

BBC Trust - Public value assessment of proposed changes to BBC Three, BBC iPlayer, BBC One and CBBC

Public Consultation Response from The Children's Media Foundation

1. Background

The Children's Media Foundation www.thechildrensmediafoundation.org is a not-for profit organisation supported by public donation, which campaigns for greater range and variety in the content provided for children and young people in the UK, advocates a research-based approach to policy and regulatory decision-making, and supports the production of UK-based programming that offers British children the opportunity to hear their own voices, experience their own stories and explore their own culture and society.

2. Introduction

Our response to the consultation has been considered in the context of the Ofcom Review of Channel 4's content provision, and the current Ofcom Public Service Content Review.

We will comment on each of the six consultation concerns, only to the extent that we believe they impact on 2 – 12 year olds. Clearly the major change of concern to this audience is the extension of hours on the CBBC Channel, and to a lesser extent the proposal to premier more CBBC and CBeebies programming on the I-Player.

3. Research

It is disappointing to discover that despite the obvious implications for the older children's audience (6-12's) of this major extension of hours on the CBBC Channel, and the innovative nature of the proposals to expand the role of the I-Player, no research was conducted amongst the children's audience. Neither the quantitative research by Communication Chambers nor the deliberative research from PAPA feature any participants under the age of 16. The qualitative research indicates "*broad opposition to the extension of CBBC hours*"¹ which is hardly surprising if the audience for whom it is intended is not surveyed. Indeed the report admits to its own shortcoming, when it states: "*The perceived personal value of this proposal was understandably relatively low to our adult sample...*"²

The Children's Media Foundation considers this a serious omission on the part of the Trust and the research companies advising it. It is indicative of an attitude at the BBC, that

¹ Deliberative audience research into the proposed changes to BBC Three, BBC iPlayer, CBBC and BBC One + 1
Research report from PAPA - September 2014 p87

² Deliberative audience research into the proposed changes to BBC Three, BBC iPlayer, CBBC and BBC One + 1
Research report from PAPA - September 2014 p56

children and young people, while they may be audiences, are not stakeholders, to be understood and taken seriously. This is short-sighted and of major concern to us in the process of consultation and inclusion which should inform Charter Review going forward.

4. The closure of BBC Three as a broadcast channel in the autumn of 2015 and the reinvention of BBC Three as an online-only offer

The Children's Media Foundation appreciates the need to cut spending and accepts that the repositioning of BBC THREE as an online service might be a viable means of continuing to serve young adult audiences on a platform they are using frequently to access video.

However we are concerned that this rationale might in future be adopted for the children's services. The description of BBC THREE as a "*pathfinder in the remainder of this Charter period*"³ is understandable as a response to the changes the media sector is facing, but is also of concern. Even in a world of increasing VOD consumption, "discoverability" remains important. Broadcast channels are powerful methods of cutting through the huge choice available on the Internet, and will remain so for the foreseeable future, according to most analysts. As one of the BBC's five core pillars of output, children's' content should remain available on a portfolio of platforms which children can readily access. Universality of delivery should apply as much to children as it does to the mainstream adult audience of the BBC.

We are also concerned that children's services may become easy targets for further cost cutting if they are relegated to online delivery only, with lower budgets applied to online content.

5. The evolution of BBC iPlayer from primarily a catch-up service to one that also offers online-first BBC content, and selected third-party content

Once again this would seem like a good idea given the changing nature of viewing.

We note that programmes intended for CBBC and CBeebies will feature significantly in this change: "*...in particular to extend premiering to programmes commissioned by the BBC's children's channels. The BBC proposes that around ten titles per year for each of CBBC and CBeebies will be premiered online. This would equate to an approximate split of hours of c.61 hours of CBBC content and c.49 hours of CBeebies content.*"⁴

Premiering titles on the I-Player has implications for when and where programmes are watched – with potentially more solitary viewing on laptops and tablets rather than on the shared household TV.

We would urge the Trust to be watchful of potential changes in viewing habits as a result of the premiering plan.

³ **Public Value Assessment of the re-invention of BBC Three online and related proposals.** Submission to the BBC Trust, January 2015 p22

⁴ **Public Value Assessment of the re-invention of BBC Three online and related proposals.** Submission to the BBC Trust, January 2015 p40

We would also be concerned if I-Player premiering led to any reduction in budgets for CBBC and CBeebies programming over time, for the same reasons expressed in the previous section. This should be carefully monitored.

6. The launch of a +1 channel for BBC One

We would dispute the logic of creating a plus-one channel:

“Launching a BBC One+1 channel meets an important audience need, providing a form of catch up for those who do not use BBC iPlayer or have access to broadband. The launch will help to offset the loss of younger audiences to the BBC as a result of closing BBC Three as a broadcast channel, providing a more stable environment within which to innovate and take risks.”⁵

This statement is inherently contradictory. It makes sense to create the BBC ONE+1 channel for older and less well-off audiences who do not have access or wish to use the I-Player, but not to claim this to be an enhancement of services for younger audiences - who are for the most part digital natives, and mostly likely to time-shift using the I-Player. Moving spend from BBC THREE to BBC ONE is also unlikely to stimulate innovation, as BBC ONE inevitably chases broad audiences. Surely it would be more honest for the BBC to admit that the +1 channel is designed to serve the BBC's ageing audience with more of what they know and like?

7. Extended hours for CBBC

We welcome this proposal in terms of the opportunities it presents the BBC to offer the children's audience a greater range of quality programming at times when they are available to watch.

We note the strategy to address younger children transitioning from watching CBeebies at 7pm – 8pm, and then to target 10-12 year-olds from 8 – 9 pm when they might return to the channel, having watched the soaps.

We appreciate this is an attempt to address two issues of concern to BBC Children's: the “dip” in viewing from CBeebies to CBBC, and the “flight” of 10+ young people.

It remains to be seen whether fine-tuning the schedule in this way will produce the best service for either audience. The result may be programmes for the older age range that are less challenging, less relevant and lacking in “edge”, because they have to be scheduled immediately after a period of younger viewing. This will reduce their appeal amongst their difficult to reach target age-range.

However our main concern is about the failure to provide any additional budget to fill the proposed 15% increase in air-time, particularly with reference to the 10+ age group which is severely underserved by UK television.

⁵ Public Value Assessment of the re-invention of BBC Three online and related proposals. Submission to the BBC Trust, January 2015 - Executive Summary p4

This failing is highlighted in the Ofcom Public Service Broadcasting 2014 Report and the Ofcom Review of Channel 4 Corporation's Delivery of its Media Content Duties (2010 – 2013).

There is a marked lack of original content for this age group, and there appears to be no intention in these proposals to remedy this:

*"The incremental costs for extending CBBC hours are minimal and BBC Children's will manage any costs from within existing resources... Cost-neutral narrative repeats will be used to construct the extra two hours in the schedule. New commissioning for this slot (or extra repeats incurring additional fees) is not being planned."*⁶

Without new and challenging content for 10-12s the BBC will perpetuate this failure to serve an audience that deserves recognition rather than neglect.

The additional airtime is an opportunity for the BBC to redirect some of the savings from the restructuring of BBC THREE into support particularly for commissioning new drama and factual content for the 10+ audience.

On a practical level, budget is needed for new content because little recent archive of relevance to 10+ has been made by the BBC. Equally, it is only through the provision of an exciting new schedule that CBBC can hope to compete with the many other calls on older children's attention. Without financial support for additional new content the proposal is setting itself up to fail.

The importance of originations in a successful schedule is clear. BBC Children's spend on first run originations in 2013 was approximately 90% of its entire content budget⁷. The recent Ofcom PSB Annual Report (2014) revealed a strong desire amongst younger audiences to see first run originated content made in the UK.⁸

New, targeted commissioning of older content with relevant topics and an appropriate tone for the 10+ age-range will achieve far greater impact than repeats.

It will also serve public purposes, in that programming for the 10+ age range can tackle a wider range of topics than younger material, connecting this group to the society in which they live, addressing the issues they face as young people, giving them a voice, and encouraging them to engage.

In terms of public approval, the recent Ofcom Public Service Report (2014)⁹ revealed a growing enthusiasm for children's public service content amongst parents, with 85% rating children's PSB as *"important"* (an increase of 13 percentage points in the last four years). New programming for older children will support this trend.

⁶ **Public Value Assessment of the re-invention of BBC Three online and related proposals.** Submission to the BBC Trust, January 2015 p74

⁷ **Public Service Broadcasting: Report 2014.** Annexes: Children's PSB summary p7

⁸ **Public Service Broadcasting: Report 2014.** Annexes: Children's PSB summary p6

⁹ **PSB Annual Report December 2014:** Children's Analysis p23 (source: Ofcom/broadcasters)

However, BBC Children's has seen a 66% decrease in the provision of first run originations since the launch of the children's channels 12 years ago. In 2002, 1,643 hours of first run originations were made and transmitted. By 2013 this had become only 583 hours.¹⁰

Equally budgets have reduced from a high of £124m in 2004 to £94m in 2013.¹¹ Both these trends need to be addressed. New money is needed for new programmes.

We welcome the statement that *"BBC Management does not envisage changing the planned funding or split between 10-12s or under 10s in relation to the proposed hours"*,¹² as we are opposed to BBC Children's relying solely on its existing budget to try to create the enhancements that the older age-range needs.

However, this may change: *"Over time, if the new slots are successful with audiences, Children's may revisit where the emphasis lies in scheduling/ commissioning, but still managing within existing resources."*¹³ We are concerned that re-prioritisation of the already limited funding will cause dilution of programme quality, and reduction in the offer for younger children.

In summary:

The new CBBC airtime should be about more than filling time. It should be about building new audience loyalty and serving public purposes by connecting older children to the society in which they live, its culture and diversity, and engaging them in the public discourse (as only public service content can) at an early age.

What is needed is more origination, of relevance to their specific age-range, and of a quality which will compete against the other calls on their time. This needs to be commissioned and paid for with additional spending, not the re-allocation of existing and diminishing funds.

Restoring some of the lost BBC Children's budget to provide for the underserved 10+ audience should be a central purpose in the BBC THREE/CBBC Channel proposals.

¹⁰ PSB Annual Report December 2014: Children's Analysis p12 (source: Ofcom/broadcasters)

¹¹ PSB Annual Report December 2014: Children's Analysis p8 (Source: Ofcom/broadcasters)

¹² Public Value Assessment of the re-invention of BBC Three online and related proposals. Submission to the BBC Trust, January 2015 p37

¹³ Public Value Assessment of the re-invention of BBC Three online and related proposals. Submission to the BBC Trust, January 2015 – p74