



### **About the BFI**

The BFI is a cultural charity, a National Lottery distributor, and the UK's lead organisation for film and the moving image.

Our mission is:

- To support creativity and actively seek out the next generation of UK storytellers
- To grow and care for the BFI National Archive, the world's largest film and television archive
- To offer the widest range of UK and international moving image culture through our programmes and festivals - delivered online and in venue
- To use our knowledge to educate and deepen public appreciation and understanding of film and the moving image
- To work with Government and industry to ensure the continued growth of the UK's screen industries

Founded in 1933, the BFI is a registered charity governed by Royal Charter. The BFI Board of Governors is chaired by Tim Richards.

The BFI administers the Young Audiences Content Fund on behalf of UK government. It aims to stimulate plurality of content for audiences up to the age of 18 by providing industry with £44m of grant-in-aid for the creation of distinctive, high-quality content. The fund makes production awards for original programming which has secured a written commitment from a broadcaster to make the programme available on a free-to-access, Ofcom-regulated service to a UK-wide audience. It also provides development awards for projects without a broadcaster. The Young Audiences Content Fund is a three-year pilot which ended in March 2022

**Q1. Do you agree with Ofcom's provisional assessment and the proposal to reduce the original productions quota on CBBC from 72% of all hours to 66% for each of the calendar years 2022 and 2023 and 68% for calendar year 2024 and for each subsequent calendar year? If not, please explain why, providing appropriate supporting evidence where possible.**

The BFI believes the BBC should provide further detail on a range of topics before any change is made to the Operating License. This will help ensure it continues to deliver its public service remit to children as effectively as possible. These topics are set out below.

The proposal of both further reducing hours, (following on from 2019's 50-hour reduction in origination hours) while increasing animation commissions is broadly contradictory to the BBC's stated purposes:

*3. To show the most creative, highest quality and distinctive output and services*

*The BBC should provide high-quality output in many different genres and across a range of services and platforms which sets the standard in the United Kingdom and internationally. Its services should be distinctive from those provided elsewhere and should take creative risks, even if not all succeed, in order to develop fresh approaches and innovative content.*

Reducing original production will make it harder to meet this objective, resulting in an overall offer that is less distinctive, reducing the range of genres that are offered in live action programming such as factual, factual entertainment, and gameshows. Some of this output, though valued by audiences, is less attractive to commercial broadcasters, risking the possibility that audiences lose access to them altogether. It is the production of programmes such as these that contributes to the distinctiveness of the BBC's offer, supports its public service remit, and reflects and represents UK audiences. The BBC should provide more detail as to how these risks will be managed.

Increasing the proportion of animated output will align CBBC more closely with other children's channels in the UK that mostly offer (largely imported) animation such as Cartoon Network, Disney, Nickelodeon, CITV, and undermine CBBC's distinctive, predominantly live action offer. It is suggested that animation will help attract audiences, but no evidence is offered to support this assertion. It is also suggested that animation consumption is higher among the target age range across other channels, though contextual factors such as what these channels are (and what audiences expect of them), their scheduling, broadcast competition, and whether they are seeing overall increases or declines in audience sizes, are not provided.

Due to the unique way it is funded, the BBC's offer should remain distinct from competitor channels, retaining its focus on ensuring it is representative and reflective of UK audiences, and ensuring it continues to produce programming popular with those audiences – in particular where commercial competitors are less likely to do so. The BBC should provide more detail on how an increased animated output will a) not impact the distinctiveness of its overall offer, and b) increase the size and diversity of its audience.

*4. To reflect, represent and serve the diverse communities of all of the United Kingdom's nations and regions and, in doing so, support the creative economy across the United Kingdom*

*The BBC should reflect the diversity of the United Kingdom both in its output and services. In doing so, the BBC should accurately and authentically represent and portray the lives of the people of the United Kingdom today, and raise awareness of the different cultures and alternative viewpoints that make up its society. It should ensure that it provides output and services that meet the needs of the United Kingdom's nations, regions and communities. The BBC should bring people together for shared experiences and help contribute to the social cohesion and wellbeing of the United Kingdom. In commissioning and delivering output the BBC should invest in the creative economies of each of the nations and across all of its regions, and contribute to their development.*

Most live action genres are cheaper to produce than animated series and given a sum of money, are likely to generate more hours of content, more titles, and support more UK based production companies. While most UK live action children's television is produced entirely within the country, most animated productions are currently co-produced outside of the UK, with the result being a reduction in investment in the nations and regions. At a time where the BBC are placing a renewed emphasis on supporting investment across the UK and outside of London and the South East, this proposal risks undermining those efforts. It also runs contrary to the UK Government's levelling up agenda, and risks the BBC being viewed incorrectly as unsupportive of it. As an increase in animated productions will likely result in an increase in co-production with internationally-based companies, and a correlating decrease in productions made entirely in the UK, commitments should be made to a) ensure domestic production, and b) require international co-productions to reflect British life and society at the same time as recognising the value brought by those international partnerships. In doing so, imagination and care must be taken to ensure that British signifiers are not simply conventional or reductive, but truly reflect the experiences of those living in the nations and regions of the UK.

Animation can be a wonderful tool for telling difficult or fantastical stories, and can also feel very British in tone and flavour. The BBC should continue to provide distinctive British animation such as *Sarah and Duck*, but it is important that it strikes a balance between animation and live action, and recognises the complementary value one form has to another. Given the recent reduction in hours of live action programming for children, an evaluation of the impact of this decision would be welcome before any further reduction is made.

Can CBBC:

- Demonstrate that there will be no reduction in the quality of its live action output, and that there will be no detrimental impact on the production sectors of the UK's nations and regions.
- Outline how the proportion of live action vs animation will change on screen across the linear offer (given that iPlayer already features a significant number of low cost imported animated titles that are not culturally distinctive).
- Outline how audience demand has changed since its most recent reduction in hours of live action children's programming.
- Submit the research documents that demonstrate the target audience prefers animation. How does this finding reconcile with the fact that historically CBBC's top performing shows have been live action such as *Horrible Histories*, *Dumping Ground*, *Operation Ouch*, as well as high quality live action acquisitions such as *The Next Step* and *Odd Squad*?

The BBC needs to maintain its point of difference in order to a) continue to meet its stated aims and objectives, b) fulfil its public service remit, and c) ensure it continues to be valued by the public for the unique role it plays in British life and society. Without robust evidence to support its proposals, including how it plans to achieve similar positive outcomes of commercial competitors without the benefit of the global architecture that supports them, the BFI cannot at this stage endorse the proposed change to the BBC's operating license.