



## The Children's Media Foundation

### Response to Ofcom's Consultation Small Screen: Big Debate

#### Consultation questions:

**Question 1:** Do you agree that a new regulatory framework for PSM delivery should support a more flexible 'service neutral' delivery approach that is more outcomes focused? *p 39*

**Question 2:** Do you agree with our proposals for a clear accountability framework? *P 39*

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This document offers some general observations on the *Small Screen: Big Debate* report, with information about a Children's Media Foundation initiative to consider in depth the value, purpose and meaning of public service media for children and young people, to examine the current stresses on the delivery and funding of that content, and to explore possible futures for public service purpose, creation, delivery and funding – over the long term.

The response outlines some general observations followed by brief remarks on each of the questions asked by Ofcom in the consultation.

## 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.

This document is CMF's interim response to the *Small Screen: Big Debate* report based upon our concerns and observations as they currently stand.

Beyond these initial observations we request that Ofcom also take into account the CMF planned report: [Our Children's Future: Does Public Service Media Matter?](#)

This will be a compendium of articles written by prominent figures in the media, academia, child-protection, futurology and technology that consider the current state of public service provision for children, its purposes and value, the competitive pressures for audience attention, rapidly changing technology and audience adoption and a variety of possible futures - in terms of funding, delivery, content and regulation.

[Initial articles have already been published](#) on the CMF website. The final report will be released in July 2021 and presented at the Children's Media Conference.

CMF commends Ofcom for the comprehensive analysis of the current condition of the UK media market in the *Small Screen: Big Debate* report. Widespread take-up of streaming services and user-generated content providers is putting strain on the audience's relationship with traditional public service providers. The *Small Screen* report articulates potential solutions to maintain the vital relationship between the British public and public service content and considers some alternative methods of funding, regulation and provision.

However, the *Small Screen* report does not particularly take into account the younger audience. There are few specific references to them. Equally we note that the government's Public Service Broadcasting Advisory Panel has only one member with experience in the provision of media for children, or consideration of its value and effects.

Children and teens are in the forefront of adoption of and activity on new platforms. They are also most immediately in danger of losing touch with or interest in public service content, who is providing it, how it is funded and therefore over time – why it matters.

Media habits in childhood and teenage years become the norm for content consumption through the rest of their lives. A generation losing touch with public service media and unable to recognise its value might be considered by some to be the inevitable result of modern media plurality. We do not accept that and consider such alienation to be a danger to maintaining a cohesive society, shared values and culture, empathy and inclusivity. The market will not always provide.

CMF recommends closer examination of the particular needs and thinking of the young in Ofcom's final recommendations to government. We hope our Public Service Media report will fill the gap in public discourse, which to an extent ignores this vitally important audience and its impact on the future of public service media. The CMF Report will also look further into the future than *Small Screen, Big Debate*.

We believe the *Small Screen* report is not sufficiently far-sighted. Though there are some radical options described, the report does not take account of technological change ahead – certainly not far ahead. The advent of ever more powerful AI and algorithmic recommendation, ubiquity of internet connected devices, the implications of mass data-harvesting, personalisation, the power of social platforms in young people’s media mix and the capacities of pervasive, interactive and responsive media - all these and many more yet to be discovered will impact on the meaning, purpose, delivery and funding of public service media in the future. The young are incubators of these drivers of change, and most likely to adopt them as they arrive. All the more reason to take into account their preferences and habits, above all other demographics. We believe the Ofcom recommendation to government needs to consider 10 to 20 years out, in terms of technological impact and the way in which the young grow up embracing change.

In this we are supported by and commend the response to this consultation by the [Youth Media and Culture Network](#) who identify technology issues which should be considered in deciding the future of Public Service Media and who lay strong emphasis on Generation Z as a key driver of change.

While needing to take a longer view, any recommendations to government also need to take into account the need for short-term change as many problems identified in *Small Screen: Big Debate* are with us now.

With that in mind, we suggest a rolling approach to the process. A plan could be formulated that covers improvements to be adopted in the immediate future with broader changes plotted further out. Regular review could redirect or re-phase the plan based on research, technological change and market conditions.

This would allow cautious change initially, avoiding seismic shifts that can quickly prove inappropriate, while envisioning considerable innovation long-term – all designed to maintain the essential spirit and functions of public service media while embracing the new.

Children and young people should form the backbone of the research and thinking that feeds this process.

It is vitally important to make the necessary changes to ensure the continued strength of UK public service content free from political bias, with clear public purpose as the goal, but with flexibility built into the decision-making process. To keep ahead of the game, it is equally important that provision for children and young people, and understanding their media preferences and habits, are also at the heart of the decisions to change.

**Further comments on Ofcom’s consultation questions follow...**

## Consultation Questions

**Question 1:** Do you agree that a new regulatory framework for PSM delivery should support a more flexible ‘service neutral’ delivery approach that is more outcomes focused? *p 39*

CMF has long supported the need for Ofcom to take a more flexible approach to regulation. We applauded the way in which Ofcom took an agile approach to regulation and assessment when invoking its new powers to regulate commercial PSBs to carry more children’s programmes.

Ofcom has already been charged with regulating SVoD and AVoD and may become the UK’s “internet regulator” under the government’s Online Harms legislation. We believe it will be important that these powers equip the regulator to manage potential radical changes in the media landscape over the next ten years.

The *Small Screen: Big Debate* report does not in our opinion look far enough into the future of media use, technology and delivery platforms. However, the flexible “service neutral” approach to regulation is the right way to go to ensure that Ofcom is equipped to manage change. We see a role for the regulator in leading a regular review process enabling changes to the provision, funding and regulation of public service content to take place gradually.

**Question 2:** Do you agree with our proposals for a clear accountability framework? *p 39*

Ofcom’s proposals for the accountability framework appear to leave too much in the hands of the providers. It is not clear what mechanisms Ofcom will use to set the broad parameters for what constitutes public service in the various contexts they may be called upon to regulate. For example, has consideration been given to what public service social media might be; what requirements might be laid upon it; what criteria will be used to judge it by comparison with commercially provided social media? If the concept of public service algorithmic recommendation became part of a future media landscape, would Ofcom leave the definition of that to the provider, or prepare a methodology for setting standards.

Our point is that technology is already moving faster than the regulators consideration of possible futures. *Small Screen: Big Debate* places most of its emphasis on “media” and appears to define that as the delivery of content. We believe that in a world of user-generation, shared content, recommendation and data manipulation, the regulator needs to give more thought to where regulation, definition of public purpose and standards might be needed and might have an impact.

**Question 3:** What do you think should be included in the PSM ‘offer’? *p 43*

**Question 4:** What options do you think we should consider on the terms of PSM availability? *p 43*

CMF considers that protection of the children’s audience is an imperative. This goes further than regulating for a “safer internet”.

Regulation which takes into account the continued, prominent provision of unbiased news and information services, publicly-funded content which educates, but also informs and entertains, and a wide range of thought, experiences and opinions – is vital for their mental well-being and the health of society as a whole. If, in any future scenario, the public funds content provision, then that content should take precedence over commercial content on all platforms.

The digital divide needs to be considered when thinking about future provision of public service content. As Covid has illustrated very clearly, there are vast swathes of the audience who don't have access to a full suite of digital platforms let alone subscription services. The children and young people marginalised for education during Covid were marginalised for entertainment too and this will continue. The arrival of "super-fast broadband for all" is a misnomer if disadvantaged groups are left out. Public service content is only public service when available to all. So future thinking about delivery needs to take this into account and changes to public service provision should be seen as an opportunity to also significantly reduce the numbers of young people affected by the current divide.

In all of this we are more inclined to the points of view expressed by the collective PSBs than Tech UK in their submissions to the consultation.

Setting up Ofcom or any future regulator with the powers to achieve the above will be vital in creating the mechanism for public (rather than state) control over the media the public access on all platforms.

**Question 5:** What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches? p 52

CMF currently strongly supports the Licence Fee and believes this should not be further cut or diluted, as in the end all such measures impact on the BBC's capacity to deliver strong children's content.

We also support the Young Audiences Content Fund pilot. However, its original source as Licence Fee derived revenue is of considerable concern in terms of future thinking. The success of the Fund should not become an encouragement to expand the scheme and cannibalise the Licence Fee to do so. Consideration should be given to continuing the work of the Fund after the pilot period with finance from sources other than the Licence Fee. The future of the Fund over the next few years is a prime opportunity to experiment with other forms of financing – including levies on the popular digital platforms and Lottery funding.

In the medium term transitioning the Licence Fee to a household payment is an option that should be explored. Though we would recommend this as part of a long-term plan to provide a mixed set of revenues which could also include levies. It would seem clear that where there are significant profits, these should be turned in part into public good. These might be in telecoms, forthcoming data provision, digital platforms or technology companies.

CMF's [Public Service Media Report](#) will explore in more detail what might be possible in terms of future funding.

However this is to be achieved, what is important is the *Small Screen: Big Debate* report to government should express a clear recommendation to increase the amount of funding available to public service provision, rather than risk reduction. It should ensure that public service content, and its relevant marketing, can compete with powerful commercial operators not only through "must carry" forms of regulation, but through its own ambition, range and quality.

Starting from a lower baseline, children's media in particular needs more funding, not a share of a more widely dispersed pot.

**Question 6:** What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven't identified? P 54

The CMF is in the process of investigating the extent to which arts and cultural activities for children have migrated during lockdown to screen-based delivery, suggesting that hybrid versions of this could create a completely new form of access to cultural experience for wider audiences of young people. If cultural organisations are embracing screens, then the possibilities for further public service media collaboration grow. The DCMS needs to consider how Arts Council and future forms of media funding might be used in tandem to best effect.

**Question 7:** What are your views on the opportunities for new providers of PSM? P 60

As stated previously, plurality of provision, and content provided on the platforms they are using has strong resonance for the children's audience. They are migrators to the new platforms and less attached to the delivery brand than the brand of the content they are viewing.

However, if new players enter the market it is vital that the overall public service budget for content for young people is increased. We see no reason to raid the Licence Fee to expand plurality when there are other options to raise new funds dedicated to public service content.

This and other options for funding, delivery, and regulation of new forms of public service will be explored in a variety of ways in the CMF [Report on the Future of Public Service Media](#).