



Children's Media Foundation Response to BBC Public Interest Test Consultation

Consultation on the BBC's proposals to re-launch BBC Three as a broadcast television channel, targeting a launch in January 2022.

BBC consultation document Published: 5 March 2021

Consultation closing date: 16 April 2021

Question 1: What do you think about the potential public value of our proposals for a BBC Three broadcast TV channel, including the extent to which our proposals contribute to the BBC's mission to serve all audiences through the provision of high quality and distinctive output and services which informs, educates and entertains?

Question 2: What do you think about the benefit to audiences who will watch the channel, as well as wider potential social and cultural impacts?

Question 3: What impact (positive or negative) do you think our proposals for a BBC Three broadcast TV channel might have on fair and effective competition?

Question 4: Are there any steps you think we could take to minimise any potential negative effects on fair and effective competition or to promote potential positive impacts?

Our Response

The [Children's Media Foundation](#) (CMF) is a not-for-profit organisation dedicated to ensuring children and young people in the UK have the best possible media choices on all platforms and at all ages. We bring together academic research institutions, the children's media industries, politicians and concerned individuals who recognise that media is a powerful and valuable force in children's lives.

We do not wish to comment on the proposed re-launch of BBC Three as a broadcast channel, other than where that proposal impacts on the audience up to the age of 16. The comments below relate in the main to the BBC's questions 1 and 2 above.

Our response to the Public Interest Test consultation is focused on two aspects of the proposal to re-launch BBC Three as a broadcast channel which most concern the children and teens audience.

1. The plan to re-allocate the CBBC channel airtime between 7 and 9pm nightly to the new BBC Three channel.
2. The proposal to "stretch" to the 13-15 year-old audience in pre-watershed programming planned for 7-9pm.

The Children's Media Foundation had the opportunity to discuss the proposed changes with the Director of Children's and Education, Patricia Hidalgo, in early March, as part of a broader conversation about the proposed move of BBC Children's production to BBC Studios. Her confidence in the plan was reassuring.

In particular the loss of airtime to CBBC was not considered a significant issue since viewing figures are low. She clarified that BBC Children's does not commission programme for an audience older than 12 years, and that it currently uses the 7-9pm airtime to offer more challenging content to the upper end of the CBBC audience. However, this does not currently extend to programming specifically targeting 13-15 year-olds.

We accept that the use of this air-time offers an opportunity to address an audience not currently specifically served by BBC content other than Radio 1.

However, we are concerned at the approach taken in the consultation document which indicates that the BBC is not taking seriously the responsibility of serving an audience with special life-stage needs as young teenagers. There are only a few references to the younger audience in the document.

The proposal states that the new channel would "...aim to reach new young audiences aged 16-34 (and stretching to 13- 15 in pre-watershed)"¹ And "The BBC Three broadcast TV channel's pre-watershed content offer will include programming that is also inviting and suitable for a 13-15-year-old audience".²

In subsequent paragraphs outlining "Editorial Vision" and "Content Highlights" There is no mention of any programming plan for the younger audience. All the programme examples and genres proposed refer to content aimed at the new channel's core 16-34 demographic. Except for one reference to partnering with BBC Sounds, which we assume means Radio 1.

While we appreciate that young teens are aspirational and can benefit enormously from experiencing the situations, issues, challenges, solutions, emotional journeys and entertainment aimed at an older demographic, this is not the same as serving the specific needs of that 13-15 year-old audience with content that speaks to their lives as they live them now.

In fact, there is no content on UK television that targets this age range, which is perhaps an indication of why they defect to YouTube and SVoD services and begin to feel that the BBC (and television in general) has little of relevance to them.

The document also outlines an indicative schedule which once more references the younger audience³:

Weekdays (7pm – 4am)

7-8pm: Showcase of broad favourites, suitable for both BBC Three's core audience and younger viewers.

8-11pm: Launch of originations alongside narrative repeats.

11pm-midnight: Comedy zone, including BBC Three's back catalogue.

Midnight-4am: Repeating the earlier schedule alongside other key content from BBC iPlayer.

¹ A New BBC Three Channel: Public Interest Test consultation - para 3.1

² A New BBC Three Channel: Public Interest Test consultation - para 3.1.1

³ A New BBC Three Channel: Public Interest Test consultation - para 3.1.4

Weekends (7pm – 4am)

A space for programming blocks such as film nights, sporting and music events and innovative talent tie-ins to create participatory experiences.

Once again programmes will be “suitable”, but not “targeted”, “focused on” or “aimed at”. At 8pm on weekdays even that aspiration seems to cease and on the weekends the pre-watershed concept disappears.

This proposal appears to take the same position as Channel 4 - abandoning any thought of dedicated content and instead including aspects of interest to the age-group in more general programming – content that is “suitable”, “inviting and “stretched” to include them. That isn’t serving an audience, it is allowing them to participate in something less than specifically relevant.

There is no outline in the indicative budgets of dedicated spend on the 13-15 year-old audience.

Since only 24% of the programming will be first run⁴, and as there is currently no programming available that is designed for 13-15s which can be repeated, the content appropriate to this age range is going to be even thinner on the ground in the first few years of the channel’s life when 76% of the prime time output will be repeats.

There is no indication in the document as to where the special production and editorial skills to deal with the young teen audience might come from. No indication of plans to study what has been successful for this age range in other public service broadcasters – such as Scandinavia – or commercial rivals for attention. There is not an analysis of Channel 4’s position in this market – which would seem appropriate in a Public Interest test.

Finally there is no discussion of the marketing and positioning of BBC Three content on the platforms that young people are most using. Without a clear policy of engagement on TikTok, Fortnite and other social platforms, the venture will fail.

All of the above does not provide reassurance that the young teen audience are being treated seriously or even with enthusiasm.

Young teens are a difficult group to reach. But as much as any other sector of UK society they deserve to be addressed. There is significant risk in this proposal that the offer to 13-15s will fail, which is doubly disappointing as the younger audience has had to give up airtime on the older children’s channel to make the experiment work.

If the proposal is to go ahead the Children’s Media Foundation recommends the following:

1. The BBC needs to give clear assurances that the 13-15s audience is not an afterthought, but central to the proposition. Broad commitments to content, funding, marketing and social media engagement, and the purpose of the content in the public service context need to be shared with the regulator before permission to proceed is granted.
2. BBC Three commissioning should take into account the need for specialist expertise in serving this age-range.
3. BBC Three commissioning should consider the value of partnership with the only in-house production department with specialist expertise in creating content for the young – BBC Children’s and Education.

⁴ A New BBC Three Channel: Public Interest Test consultation - para 3.1.5

4. Given the new understanding of the BBC's relationship with its audience to have grown out of the Covid experience, the potential for educational partnerships could also then be more effectively explored.
5. The BBC needs to study the young teen audience carefully, consider successful services in other territories, and ensure that learning is applied to not only the content but the methods of engagement with this audience.
6. The BBC should commit to report on the effectiveness of the new service amongst the specific age range mentioned in the proposal. 13-15's should not be a footnote.

15.4.21

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