

Public Media Alliance submission to Ofcom Children's Content Review 2018

The PMA is the largest global association of public broadcasters. The organisation's core remit is to provide support and advocacy for public media worldwide. The PMA has UK, as well as international, members and is run by a UK based Secretariat. PMA's website describes in more detail the mission and work of the organisation. <https://www.publicmediaalliance.org/>

Following many years of work with and feedback from its members, PMA has identified that high quality, original, relevant and appropriate content for children and young people is a central pillar of public media.

PMA's international network means that the organisation has a unique global overview of the public media landscape. The BBC was the first public service broadcaster and the UK is still viewed as a global leader in terms of ideas and innovation in public broadcasting. Many other countries look to the UK for input and direction in this area and the UK is well positioned to provide global leadership in public media as public broadcasting evolves to become multiplatform public media worldwide.

In terms of regulation, Ofcom's remit under the Communications Act 2003, in particular Ofcom's duty when reviewing the fulfilment of PSB purposes, to have regard to the desirability that PSB services *'(taken together) include what appears to OFCOM to be a suitable quantity and range of high quality and original programmes for children and young people'*, sets an important standard in the UK and beyond.

PMA's submission to Ofcom regarding the Children's Content Review has the aim of further informing Ofcom's approach to the new power provided in the Digital Economy Act 2017.

Our submission is drawn on our UK and international experience and has been framed as responses to some but not all, of the specific consultation questions:

With reference to audience behaviours and preferences, [questions 1-5] our overall response is that there is currently a substantial research deficit in this area. We now live in a multiplatform world and it is essential that more research is available not only into which devices and/or streaming services are used by children and young people in the UK but also research is required as to the nature of content available and viewed by children and young people on those devices/streaming services.

Our view is substantiated by Professor Sonia Livingstone, [\[http://eprints.lse.ac.uk/69944/1/Livingston_Measurement%20matters.pdf\]](http://eprints.lse.ac.uk/69944/1/Livingston_Measurement%20matters.pdf) P.10 Livingstone, Sonia & Local, Claire (2017). Measurement matters: difficulties in defining and measuring children's television viewing in changing media landscape], who believes, 'it is imperative to generate more and better research on children's consumption of content so that we are able to understand the role of public service media for children today, anticipate future trends and, importantly, seek to shape these in children's best interests'.

In summary, when planning policies and regulation it is essential for Ofcom to commission research on what children are actually watching on various devices, in order for Ofcom to administrate better content quotas and assess the different roles broadcasters, in particular public broadcasters, play in children's lives.

Ofcom data shows that in 2016, the UK PSB channels spent £95m on networked children's programming (first-run UK-originated, repeats and acquisitions) and commercial children's channels that broadcast to the UK spent £41m.⁷⁷ This represents a 25% reduction in real terms in spend by the PSB channels between 2009 and 2016, while there was a 39% real terms reduction in spend by commercial channels over the same period.

Investment in children's content by all public service broadcasters in the UK should be increased. Media plurality has been proven to be beneficial for innovation and although at present the BBC alone produces content across all genres of children's content, including news and factual, the PMA proposes that other UK broadcasters licensed for public service should also be mandated to produce news and factual content in order to increase plurality.

Availability of children's content

Q 6) Are there specific genres within children's content (on any platform) where demand or audience need is not currently matched by supply from PSBs, commercial channels, or on-demand and streaming services, or a combination of the former? What supports your view on this?

Ofcom states that public broadcasters should produce TV content that actually represents children's lives and where they can see themselves represented. Research data from Ofcom [Ofcom 2-17 Children and Parents: media use and attitudes report. Section 8.] demonstrates that currently, 'only half say there are enough programmes that show children who look like them (52% and 50%) and less than half (48% and 45%) say there are enough programmes that show children who live in the same part of the country as them. The research also found that a sizeable minority of 8-11s and 12-15s say that there are not enough programmes across each of these latter two areas.

In the UK public broadcasters are still well trusted by both parents and children. This means that public broadcasters also have the opportunity to engage children and young people in important topics and current issues, striking a balance between education and entertainment.

According to the new study conducted by the research company Childwise, www.childwise.co.uk/ one in three children aged 9-16 say that conflicts in the world, such as war and terrorism, are the thing that worries them the most. However, most of the children in this age group tend to get their information from friends, family, or social media.

In light of these concerns, the current issue of 'fake' news, and parental concerns about inappropriate online material, public broadcasters have a great opportunity as well as a duty to ensure that children are kept well informed and provided with timely and accurate information without any alarmism or sensationalism. Given the high level of trust held in UK Psb's by families and children, public broadcasters should be supported and encouraged to develop new programmes, including news, factual and drama programmes, specifically targeted at children and where children are represented but also participate.

Q 7) What is the role and importance of first-run UK-originated programming for audiences? For broadcasters? Does this vary by sub-genres or by age group?

An increase in first-run UK originated programming across all genres is critical for UK children and young people to be able to see themselves and their own lives represented and reflected in content. As discussed above, Ofcom's own research, [Ofcom 2-17 Children and Parents: media use and attitudes report. Section 8.] , has demonstrated that there is a deficit in this area.

With the increased globalisation of media markets and the domination of US and Far Eastern content production for children there is a significant risk that the financial obstacles to UK children's content production will mean that children in the UK are increasingly watching imported content. This will inevitably have a further impact on the representation of UK children in the content that is available to them and their ability to identify with it.

English is one of the world's most widely spoken languages and this combined with the strong, established reputation of UK content means that there is currently a wide non UK market for UK content. Further investment in UK children's content production will create further opportunities to develop the UK creative economy in terms of international sales.

Incentives and disincentives to produce children's content

Q 8) How are on-demand and streaming services changing the nature of competition in children's content? Is this impacting on the range or quality of content available to UK audiences?

The increasing predominance of On-demand and streaming services are impacting the range of content available to UK audiences as content is becoming more fragmented. Such content is also unregulated which poses real questions, especially for children's content, in terms of security, suitability and quality.

It should be noted that even if children's viewing on a TV set is declining (2017,Ofcom PSB report), this does not necessarily mean that children do not watch or engage with PSB content on other devices or via alternative platforms such as YouTube. The PMA is providing support and advocacy for public broadcasters worldwide to ensure that the core values of public broadcasting are carried forward as broadcasters evolve into multiplatform public media organisation. As children are increasingly watching content on a variety of devices, it is crucial that UK public broadcasters are supported to develop and produce content for multiple-platforms.

UK broadcast content is also of high quality because it is produced for broadcast and therefore subjected to UK regulatory policy. This may well enhance the domestic and international resale value of UK children's content for commercial channels and for streaming services

Q 11) Are there other incentives and disincentives you think we should consider as part of the review?

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International co-productions [such as Open a Door by UK production company Ragdoll] have been viewed in the global industry as a cost effective way of increasing content for children that demonstrates global diversity alongside providing a sense of place and context. Each country produces and pays for one episode but all episodes are available to all participating broadcasters.

In 2007 Australia introduced a Screen Production Incentive (ASPI) that enabled applicants to spend over \$8 billion in qualifying Australian production expenditure and received over \$1.9 billion in support. As a result overall production of children's content such as feature films, TV dramas and documentaries increased significantly, and also attracted foreign investment. <https://www.communications.gov.au/sites/g/files/net301/f/consultation/pdf/australian-and-childrens-screen-content-review-consultation-paper.docx.pdf> This Australian example may prove useful in terms of the UK Government's recommendation that the Contestable Fund pilot should focus on provision for children.

In conclusion:

- The BBC dominates children's production in the UK but there is still clearly a failure in the market regarding provision of certain genres and for certain age groups. Children do not feel represented in many programmes they watch.
- It is essential for Ofcom to devise measures that capture the nature and type of content viewed across different devices and platforms, not only the time spent consuming content. Only after gathering this kind of data can we then start talking about whether or not children are moving away from established TV channels to other kind of brands/content.
- It would also be relevant to ask why children decide to engage with certain types of content instead of others, rather than just noting the lack of engagement.
- In terms of administering and implementing quotas for UK children's content production there needs to be increased flexibility in terms of recognising that children now consume content in a multiplatform environment.