



Save Kids' TV

Response to Ofcom's Consultation on Phase One of the Second Public Service Broadcasting Review

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Save Kids' TV

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Introduction

Save Kids' TV is a coalition of parents, producers, artists, educators and others concerned about screen-based media for children in the UK. Since 2006 it has sought to increase public and political awareness of the crisis in children's media production in this country, the dramatic decrease in funding for the production of children's programmes and the affects this will have on the cultural entitlement of British kids and in the long run on the cohesiveness of UK society.

These observations were well-supported by Ofcom in their October 2007 report "The Future of Children's Television Programming". Research into the attitudes of parents and children to diminishing choice and a lack of plurality of provision, and into the stark figures for production in the UK which indicated that only 1% of new programmes made originated here, have confirmed the SKTV contention that the failure of PSB to deliver in the digital multi-channel marketplace is very much already upon us as far as the children's genres are concerned.

In their latest Phase One report on Public Service Broadcasting in general, Ofcom has amalgamated their research in the children's sector with further work on the other PSB genres, and has identified that the children's production crisis is the "canary in the coalmine" for other PSB programming over time.

SKTV is responding to this consultation specifically with reference to PSB provision for children. We believe this is an audience which has needs that cannot be supported by the market alone and which requires support and protection

This SKTV submission is laid out as a series of responses to the questions listed in the PSB Review document.

Consultation Questions

Section 3. How well are the public service broadcasters delivering public purposes?

3i) Do you agree with Ofcom's assessment that television continues to have an essential role in delivering the purposes of public service broadcasting?

Yes, we agree. TV clearly remains an important entertainment and education medium for all children of all ages. Public service television which provides a full range of programmes to encourage children's social, emotional and intellectual development is especially important for those children who would not otherwise have access to such stimulation and support at home, particularly children in less affluent homes who could be disadvantaged.

3ii) Do you agree that UK-originated output is fundamental to the delivery of public service broadcasting purposes?

Yes. Paragraphs 3.79-3.84 clearly support the case in terms of provision for children. A significant amount of UK-originated programming reflecting UK culture is needed to entertain and inform children and to educate them as UK citizens. Children need to have their own complex and diverse world reflected back to them.

Section 4. The changing market environment

4i) Do you agree with Ofcom's conclusions about the way that other digital channels and interactive media contribute towards the public purposes?

Yes. Children are early adopters of new technology and make great positive use of it. The quality, range and accessibility of the content, however, remain ongoing issues.

Section 5. Prospects for the future delivery of public service content

5i) Do you agree with Ofcom's assessment of the implications of different economic scenarios for the UK TV market for the future prospects for delivery of the public purposes?

Yes. It is clear that the implications for the future of children's PSB are increasingly serious.

5ii) Do you agree with Ofcom's analysis of the costs and benefits of PSB status?

Yes.

Section 6. Meeting audience needs in a digital time

6i) Do you agree with Ofcom's vision for public service content?

In general, yes. But we would stress the need for substantial provision of high-quality, innovative and original children's content across all age ranges and genres (see section 6.4)

6ii) How important are plurality and competition for quality in delivering the purposes of public service broadcasting, and in what areas?

In terms of the provision of children's services both are essential. There is a need for a variety of editorial voices and points of view. Children should be exposed to a wide range of voices and ideas in order to support concepts of democracy and citizenship, so giving the BBC a virtual monopoly would be limiting and dangerous. Competition enhances quality as well as providing choice and keeping budgets at a proper level.

6iii) In maximising reach and impact of public service content in the future, what roles can different platforms and services play?

We believe that children's services in the future will need to be multi-platform, on-line, interactive and participative. (See the "Destination" proposal in our submission to the Ofcom Children's Review - 17th December 2007) All kinds of service and means of delivery should be utilised and be accessible. The issues will be how to achieve the provision of high-quality PSB content and how it will be financed.

6iv) Do you agree that the existing model for delivering public service broadcasting will not be sufficient to meet changing needs in future?

Yes.

Section 7. Future models for funding and providing public service content

7i) What are your views of the high-level options for funding public service broadcasting in future?

We are concerned about the possible reduction or re-allocation of the licence fee. We do not believe that distributing the same pot of money in a different way will solve the problems. We do not wish to see the BBC's children's services lose funding. We would want their service better funded and to see the £30 million which has been lost from other children's services replaced and if possible enhanced.

The other options should be investigated as should ethical advertising and potential funding from Foundations and cultural bodies.

7ii) Are the proposed tests of effectiveness for future models for public service broadcasting the right ones?

Not quite. There is no reference to the delivery of "quality."

7iii) Of the four possible models for long term delivery of public service content, which, if any, do you consider the most appropriate and why? Are there any alternative models, or combination of models, that could be more appropriate, and why?

Neither Model 1 nor Model 2 is feasible. Evolution is not an option for children's PSB. It would not survive "natural" commercially-driven selection and would become extinct. The BBC on its own cannot satisfy the need for plurality and competition. Standards and budgets would fall, and there are serious doubts as to how effectively the Trust could regulate.

Model 1

We have serious concerns about this model. It appears to do little more than maintain the status quo which has already failed.

If it were adopted we believe that it would require firm regulation in terms of ring-fenced funding, transmission hours and variety of genres.

A move from tier 2 to tier 3 for the commercial PSBs might help.

We propose there should be a regulatory body or sub group specifically for children's output composed of people with expert knowledge of the needs of this audience.

Model 2

We feel that this model contradicts the public's clear desire for plurality and concentrates commissioning power in a dangerously small base.

In order to achieve plurality and competition, maintain high standards and protect budgets, a major re structuring of the BBC would probably be required, plus a powerful regulatory regime.

We do not believe that this is in the best interests of the BBC or the children's audience.

If the BBC were the only significant provider there would need to be a major increase in the children's budget at least to the level of the 'missing' £30 million.

Model 3

We feel this could be an option, but it lacks clarity. There would have to be safeguards on a long-term commitment by Channel 4 across all age ranges which would require them to set up a dedicated children's service. There would need to be a significant TV outlet to draw the audience to the brand. We are unclear about the definition and determination of "content the BBC is not providing." How would the competitive element work?

Model 4

Again, we think this is a possible option providing plurality and competition. There are still serious challenges around the sources of funding and the form of administration. We do not want to end up with a costly bureaucracy that would limit the scope of content creation.

Whatever model is chosen, we believe that certain criteria must be met when considering the provision of a new children's service.

It must:

- Serve all age ranges
- Be available to all
- Include all genres
- Be cross-platform/multi-media
- Be properly financed
- Provide programming of high quality
- Be culturally relevant
- Reflect the wider world
- Acknowledge that this audience has specific needs
- Enfranchise the audience
- Interact with the audience
- Be fun

Section 8. Options for the commercial PSBs

8i) What do you think is the appropriate public service role for Channel 4 in the short, medium and long term? What do you think of Channel 4's proposed vision?

We believe that C4 can have a useful role to play in the provision of PSB content for children. The current pilot, however, is relatively modest and limited in age range and accessibility. It would need to be considerably extended in terms of target audiences and budget. Most importantly, any provision for children would need to be guaranteed a long-term future if C4 were to become a major provider alongside the BBC.

8ii) Which of the options set out for commercial PSBs do you favour?

We would welcome the continued participation of commercial PSBs, but only if they embraced the criteria we have listed in 7iii and under the regulatory terms we have applied to Model 1 above.

Section 9. Scenarios for the UK's nations, regions and localities

N/A

Section 10. Prospects for children's programming.

10i) Do you agree with our assessment of the possible short-term options available relating to children's programming?

The short-term options listed in this document are too limited. We support the concept of tax incentives, despite the issues raised, but agree that this could only be a stop-gap solution. We also agree that the other options should be explored but stress the need for this to be treated with urgency. The BBC Trust should seriously consider the level of investment in content and the extension of children's hours. Our comments on Channel 4 are outlined above.

We do not believe the S4C option is really practical on any major scale. Re-voicing and double shooting are not always creatively satisfactory and can be costly.

Dialogue with the broadcasters on the subject of children's PSB provision should be robust and top priority.

Section 11. Timetable for implementing a new model

11i) Do you agree that new legislation will need to be in place by 2011 in order to ensure continued delivery of the public purposes in the medium and long term?

In relation to children's services, we are concerned that the timescale is too drawn out. 2011 will be too late to save a comprehensive PSB service for children in the UK.

The Government should act now and legislate soon