

Dear Clair,

Re: Ofcom's review of children's content

Thank you for the opportunity to contribute to the review of children's content. As you rightly point out children's viewing and consumption habits are changing both in terms of their source and their content genre, and we welcome Ofcom's commitment and approach to understand this issue more deeply in light of new powers in the Digital Economy Act.

Mediawatch-UK is an independent organisation that works for a safer media, in particular with regard to protecting children, and developing media literacy skills among children and families. Our submission to the review is based on both our analysis of the current and emerging media landscape and anecdotal observations from frontline outreach with parents and school. Our response is shaped around the three themes of the consultation.

Audience behaviours and attitudes

It is clear that a critical barrier to accurately understanding the market of children's content and behaviour is that it includes providers and channels that lie outside Ofcom's remit, or where not enough is known about their expenditure on children's content. We would encourage Ofcom to use its relationship and influence with government to press for greater cooperation from key players e.g. Youtube to better understand behaviours and attitudes. Such cooperation and sharing could potentially form part of the transparency measures or code of practice for social media companies proposed in the government's Internet Safety Strategy.

We see and hear from parents that they value the PSB channels for their age-appropriate themes, educational and informative aspects, as well as their entertainment appeal. Moreover, PSB channels offer assurances about material shown before the watershed that parents appreciate, especially given that your research points to TV viewing as an important family activity, with children drawn to content not specifically aimed at them. However, the reality is that with children accessing or owning mobile devices from an increasingly earlier age, turning to other sources of content, particularly those designed for such, is inevitable. Parents also value the choice and accessibility presented by other platforms, yet also express concerns about the lack of clear and effective safeguards from inappropriate content, and at times the poor quality of content.

The availability of children's content

We observe that as children get older they increasingly turn away from children's content on PSB channels, preferring content found on Youtube, online streaming services and pay TV. Reasons observed anecdotally for this include more choice, with children able to search for videos (Youtube) that reflect their personal hobbies and interests, or humour, and content more appealing to their age group especially dramas. However, factual programmes on PSB channels can often still be attractive and stand out in the overall range of content.

Incentive and disincentives to produce children's content

We wholeheartedly support efforts and incentives to encourage greater investment in PSB children's content. Mediawatch-UK believes it is vital to have a robust PSB offering in the children's market firstly, to ensure that there remains a wide variety and high standard of programming which is free to access. Secondly, so that the standards and characteristics of PSB serve as a benchmark for non-PSB channels and platforms. We welcome the recent announcement from the government of a £60 million pound fund to assist the development of children's content.

I wish you every success as you consider the contributions to the review. Please do not hesitate to get in touch if Mediawatch-UK can be of further assistance.

Yours sincerely,

Helen Lewington
Director
Mediawatch-UK