



BBC Trust Second Consultation: Closure of BBC Three Channel and move to Online, and other related service changes

Response from the Children's Media Foundation - 28.9.15

1

Do you agree with our provisional decision to approve (with conditions) the closure of BBC Three as a broadcast channel and its reinvention online in recognition of the need to generate savings and to serve younger audiences in new ways?

Yes

No

Don't know

1a

Why do you say that?

The Children's Media Foundation considers that the decision is reasonable under the special circumstances of the 16-24 year-old audience. It should release funds for other purposes.

2

Do you think that our proposed conditions are appropriate, given the concerns we identified in our provisional conclusions and the information provided by the BBC management?

Yes

No

Don't Know

2a

Why do you say that?

The Trust has failed to take into account the special needs of the children's audience. The closure of the service releases £30m in funding which the Trust welcomes if allocated to drama on BBC One and Two. However additional funds are needed for the creation of programming suitable for the older children's audience (10+) in the additional airtime on the CBBC Channel. Conditions should be set which promote this.

3

The conditions we have proposed for BBC Three are also designed to address our concerns about the accessibility of an online-only offer for certain audience groups, such as those without access to a reliable internet connection. We have done this by requiring that all long-form BBC Three programmes are also broadcast on BBC One or BBC Two. Do you agree with these conditions?

~~Yes~~

~~No~~

Don't know

3a

Why do you say that?

N/A

4

Are there any other points or issues you would like the Trust to consider in relation to its provisional conclusion on the BBC Three proposal?

N/A

5

Do you agree with our provisional decision to reject the BBC One + 1 proposal?

~~Yes~~

~~No~~

Don't know

5a

Why do you say that?

N/A

6

Are there any other points or issues you would like the Trust to consider in relation to its provisional conclusion about the BBC One +1 proposal?

N/A

7

Do you agree with our provisional decision to approve 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?

Yes

No

Don't know

7a

Why do you say that?

The Children's Media Foundation believes the iPlayer, particularly the recently announced dedicated iPlayer for children will be a valuable addition to children's viewing options, given the number of pre-schoolers accessing their content on tablets and the number of over 8's accessing their content on mobile devices. Original content on the iPlayer (and the subsequent iPlay service for children) will be an important component of maintaining audience loyalty. However, this content needs to be funded. The recent aspiration expressed by the Director of BBC Children's to produce content on iPlay for younger teens will clearly need a budget to back it up.

8

We have recommended that the BBC should set clear, objective criteria for determining what third-party content could be included on BBC iPlayer. Do you think our proposed condition is appropriate?

Yes

No

Don't know

8a

Why do you say that?

It is important that the third-party content on iPlayer is not seen as the equivalent of BBC "commissioned" content. It needs to be independent and bring value back to the brands it represents, rather than the BBC.

9

Are there any other points or issues you would like the Trust to consider in relation to its provisional conclusion about the BBC iPlayer proposal?

No

10

Do you agree with the BBC Trust's provisional decision to approve the extended hours for CBBC (so that, instead of broadcasting until 7pm, the service would continue until 9pm) as this will expand choice for younger viewers and can be implemented at minimal cost?

~~Yes~~

No

~~Don't know~~

10a

Why do you say that?

The Children's Media Foundation agrees that additional airtime on the CBBC channel will be of value to both the younger and the older CBBC audience. However the failure to provide even a small additional budget to enhance the minimal amount of CBBC content accessible to the over 10's, is mistaken. We cannot agree with the latter part of the statement that: "this will expand choice for younger viewers and can be implemented at minimal cost", as the only way to expand choice in a meaningful fashion is to provide some new programming in this airtime. This is particularly the case with the over-10s, as the two series mentioned in the report: *Wolf's Blood* and *The Dumping Ground* - are essentially the only existing programmes which will resonate with the 10+ audience. The acceptance in the report that the savings from the closure of the BBC Three television channel will be allocated to drama is welcome, but the comment that some of this drama should be aimed at "younger audiences" does not go far enough. A proportion of the figure should be allocated to the CBBC budget to create further drama for the 10+ audience. This is the audience that the BBC does not currently serve.

Moving BBC Three to online to make it more effective, and expending so much care and attention on the 16-24 audience, only serves to reflect how little attention is paid to young people between 10 and 16.

Apart from educational content and Radio One, the BBC does not engage with this audience. They are at a life stage which has its own needs, and those needs are not entirely served by music, or watching family entertainment. They have the right to content aimed at them, featuring them, and listening to their voices. Channel 4 has been woefully inadequate in providing their promised content for this age-range. The release of the additional airtime is the opportunity for the BBC to step into the gap.

At a time when there is much talk of the new iPlay service, which will be a personalised approach to content and allow older children to build their own portfolio of BBC and partner content. The additional airtime on CBBC Channel

specifically targeted at 10+ is the perfect opportunity to develop new content for this age range which can subsequently be made available on iPlay.

We are surprised that the BBC Trust does not reflect these new plans to serve older children in its deliberations on the closure of BBC Three, and we believe that the proposals should be revisited, with this new context in mind.

11

Are there any other points or issues you would like the Trust to consider in relation to its provisional conclusion about the CBBC proposal?

The Children's Media Foundation considers the lack of funding to be an important issue and our perspective expressed in the previous consultation and reiterated here is a reasonable reflection of what children and their parents expect from the BBC.

For that reason we were surprised to find that in the BBC Trust Provisional Conclusions Report no mention was made of our identification of the problem of lack of funding - even if only to explain why the Trust has rejected the points we made. As a result, it appears they have not been given serious consideration.

12

Do you agree with our overall provisional conclusions as a package whereby we approved the BBC Three, CBBC and iPlayer proposals but rejected BBC One +1?

~~Yes~~

No

13

Is there anything else you would like to add?

No.

14

How did you hear about this consultation? (Please tick all that apply)

~~Saw an advert on the television~~

~~Heard an advert on the radio~~

~~From a BBC Twitter account~~

~~From another Twitter account~~

~~Other social media site (e.g. Facebook)~~

BBC Trust website

~~BBC News website~~
~~BBC radio station website~~
~~BBC homepage~~
~~Other website~~
~~On TV~~
[Newspaper/magazine](#)
~~Word of mouth~~
[Somewhere else](#)

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