Introduction

The BBC Trust welcomes Ofcom's report into the future of children's television programming. The report highlights a number of important issues and raises concerns over the decline in investment and output in new UK-originated content for children. Many of the issues raised by Ofcom are relevant to public service broadcasting as a whole, and the Trust looks forward to engaging with Ofcom as part of its wider review of public service broadcasting.

The Trust welcomes the evidence presented in Ofcom's report showing that the BBC's output has increased significantly over the period reported and that parents 'highly value' BBC programming in this area. As the UK's main public service broadcaster, and given the nature of its funding, the BBC is not subject to the commercial pressures which are currently affecting the levels of children's provision on other channels. The Trust considers that ensuring the BBC continues to provide high-quality UK-originated children's programmes, and the considerable public value that brings, is central to its role.

The BBC Executive is submitting a separate response to this consultation, the conclusions of which we note. This response sets out a brief commentary on:

- BBC children's television output and the role of service licences;
- Future spending plans;
- The issue of plurality;
- Possible policy approaches.

BBC children's television output and the role of service licences

Ofcom's report notes that the service licences, which are an important tool for the Trust to hold the BBC to its remit, do not reflect the current level of children's output and that there is a risk the BBC could reduce this output. Service licences are a key tool of governance introduced in the 2006 Charter, and set out, for the first time, the key characteristics of each BBC service including: its remit, the scope of delivery mechanisms; an annual budget; an overview of its aims and objectives; conditions of service; and performance indicators. Each licence also describes the service's commitments relating to each of the BBC's Public Purposes. Collectively, these commitments are designed to ensure that each service is focused on promoting the Public Purposes.

The current service licence commitments and conditions relevant to children's television are:

- **BBC 1 and 2.** Have a shared commitment to offer at least 500 hours of children's programmes across the year;
- **CBBC.** Remit states that 'the great majority of (its) content should be produced in the UK.' Specific conditions are to broadcast 650 hours of drama, 150 hours of live material, 85 hours of news and 1,000 hours of factual and schools programmes each year;
• **CBeebies.** Remit states that it should broadcast ‘mostly UK-produced programmes.’ Specific conditions are to offer over 4,500 programme hours, that at least 75% of investment is in new UK-originated programming and that a quarter of hours of UK programming are new material.

As required under the Charter and Agreement, service licences have been operational since January 2007. The licences included areas which had already been approved by the BBC Governors, for example:

- Service budgets which were based on the 2006-07 Financial Plan, approved by the Governors in March 2006;
- Conditions for each service, which had been approved by the Governors in the form of commitments within Statements of Programme Policy for 2006-07.

In drawing up service licences, the Trust took the view that if service licences were to be effective tools of governance, the conditions and commitments for channels and networks needed to retain sufficient flexibility to allow the Executive to deliver output which responds to the changing market and audience demands, while ensuring that the Public Purposes are effectively promoted and audience expectations met. These principles apply to the provision of children’s services as well as any other core part of the BBC’s public service remit.

At the time of issue, the Trust also issued a full public consultation on the whether each service licence was sufficiently accurate and comprehensive, and whether the service licences, taken together, are appropriate tools to allow the Trust to govern the BBC’s UK public services. The consultation specifically asked respondents for comments on whether the levels of the conditions were appropriate. The consultation responses and the Trust’s summary can be found at [http://www.bbc.co.uk/bbctrust/consult/closed_consultations/service_licences.html](http://www.bbc.co.uk/bbctrust/consult/closed_consultations/service_licences.html)

The Trust is now considering the role and nature of conditions within service licences in light of the consultation and the outcomes of the six year strategic plan. The Trust will also take into account the BBC Executive’s view on the levels of conditions for children’s television output. The Trust will communicate its decisions, and publish the amended service licences, in spring 2008. Any variations will help shape service licences into tools which best reflect the Trust’s role in governing the BBC’s services and its aspirations for them.
Future spending plans

The Trust approved the BBC’s six-year strategic plan in October 2007. The plan makes a firm commitment to the delivery of the BBC’s public purposes through high quality and distinctive creative content and was based around three core principles, that the BBC should deliver:

- Distinctiveness in its output;
- Sustainable quality;
- Value for all its audiences.

These principles apply to children’s television as they do to all BBC output and the plans require Management to deliver efficiency savings from children’s television, with the overall aim being to ensure that the money saved is re-invested in programme-making. The plans also include some new investment in children’s output.

The Trust is aware that these plans present BBC Management with challenges: to maintain the volume, range and quality of its output while delivering efficiency savings. However the Trust has put the processes in place to track performance and take corrective action to ensure that efficiency savings do not affect quality. Such processes include: reviews of each of the BBC’s services at least every five years; Public Value Tests for new services or significant changes to existing services; and independent verification and reporting that efficiency savings are being delivered. These processes will all be underpinned by audience research and the Trust is confident that this can ensure that BBC output meets audience expectations.

The issue of plurality

Ofcom’s report presents evidence that parents value plurality in the provision of children’s television and questions whether it is in the audience’s interests for the BBC to be by far the UK’s largest commissioner of UK children’s programming. The Trust recognises the arguments around plurality and is of the view that, in general terms, audiences can derive benefit both from increased quality and innovation that competition can drive, and from a diverse range of voices.

Ofcom’s report makes clear however that the general concern over children’s television applies more in some genres and sub-genres, and for some age groups, than others. For example, pre-school children (2-5 year olds) are currently better served than older (9-12) year olds while animation is better provided than drama and factual. As part of Ofcom’s wider review of public service broadcasting, the Trust considers that further analysis is needed, to gain a deeper understanding of the relative benefits and importance of plurality within different genres and sub-genres, at different stages of the broadcasting process (outlets, commissioning and production) and across different platforms. The Trust welcomes Ofcom’s intention to explore the costs, benefits and importance of plurality in different aspects of public service broadcasting as part of its wider PSB review.

Possible policy approaches

The report presents a number of possible policy approaches to address the issues faced by children’s television. Most of these are properly decisions for the Government but it is clear that a number of the proposed approaches would have a direct impact on the BBC. The Trust does not consider that these options are mutually exclusive, and is of the view that, just as the
picture is different by genre, sub-genre and age category, there is not necessarily a “one-size fits” all solution to the issues facing children’s television. The Trust looks forward to playing a key role in engaging with these approaches as part of Ofcom’s wider review of public service broadcasting. While at this stage the Trust does not rule anything out, it is clear that if action is taken, it should follow extensive public debate and be underpinned by strong evidence that it is in the overall interests of audiences.

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