

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

The UK Film Council believes that the provision of high-quality children's television content is important in stimulating and enriching the collective imagination and the cultural life of the UK's children and young people. Programming which reflects both the contemporary culture and heritage of the UK in its diversity is as important in this genre, as it is in a number of other key genres, as recognised, for example, in Clause 264 of the Communications Act. Equally, we do not believe that the production of such programming should be left to the BBC alone since plurality of provision helps to ensure that children and young people have access to a variety of different perspectives which reflect the diversity of the world around them.

Ofcom's principal document, The Future of Children's Television Programming, contains no analysis of the situation regarding children's films; this is a serious omission and needs to be rectified in the course of Ofcom's forthcoming PSB Review. We note that in Ofcom's Research Report however that the analysis of the top-performing Children's Programmes at Figures 96 and 108, the films which appear are all US titles: Bruce Almighty, Pirates of the Caribbean, Cheetah Girls 2 and High School Musical Singalong. It is also apparent from the analysis at p.78 of the Annex D - Deliberative Research by Opinion Leader Research - that to the extent that films for children are shown on television during the hours 2pm-6pm that they tend to originate from the United States. Ofcom's PSB Review needs to specifically address this imbalance in the supply of British films during these hours and to consider ways in which it might be addressed. We would note that while culturally British films, made by US companies, such as the Harry Potter series make a very important contribution in stimulating the imagination of children and young people when they are shown on television, it is important that young audiences are exposed to a variety of different storytelling techniques and perspectives upon the world, well beyond mainstream culture.

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?:

We do not believe that the status quo, leaving provision to the BBC, is desirable. We consider that broadcaster-based interventions, including a dedicated fund or output quotas are worth exploring in more detail, and are likely to have the most impact since they would build on the existing regulatory framework for public service broadcasters, although we recognise that there may be practical problems with enforcing quotas in a digital age; any sustainable solution will need to go with the grain of the market. The case for production incentives in the form of tax credits for such programming appears to us weak since the costs of production for children's original television content are relatively low. The problem is the reluctance of broadcasters to air such original programming and thereby to create a market for it.

Question 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 stated in response to Question 1, we believe that Ofcom should undertake a specific analysis of issues relating to the under-provision of UK films within certain scheduling slots.

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

See answer to Question 1.

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

See answer to Question 1.

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

We believe that this issue needs to be considered in the broader context of analysing whether there is a need for provision of public service content as a whole across platforms other than linear television. We are aware that this broader issue will be considered as part of Ofcom's PSB Review.

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

We believe that there are specific issues around the plurality of provision of children's programming as identified by Ofcom's analysis, and that these merit specific attention.

Additional comments:

The UK Film Council is the Government-backed agency for film in the UK ensuring that the economic, cultural and educational aspects of British film are represented effectively at home and abroad.

Our goal is to help make the UK a global hub for film in the digital age, with the world's most imaginative, diverse and vibrant film culture, underpinned by a flourishing, competitive film industry.

The UK Film Council welcomes the opportunity to comment on questions set out by Ofcom in relation to its documents on the Future of Children's Television Programming. We note that this is not a formal consultation.

We recognise the importance of a diversity of high-quality audiovisual content being available to children and young people; for example, the UK Film Council's Premiere Fund has co-funded films directly aimed at children and young people including for example, *Five Children and It* (2004) and *Stormbreaker* (2006). We also recognise the importance of children and young people being specifically involved in creating audiovisual material. For example, we fund *First Light*, an initiative whose objective is to create opportunities for children and young people of school age to make short films which reflect the diversity of their lives.