



OFCOM: THE FUTURE OF CHILDREN'S TELEVISION PROGRAMMING

1. BECTU is the trade union for workers (other than journalists and performers) in the audiovisual and live entertainment sectors. Many of our members, both staff and freelancers, have worked in the children's programming sector. We have for some time had concerns about the development and future prospects of this sector and we are members of the Children's TV Campaign Alliance.
2. We note that Ofcom is required to report on the fulfilment of broadcasters' PSB remits including original programmes for children, every 5 years and that Ofcom's second PSB review is about to commence. In the light of this we are happy to set out below our response, in summary form, to the Discussion Paper.
3. We acknowledge the extensive research commissioned and undertaken by Ofcom. We believe this confirms the concerns already expressed by BECTU and others, especially the Children's TV Campaign Alliance:
 - Despite the increase in the number of children's channels, expenditure on original children's programming is in decline, falling from £127m 1998 to £109m in 2006 (-14%).
 - By 2006 only 17% of total children's programming was UK-produced. Less than 1% was original programming made in the UK and shown first on a domestic channel.
 - Expenditure on original children's programming by commercial PSB broadcasters (ITV, C4, Five) has significantly reduced, halving in real terms from 1998 to 2006. Their proportion of overall UK spend on original children's programming fell from 52% to 33% over the same period. Non-PSB commercial children's channels continue to contribute only 10% of original children's programming.
 - The most significant and serious decline in original programming has been at ITV1, with a 60% reduction from 362 hours in 1998 to 146 hours in 2006.

POLICY APPROACHES

4. We note the possible policy approaches suggested by various sources and set out on page 32. Some initial points in response are as follows.

A/ Broadcaster-Based Intervention

Of the funding sources suggested, we favour a levy on non-PSB broadcasters such as BSkyB. We are completely opposed to top-slicing the licence fee for any purpose. We have set out our views on this in more detail in earlier responses to Ofcom PSB consultations.

B/ Production Incentives

We are concerned that tax incentives for commercial independent producers will directly undercut in-house production of children's programming at BBC and ITV. We regard Pact's argument as arising from commercial self-interest as much as any broader concern for children's television.

C/ Extending the Remit of Existing PSB Broadcasters

We favour extending and making more specific the remit of ITV, C4 and Five. However, we consider that this should apply to PSB programming generally and not just to children's television. We further question why the PSB remit (including that governing children's television) has not been defined more tightly in legislation and regulated more rigorously by Ofcom.

D/ New Institutions

We have set out our views on Ofcom's proposal for a PSP in our response to earlier Ofcom consultations. This could, in principle, include provision for children's content.

5. As indicated above, **BECTU** has consistently favoured a more robust approach in favour of PSB generally and not just children's programming specifically. We believe some of the specific policy proposals (eg access to **a levy on non-PSB broadcasters, extending the PSB remit, including children content within the proposed PSP**) could assist in providing a future for original children's programming - but **only in the context of a strong general role for PSB in the digital future.**
6. One specific measure which Ofcom should, in or view, take in order to inform, debate on the whole issue of the future of children's television, (and PSB generally) is to **make broadcasters' annual statements of programme policy available in full to the public.** We see no reason (with the sole exception of detailed commercially confidential financial information) why this should not be possible. If Ofcom takes the view that current legislation does not provide for this, then we believe Ofcom should lobby government to be allowed to do so - in view of the wide public interest in the future development of PSB.

SECOND PSB REVIEW

7. We believe there is a key role for UK- originated programming for children. We fully agree with the opening paragraph of the Ofcom report, which states that 'Children's television has been at the heart of the UK's PSB system for over fifty years' and that 'the UK has built a reputation for producing some of the most distinctive and high quality children's programming in the world'. All of this is now under threat.
8. We believe, in line with the Children's TV Campaign that:
 - television plays a key role in children's lives and programmes designed specifically for them not only entertain but also educate and inform
 - quality public service television helps children make sense of the complex and often confusing world they inhabit, and shows how they can make a creative and positive contribution to it.
 - we should ensure that our children have access to high quality original home-grown programming that reflects their lives, their language and their culture at both a national and regional level in a way that imported programming can never do.
 - issues affecting the quality of our children's lives cannot be left to commercial forces alone.
 - the lack of significant original children's programming can, over time, have serious implications for the cultural entitlement of young people in the UK and for the cohesion of our society.
9. We note that the Children's TV Survey referred to in the Discussion Paper revealed significant parental support for original PSB children's programming. Strong majorities of parents consulted believed:
 - that children's television has an important role to play
 - that the PSB main channels should provide PSB programmes for children
 - that they want a more even balance of programmes from the UK and overseas and place a high value on PSB children's programming reflecting the cultural values of the UK.
 - that children's programming should show a range of different cultures and opinions from around the UK.
 - and that they are not happy with the PSB channels' current delivery of these outcomes for children's programming.
10. We strongly support plurality in PSB provision generally and in children's programming specifically. While we strongly support the existing and future role of the BBC as a major producer of children's TV, we believe reliance on a single domestic provider is unhealthy and that we should be able to look to commercial PSB broadcasters for significant original children's output. This is all the more necessary in the light of the BBC's own financial constraints following the unsatisfactory licence fee settlement.

11. There are additional aspects to this plurality debate:
- Within the independent sector, the trend to consolidation threatens the smaller specialist children's producers. The increasing prevalence of super-indies may also lead to a distracting focus on additional revenue streams (eg merchandising, secondary markets) rather than solely on distinctive original production.
 - We are also faced with a geographical lack of plurality in original children's production. As the Ofcom report indicates, such production may increasingly be concentrated in London, the North West, Scotland and Wales rather than a more diverse spread of production centres.
12. We agree in principle that consideration should be given to provision of public service content for children over platforms other than linear television. This could encompass Ofcom's PSP proposal. This, however, begs the question of the broader context in which any such proposal is developed. As indicated above, our concerns on this have already been expressed in responses to previous Ofcom consultations.
13. Lastly, we see the policy approach for children's programming as resting within a strong general commitment to the future of PSB in the UK. In this sense, we do not see the particular approach for children's programming as diverging from our general approach to the future of PSB. As indicated above in the section on 'Policy Approaches', we favour a strong general role for PSB in the digital future as the best context for securing the future of original children's programming in the UK.

CONCLUSION

14. We hope you will take note of views - especially on the centrality of a strong overall commitment to the future of PSB and on the specific policy approaches listed. We look forward to further discussion on the future of children's programming within this PSB Review.