



Submission
From
The International Broadcasting Trust
to
Ofcom
Concerning
The Future of Children's Television Programming
December 2007

Introduction

This document sets out the response of the International Broadcasting Trust to Ofcom's *The future of children's television* report.

Background: IBT

The International Broadcasting Trust (IBT) is an educational charity which seeks to promote high quality television and new media coverage on matters of international significance. IBT represents a coalition of international charities campaigning for high quality television coverage of 'matters of international significance or interest'.

Its members include: ActionAid, Amnesty International, British Red Cross, CAFOD, Care UK, Christian Aid, Comic Relief, Concern UK, Friends of the Earth, Merlin, Oxfam, Plan UK, Practical Action, Progressio, RSPB, Save the Children, Sightsavers International, Skillshare International, Tearfund, UNA UK, UNICEF UK, VSO, the World Association for Christian Communication and World Vision. The views in this submission reflect the concerns of IBT's member agencies regarding adequate common understanding of the world in which we live. These concerns are shared by millions of UK supporters of our organisations.

IBT is an amalgamation of two former organisations: the former Third World and Environment Broadcasting Project (3WE) and former International Broadcasting Trust (IBT). In the past, 3WE has been active in this area and this submission fully reflects 3WE's long history of campaigning on these issues and arguing that international coverage on television is a necessary tool in informing us all, as global citizens.

Comments on *The Future of Children's Television Programming Report*

1. IBT welcomes this report which has been useful in establishing the facts about children's television at a time when the market is undergoing such fundamental changes. We congratulate Ofcom on the thoroughness of the report and its approach.
2. The research provides a wealth of information on viewing habits, how parents and children regard television and what is happening in children's television elsewhere in the world – all of which which we consider essential in establishing what it is the public wants from children's television and prospects for future delivery.
3. IBT's primary focus and concern is that there should be more content aimed at all age groups in the children's audience which presents images and information about the world outside English-speaking countries. Currently the only notable examples of programming where this is the case are BBC's *Newsround* and the occasional special on *Blue Peter*. We are currently conducting research into the total hours of programming for 2007 which has featured international issues and will be publishing this research in Spring 2008. One element of this research will be how many hours of programming which featured the wider world, outside the UK, was broadcast for children in 2007.
4. In light of the large gap shown in the Ofcom research between parents' expectations and what they think is being delivered, IBT believes public service content for children is an issue which needs urgent consideration by the government in order to maintain current provision and secure provision for the future.
5. IBT holds the view that in order to grow up as fully-developed citizens of the global community, children need information about not only what is going inside the UK but also what is happening internationally, especially outside the English-speaking world.
6. IBT believes that high quality television which provides children with an understanding of the world they live in and broadens their horizons towards the wider world is a basic right. It is vital that as children grow up they have access to entertaining and informative content which provides them with cultural reference points and important foundations of knowledge about the world in general.
7. Some of the benefits of being exposed to engaging images and information about the wider world include promoting understanding of other cultures and religions; creating in children an outward-looking rather than insular view of the world; and helping them understand the impact decisions we make in the UK might have on people in other countries.
8. It is IBT's view that market forces alone will not adequately deliver this type of public service content because broadcasters which currently transmit children's programming in the UK (other than the BBC) are driven by commercial business models which prioritise high returns rather than mixed public service programming which aims to educate as well as entertain.
9. It is our contention that it is not wise for the BBC to dominate the children's PSB television sector in the way that it currently does. A monopoly position is highly likely to lead to a narrowing of perspective and a reduction in the variety of viewpoints presented to child viewers. We agree with the general consensus that plurality and competition leads to a thriving, more imaginative marketplace. Ofcom itself has

acknowledged that public service broadcasting should not be left to the BBC alone, concluding in its last review of public service broadcasting that this would potentially undermine creative competition and restrict the range of views reflected in television programmes.

10. In light of the findings in the Ofcom report, IBT urges that new funding mechanisms should be devised by the government – production incentives or a plural funding mix - in order to support non-BBC provision of public service content for the children’s audience where it has been identified as lacking in the Ofcom report. It is our belief that both producers, broadcasters and platform managers (mobile, VOD, online etc) need support and incentives in order to continue producing public service content for children which is perceived to be of value to the country as a whole but may not be commercially viable.

Policy approaches

Question 2: Of the Policy Approaches suggested by stakeholders, which, if any do you consider the most appropriate to address the conclusions made in this report?

11. IBT proposes a pluralistic policy approach to maintain provision of UK children's television. The options put forward in Section 6 of Ofcom's Discussion Document support a variety of different protagonists which produce/broadcast material for children. Rather than following a single option IBT believes that a combination of approaches is required.
12. In our opinion supporting all these protagonists is important in order to sustain a multi-platform market where supply and demand are balanced. As stated above, it is our belief that broadcasters, platform managers and producers all need support and incentives to produce and broadcast public service content for certain sectors of the children's audience in a highly competitive marketplace.
13. In response to the options suggested by Ofcom we broadly support individual aspects of options 2, 3, 4 and 5, as listed in more detail below.

Option 1: Maintaining the status quo

14. In IBT's opinion, maintaining the status quo is not an option for a number of reasons:
 - i. This is likely to lead to a continuation in the decline of UK-produced material crafted specifically for UK children thus maintaining the status quo will not secure plurality of supply or distribution.
 - ii. Taking the longer-term view, post-Digital-Switchover, a further decline in public service broadcasting for children is likely if the status quo is maintained. While there will be a number of specialist children's channels available on DTT, aside from those provided by the BBC, there is no guarantee that any other programming will fulfil public service broadcasting values. If there is less intervention and market forces increasingly determine the schedules, it is likely that trends seen in the research produced by Ofcom will simply continue, which will mean more imported material and more animation, less UK produced drama and factual.
 - iii. With reference to the BBC: the BBC Trust needs to immediately tighten the BBC's remit in order for it to maintain current levels of UK-originated children's programming which is not guaranteed under its current service licenses. This might include ring-fencing budget as well as transmission hours.

Option 2: Broadcaster Based Interventions

15. IBT supports the concept of a fund dedicated to public service broadcasting which would include funding for children's programming.
 - i. This fund should be available on a competitive basis to all broadcasters (rather than producers) including commercial digital channels, excluding the BBC. In return for the funding broadcasters would be obliged to commission and broadcast new UK-produced original children's programming.
 - ii. IBT proposes this funding should derive from a combination of the lottery and the Government. IBT opposes any top-slicing of the licence fee which should remain reserved for the BBC.
 - iii. In addition we suggest that similar to the analogue system of licensing, public service broadcasters after Digital Switchover should be required to broadcast a quota of children's programming in return for discounted spectrum on DTT or preferential positioning on the EPG.

Option 3: Production Incentives

16. IBT would support the introduction of tax incentives, such as the tax credit system proposed by PACT, especially in the short-term to support the UK independent production sector.
17. IBT notes however that even if there are financial incentives to produce content for children, that broadcasters need an incentive to provide slots for this programming, hence our responses to Option 2.

Option 4: Extending the Remit of existing PSB Institutions

18. BT would welcome the extension of Channel 4's remit to include the provision of children's programming, especially if it provided alternative viewpoints.
19. IBT welcomes ITV's announcement that it will begin commissioning children's programming again in the near future.

Option 5: New Institutions

20. Allowing for a continuation in the trend that children migrate towards specialist television channels and online platforms, IBT would support the provision of children's public service content on a specialist PSB children's television channel or broadband platform in order to provide alternatives to the terrestrial provision post-digital switchover in 2012. We would support the creation of such an institution only as additional to children's programming being available on the mainstream broadcasters.

Question 3: Should there be different policy approaches for different age groups/genres?

21. The Ofcom report demonstrates that the children's audience is fragmented into sectors according to age which have different needs and varied tastes. It also shows that there are sectors of this audience which are being underserved currently in certain genres and others which are being superserved.

22. In light of these findings it is IBT's view that a single policy approach for children's content across all audience groups and genres of programming will not be effective in addressing the current problems in public service provision for children. Any policies proposed will need to be specifically devised to target areas where there is under-provision, such as factual programming and drama for children aged 7-12 and 12-15. This would mean that tax credits, for example, could be available for certain genres aimed at a specific audience where there is an established under-provision of content on a short-term basis to help rectify the problem.

Questions for the Second Public Service Television Broadcasting Review

Question 4: What is the role and importance of UK-originated programming for children?

23. UK-originated children's programmes are only essential, as opposed to acquired foreign programming, as far as they are able to provide content which is presented firmly from a UK perspective, culturally and socially. It is clear that children acquire much of their information about the world and form many of their habitual attitudes from what they see on television. Therefore it is important that they are able to see their own world, hear their own voices and absorb their own indigenous culture as well as seeing material from other cultures and societies.

24. Given the current concerns about childhood, we see children's access to media as a vital component in creating a cohesive society of engaged citizens.

Question 5: What is the role and importance of plurality in the provision of children's programming?

25. IBT believes that plurality of provision is essential. In order to reflect the diversity of British society, children must be exposed to a variety of editorial 'voices' in order to broaden their horizons and provide them with diverse points of view. Equally, competition among providers is healthy because it is generally agreed it encourages innovation as argued above.

Question 6: Should further consideration be given to provision of public service content for children over platforms other than linear television?

26. Yes, but not at the expense of public service content on traditional platforms, as stated above.

Question 7: Does the policy approach for children's programming need to be different from the policy approach taken to public service broadcasting overall?

27. It is our opinion that children's programming does need to be approached differently from other categories of public service broadcasting. This is because children are more vulnerable and their needs and rights, as per the UN Convention on The Rights of The Child, must be represented and protected by adults. Under the current status quo children's provision of public service content is at risk and we believe that content which portrays international issues is virtually non-existent.

28. Our primary recommendation is that that through new funding mechanisms children's needs for educational entertaining content across all media platforms are supported. We believe that action needs to be taken immediately in order to encourage producers of public service content for children to continue making programming and broadcasters are encouraged to commission it.

December 20th 2007