



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

BBC iPlayer II 2022

BBC consultation document Published: 23 June 2022

Consultation closing date: 4 August 2022

Question 1: What do you think about the potential public value of our proposals for BBC iPlayer content availability, 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 watch BBC iPlayer, as well as wider potential social and cultural impacts?

Question 3: What impact (positive or negative) do you think our proposals for BBC iPlayer 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

Introduction

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.

Our response to the Public Interest Test consultation is mainly focused on **Questions 1 and 2**. We wish to comment on public value, and the wider social and cultural impacts. These comments will specifically relate to the audience between the ages 2 and 16 years old.

There are also comments to be made on **Question 3**. While industry advocacy is not our principal role, the health of the dedicated children's media production sector matters to us, as the guarantor of key benefits - such as range and diversity of content, innovation, relevance, UK-cultural and regional identification, age-appropriateness and the duty of care towards this special audience.

While this may not be deemed within the scope of this consultation, our comments will inevitably also relate to the proposal to cease broadcasting the CBBC Channel and place all content for that age-group on iPlayer only. The invitation to participate in this consultation references the vision outlined by the Director General in May 2022 of "*content and services reshaped to build a digital-first BBC*" as the ultimate reason to evolve the iPlayer. If this is a first step to a digital-first BBC, then this consultation is also the first formal opportunity to respond to the plans for CBBC - plans which will impact significantly on the children's audience, no matter how far in the future they may be.

One final point in this introductory section: the entire consultation document, and we assume the strategy behind it, is woefully lacking reference to the younger audience - by which we mean the true younger audience, not the 25-34 year olds which are considered in your document. Children and their content are mentioned only 4 times - mainly in relation to the "*rich archive of children's programmes*" or in an educational context as "*specialist and minority content*". This is a significant omission.

We would respectfully suggest it's wise, when considering change, to take into account from the outset the activity, choices and habits, and hear the voices, of young people under the age of 18. They are, after all, the licence fee payers (or its equivalent) of the not-so-distant future. Within the period of this plan many of them will reach adulthood. Their relationship now and in the next few years (the "few years ahead" in which the CBBC Channel will be abandoned) will define their understanding of the BBC brand, of public service content and their loyalty to the Corporation's content offer. No mention is made of research which will encompass their view. No attempt is made to understand why they are migrating in huge numbers to other services. No serious thought is given to rebuilding a relationship with them other than an assumption they will embrace the iPlayer when all their content is placed there.

Question 1 - Public Value

CMF understands the BBC's strategic aspiration to free the iPlayer from constraints so that it can compete for the on-demand audience, and that much of this was already achieved after the previous PITC in 2019. However, this is the first stakeholder consultation since the announcement of the "Digital First" plan, which specifically references the planned closure of the CBBC channel and the migration of content for 6-12s entirely online - via the iPlayer. This proposal therefore has an impact on the delivery of that plan. A plan which for the CBBC audience goes beyond "digital first" and becomes, more accurately, "digital only".

We believe that if the plans for the iPlayer are designed in the long-run to prepare it for this radical change to the delivery of a key BBC brand then they are likely to diminish public value rather than enhance it.

To be clear, we completely understand the need to pursue a rapidly diminishing audience of older children who are deserting mainstream services for SVoD and AVoD. This is the fundamental issue at stake - the capacity to deliver an iPlayer that is more attractive and competitive. But while additional boxed-sets of children's archive content might have some power to attract, that is of marginal value when compared to the failure of the iPlayer to engage the children's audience. There is nothing in the consultation document which suggests that the iPlayer will become a child-friendly or teen-attractive destination.

No mention is made of:

- a child-friendly re-design

- age-appropriate data capture for personalisation
- specialist marketing to young people - which is vital when an audience is substantially already "lost"
- additional spending on new content - some of which should be interactive as this is deeply attractive to the 6-12 audience, and could be social so that content can be shared

In short, this new strategy for the iPlayer does not embrace children and young people, as evidenced by the paucity of references to the children's audience in the consultation document.

Why should it?

Because engaging the young audience is central to the future of the BBC and public service media in this country. They are the licence payers (or equivalent) of the future. They are the consumers of balanced and informed news and current affairs - or not. They are engaged citizens - or not. They embrace educational value in content, however subtly delivered, as well as entertainment - or not. Not serving them in these plans leaves a significant deficit in public value. The proposals should be re-drawn to clarify how provision for the young will be addressed by the "Digital First" policy and how the younger audience can be drawn back to public service experiences and appreciation.

Informal research by Children's Media Foundation partners has revealed how little young people think of the iPlayer at present. It is simply not a brand which comes to mind - as opposed to Disney+, Netflix or YouTube. How can the iPlayer increase public value for a generation of young people who do not and will not use it?

The iPlayer is an opportunity to engage with young people in ways which suit their viewing, playing and sharing styles. But it is an opportunity already missed. Some years ago, after much internal BBC lobbying a children's iPlayer was built and delivered and was being used by young people. It was then abandoned, apparently for consistency across the brand. This was short-sighted.

In 2018 the then Director of Children's outlined a £34m plan to develop the BBC's relationship with the teen audience. This included spending on ramping up iPlayer personalisation to bring all of the BBC's content to teens in user-friendly ways. External content partnerships were also discussed. There has been no perceptible change to the iPlayer as a result.

Abandoning linear delivery of the CBBC channel will do nothing to bring back viewers already lost to other services. It will, however, lose a significant proportion of the remaining audience who are unable to access television online. Up to now the BBC response to informal questioning has been that the plan is not yet fully formulated and will not take effect until it can be shown that no child will be "left behind". It is important that this becomes the guiding principle. Anything else will be a message to less advantaged families that their children aged 6-12 no longer matter to the BBC and will deprive children who need public service content as much as anyone else of what should be a universal benefit.

We might also ask why it was deemed important to return BBC Three to television, while CBBC will be taken off. Presumably because its programmes benefit from the higher profile they achieve on a broadcast channel. And the channel's profile enhances the public impression of the services the BBC offers. We would respectfully suggest exactly the same principles apply to CBBC.

We assume that when the time comes there will be a separate Public Interest Test for the proposed changes to CBBC Channel distribution. But for this consultation, the end result of "an improved iPlayer" could be less public value, not more.

Erosion of scrutiny also fails the public value test in our opinion.

In **para 3.2 Constraints** this statement is disturbing: "*While it is the BBC's intention for BBC iPlayer to have a strong and broad content library there are strong constraints created by the market that will naturally limit the volume of programmes we will publish on BBC iPlayer. As such we consider it is not necessary for BBC iPlayer to be additionally constrained on the volume and genres of programmes by regulation.*" For the children's audience regulation is a vital component of the public service machinery. Quotas to ensure minimum hours (and preferably also spend) on children's content, on specific genres within that content and control over the proportions of acquired and commissioned programming are the guarantors that this under-served audience is protected. Public value is eroded when regulations are relaxed.

In summary:

- Public Value will not be served by the changes proposed unless they also include a serious plan to develop and market the iPlayer as an attractive destination and service for children and young people, and fund new, exciting content.
- More archive content is not enough to win back the rapidly disappearing audience.
- This audience should not be lost, as the BBC runs the risk of losing a generation's support in the long term.
- Removing the CBBC Channel will add fuel to the flames. The BBC ceases to be a child-focused brand, potentially abandons the least enfranchised segment of the audience who cannot access iPlayer.
- Quotas ensuring minimum levels of children's content and new production are essential.

"The proposals lack any real reference to children and young people which is very disappointing because if they can't reach out to this audience now then things are unlikely to get any better..."
Prof. Jeanette Steemers, Kings College London, CMF Board member.

Question 2 - Benefits for those who watch iPlayer and Social / Cultural Impacts

There will be some benefit from the release of additional archive content for the children's audience. But this should not be over-emphasised as children are not interested in nostalgia and have keen eyes and ears for the contemporary. We note that **section 3.1.1.** of the consultation document discusses the aspiration to use more archive content and refers to "a rich archive of Children's programmes to appeal to our youngest audiences and their families". Family viewing of children's content is not the same thing as providing a mix of content specifically made with children in mind, addressing their contemporary issues and portraying their lives as they are lived now. It is not the lack of family content that has driven young viewers away from CBBC.

CBBC's prioritisation of animation commissioning, which will impact on the commissioning of live-action content, coupled with likely budget cuts ahead, are of concern, when considering the maintenance or growth of the younger audience on iPlayer. To achieve a successful re-launch the iPlayer plans need to feature not only enhanced features of relevance to children and young people, but also additional, new children's content that recognises the importance of the loss of this audience for the long term health of the BBC.

Section 3.1 of the consultation document discusses growing reach by "*re-allocating significant amounts of money every year into video that delivers on iPlayer across a wide mix of genres. We will focus money where we are distinctive and more uniquely BBC.*" Serving the younger audience is uniquely BBC and distinctive - for all of the public value reasons outlined in the previous section. We

would also contend that children's content has long been under-funded, and this is one of the principal reasons why CBBC content finds it difficult to compete with the new streaming services. Redressing the imbalance as part of the iPlayer content plan will be essential to maintain the younger audience on iPlayer and if there is to be any hope of audience growth.

The impact on society and culture in the UK of having more BBC programmes available with public service values and purposes attached is obviously beneficial. But increasing funding for a range of additional public service content for the younger audience amplifies that effect considerably. Relevant content that tells their stories, gives them their voice, connects them to their own culture and promotes engagement in the society in which they live - and will live as adults - is a powerful force which the BBC should aspire to provide. This needs funding and commitment.

in summary:

- Additional archive content is not particularly powerful.
- New, well-funded content will maintain audiences and, if sufficiently well marketed, promote greater reach amongst young people.
- This will have the most powerful impact on society and culture in the long run.

Question 3 - Fair and Effective Competition

In **section 4.3.6 Industry Spend**, the document states *"In order to make programmes available for longer the BBC will spend more with production companies to secure rights. While this limits the scope of what can be placed on BBC iPlayer, the extra funding will go to production companies."*

Industry contacts tell us that current discussions with BBC about digital rights are difficult - in particular, the right to exploit producers' content on YouTube. We welcome the statement in **4.3.6**, but the BBC should be aware that they will be held to account for it if there are infringements.

Conclusion

The BBC's services for children are one of the core elements of its public service remit, and it is in the public interest of today's children now, and as future adults, that these services are not diminished, but rather enhanced, as the Corporation moves towards a digital future. Decisions taken now about the relationship with this audience will affect not only their futures but the entire public service media ecosystem in the UK, with long-term implications for the media industry and for society as a whole.

In this case public value is about far more than whether the BBC can serve extra content on the iPlayer. It is about whether the current custodians of the BBC's public purpose decide to deliver for the children's audience as the key to their future relationship with the British people.

3.8.22

Greg Childs

Director

[The Children's Media Foundation](#)

DECLARATION

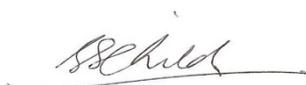
I confirm that the information I have submitted is a formal consultation response.

It can be published in full on the BBC's website, unless otherwise specified, and I authorise the BBC to make use of the information in this response to meet its legal requirements. If I have sent my response by email, the BBC can disregard any standard email text about not disclosing email contents and attachments.

NAME: Greg Childs, Director, The Children's Media Foundation

DATE: 3 August 2022

SIGNED:

A handwritten signature in black ink, appearing to read 'G Childs', written over a horizontal line.