

## Your response

Question	Your response
<p><b>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.</b></p>	<p>The Children’s Media Foundation (CMF) does not agree with Ofcom’s provisional assessment and its proposed changes to the Operating Licence.</p> <p>While we accept that older children are migrating to online viewing in increasing numbers every year, we do not believe that at present there is sufficient evidence to warrant this regulatory change.</p> <p>The BBC has cited a significant rise in the unique browser reach of the Newsround website as one of the reasons for making the proposed move. We respectfully suggest that Ofcom looks into this increase more closely as we have been informed that it is partly the result of changes in the way the users are counted – and the sudden spike in mid-2018 is an indication of this type of change.</p> <p>There is a danger that BBC Children’s is moving too quickly to embrace digital delivery. It is a policy which has not achieved its aims for BBC Three.</p> <p>We are also concerned that it restricts access for an albeit small minority of the audience which is already under-served.</p> <p>In this response we reflect in part on observations made in the Ofcom provisional report, and in part on representations made by CMF supporters and our executive team.</p> <p>Ofcom’s own reservations are clear:</p> <p>In para.3.20 you state: “When asked, the BBC was unable to provide specific evidence to demonstrate how likely children aged 6-12 are to actively seek out its online news content...”</p> <p>In para. 3.24: “...we have some concerns about how likely children, particularly younger children and those from lower socio-economic</p>

backgrounds, might be to seek out news on the Newsround website actively, in comparison to more passive consumption via the TV bulletins which are shown in between other popular programmes.”

In para 3.25: “...it has not been possible to understand from this how many children are using the Newsround website currently.”

In para 3.26: “...there is a risk that the BBC might not produce significantly more news content online than it currently does, or that this could decline over time, which could lead to an overall reduction in the amount of children’s news available across the BBC.”

In para 3.34: “...we consider that the evidence provided by the BBC, and data from other sources available to us (such as BARB), does not demonstrate that this audience has significantly moved to online news consumption. Nor does the evidence suggest that children would actively and independently seek out news online. We therefore consider that there are risks associated with the BBC’s proposal.”

The proposal of new condition for BBC Online which requires the BBC to provide “daily news and information for children through content in a range of different formats, including text-based articles, videos and interactive pieces, which cover a broad range of subjects and should include in-depth news and analysis”, is by Ofcom’s own admission not quantifiable, and does not provide robust insurance against a generally diminished service.

There are clearly significant concerns, which indicate it is too soon to make these changes. There should be a period of testing, analysis and reflection before the decision is taken.

Otherwise, the BBC would be seen to be walking away from a long-standing public service commitment, particularly for the less privileged audience, with no guarantee that their online replacement will be an effective alternative.

Ascertaining what is true or false online is of increasing concern – especially amongst the young. Broadcast news is widely understood to be balanced and unbiased in the UK. Newsround conforms to those standards and its presence on television supports that understanding.

At a time when more and more young people are taking to activism and social or political engagement, the symbolism of reducing the footprint of Newsround is equally unwise.

Associating Newsround more closely with the school experience does not help its brand image. It is, of course, a valuable use for the programme, but to rely on school delivery by teachers takes it down a route where children themselves are not choosing it as their source of information. Should news be solely “educational” or should it serve other purposes – and prove itself of personal value to the young consumer?

The BBC should embrace its public service obligation, ensure Newsround is widely available on a variety of platforms, and take pride in and promote Newsround as a rare trusted source of information in an increasingly confusing content environment.

The BBC should begin by considering ways of enhancing and promoting the afternoon bulletin.

Viewing figures for the bulletin dropped when 5pm Newsround came to an end as part of the removal of all children’s content from BBC One. A later slot for the afternoon bulletin on CBBC might increase its reach and once again offer family viewing potential.

The BBC has provided insufficient evidence of the value in the change. No detail on the re-allocation of funding has been provided. We appreciate it is not for Ofcom to consider this, but for any reasonable scrutiny of the plan, the relative figures should be clearly included in the proposal. The simple numerical increase in the number of stories does not indicate the extent to which the plans for Newsround online are

	<p>ambitious and comprehensive, or indeed the extent to which they would involve placing stories on third-party sites such as YouTube or Instagram which is vital to increase reach and to provide a news service where older children are actually viewing.</p> <p>Given the lack of detail in the plans we consider a better way forward than to accept the request for regulatory change, is to keep an open mind, and wait for evidence.</p> <p>To achieve this, the BBC should find savings which allow it to enhance Newsround's presence online.</p> <p>Without specific information it is difficult to say how much money will be released by losing one bulletin. But we'd suggest that a creative approach to the way all of the bulletins are produced, using new technology and avoiding long-term fixed costs, could release funds to produce more online content.</p> <p>The online enhancements could be studied for a year before the final decision is taken. Ofcom's aims for greater range of content and innovative approaches could be assessed and a programme of positioning and syndication on non-BBC social media outlets could be shown to reach the target audience more effectively and enhance understanding of unbiased news sources. Ofcom would then be working on evidence rather than conjecture and aspirations.</p> <p>To be clear – we believe Ofcom should refuse the BBC's request to change its Operating Licence to reduce the hours of news on its channel and should instead discuss a more measured approach which would provide evidence of enhanced service and increased reach before such a decision is taken.</p>
<p><b>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</b></p>	<p>We agree with Ofcom's provisional assessment and the proposed changes to the definition of a first-run UK origination.</p> <p>We accept the BBC's position on needing to create some content for I-Player only, as it is inappropriate for the CBBC channel because it</p>

<p>not, please explain why, providing appropriate supporting evidence where possible.</p>	<p>targets pre-teens. We would not wish to discourage the expansion of BBC services into content for this under-served audience, and do not believe the BBC should be penalised for online-only delivery.</p> <p>We have reservations in relation to both the Newsround proposal and this regulatory change that they might both be the “thin end of the wedge” and lead, over time, to arguments for online-only delivery of all children’s services. While a time may come when this makes sense, we believe that Ofcom should ensure that this is not on the agenda until overwhelming evidence indicates it to be essential to maintain reach.</p>
<p><b>Question 3: Do you agree with Ofcom’s provisional assessment and proposed changes to the first-run originations quota for Children’s content on CBBC? If not, please explain why.</b></p>	<p>We do not agree with the proposed changes as they reflect the reduction in hours of news content which we feel should not be permitted until further evidence of the value of the move to online is available.</p> <p>Even if Ofcom were minded to accept the reduction in hours for children’s news, we would recommend maintaining 400 hours of origination, so that the BBC makes up for the loss by providing other new content of a public service nature.</p>
<p><b>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.</b></p>	<p>N/A</p>
<p><b>5: Do you agree with our proposal for the transitional arrangements? If not, please explain why, providing appropriate supporting evidence where possible.</b></p>	<p>N/A</p>