



Your response

Question	Your response
<p>Question 1: Do you agree that a new regulatory framework for Public Service Media (PSM) delivery should support a more flexible ‘service neutral’ delivery approach that is more outcomes focused?</p>	<p>My response concentrates mainly on the consultation as it affects children and how they are represented in the public service system.. A flexible approach to service neutral delivery would be helpful but it also needs care to ensure that PSBs can be easily found and are prominent so that the system remains sustainable. But generally PSB content should be available on any freely available platforms, that children can freely and safely access, and which can be regulated in ways that protect children from harm. For the time being broadcasting is also important particularly for those families and children for whom online provision is not an option.</p>
<p>Question 2: Do you agree with our proposals for a clear accountability framework?</p>	<p>There is a danger with the current proposals that public service providers will be able to determine too much of what should be provided, with little opportunity for Ofcom to determine what that is, how it is defined in the public interest, and what it encompasses in a rapidly changed landscape of different types of content delivered in a range of ways including by algorithmic mechanisms. In writing their own annual statements, and setting the terms of how they are judged there is a considerable risk that accountability to the public will be undermined.</p> <p>It should be noted that commercial PSBs investment in UK children’s content declined massively after the removal of quotas, and recent small amounts of investment have only occurred as a result of gentle coaxing from Ofcom and the prospect of financial support from the YACF combined with tax-payer supported tax credit systems for animation and live action. Investment in PSB content has fallen, but investment in PSB children’s content has</p>

	<p>fallen even more starkly as evidenced in countless Ofcom reports. As the regulator of VoD services and a potential internet regulator, a flexible approach should not be taken at the expense of children's rights to have access to and be informed by high quality UK-originated content. Given recent history it is regrettable that quotas have not been maintained in children's content, and are also being loosened in respect of the BBC (Newsround down to 34 hours from 85 – plus reduction in CBBC originated hours to 350). As part of the review, Ofcom should consider how original children's content can be maintained, so that PSM is also accountable to children.</p>
<p>Question 3: What do you think should be included in the PSM 'offer'?</p>	<p>Children's content should be part of the PSM offer, but it's disappointing that it's mentioned infrequently in the consultation document (briefly on 6 pages) and was not always a focus of Ofcom public events leading up to the consultation. To echo the newly appointed children's commissioner in an announcement on 15th March "society and political structures often short-change children" and the long-term impact for children and PSB will only be known in years to come, if PSB fails to engage younger audiences now, who are the PSM users of the future. Consultation of children has often been lacking in previous inquiries (which is different from tracking media usage as consumers as in media trackers). The current media system, of which freely available public service broadcasting is a key part, contributes to a cohesive democratic society, to which children also belong and in which they participate, engage and learn. It underpins their communications rights including 'access to information and material from a diversity of national and international sources', and the right to require states to give 'due weight' to the views of children, and to provide them with an opportunity 'to be heard' (see UN Convention on the Rights of the Child) . The current Ofcom overview does not take enough account of the future impact of technological transformations on children's lives or offer to explore their views.</p>

	<p>A public service offering for children should mirror that of adults and include impartial news, educational content, drama and entertainment which reflects the diverse backgrounds of children living in all parts of the UK., and promotes inclusiveness. It should be universally accessible, and not subject to commercial priorities alone. It should be accessible in a platform neutral way on PSB VoD and online, so that all children can access it.</p> <p>There is a danger of taking on the PSM definition over and above the PSB definition, without clear definition over issues such as funding support, prominence and who is qualified to provide it. There is a suggestions that PSB quotas may be reduced in favour or more qualitative metrics. However, this approach has not benefited children's content which has seen a substantial reduction in hours and expenditure on originations since the removal of quotas. Without regulation commercial PSBs have always reduced their commitment to children's and this would likely also occur with other genres. The BBC is not immune from this tendency either. The removal of quotas on children's content offers a cautionary tale if policy-makers fail to provide necessary safeguards.</p>
<p>Question 4: What options do you think we should consider on the terms of PSM availability?</p>	<p>The pandemic has made even more visible the divisions in society and particularly the difficult circumstances of many children in the UK, who do not uniformly have access to Wifi and electronic devices at home, let alone popular subscription services. In this situation Public service is about inclusivity and access and making sure that no one is excluded in ways that are likely to undermine social cohesion and democracy.</p> <p>This means prominence for PSB services and players on those platforms where screen-based public service content is most easily and frequently accessed and watched as recommended by Ofcom in 2019 and also in search and algorithmic engines, so that children can also discover content made for and by them.</p>

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

Although the licence fee is not within scope for this consultation the licence fee it is currently the best way of supporting the BBC and its investment in children's content, which also supports a range of independent production companies around the country – contributing to diversity and inclusion.

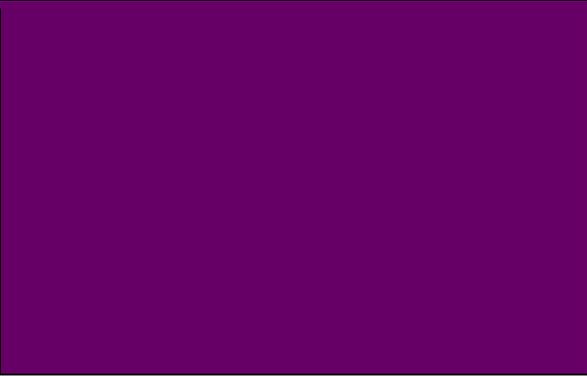
The YACF has made great strides in encouraging commercial PSBs to invest in children's content on a match-funded basis, but from a historical low point after the removal of quotas in 2006. The danger to children's content is that the licence fee will be top-sliced again to continue the fund and this will not necessarily benefit children, if the BBC ends up cutting budgets to make up the loss. The benefits of contestable funding in other countries are not [clear-cut](#) and often very problematic.

Advertising is especially problematic as a funder of children's content given bans on advertising for HFSC around children's broadcasts, and one reason why commercial PSBs are reluctant to invest in children's content. Recent regulation of advertising-funded children's content on YouTube has been difficult for some children's content providers, as opportunities are reduced.

This may be the time to explore levies on large transnational media companies and platforms, who enjoy unparalleled access to UK markets including access to substantial tax incentives and low tax rates, but do not always invest in areas of the UK market. This is the case for video streaming services.

[There are other options including household fees \(Germany\) and tax-based system \(predominantly in Scandinavia\)](#) (**The Funding of Public Service Broadcasting in Europe – Funding Systems and Decriminalisation - Selected Territories Information Briefing 30 March 2020**) which have a progressive element (Finland, Sweden, Norway) based on personal income. All systems

	<p>have drawbacks and the household fee is not necessarily equitable or devoid of non-payment (approximately 3.5m households did not pay in 2018 in Germany).</p>
<p>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>	<p>There are opportunities for collaboration, particularly those that involve children and young people, and which could enhance engagement by this section of the population. But it's also important to consider how much it costs to make good quality content, and with whom one is collaborating. If it is at the expense of public service commitments, e.g. working with organisations and prioritising content that is not recognisable to those who live in the UK then this is more problematic. Opening up the public service system to all kinds of providers is reminiscent of a contestable system, and evidence of how this operates in other countries, does not necessarily show a better fulfilment of the public service mission.</p>
<p>Question 7: What are your views on the opportunities for new providers of PSM?</p>	<p>New providers of PSM could expand the plurality of what is on offer, but there is no guarantee that this will happen, and should be contemplated with great care. This shouldn't be an opportunity to pick and mix those parts of the public service mandate that suit, and weaken the delivery of PSB content and purposes overall. Existing PSB institutions (both BBC and commercial PSBs) are highly valued by the public and there is a risk of fragmenting the public service mission for competitive reasons that are not fully grounded in evidence that this will improve delivery and quality for the public as a</p>



whole. It will be especially difficult if the same funding pots have to be shared by more providers.