

Response by Professor Jeanette Steemers
Department of Culture, Media and Creative Industries (CMCI)
King's College London

**To the Ofcom Consultation on holding the BBC to account for the delivery of its mission
and public purposes**
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This response on holding the BBC to account for the delivery of its mission and public purposes is focused on the BBC's Children's services. I am an academic with a longstanding research interest in the children's television industry. I have an industry background, having worked as research manager for HIT Entertainment (*Bob the Builder, Thomas and Friends*). I am author of *Creating Preschool Television* (Palgrave) and numerous articles on the children's television industry both in the UK and overseas. As a contribution to BBC Charter Review, I wrote the report *Policy Solutions and International Perspectives on the Funding of Public Service Media Content for Children: A Report for Stakeholders* (May 2016 <https://goo.gl/aYxhFP>). This submission draws on my knowledge of children's television, public service broadcasting and developments in children's screen industries. As a Board member of the Children's Media Foundation and a Trustee of the Voice of the Listener and Viewer I endorse the submissions of both these organisations. However, this submission represents my personal views on the Ofcom consultation document.

The BBC's commitment to UK children is hugely important and beneficial. As the BBC prioritises its strategy for serving future generations of children, the decisions it makes now really matter. If children do not grow up with the BBC, they are unlikely to support it in future, so evolving approaches to public service children's content and services are existential. In making this response I also refer to the BBC Annual Plan.

Ofcom's approach to holding the BBC to account for its performance through a single operating licence based on the fulfilment of the BBC's public purposes is largely appropriate with regard to children's content and services. Ofcom's undertaking to adjust the licence in line with changes in tastes and consumption is particularly relevant to children whose media consumption habits are diverging from older audiences, and which need to be kept under review if the BBC is to meet its obligations to children in future. First-run origination quotas for CBeebies and CBBC and transmission quotas for news, drama and factual programming on CBBC are confined to linear broadcasting channels. These quotas need to be kept under review, especially if the BBC shifts resources and commissioning to on demand, online platforms.

Although Ofcom will not be reviewing children's services and content as the BBC Trust did in 2009 and 2013, it is appropriate that Ofcom will still be able to look at the delivery of BBC children's services on an ad hoc basis, taking account of the broader context of children's content production and delivery in the UK. To promote the overall health of UK children's content originations, it would also be helpful if annual reviews and any ad hoc investigations are aligned with Ofcom's new responsibility for administering children's content quotas on commercial PSBs in line with the Digital Economy Act.

Annual quotas on first-run origination for CBBC (400 hours) and CBeebies (100 hours) have budgetary consequences that will need to be closely monitored to ensure adequate financial resourcing. Although it is not the job of Ofcom to specify BBC budgets, analysis of BBC spend on first run-originations will be crucial in determining the Corporation's commitment to the production of high quality content in line with Purpose 2 and Purpose 3 of the Charter. If the performance measures reveal inadequacies, for example in funding to ensure quality, what variations could be made to the licence?

The BBC has recently announced an additional £34m investment in children's services over three years from 2017/18 until 2019/20.¹ It estimates that it will be spending £31.4m 'online' by 2019/20 out of a total children's budget of £124.4m by this year. However, the promise to use the additional money to fund online offerings with 'new forms of content and interactivity' and personalised offerings looks somewhat out of sync with the draft licence's emphasis on production and transmission quotas that are aligned to the broadcast channels of CBBC and CBeebies. The BBC does need to invest in online delivery and online-specific content to keep up with its audience and match its commercial rivals with high quality, distinctive content. However, the licence does not specify any targets for online delivery of children's content, or expectations apart from 'content which supports children and teenagers in their formal learning in all parts of the UK' (2.30) and the objective that it produces 'engaging and stimulating content for informal learning' 'in the formats and on the services that children use' (1.24.3). As online expenditure and content become a larger part of what the BBC provides for children, Ofcom should also be mindful that the Corporation delivers on distinctiveness, innovation, quality and diversity across new formats for online delivery as well as hours of long-form content on broadcast channels.

Annual quotas on first-run UK originations are welcome as a measure to halt the decline in spend and output in children's programming, and are in line with what the BBC has been commissioning in recent years, in spite of falls in previous years.² They will halt further decline. Origination quotas on their own, however, are not sufficient to deliver distinctiveness and quality. Public Purpose 3 places an emphasis on distinctiveness, asserting that the BBC should be taking 'creative risks, even if not all succeed'. If as the BBC asserts, it will be concentrating on 'a smaller number of stand-out titles for which we will commission TV series and high-quality brand extensions across all platforms'³ it will be important to know whether it is commissioning new titles or mainly concentrating on titles which it has commissioned before. This suggests that performance measurement by Ofcom should also pay close attention to new commissions across all platforms and also to the types and range of production companies used by the BBC to ensure innovation from a range of different suppliers. It is important that the BBC continues to take creative risks with new content that engages child audiences.

The requirement in 1.24.3 of the licence that the BBC should 'ensure that it serves children of all ages, including older children and teenagers' producing 'engaging and stimulating

¹ *BBC announces biggest investment in children's content and services for a generation* Press Release, 4 July 2017.

² BBC spend on first run UK originations (2014) prices fell from £110m in 2004 to £84m in 2014. Commissioned hours declined from 1,332 in 2004 to 579 in 2014. Ofcom *Public Service Broadcasting in the Internet Age, Data Annex*, 2 July 2015, p. 13.

³ BBC Annual Plan 2017, p. 11

content for informal learning which is available in the formats and on the services that children use' is welcome as older children are underserved by all PSBs in the UK. However, the BBC currently only serves children under 12 through CBeebies and CBBC ('a mixed-schedule channel for pre-teen children'). The BBC's promise to cater more to young teenage audiences, including through extended CBBC hours from 7-9pm is welcome.⁴ What is missing in the licence is the specific age range which defines 'older children and teenagers', and any quotas for first run UK-originated content aimed at older children, which might be used to measure BBC performance.

The time allocated to transmissions of drama (from 665 hours to 1000 hours a year) and factual (from 550 to 675 hours) including repeats and acquisitions on CBBC is greater than the transmission quotas from the BBC Trust's Service Licence for CBBC. The draft licence does not specify whether these hours should be UK originations or whether they are simply subject to the 72% quota on original productions (UK and European content). There is a small risk that additional hours for drama and factual programming might be acquired from cheaper overseas sources (North America) to meet the quota unless specified. Although the increase in volume is welcome, it should also be made clear that these additional transmission hours (including repeats) should not only satisfy criteria for distinctive high quality content, but also reflect and represent the diversity of the UK's nations and regions.

Any assessment by Ofcom of the BBC's children's content and services should adequately engage with the views of children and their parents through a variety of methods if Ofcom is now responsible for representing the audience's interests in the BBC. Children's voices as future licence fee payers also need to be consulted and clearly heard. Although Ofcom expects its proposals, for example on factual and drama programming on CBBC and first run originations, to have a positive impact on parents, carers and children, the ways in which it expects to measure this impact and allow public feedback need to be very clearly articulated and acted upon, so that future debates and decisions are not dominated by industry stakeholders.

⁴ BBC Annual Plan, p. 11