



“Pluralism and the Children’s Sector” **Submission from Save Kids TV to Ofcom 14.11.11**

Providing UK Children with UK Content

The Children’s TV Sector is one of the least pluralistic in the UK TV industry – culturally and commercially. Possibly it is the least. If this were happening in News or Current Affairs there would be an outcry. No other group of people who make up around 18-20% of the UK population are treated this way – and this group is special. Many other territories recognise the importance of Children and Young People to their society and protect and promote age-appropriate culturally local media. We do not.

The very vulnerability of children and young people should mean that they are protected and cherished. This is recognised in Education and Childcare but not for some reason in Media provision. This is despite the fact that in any one year children and young people spend around the same time watching screens as sitting in classrooms.¹

But as important as their vulnerability is the fact that they are the future. What happens to a child or young person affects them for the rest of their life. We should be even more concerned about the media children and young people are exposed to than the media we provide for adults, whose ideas and perceptions are in many ways already formed. This is recognised in some ways – for example, the banning of junk food advertising around programmes watched predominantly by children, the suggestion that all commercials should be banned from Children’s TV, thoughts on controlling child internet access, and the expressed concerns about the over-sexualisation of children. But it is not recognised by government or regulators when it comes to support for locally-produced content which can have significant positive affects on children’s lives – content which is inclusive and relevant, engages with them on their own terms and in their own settings, speaks their language, addresses their concerns and tells their stories.

The Facts on Content Provision for Children

Sadly some of the measures taken to protect children have also been counter-productive; prime examples of the law of unintended consequences. For example, by

¹ Childwise (1.2.11): 39 weeks x 6 hours classroom schooling = 234. 52 x 4.4 hours Media watching = 228.80



restricting advertising and thus diminishing the capacity of commercial channels to serve children, there is significantly less age-appropriate, UK-cultural, psychologically valuable children's product available, so children are drawn to age inappropriate material, and to other cultural references (mostly US) which is of less value to their development and well-being

It is true that there are currently 32 dedicated Children's Channels – transmitting over 140,000 hours annually of broadcast children's programmes. But less than 1% of the available content is UK originated and in its first run. The rest is imported (mostly from the US), or repeats.² And only four of those channels (CBeebies, CBBC, CITV and the children's block on Channel 5) can be said to be British.

Two of these – the BBC Channels – together commission over 90% of UK dedicated children's output.

The Cultural Perspective

Culturally this means that one organisation – the BBC – now massively dominates the UK market place. . Ratings show that many more children watch these two channels than any other competitor, though the proportion watching the US major channels has increased as the provision from the UK PSBs has decreased.³ The combined departmental budgets of CBeebies and CBBC are £118m – around £80m of which is spent on programming. CITV is estimated to spend approximately £4M and both Channel 5 and Channel 4 have withdrawn from Children's television production. Channel 5 essentially now provides a window to show product which is funded elsewhere.

² Number of hours of Children's TV has increased by 100 times in 50 years – but mostly as a result of foreign imports. In the 1950' & 60's it was around 1000 hours. By 2008 it was 111,000 hours (Livingstone 2008).

³ Average top ten top children's channels ratings October 2011 –

- CBeebies 550K
- CBBC 398K
- CITV/CITV-GMTV 237K
- Disney 209K
- Nickelodeon 124K
- Cartoon Network - 90K

The proportion of viewing by children of Children's programming on the main five PSBs fell from 29% in 2005 to 10% in 2009.



The only other genuine competitors are the US international media broadcasters – Disney, Cartoon Network and Nickelodeon, which control 12 channels between them. Culturally they are almost exclusively US product though some admirable small

exceptions exist (eg *Peppa Pig*) and there are some signs of increasing UK spend from Cartoon Network in the UK. Unfortunately Nickelodeon looks as though it is moving in the opposite direction. It should be remembered that even when the London-based European operations of the three international majors produce anything of scale, their product has to essentially be internationally viable (which essentially means acceptable to a US audience) as that is where the significant funding comes from. So what little plurality exists does not necessarily lead to UK-focused or UK-centric programming.

All of the above has significant and long-term cultural implications

The Commercial Perspective

Commercially the scene is also almost completely monopolistic and dominated by the BBC. This has already led to a drop in commissioned programming. Between 2004 and 2008 there was a 50% decrease in commissioned hours of UK Children's television and this was already a decline from the 2001 position.⁴ This was mostly due to the withdrawal of ITV, Channel 4 and 5 from commissioning. There has been a small increase from the BBC since then. Overall the US majors appear to be commissioning in total at the same level today as they have throughout the last decade. ITV is experiencing some commercial success with the advertising revenue from its CITV Channel. However, it is reluctant to match this with budgets for new programming, preferring to acquire or commission only a few series of low-budget advertiser-funded programmes. To create a UK-focused plurality in the children's marketplace, measures need to be considered which would stimulate CITV to engage with the UK production industry in more meaningful ways.

This means that UK producers have essentially one outlet and one outlet only for their programmes – the BBC - which does the usual thing for a monopolistic buyer – suppresses rates, profitability and innovation.

⁴ There has been a 50% drop in commissioned hours of UK Children's TV 2004-2009 (*Ofcom 2009*) The number of hours of new UK-produced Children's programmes broadcast across the PSBs, including CBBC and CBeebies, was 1,887 hours in 2004. By 2008 it was 919 hours. This is also a reduction from 2001 (*Ofcom 2007*)



Conclusion and Recommendations

A massive amount of material is broadcast to UK homes under the banner of 'children's TV.' Plurality, however, does not exist in the sense of competition on the same ground between relatively equal contenders.

Culturally the consumer has two options – the BBC (with a very few additional offerings from its competitors) or US imports,

Commercially, producers are limited in their options to the massively dominant BBC, to small-scale opportunities on CITV or very occasional commissioning of localised programming by the international channels. This is not a recipe for commercial or creative success.

This would not be tolerated in News, Documentaries or Current Affairs. It's not good for our children. It's not good for the nation. It's not good for the UK media industry. And it's not even good for the BBC.

As the then Head of Children's at the BBC said in 2008: "Anything that curtails healthy competition curtails our ability to deliver for our audiences now and in the future."

A number of solutions have been proposed to address the plurality issue in children's media.

Save Kids' TV and the Children's Media Foundation support the UK Animation campaign for tax incentives for UK animation production. Incentives will go some way towards "levelling the playing field" for our animators in the face of fierce and supported competition from other territories, and while much of the programming produced will still need to be international rather than UK-specific (due to the inevitable need for co-production partners), such an initiative could serve to encourage greater participation by CITV and Five.

Save Kids' TV has proposed a Video-on Demand "Destination" as a healthy public service competitor to the BBC, to break the monopoly. This would be funded to commission programming in the key drama and factual genres, could be provided to kids via VOD and through partnering with all the children's broadcasters on a programme-by-programme basis, thus stimulating competition in general. While we envisage little appetite for this proposal in the current public finance climate, it remains in the long-term a viable option to ensure plurality in children's content provision.



For more information please see:

<http://www.savekidstv.org.uk/wp-content/d/SKTVofcomresponse.pdf>

Recently, Save Kids' TV and the Children's Media Foundation have contributed to the Ofcom consultation on regulation and the Channel Three and Five licence renewals. We have made the point that the 2003 Broadcasting Act was seriously flawed in its failure to

include children's programmes in the mandatory Tier Two regulation of "must-carry" content. Serious considerations needs to be given to strengthening regulation in this area as the market will not provide the solution to the very evident loss of plurality in the children's public service market in the UK.

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