



**The Children's Media
FOUNDATION**

Ofcom consultation on the Draft Operating Licence for the BBC's UK Public Services.

Submission from the Children's Media Foundation (July 17th 2017)

1. The purpose of the Children's Media Foundation (CMF) is to advocate for the best possible range and quality of services for UK children and young people. This response is therefore on the terms of the Draft Operating Licence as they effect the BBC's Children's services
2. The CMF agrees with the general proposals as laid out in the draft document. We particularly welcome the stress on the requirement for distinctiveness; e.g. (para.1.16.3)... "Its services should be distinctive from those provided elsewhere and should take creative risks, even if not all succeed, in order to develop fresh approaches and distinctive content."
3. However, we feel requirements for diversity and distinctiveness are very much open to interpretation and will require careful monitoring. To this end we would suggest that Ofcom uses its regular research amongst families to assess parents' and children's sense of the extent to which programmes are innovative, challenging and distinctive.
4. We applaud the requirement to serve older children (para.1.24.3) '...ensure it serves children of all ages, including older children and teenagers and that it provides stimulating content for informal learning which is available in formats and on the services children use.' UK public service provision for young people between the ages of 13 and 16 is currently inadequate.
5. The CMF considers that the programming quotas, as outlined in in the three public purposes, are reasonable.
6. We particularly welcome the introduction of quotas on original first run UK originations (400 hours for CBBC and 100 hours for CBeebies).
7. However, we wonder whether this quota should have been more ambitious - in the context of Ofcom's well-documented history of the steady decline of original UK content for children on all public service channels including the BBC over the last ten years. (BBC spend on first run UK originations fell from £110m in 2004 to £84m in 2014, while commissioned hours declined from 1,332 to 579 in the same period.)
8. The increase in the quota for drama on CBBC (from 665 hours to 1000 hours a year) and factual (from 550 to 675 hours) is also a step in the right direction. But since these quotas include repeats and acquisitions, there remains a concern that they may not significantly stimulate a diverse range of programming from across the UK dealing with uniquely British topics.
9. We would also like to see a requirement to ensure completely new titles as well as new episodes of continuing series – when considering original first run content.
10. We appreciate that it is not in Ofcom's remit to "set service strategies or budgets". But the BBC's recent announcement concerning its £34m increased investment in both linear and digital services and its welcome announcement of providing new services for 13 to 16 year olds (as is required under the draft licence) – again bring into question whether the proposed quotas go far enough.
11. In particular there is concern in the industry that the recently announced increases will only be marginally directed at programme content. This also concerns the CMF as an

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audience-focused body. We need a healthy, pluralistic children's media production sector, working with additional programming money, to ensure the audience enjoys greater choice, range and quality of originated content.

- 12.** The revelation in the BBC's recent announcement that BBC Children's will focus on "fewer and bigger" programmes, as part of the strategy to compete against VoD rivals such as Netflix and Amazon, is also of concern. It indicates that over the three-year period the BBC will spend less on conventional content for the 2- 10 year old audience. Fewer series suggests a budget cut.
- 13.** At the same time there is concern that the budget for the additional digital content, especially that aimed at the older audience, will be significantly eroded by the need to develop the technical infrastructure to deliver the new signed-on VoD service for children and young people.
- 14.** In general there is a fear that most of the £34m will be spent on platforms rather than programmes or content.
- 15.** With this in mind we would propose Ofcom should re-examine the levels of the quotas and add one for content for 13 to 16 year olds, and that quotas should contain reference to short and long form programming and the cost per hour. While this content will be delivered online, it is still necessary that it have targets and is monitored.
- 16.** CMF looks forward to further discussion with Ofcom over these points

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The Children's Media Foundation 17.7.17

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