

British Film Institute: response to Ofcom

BBC Children's news and first-run

UK originated programmes

December 2019



About the BFI

At the BFI we support, nurture and promote the art of film, television and the moving image. A charity funded by Government and earned income and governed by Royal Charter, the BFI is also a distributor of National Lottery funds. We serve as lead body for the UK's fast growing screen industries, protecting the past and shaping their future across the UK.

The BFI administers the Young Audiences Content Fund on behalf of UK government. It aims to stimulate plurality of content for audiences up to the age of 18 by providing industry with £57m of grant-in-aid for the creation of distinctive, high-quality content. The fund makes production awards for original programming which has secured a written commitment from a broadcaster to make the programme available on a free-to-access, Ofcom-regulated service to a UK-wide audience. It also provides development awards for projects without a broadcaster. The Young Audiences Content Fund is a three-year pilot running until 2021.

Question 1: Do you agree with Ofcom's provisional assessment and its proposed changes to the Operating Licence for Children's news on CBBC?

The BFI believes the BBC should provide further detail on a range of topics before any change is made to the Operating License. This will help ensure it continues to deliver its public service remit to children as effectively as possible. These topics are set out below.

Providing children with choice

Providing impartial news and information to help all audiences to engage with the world around them is at the centre of the BBC's public service remit. It is therefore essential that the BBC continues to produce news content for children and young people. It is a cornerstone of the BBC's offer to this demographic.

Both ending afternoon broadcasts of Newsround and reducing originations would decrease audience choice in terms of linear programming. This is at a time when Government, Ofcom and industry recognise a need for greater plurality in children's public service broadcast landscape media. The Young Audiences Content Fund administered by the BFI was established in order to achieve this plurality by

stimulating production of a rich variety of children’s programming; reducing the BBC’s own output would run counter to its objective in terms of linear content.¹

This reduction in originations would come at a time when other public service broadcasters are working to retain linear audiences by expanding their offer for children, including news programming. The Young Audiences Content Fund announced a number of broadcast news programmes as part of its first slate in November 2019, including an *FYI Specials* documentary series, a set of *I Don’t Get It* explainers and seven *Kidversations* short films that will air on Sky News and be available in classrooms through First News. ITN has also received development funding to work on a current affairs series.

The BBC should provide greater detail on the range of content it intends to provide via online services before any change to the Operating License is granted, demonstrating how it will mitigate a reduction in choice for children as effectively as possible. Reporting on estimated and actual cost of production for this content as well as any projected savings would also be welcome – enabling assessment of efficiencies against quality of service.

Supporting access and engagement with news content

The BFI believes that Newsround’s current broadcast bulletin format offers intrinsic benefit to children. By offering a pre-selected mix of stories chosen by expert editors, each bulletin ensures that children are informed about a broad range of topics. Its audiovisual presentation (including supporting features such as subtitles) as well as the passive manner in which it is consumed ensures makes it accessible to a wide range of children. This includes those with visual and/or audial impairments as well as those at all levels of literacy, for whom reading and navigating the internet may pose more of a challenge. These access issues compound Ofcom’s own concerns around the disproportionate impact a discontinuation of the afternoon bulletin may have on C2DE audiences.

Increasing the number of articles and video published on the Newsround website may help ensure content is available on a range of subjects, but it does not ensure that children engage with a diverse mix of it in the same way that a bulletin can. We recognise Ofcom’s concern about how likely children, particularly younger children, might be to seek out news on the Newsround website actively, in comparison to more passive consumption via the TV bulletins. A combination of the way children decide to navigate the internet and the algorithms commonly employed by digital content platforms risks obstructing the BBC’s ability to ensure they engage with issues beyond the locus of personal interest and/or opinion. The danger posed by online ‘filter bubbles’ in an age of digital news consumption is one widely recognised by the public and the media - particularly in the age of ‘fake news’. The BBC identified that it must ‘develop systems that are [...] shaped by audience interest, but which do not create filter bubbles or echo chambers’ as part of its digital offer in the Lords Communications Committee’s recent report *Public Service Broadcasting: As Vital As Ever*.²

For these reasons, the BFI supports Ofcom’s intent to set requirements around the kind of content the BBC must produce. The BBC should set out detail on the new formats and levels of provision it will deliver following the proposed change to the Operating License before the change is granted. These

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<https://www.bfi.org.uk/supporting-uk-film/production-development-funding/young-audiences-content-fund>

² <https://publications.parliament.uk/pa/ld201919/ldselect/ldcomuni/16/1602.htm>

should demonstrate how it will not only preserve and improve accessibility of content, but how it will drive engagement with a wide variety of news as effectively as possible.

Furthermore, while we recognise the BBC has offered a number of measures by which to drive traffic to Newsround content online, we believe further detail is needed on how some of these measures might work effectively - including from the C2DE audiences with whom Newsround's afternoon bulletin is particularly popular and are recognised as less likely to seek out content. For example, while the BBC suggests it might provide links from other areas of the BBC site to Newsround services, we would question how many children will be surfing other parts of the BBC if it is already acknowledged that children may not actively seek out news-related content.

The continuing role of linear television

The BFI recognises that children are increasingly engaging with online content and that it forms a growing proportion of the media they consume, while the audience for CBBC's broadcast content continues to decline steadily.

But linear television services have a continued role to play in reaching audiences even as they move toward digital platforms. Ofcom's consultation recognises that it is unable to make any meaningful assessment of whether increasing digital audiences are enough to offset declining viewers to linear services in terms of reach, both in terms of Newsround and children's content more broadly. It is not only important to understand whether a move to digital would secure audience reach as far as possible given shifting audience behaviours, but also how linear and digital services work interdependently to secure viewers. Many broadcasters recognise the value of linear television as a 'shop window' for their content - introducing new viewers to available programming in a way that online platforms currently cannot. Fixed broadcast times, as well as practices such as 'hammocking' and promotion during ad breaks help audiences to encounter new shows, whereas online players require users to actively seek out the content they wish to watch.

The continuing role of linear television in reaching audiences even as they migrate to digital services was demonstrated by BBC Three's move online in 2016, when its weekly reach among 16–34 year olds fell from 26 per cent in 2014 to 8 per cent in 2017. The BBC should produce further evidence to understand how Newsround's multiple broadcast slots, as well as the strength of this brand as a linear news programme, help to drive audiences to online content before a change to the license is granted. This will ensure that the discontinuation of its afternoon bulletins will not undermine this growth.

Metrics and reporting

The BFI supports Ofcom's call for robust metrics by which to report on performance following any switch to digital services. Metrics on the following topics should be developed as a condition for any change to the operating license:

- **Viewership on iPlayer:** Previously, migration of BBC services to digital platforms has led to less transparency regarding their performance. BBC Three's switch from a linear channel to iPlayer has led to reduced public data on viewing numbers, audience and reach. The BBC should commit to reporting on viewership on children's content hosted on iPlayer in order to ensure children's provision is not negatively impacted.

- **Audiences for broader online content:** While Ofcom's consultation document offers basic data on the number of people accessing the Newsround website, as well as some survey data on children's media consumption, more granular data is required in order to demonstrate how children in particular are accessing the website, and how different demographics interact with the site and content in different ways. It is not currently possible to distinguish how many of the visitors to Newsround's website are children, compromising the insights that can be drawn from this data. This will ensure content is tailored to engage children with news and content as effectively as possible.
- **Spend:** BBC Three's switchover also led to spend on the service reducing from £85m to £30m per annum. While the BFI recognises the value of efficiencies, particularly in light of the increasing financial pressures on the BBC under the terms of its new Charter Agreement with Government around license fees for the over-75s, it is important that these are balanced with continued quality of service. This is particularly true given Ofcom's recognition of a consistent decline in spending on children's television overall by public service broadcasters in recent years. Providing information on spend will help to ensure that a proper balance is achieved.

2. Do you agree with Ofcom's provisional assessment and proposed changes to the first-run UK originations quota for children's content on CBBC?

As set out above, the BFI recognises the need to adapt service provision in order to keep up with children's media habits. We also believe that robust reporting requirements on the BBC would help ensure this is done as effectively as possible. This logic also applies regarding the proposed changes to the first-run UK originations quota for Children's content on CBBC.

The BFI supports Ofcom's desire to maintain the quality and distinctiveness of the BBC's linear children's channels. Further evidence on how a greater reliance on repeats over originations (both in terms of titles and hours) may impact distinctiveness and in turn appeal to target audiences would provide valuable insight. This would help understand how reduction in originations (potentially including any change in originations produced in accordance with BBC Children's 'Bigger, Better, Fewer' strategy) interacts with other trends impacting children's audiences, such as technological change.

The Producers' Alliance for Cinema and Television (PACT) have highlighted a number of questions around how proposed-changes to the first-run UK originations quota for children's content would impact returns to producers. This includes issues such as the fact that shows premiering that shows premiering on online services are not subject to the same terms of trade as those premiering on linear services, impacting the way in which they are able to generate profit through secondary rights windows. We encourage Ofcom to consider PACT's submission on these matters as part of this consultation process.

CBBC and CBeebies

The BFI support's Ofcom's proposal to maintain separate origination requirements for CBBC and CBeebies. These channels currently offer separate quality services to very distinct markets, and maintaining different regulatory requirements could help ensure continued high-quality content and varied programming in the long term.