

Response to Ofcom Consultation on BBC Children's news and first-run UK originations and the BBC's request to change its Operating Licence

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Introduction

This constitutes a response to the BBC's request to Ofcom to change its Operating Licence in respect of a) a reduction in first-run originations for news from 85 hours to 35 hours and a reduction in frequency of broadcast news bulletins b) a reduction of first run originations from 400 to 350 hours a year and c) to amend the definition of first-run UK originations to apply to the BBC I-Player as well as for channels CBBC and CBeebies. As academics, our response is based on our longstanding academic research interest in children's media, and on the BBC's contribution in particular.¹ Based on the evidence our summary and recommendations are as follows:

- The proposed changes seem hasty and under-researched. There is no guarantee that they will work or provide a viable online news alternative for children because there is not a clear distribution strategy. Nor is there clear evidence of how resources will be reallocated and for what purposes to improve Newsround online. The proposals are too vague and lacking in imagination. Ofcom's own comments throughout its consultation document suggest that they are not convinced either that children will use or find the online services, which begs the question, why accept the proposals and not seek to push for better ones that can be properly tested?
- Our recommendation is that the BBC and Ofcom should take a more considered approach to test and analyse options for online content and distribution and also crucially to consult children for a period of time over a year before making any final decisions. The lack of consultation with children is very disappointing.
- We do not agree with the reduction in first-run hours from the current 400 hours until the BBC has clearly demonstrated how and where the hours will be made up either as

¹ Carter, C. 2017. *The role of news media in fostering children's democratic citizenship*; Carter, C. 2014. *The point of news: young people, critical news literacy and citizenship*. Messenger-Davies, M. et al. 2014. *News, children and citizenship: User-generated content and the BBC's Newsround website*. Steemers (2019). **Invisible children: Inequalities in the provision of screen content for children**; Potter and Steemers (2019) *Transforming Markets for Children's Television Industries*. Steemers (2017) *Public Service Broadcasting, Children's Television and Market Failure: The Case of the United Kingdom*

news content online or as other forms of public service content , otherwise this could set a precedent for further reductions. There should be quantitative quotas on online provision of news as a guarantee that the BBC will fulfil its remit.

Question 1: Do you agree with Ofcom’s provisional assessment and its proposed changes to the Operating Licence for Children’s news on CBBC? If not, please explain why, providing appropriate supporting evidence where possible.

While it is true that UK children’s television viewing habits are changing across entertainment and factual media and that viewing of linear scheduled television is declining, the BBC’s proposals lack sufficient evidence to support the decision to justify a radical decrease in first-run originations for news (Newsround) from 85 to 35 hours and the frequency of broadcast news bulletins. Additionally, there is insufficient detail about CBBC’s multiplatform strategy to strengthen the Newsround brand online with its core 6-12 year old audience, what type of content they intend to make for online platforms (where is the evidence confirming this is what their audience want?), and how they are going to promote it so that children can actually find the content? These are not new issues for the BBC as past studies of the BBC’s news provision for children have demonstrated.² No clear strategy is outlined by the BBC about how they plan to improve reach, and without a clear strategy, the reduction of original hours to 35 hours a year seems short-sighted and risky, if the BBC wants to continue to engage with children and young people as they become adults. Last month former [Newsround Editor Sinead](#) Rocks criticised this decision, maintaining that “Newsround needs more prominence – not less. The ability to watch with parents/families is also important. Relying mainly on a child’s ability and interest to seek it out online is short sighted and sad.”

As children’s news is a key part of the BBC’s public service commitment to children to foster and support their citizenship, the BBC’s proposal is disappointing, not least because it is clear that children are interested in finding out about what is going on in the world, as past research has demonstrated.³ A powerful contemporary example of children and young people claiming their right to be heard and taken seriously as young citizens is epitomised by the Norwegian climate strike activist, 16 year old Greta Thunberg who has recently been named TIME Magazine Person of the year for her efforts to effect political decision-making and action worldwide on climate change and who has helped to energise children and young people to the issue.

Even Ofcom does not seem entirely convinced “that this audience has significantly moved to online news consumption” (Para. 3.34), and that children would “actively and independently seek out news online” (Para 3.34) either on the website (Para 3.24) or on the IPlayer (Para. 3.68) which makes it all the more surprising that they have not imposed stronger conditions. Newsround presenter [Ricky Boleto](#) recently voiced his concern about the reduction in Newsround broadcast hours, saying “I worry that as we chase the clicks, we lose focus on what really matters” (16 November 2019). Again, academic research in the UK and globally in recent years has consistently demonstrated that children’s preferred platform for news

² Carter, Messenger Davies, et al. (2009) [What do Children want from the BBC?](#); Messenger Davies, Carter, et al (2014) [News, children and citizenship: User-generated content and the BBC’s Newsround website](#)

³ Carter, Messenger Davies, et al. (2009) [What do Children want from the BBC?](#); Carter (2013) Carter, C. 2013. [Children and news: Rethinking citizenship in the twenty-first century.](#)

continues to be television.⁴ What is not admitted here or elsewhere is that falling audiences for Newsround on television in recent years was precipitated by its move from BBC1 in a prime time evening slot, where it was sandwiched between content that was often watched with other family members, to the CBBC digital channel where it became more closely identified as a children's programme. Some researchers suggest that this move, which was followed by declining audience figures, might be explained quite simply: Newsround's status, and as a corollary its significance for the audience, was diminished by moving it from the most prominent BBC channel (BBC1) featuring flagship news programmes to the margins of provision amongst cartoons and other features solely for young children. Carter, Allan, Messenger Davies, Mendes and Prince found in their study with 11-13 year old children who were asked to construct and pitch a news programme for 12-15 year olds all agreed that such provision should be cross platform, with the television element offered in an early prime time slot on BBC1, just the spot Newsround had enjoyed for many years before it was moved to CBBC digital.⁵ Ofcom's own data show that although children's viewing of broadcast television is declining, 79% of 4-15-year olds still watch broadcast television each week. It is therefore important not to overstate the Newsround audience's engagement with news in online forms, particularly at the expense of broadcast news bulletins (which are also on its website and updated regularly throughout the day).

The reduction of first-run original news hours from 85 hours to 35 hours on CBBC or about 5.75 minutes a day is a core issue when there is lack of detail on where the reduction in content is going to go and how Newsround will be promoted online and offline. The BBC's submission and Ofcom's response offer no detail on the following:

- How will the BBC promote the Newsround brand online and on social media so that children are aware of it? What other platforms will be used to advertise it?
- What type of content is likely to be offered, apart from the limited examples offered in the BBC's evidence (p. 6)?
- Research suggests that any new provision of news for children is likely to be more successful in gaining an audience if children are consulted and their contributions are regarded as central in terms of the development of content, embedding audience interactivity into any provision to ensure relevance, to make children's civic engagement central to any new provision. This approach is not evident either in the BBC's evidence or in Ofcom's response.

The aim in changing the Operating Licence is ostensibly to increase provision of news on the "Newsround website and provide more new children's content on the BBC iPlayer." However, BBC and Ofcom evidence refers mostly to the Newsround website. It could be argued, that websites are not necessarily the main way that children in Newsround's target audience of 6-12-year olds are likely to engage with news either now or in the future, as the academic research attests. Moreover, Ofcom states "it has not been possible to understand ... how many children are using the Newsround website currently" (Para. 3.25). Clearly, there is a need to generate much better data and a deeper understanding of the Newsround audience

⁴ Carter, Messenger Davies, et al. (2009); Kaziaj (2016) [Children in Television News](#); Narberhaus (2016) [Children's News. Topics, Information Quality Around Newsround, Logo and Info K](#).

⁵ Carter, Cynthia, Allan, Stuart, Messenger Davies, Maire, Mendes, Kaitlynn and Prince, Ian 2009. [What do children want from the BBC? Children's content and participatory environments in an age of age of citizen media](#). [Project Report]. Arts and Humanities Research Council.

rather than simply making assumptions about them which are not founded in robust evidence.

There is currently little promotion of Newsround on other online platforms, for example on YouTube, which Ofcom data suggests is more popular with children aged 8-11 and those aged 12-15 than watching television programmes on a TV set.⁶ On the CBBC YouTube channel, Newsround does not come up on the home page, nor is news highlighted in the "about" section of the CBBC YouTube channel, suggesting it is of low priority. Newsround does not have its own channel on YouTube. Even on the day before the UK general election in 2019 (11 December) no Newsround stories featured on the CBBC YouTube home page. Under the "Video" tab there were some short features about each of the parties, but with very low views (500-1200). On the IPlayer Kids home page (keyed in for the oldest age category of plus 9s) and on "Latest from CBBC", Newsround does not feature either, which suggests that news or the repurposing of material for other platforms has not been given priority, which would reinforce declining viewing. On Instagram (admittedly not for children under 13), CBBC has 1303 followers currently. Newsround does not have its own App – and it could be argued that this might have been a better investment than the recently launched Own It. A key step in mitigating this risk would be for the BBC to be held to making Newsround more prominent on the IPlayer and YouTube and crucially on the CBBC website <https://www.bbc.co.uk/cbbc> not just as a tab on the top which leads to <https://www.bbc.co.uk/newsround>. Today there were no links on the CBBC website to Newsround and the election. If Ofcom and the BBC are serious about Newsround and news then there should be conditions about prominence and the BBC should have a much clearer strategy about how it is going to attract viewers, or the brand will decline further.

The BBC should certainly innovate its news coverage for children and promote it on other platforms, but its evidence and plans for doing so are thin and not innovative. At its core, it is apparent that there is little, if any, in depth research evidence about Newsround's audience, instead relying on in-house/commercial marketing reports and more general Ofcom data on media usage which is largely quantitative as the basis for its current plans to reduce broadcast news for children.

If Ofcom intends to take a light touch to regulating performance then this does not bode well for the future, and BBC news for children may well become a further marginalised offering living a lonely life somewhere online, yet difficult and perhaps not engaging enough for its child audience to locate. This would be a sad reflection on the BBC's obligation to provide impartial news to young UK citizens, at a time when reliable news has become even more crucial for democratic life, and when anecdotal evidence suggests that children and young people are very engaged with a wide range of issues including climate change, Brexit, education, homelessness, poverty, Scottish referendum (where 16 and 17 had the vote in 2014) as well as more personal issues such as school uniforms, healthy eating, exams, and bullying.

Ofcom's acceptance of online provision "though a range of content in different formats" on the website lacks detail (p 2) and the suggestion that quotas would not be appropriate sounds weak from a regulator whose responsibility it is to safeguard the remit of the only publicly funded public service broadcaster. The notion that setting a certain level of expenditure or certain levels of quality would work against higher quality output (Para. 3.36) could go badly

⁶ Ofcom (2019), *Children and Parent: Media Use and Attitudes Report* p. 6

wrong if things are allowed to slide, and on past experience broadcasters have not been held to account on children's content by Ofcom, followed by a decline in both hours and expenditure (See Ofcom's own Children's Content Review July 2018).

At a time when public service broadcasting is under more threat than ever this weakens one key tenet of the BBC's remit, just as its commercial rivals see the opportunities, and can reinforce their claim to offer public service content. A recent award by the Young Audience Content Fund in November 2019 to support Sky (Fresh Start Media) on free platform Sky News with 4 X 20-minute specials and 20 short form broadcasts (Broadcast 5 November 2019) suggests that the BBC may be losing ground to rivals who do not have a statutory public service remit. The argument that Newsround needs to move more of its provision online is understandable, but the argument that it needs to move online to free up resources does not add up without a clear strategy of how to support news online and reach out to audiences in a more concerted way.

Moreover, it sends the wrong message about the extent to which the BBC takes its responsibility for fostering and growing children's citizenship and civic engagement through the provision, since 1972, of news especially made for them. It cannot be stressed too strongly that Newsround has been the **only** bespoke news provision for children in the UK for many years. From the early 2000s, commercial children's news producers stopped making news programmes for children (Nick News; Channel 4's First Edition), often citing their lack of commercial profitability as the reason for shutting them down. To support its children's news investment, Sky has had recourse to public funds (see above). As such, Newsround is a particularly significant programme because of its public service commitment to its audience and not the profit-making market. That said, it is also important that Newsround is attractive and relevant to its target audience. Available evidence suggests that in recent years Newsround has not been promoted effectively since it lost its key place in the television schedule on BBC1. It has not been promoted effectively on the IPlayer and YouTube so far, when this would not have been difficult to do (repurposing videos). There needs to be a much clearer strategy about how the BBC will repurpose the 35 hours of broadcast content ensuring that it is still factual programming for the audience of 6-12-year olds and how it will be multicast across different platforms beyond IPlayer to encompass YouTube as well. There is too much emphasis on the website, even though Ofcom points out that "it has not been possible to understand from this how many children are using the Newsround website currently." (Para 3.25)

Question 2: Do you agree with Ofcom's provisional assessment and our proposed changes to the definition of a first-run UK origination in respect of children's content and additional condition to safeguard the provision of some first-run UK originated children's content on the linear services? If not, please explain why, providing appropriate supporting evidence where possible

Question 3: Do you agree with Ofcom's provisional assessment and proposed changes to the first-run UK originations quota for Children's content on CBBC? If not, please explain why, providing appropriate supporting evidence where possible

Ofcom seems to concur with the BBC that the level of first-run originations should fall from 400 hours to 350 hours a year on CBBC and that this quota will now be applied to the IPlayer as well; and that the current 100 hours of originations on CBeebies will now be counted across

the IPlayer as well. The BBC claims that the 50-hour reduction in originations (attributable to the cut in news hours) will be cost neutral. According to Ofcom (3.111.) the Corporation has not proposed to increase the volume of or spend on UK originated children's content across its services as a whole. So this does mean an actual fifty hour cut in first run originations on CBBC/iPlayer – a substantial cut and in our view sets a bad precedent for further cuts to other quotas. In the evidence provided by the BBC it is not made clear how this cut in news will be made good online – apart from indications that it aims to publish 20 plus news stories daily online including 4 video stories (BBC, p.6). However these are suggestions; there is no condition to specify the amount of new content it will produce online (Ofcom 3.26). Given the poor presence of Newsround on online platforms at the moment, there is a real risk that the BBC will not “produce significantly more news content online than it currently does” and this could “decline over time” (Ofcom Para 3.26). Will the BBC be repurposing the 35 hours of broadcast material for online use or will there be new video material? What kinds of content, generated by whom? Will there be a commitment to greater interactivity and engagement with child audiences, a commitment that appears to have been watered down in recent years but which was a core feature of its activities a decade ago. In the evidence this is glossed over. The BBC claims that it will be able to create “a greater volume of news content” and that they have been experimenting with “longer video pieces” (BBC, p.6), but apart from one example (p. 6) there is no detail and little evidence about its current presence on YouTube, Instagram and Twitter. The aim of providing more original children's programming exclusively on IPlayer is fine, but there is no mention of how news will be promoted and signposted on this platform. The stipulation that half (175 hours) of CBBC hours and 50 for preschool should air on CBBC and CBeebies first does not safeguard broadcast content, and there is the risk that the BBC will simply move towards online content, undermining the channels and providing the pretext to dispense not only with children's channels but BBC1 and 2 also.

Question 4: Do you agree with Ofcom's provisional assessment on the cumulative impact of the variations as a whole? If not, please explain why, providing appropriate supporting evidence where possible.

Question 5: Do you agree with our proposal for the transitional arrangements? If not, please explain why, providing appropriate supporting evidence where possible.

While Ofcom and the BBC's assessment of limited impact on the BBC's rivals is part of this review process, there is little assessment on what the impact might be on children, a common and regrettable oversight. On the evidence provided by Ofcom and the BBC, it is not clear whether children have been consulted. There is ample quantitative data from Ofcom and elsewhere about declining child audiences for linear TV and Newsround in particular, but no information on why children might not be watching, and what they expect from news – hence our earlier points about scheduling, platforms/channels, prominence, and promotion of Newsround's provision. There is little information about why children might find it difficult to find news on the BBC's online offerings, although the lack of prominence online might be a factor. In Ofcom's last review of children's content in 2019, it highlighted news, domestic drama and factual content which reflects the lives and experiences of UK children as under threat, but these proposals do not necessarily safeguard news, and are underpinned by little information about what public service content children view and value – without this information the public service contribution of children's news can't be adequately assessed.

For too long decisions about children's news provision appear to have been taken without such consultation and without in-depth, academically-informed analysis of proposed changes to children's news content that take account of the shape and volume, scheduling, choice of platforms, reflection and deeper understanding of child audiences, journalistic news values shaping children's news, technological change and child news audiences, and so forth. Without this greater depth of knowledge and understanding, we run the risk of 'chasing the clicks'.

Ofcom has indicated that it will want to monitor the changes, but this needs to be more far-reaching than quantitative data on spend and viewing – it also needs far-reaching qualitative data on what children value about news made specifically for them. Again, this would necessitate a commitment to ongoing research about, with and undertaken with children to ensure the decision-making is robust and responsive to the needs of children and to a public service ethos committed to children's civic education and engagement. Unfortunately, it would appear that the decision has already been taken with little consultation among the key stakeholders – and of course especially among children who are the most affected stakeholders. This approach is indicative of a growing lack of commitment to children and PSB values, which reduces the BBC's accountability to this important group of citizens. The proposal to start applying these changes from 2020 and Ofcom's seeming acceptance of the BBC's proposals suggests a lack of public consultation and undue haste. The BBC could have made a better case for Newsround in a multiplatform era, but this case has not yet been made.