Children deserve content specifically tailored to their needs, and which shows them images of themselves. We therefore urge the BBC Trust to protect children's content budgets and channel air-time through ring-fencing.

In theory, we support Channel 4's aspiration to cater for 10 to 16 year olds as part of a new public service remit, but understand that this is conditional upon securing additional funding. However, we would seek further clarification and assurances from Channel 4 as to what this 'new vision' really is, what proportion of any new funding would be allocated to it, and how comprehensive a service it would provide. In the current economic climate, we express concern about the viability of Channel 4's £10m pilot fund relating to this initiative.

We now understand that S4C is not intending to extend its children's programming to a wider English speaking audience (and is not mandated to do so under the terms of its funding mechanism) although it will continue to version some of its animation. This means that S4C provision will have a negligible impact on the areas of children's provision under threat.

We welcome 5's willingness to make a greater commitment to children's programming by moving from tier 3 regulation to tier 2, and we welcome its proposal to raise its target age range up to 7. However, it is again not clear how comprehensive a service 5 is suggesting, and despite a change in its regulatory status, we are concerned about the intense commercial pressures 5's children's

programmes would be subject to, and what mechanisms would be in place to protect them.

SKTV has a major concern that old models of provision for children are outdated; even if 5 were able to achieve its goals, and Channel 4 was able to start provision for 10 to 16's, there would still be gaps in PSB content for children, leading to a patchwork service.

As regards various funding options, SKTV supports the concept of tax breaks providing that in order to qualify for the breaks, there is a guaranteed broadcast outlet for these programmes.

We believe that the issue of European content laid down in the EU Audiovisual Media Services directive which stipulates that all channels should broadcast 51% indigenous European content 'where practicable', should be re-examined and clarified. 'Where practicable' has never been clearly defined and is open to interpretation. This directive might be a way of ensuring new UK kid's content on the cable and satellite channels but would be counter-productive if it only meant acquisition of existing European animation.

The issue of levies as employed in other parts of Europe on non-terrestrial channels should be investigated, and a certain percentage of the resulting income should then be allocated to children's original production.

We believe that contestable funding should be considered seriously and if it were introduced a sum at least equivalent to the £35 million sum identified by Ofcom's Review of Children's Programming should be ring-fenced for children.

## Conclusion

While we support all of the above ideas, SKTV believes that there needs to be a braver vision and more forward-looking solution to the issues facing children's provision now, before it is too late. We are concerned that "pasting over the cracks" may provide short-term solutions at the expense of long-term considerations and security for specific children's content provision. SKTV calls on Ofcom to recommend solutions which are fit for purpose now and which build for the future; solutions which encourage partnerships between the creative community, broadcasters and educators, which support innovation and experimentation, and which entertain and promote social and cultural values.

We therefore urge Ofcom to support our proposal for a new public service online and broadcast service for children, as outlined in our original submission in December 2007, an excerpt of which is attached to this document as Appendix 1, and which includes a new graphic illustration of the concept.

The new service we propose would address market failure and fill Ofcom's identified gaps in production, as well as providing new and much-needed opportunities for dissemination of new content. That content will include professionally produced programming as well as content produced by users themselves, creating a different relationship between children and media. A centre for research into the children's audience, it will help advance our understanding of what children need and demand from media in the 21<sup>st</sup> century. It will be a fresh response to the innovative and creative ways that today's children engage with media, preparing them and the media industry for the future.

## APPENDIX 1:

### Excerpt from SKTV Response to Ofcom Consultation on the Future of Children's Programming, originally submitted 17<sup>th</sup> December 2007



#### Proposal: A new public service children's online destination

We think a new, public service *online* destination for children is required. This destination would be a beacon, attracting to it high quality content from a rich mix of sources. Such a destination would address a significant market failure because no such mainstream service currently exists – the children's broadcasters' web services are mainly online extensions for their on-air content. Our proposed new online destination will have a strongly public service feel: fun but not exploitative, entertaining but constructive, educative and safe.

Crucially we propose that this service is audience-driven. So, rather than representing adults' views of what children might want to do and see, it will be shaped and produced for and by its audience.

This destination will, like Channel 4 a quarter of a century ago, create a new focal point for public service content, but this time aimed exclusively at children. We suggest that the destination is targeted at 6-15 year-olds with particular emphasis on those in the range 9-15 who are least well served, even by the BBC's output. We propose that the destination focuses on drama, factual content and participative entertainment that actively involves children, and focuses their attention on high quality narrative and constructive entertainment.

Based online, the service will embrace the best of the participative and interactive characteristics of the digital world. At the core of the service will be on-demand, high quality video content blended with a rich mix of dedicated British content, competitions and social networking. All of the destination's content will allow kids to influence it in some way whether through suggesting storylines, commenting on commissioning plans or rating content. To reach the target audience, the service will be available, where possible, through mobile phones as well as broadband internet. The service will be designed to ensure it is always at the cutting edge of what this demanding and savvy group want.

The destination will be publicly owned and in receipt of public funds, and run with a view to generating profit that can be ploughed back into new services. Governance for the destination would ensure that it adhered to a strong set of core values:

- Strongly British in feel and tone
- Mandated to support the British production industry

- Non-exploitative in terms of commercial content or in its dealing with children. The destination will take on a different relationship with advertisers, focusing on corporate social responsibility-led sponsorship rather than just product advertising.
- Strongly informed by the wishes, views and ideas of its audience
- Entertaining but with a greater purpose
- Striving to be innovative and breaking new ground in format, style and ways to involve its audience

We think that such a service would not suffer from a shortage of content. Sources would include:

- New commissions funded by the destination based on innovative cross-platform ideas from across the UK industry
- New ideas self-funded by production companies that they can prove with a large audience and then commercially exploit through other channels
- 3<sup>rd</sup> sector funding to create issues-based content e.g. an interactive series about bullying part-funded by a children's charity
- Content developed by aspiring producers climbing the children's production 'talent ladder' and seeking an audience for their work
- Content created by the audience themselves
- Showcasing the best of British, European and world archive programming

The destination would also support the regeneration of the mainstream production market by forming relationships with commercial children's TV channels to:

- Co-develop broadcast spinoffs to new ideas developed on line
- Cross-promote content and services
- Jointly fund innovative new content

These relationships could be arms-length or, potentially, develop into a close partnership where one or more broadcasters join forces with the new destination. The model could, perhaps, be similar to that of the 'Kangaroo' broadband catch-up service being launched by the BBC, Channel 4 and ITV. Kangaroo shows how enlightened competition between broadcasters sees them cooperating on a venture to create a larger new market than any of them could achieve on their own. We think that a similar model could ensure the success of our proposed destination: broadcasters would benefit from the innovation and exciting content brought to their channels, whilst the destination would benefit from the cross-promotion and commissioning leverage of its partners.

To avoid claims of market distortion, the new destination would, after a suitable window, license its content to others. In the future, commercial and third sector funding might reach the point where state support was no longer required and the destination could be sold to repay its initial funding costs (perhaps with a 'golden share' mechanism to protect its unique characteristics).

## Summary

In summary therefore, SKTV believes that the UK can once again have a blossoming, world-leading children's production sector by being bold and creating a new institution that addresses failure both in the supply and distribution ends of the market. We believe that plurality among distributors is particularly important because those suppliers who do remain will be heavily dependent on their relationships with a small number of commissioners, mainly at the BBC. Ideas for content will inevitably be directed to suit these commissioners' tastes and

preferences and this will act to stifle innovation and drive further consolidation of the supply market.

The service we propose is flexible to allow for reductions in the amount of public money that would need to be spent in future whilst having the desired economic effect on the sector and cultural impact on our children. However, as Ofcom has demonstrated, the experience from other countries is that a certain level of subsidy is probably required on an ongoing basis to maintain a base level of high quality content output.

**Graphic illustration, showing broadcast and online applications of SKTV concept.**

