

Introduction

This document sets out the Save Kids' TV (SKTV) response to Ofcom's "The future of children's television programming" consultation.

Save Kids' TV is a coalition of parents, producers, artists, educators and others concerned about screen-based media for children in the UK. In formulating our response to Ofcom we have consulted widely with our membership and other key stakeholders to ensure we provide a balanced and pragmatic response to the significant problems that face the children's production industry.

We would like to congratulate Ofcom on a thoughtful and timely consultation. The supporting documentation provides a wealth of information on how the children's television sector has gone from being one of the creative powerhouses of the UK's TV industry to crisis in just a few years. We hope the consultation will be a trigger for concerted effort to regenerate a key segment of one of our most important creative industries.

Our response

If it were not already clear, the evidence set out in the Ofcom consultation details the severe challenges faced by children's TV production. A combination of relaxed PSB requirements, commercial pressures, regulatory change and massive structural changes in the way that children use media have all played their part in a rapid reduction in the amount of original British commissioning taking place. We agree with the views expressed by others in the consultation that a strong children's content industry is important not only as a key plank of our cultural heritage, but because thriving creative industries are already a vital part of our economy and will only become more important as we move forward.

SKTV believes that good content for children is nothing less than a cultural entitlement that is part of the social fabric of British life. As children growing up in the UK, TV gave us shared reference points with kids from other backgrounds and contributed to our values and knowledge. You only have to listen to today's children to hear them picking up the American values of characters in *The Suite Life of Zack and Cody* and aspiring to join the cast of *High School Musical*. Even successful home-grown shows are under pressure to be so highly internationalised that only the British accents ground them in the UK.

Our view is that any intervention should be focused on addressing market failure and building, where possible, sustainable markets going forward. Our aim is for intervention to pump-prime a thriving new market in children's content that can, in time, be largely self-sufficient. However, we also strongly believe that there will never be a purely commercial market for the sort of innovative, risk-taking content that many people feel should be part of a balanced mix which entertains, educates and supports children. Our proposals are designed to create structures that will provide flexible long-term support for the children's content industry.

Whilst this consultation focuses on 'children's television programming', we believe that it needs to take a wider perspective on children's media content as a whole. We think this is important because:

- It is clear that media consumption habits amongst children are changing rapidly and that they increasingly don't see TV as a special medium, but

rather as one point on a continuum of education, communication and information outlets that they move between freely.

- Children's broadcasters are (with the exception of the BBC) driven by the way their current business model works and will inevitably take fewer risks with new content or content that is not primarily destined for the TV screen.

For these reasons, we think it is important *not* to look at this issue as being just a TV problem but consider a wider set of remedies that complement existing broadcast channels rather than add additional constraints onto them.

Our Proposal

In this section we set out what we believe Ofcom and the Government should do to address the issues so clearly set out in the consultation document. In Appendix 1 we have set out our views on the options in Section 6 of the consultation document. We have responded to Ofcom's additional questions in Appendix 2.

At a time when the essence of Britishness itself is being debated and promoted to achieve a more cohesive society, it is vital that our children have access to high quality, entertaining and informative UK content that will form cultural reference points for them in the future in the way that Dr Who and the Daleks, or The Clangers do for millions of adults today.

Market forces alone will not deliver this because current business models simply don't support the sort of high quality content required. We also believe that it is not healthy from a commercial or cultural perspective for the BBC to monopolise the commissioning of high quality UK content. A monopoly position will inevitably lead to a reduction in risk-taking, a narrower perspective on what makes good TV for children and a reduction in the number of companies generating ideas and making content in the sector.

To survive, the children's production sector needs to be at the forefront of working across multiple channels. For instance we would like to see much more innovation in entertainment, information and drama formats that blend internet concepts like social networks and user-generated content with some of the production values and craft skills that have made our TV the envy of the world.

There are some examples of the sort of innovation we have in mind: *Kate Modern* on Bebo is redefining the boundaries of drama and creating an ongoing experience in which the viewer participates to solve puzzles and even be part of the show. Set in Britain and aimed at teenagers, the show's episodes have received more than 25 millions views in the 3 months to the end of November 2007. *Kate Modern* is funded by product placement and has been commissioned by Bebo precisely because of the power of compelling narrative to engage its audience over long periods of time.

However, examples of genuinely new approaches to children's content like *Kate Modern* are few and far between. It is notable that almost all of the innovation is coming from the web sector because it has no established conventions, regulations or business models to protect and needs to create new ideas that suit the medium's constraints. It is for this reason that SKTV believes that intervention in Broadcast TV is not the future for indigenous production. In a market where afternoon repeats of *Rising Damp* can deliver more revenue than children's programming, broadcast TV is clearly not going to be the engine for renewal of the children's creative sector.

Similarly, whilst another children's public service broadcaster would be welcome, we think that our proposal below has the ability to improve the mix of content across all the existing children's broadcast channels because it will help bring new, British programmes to the fore.

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
- 3rd 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.

We would welcome an opportunity to discuss our ideas with Ofcom.

Appendix 1

This appendix details our views on the options put forward in section 6 of Ofcom's consultation document. Our proposal as set out above effectively support options 3 and 5 below.

Option	SKTV Response
1. Maintain status quo	<p>The status quo is continuing decline. Our view is that this is not an option for the reasons identified by Ofcom: it will not secure plurality of supply or distribution.</p> <p>In terms of tightening the BBC's remit for children, the trust should consider ring fencing budget as well as hours.</p>
2. Broadcaster-based interventions	<p>Our view is that the future will not be led solely by broadcasters. The ideas for cutting edge content will come from producers, and online and truly cross-platform services. On this basis funding via broadcasters reduces some immediate financial pressures for producers but won't encourage the innovation that will allow a self-sustaining industry to emerge.</p>
3. Production incentives	<p>We would support tax credits as a potential short term solution to the problem. However it will be important that there is both a demand and a window for the content.</p>
4. Extending the remit of existing PSB institutions	<p>We think that it is important to at least secure the existing commitments of the PSBs. We would support any new initiatives from Channel 4 to extend their commitment. We see C4 as a natural provider of challenging and innovative content for older children.</p> <p>The PSBs' online services for children are little more than promotional extensions of their broadcast offerings - we would like to see the PSBs encouraged to innovate and develop more content specifically for this medium.</p>
5. New institutions	<p>This is the core area in which, we believe, action needs to be taken. Existing institutions have created the market failure that is the basis for this consultation and they cannot, on their own, be expected to resolve matters in the interest of our cultural heritage and children's creative industry.</p> <p>We propose a dedicated online destination for 6-15 years olds. In this our proposal differs significantly from Ofcom's PSP plans which propose a body that commissions content and distributes it through a wide variety of third party outlets. In the children's market, the root of the problem is that, outside the BBC, suitable outlets for innovative PSB content don't currently exist. Our proposal seeks to address these market failures. It envisages partnerships with brand holders, and stake holders in civil society.</p>

Appendix 2 - Response to Questions for Discussion

On the findings

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

We believe the findings in the report are valuable, although some of the situations are already out of date e.g. the position of the BBC. The findings clearly support the concerns SKTV has been voicing since its formation in 2006.

On the policy approaches suggested 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 made in this report?

Our main response sets out our preferred options. Appendix 1 sets out our specific comments on the options suggested by others.

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)?

While our concern is for all age groups including pre-school and teenagers, our proposal particularly targets children aged 6 – 15. We support a multiplicity of genres but consider drama and factual to be under the greatest threat.

On the questions for the second public service television broadcasting review

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

UK-originated children's programmes should be part of the cultural and social educational structure in which our children grow up. It is clear from the research that children acquire much of their information and attitudes from TV and therefore it is important that they are able to see their own world, hear their own voices and imbibe their own indigenous culture. Media is a common thread that runs through all children's lives. It has the power to transform. 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.

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

Plurality of provision is essential. To reflect the diversity of British children, there must be a variety of editorial outlets responsible for content in order to open children's minds and widen their perspectives. Equally, competition among providers is healthy because it encourages innovation.

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

Yes, see our main response.

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

Yes. Children are a special case, they are a vulnerable group, have no political voice and their needs and rights, as per the UN Convention on The Rights of The Child, must be protected by responsible adults. The current structure of PSBs ensures that children's provision will always be at risk. Our proposal ensures they have a dedicated, funded organisation whose sole purpose is to champion their media needs.