

## **DRAFT Response to The Future of Children's Television Programming**

By NI Advisory Committee

### **On the Findings**

- 1. Do you have any comments on the general analysis and conclusions of the report?**

The analysis and research has been comprehensive. However the analysis is primarily concentrating on trends rather than statistical differences.

### **On the policy approaches by stakeholders (Figure 30)**

- 2. Of the policy approaches suggested by stakeholders, which, if any, do you consider the most appropriate to address the conclusions of this report?**

Pros and cons of proposed approaches:

- Maintain status quo – While this approach would at least ensure continued provision of children's programming, the over dependence on the BBC would significantly reduce plurality of output.
- Broadcaster based interventions – A dedicated fund for children's programming undoubtedly has appeal. Similar funds have been established to fund minority language programming in Scots Gaelic in Scotland and in Irish in Northern Ireland. Funding for children's programming could emanate from a variety of sources including Exchequer funding, ringfenced licence fee money and Lottery funding as suggested. The suggestion to levy the broadcasters to contribute to the fund is unlikely to materialise in reality. If this fund were to be established with government funding, the ideal scenario would see its output broadcast across a variety of distribution outlets at peak viewing times for children. A similar system to the quota system which exists for Out of London productions could be introduced for children's productions.
- Production incentives – Since Ofcom is a light touch regulator, it is doubtful that it is in favour of introducing tax incentives as proposed by PACT. Such interventions should only be undertaken where there has been clear market failure and it does not appear that this is currently the case.
- Extending the remit of existing PSB institutions – This is highly unlikely considering that the Communications Act 2003 changed the requirements for regulation of children's programming in advance of digital switchover. As Ofcom's role is to offer guidance to broadcasters, it would seem to go against the grain for the regulator to be prescriptive in relation to children's programming.
- New institutions - The creation of a new institution would help to protect PSB and provide plurality. However, this is based on the assumption that the BBC continues to show commitment to children's programmes despite the service licence not reflecting

the BBC's current delivery of children's broadcasting and their recent budgetary cuts. The Public Service Publisher has particular appeal given its potential capacity to appeal to children across all media outlets which is important in the light of children's changing habits of media consumption.

- 3. If they are appropriate, should any of the policy approaches be tailored to different age groups (for example to pre-school, younger children, older children and young teenagers), or to different types of children's programming (like drama, factual, entertainment and animation)?**

As regards the various age groups, it is clear from the research that pre-school and younger children are well provided for by both PSB and commercial channels. It is clear from the report that older children and teenagers or kids are most challenging to provide for. This audience segment used to be partly served by the T4 strand on Channel 4 which now focuses on older teenagers.

As regards programme genres, there is plenty of choice from commercial channels for animation. Factual programmes tend to be less costly to produce and therefore are relatively well provided for although it should be noted that the BBC is the main commissioner of factual programming which has implications for diversity. In general, factual programming is less appealing to the PSBs and in particular to the commercial channels to commission since it is less exportable, repeatable and since it does not have the same secondary revenues as animation for example.

There also appears to be a greater need to produce drama and entertainment that is more age and location specific. To achieve this it may be necessary to provide some production incentives since these genres are less economically viable to produce.

#### **On the questions for the second public service television broadcasting review**

- 4. What is the role and importance of UK originated programming for children?**

The role is set out clearly in Figure Three and is of high importance. Most specifically in reflecting our cultural identity and how it is expressed through our heritage, knowledge and interests. It is important that children in the UK see their lives expressed on TV using a variety of regional accents as opposed to being predominantly dependent on seeing their experiences reflected through a prism of Australian and/or American drama series.

- 5. What is the role of plurality in the provision of children's television?**

It provides opportunities to increase UK produced material that is locally relevant to reflect diversity and to encourage different types of programmes for a variety of age groups. As outlined in Ofcom's first review of PSB, plurality of outlets, of commissioning and of production is a central tenet of public service broadcasting and this applies irrespective of the target age group. While Ofcom's second review of PSB proposes to conduct a cost benefit analysis of plurality in the light of impending digital switchover, it should still remain a central tenet of PSB. Beyond PSB and specifically the BBC, it is important that children's television should be produced and broadcast by a variety of sources.

- 6. Should further consideration be given to provision of public**

**service content for children over platforms other than linear television?**

**No.** There is a need to focus on and establish the position of PSB provision on linear television, but perhaps begin in parallel to investigate the shape and direction of the PSB provision for children on these other platforms

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

**No.** Children's programming should fall within the overall policy approach to PSB.