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Citation for final published version:

Carter, Cynthia and Steemers, Jeanette 2025. Speaking with one voice – The future of UK children's PSB provision and policy making, updated. *Journal of British Cinema and Television* 22 (2) , pp. 259-281. 10.3366/jbctv.2025.0766

Publishers page: <https://doi.org/10.3366/jbctv.2025.0766>

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## **Speaking with One Voice –The Future of UK Children’s PSB Provision and Policymaking Revised/Updated<sup>1</sup>**

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**Keywords:** public service broadcasters (PSBs); commercial public service broadcasters (CPSBs); children’s media; public service media (PSMs); children’s media policymaking; public service values; child media audiences

Celebrations marking 100 years of the BBC in 2022 provided an ideal opportunity for the BBC to recommit to its original, Reithian, public service ethos - to inform, educate and entertain both adults and children of all ages, backgrounds, and regions around the UK and its then century old commitment to foster children’s understanding of the world and our shared social values as a nation. The BBC’s earliest flagship programme was *Children’s Hour* (1922-1964), first broadcast on radio on 15<sup>th</sup> November 1922 and last broadcast on 27 March 1964 (known as “For the Young” from 1961 onwards).

Commercially-funded PSBs (CPSBs) – ITV, Channel 4, and Five, have also made important contributions to children’s content production. However, it is important to note the total number of hours of original, public service content dramatically decreased in the years immediately after the deregulatory 2003 Communications Act which dropped origination quotas for CPSBs. Between 2006 and 2011 first-run originated hours on the CPSB channels more than halved (51%) from 1,584 to 778. At the BBC there was a decrease of 46% across its channels, whilst ITV fell by 61% to 61 hours and Channel 5 dropped by 85% to 22 hours (Ofcom 2013). This report updates an earlier discussion paper for the Creative Industries Policy and Evidence Centre (2023) that explored questions around declining provision of children’s public service content in our increasingly digitally focused media landscape and how best to address what many now regard as a crisis in children’s PSB.

### **Communications Act 2003 and PSB**

Since the 2003 Communications Act, children’s PSB has seen a marked decline in the numbers of UK original children’s productions. At the same time, the BBC has come to dominate the field of children’s public service content. Shortly after the Act came into force, it was already clear something needed to be done to address serious market failure. It is therefore no surprise that 2006 saw the launch of the campaigning group “Save Kids’ TV” (now known as the “Children’s Media Foundation” or CMF) by UK children’s media creators, in part because of concerns about ITV’s decision to close its children’s production arm and reduce children’s media output on ITV1. At the same time, a ban on advertising foods high in salt, sugar and fat around children’s content significantly decreased advertising revenues for the UK’s commercial broadcasters<sup>1</sup> making children’s content even less attractive (CMF 2023a).

It was clear to those in the industry as well as policymakers, media advocacy groups, Ofcom, academics and others that children’s public service content was coming under increasingly severe pressure. The government eventually responded, albeit belatedly, agreeing to launch a three-year contestable funding scheme, the Young Audiences Content Fund (YACF), which launched in 2019.

### **Government support for CPSBs – YACF**

The YACF contestable funding scheme, worth £44.1m, was meant to support commissions, primarily from CPSBs, available free-to-air. Government funds were managed by the British Film Institute (BFI). The YACF was set up to provide CPSBs with the financial means to address a downward trend in first-run original productions. Its aim was to create opportunities for partnerships between CPSBs and independent producers that would revitalise the children’s media industry and deliver more and a broader range of unique and distinctive UK public service content.<sup>2</sup>

The scheme was designed to incentivise CPSBs to meet their statutory obligation to deliver public service content. With its limited powers of enforcement, regulator Ofcom (2017) had been unable to compel them to do so. Releasing a final report on the pilot, the BFI evaluated the Fund and claimed success for reinvigorating the CPSB sector in the UK (Barratt 2023). Upon its closure, CMF chair Anna Home (2023) declared the Fund “will be – and is already being – sorely missed.” Despite industry and advocacy group campaigns to reinstate it, by early 2023 it was clear that it would not continue.

The CMF (2023b) hosted an event in late February 2023 to take stock of the Fund's value and impacts and how best to go forward. "YACF – Evaluating the Evaluation" provided an opportunity for producers, audience advocates, academics and policy makers to discuss the advantages of contestable funding for the children's public service media sector.

### **"Digital-first" children's content provision and the commercial bottom line**

With the demise of the YACF and withdrawal of CPSBs, the BBC has also faced financial difficulties around children's programming. Financing for children's original media content has been decreasing just as the BBC has come under increasing pressure from both government and Ofcom, to grow its child audience. Cuts in free-to-air content and more emphasis on CBBC's online and commercial enterprises (via BBC Studios), in recent years the BBC has become progressively driven by digital-first policies. However, critics argue there are issues around equality of online access for young audiences in relation to the discoverability and prominence of public service content, which are in urgent need of attention and solutions (Bryan 2022).

There is also growing concern that commercial pressures on the BBC are leading to more emphasis on a smaller number of genres. Animation, claim CBBC executives, is particularly appealing to lower income household children "compared with other genres such as drama, whereas CBBC's audience is currently skewed towards the ABC1 socio-economic group" (Ofcom 2022). Animation can also be made and marketed with global audiences in mind (Steemers and Carter 2022).

The commercial bottom line is also shaped by an assumption that today's children are all digital natives who are no longer interested in what public service television channels have to offer (Andrew Marr Show 2021).

### **Children's PSB at a critical crossroads**

There is now widespread agreement amongst children's media policymakers, advocacy groups, Ofcom and academics, that children's public service content is at risk. There is a real danger, many suggest, that its underlying value in terms of distinctiveness, diversity and engagement with UK children might be further undermined, if not abandoned. A central aim of this report is to explore the value of PSB (see Chivers and Allan 2022 on public service values), to encourage the engagement of key stakeholders and facilitate the development of fresh ideas, plans and strategies to ensure the current and future health of a UK based children's media ecology (Boardman 2022).

Children's public service media matter. However, reflection on policy formation over two decades demonstrates little joined-up thinking among stakeholders. Children's public service content is rarely mentioned in broadcasting White papers, and Ofcom reports (unless there is a children's content review). Where children are concerned, attention tends to focus on current "hot button" issues such as the protection of children from online harms (e.g., bullying, fake news), requiring regulation against negative effects (Steemers and D'Arma 2012). What tends to be overlooked is the positive contribution public service media make in support of children's social, political and personal development as young citizens.

How do public service media fulfil their central purposes in relation to the child audience, as set out in the 2003 Communications Act, each of which is underpinned by a set of values or duties? (BBC Charter Review 2016). The first purpose is to inform understanding of the world; the second to stimulate knowledge and learning; the third to reflect UK cultural identity; and the fourth to represent diversity and alternative viewpoints (Parliament UK 2016; see also House of Lords Select Committee on Communications and Digital 2019)<sup>2</sup>

### **Are public service media still fit for purpose?**

These purposes were examined by the CMF's 2021 report *Our Children's Future: Does Public Service Media Matter?* which set out useful terms of reference for thinking about public service media for children and asking if they still fulfil their public service duties. The report included the views of stakeholders in the media industry (PSBs, CPSBs and independent producers), politicians, policymakers, children's media advocates and academics.

Jackie Edwards, former Head of the BFI Young Audiences Content Fund (YACF), emphasised in her chapter the importance of focusing discussion around strengthening the quality and availability of public service content for all UK children, reflecting their lives, and enabling them to see children just like them on screen. She argues recent debates focus too much attention on delivery platforms and technology at the expense of content: "Great

content is what draws an audience, not a pretty interface or a snazzy algorithm that gives you more of the same (which is sort of the antithesis of public service really – we should be broadening horizons, right?)” (2021: 95).

In the same publication, Children’s Laureate and author Michael Rosen reinforces this point, where he contends “It’s all in the name: it’s for the public – that’s all of us, and it’s a service. It serves the people. Children are part of the people, they are people. They are entitled to be given a service that is for all of them.” He maintains, children’s diverse needs today necessitate “commitment beyond that of the market to ensure that these diverse needs are served. For Rosen one of the enduring commitments of public service-oriented media is to make programmes that are popular with mass audiences whilst also ensuring provision for minorities, who “may or may not be profitable for broadcasters to reach” (2021: 9).

Global successes such as *Peppa Pig* (Five), or *Teletubbies* (BBC) are not the problem. Commercial provision only becomes potentially problematic when these are the *only* types of content that are commissioned because they generate sizeable profits and appeal to global audiences - at the expense of UK specific drama (e.g. *Hettie Feather*; *Tracy Beaker*) or shows that appeal to smaller and minority audiences, including factual programmes that give children a voice.

Another issue focuses on digital delivery, and the technical and representational inequalities experienced by many children in the UK. *Observer* and *Guardian* columnist Jane Martinson (2022) contends that, “The BBC cannot and should not try to ape the streaming giants, with their deep pockets and global reach. Its purpose is to serve all British citizens, whether rich or poor, urban or rural and anything in between. Local content, whether regional drama or memorable ditties about medieval kings, does not sell globally.” So, while many children in CBBC’s target audience of 7–12-year-olds are using streaming services, not all are, particularly in households that can’t afford subscription services and those who live in parts of the country where fast speed broadband is not available. Ofcom noted in its *Media Nations: UK 2019* report that homes with “only free-to-air digital terrestrial TV (DTT)” make up the biggest proportion of all UK homes, totalling 11.3 million (39.7% of all households), an increase of 2.3% since 2012. Although the number of those primarily watching DTT is declining (in part through a reduction in the cost of subscription services through the introduction of advertising in exchange for a cheaper subscription cost), the report forecasted that watching scheduled TV channels through DTT and satellite would likely drop from 67% of total long-form TV viewing in 2022 to 35% by 2034 and 27% by 2040. Those audiences still viewing would be those that “rely solely on DTT, which are more likely to include people who are older, less affluent or have a disability” (Ofcom 2024). A worry specifically related to children in this future scenario is that whilst streaming services do provide educational content, Martinson maintains, “there is simply not enough in educational or news-based programming to make subscription companies produce much in these areas as a broadcaster whose entire remit is to produce shows for all.” Here a strong case is made for the importance of universality, which underpins the BBC’s stated purpose of reflecting and serving the diverse communities and generations of all the UK’s nations and regions and supporting the creative economy in all parts of the UK (BBC 2023).

As Sir Lenny Henry stated in a 2022 *Times* interview in response to the BBC’s decision to move CBBC away from television to a “digital-first” service, such a move would, in his view, make it more difficult for children to discover stories that reflect their lives. According to Henry, “It is a mistake to shove CBBC to one side and have this thing that is online. Where is kids’ drama going to be, where are kids going to see themselves? If you can’t see it, you can’t be it” (Sanderson 2022). This is an even greater worry for children in less affluent households that may be unable to afford a wide array of subscription based digital content.

### **Public service content provision across 30 years – a regulatory and industry context**

From discussion of the value of PSB for UK children, our timeline below charts the gradual decline of children’s public service content. This started with changes at the BBC in the 1990s and continued with the announcement in April 2022 that CBBC Productions had been moved its operations to BBC Studios, the commercial arm of the BBC, and rebranded as “Kids & Family”, heralded by the BBC in a Media Centre (2022) announcement as “being open for business.” This announcement was shortly followed up by BBC DG Tim Davie in May 2022 that by 2025 CBBC, would be provided online-only, heralding a “digital-first” ethos (Waterson 2022). In February 2024, the CMF framework for public service broadcasting, including children’s content, “including provisions to enable the delivery of public service content through digital platforms.” (House of Commons Library 2024).

#### **1990s – 2002**

### ***Growth in children's content provision***

- The BBC expands its Children's Department into Children's BBC (2002). With the launch of dedicated digital channels CBeebies and CBBC in 2002, children's provision becomes increasingly segregated from the BBC's linear provision on the BBC1 and BBC2 channels, with children's audience figures falling for both (Tobitt 2020).
- Children's ITV for 5-13s was launched in 1983 as an afternoon block on the ITV channel. In 1993 it was rebranded as CITV (Wikipedia 2023). While the ITV channel has public service requirements, the CITV channel (launched in 2006) does not. In 2001 and 2002 CITV's budget was cut because of falling advertising revenue, resulting in a sharp reduction in new commissions.

2003

### ***Communications Act 2003***

- The *Communications Act* removed origination quotas for commercial channels such as ITV1, Five and C4.

2006

### ***Declining children's content provision***

- Restrictions on advertising foods high in fat, sugar and salt were put in place. This led to further reductions in children's content at CITV, because of loss of advertising revenues.
- The CITV children's channel launched but closed its in-house production unit "ITV Productions Kids", relying instead on archive programming and limited commissions (Ofcom 2013).
- The BBC becomes the dominant commissioner of children's PSB content, with a strategy of "fewer, bigger, better." Critics argued this did not allow the BBC to cater for diverse child audiences.

2007

- Ofcom publishes *The Future of Children's Television* (2007) highlighting severe market pressures facing CPSBs and its lack of regulatory powers to safeguard children's content. Older children, start to abandon the BBC and PS content providers have struggled to win back young audiences, especially teens (see also CMF 2021)

2009

- CITV Channel is relaunched, with "more acquisitions rather than new programmes being commissioned" (Rushton 2009).

2011

- CMF help set up the **All-Party Parliamentary Group (APPG) for Children's Media and the Arts** to raise awareness of the issues around children's media and arts (CMF 2023c)

2013

- **Ofcom's PSB Report including the "Children's Report" Annex F** outlines the decline of original production for children especially at ITV which was cut by almost two-thirds (60%).

2017

- Government gives new powers to Ofcom in the Digital Economy Act, to regulate the three CPSBs to provide more content for children and teens and undertake regulatory oversight of the BBC.
- Ofcom's **Children's Content Review** report again identifies falling expenditure and originations of public service programming, and a lack of content that reflects the diversity of children's lives (Steemers 2022). Ofcom concludes that rather than insist on clear provision, it will instead monitor the implementation of the CPSBs' plans without setting specific conditions.

2019

- Merger of BBC Children's and Education departments into BBC Children's and Education.
- **The Young Audiences Content Fund** was a UK government initiative, run by the BFI providing £44.1m for a three-year pilot funding scheme to support children's public service content creation by Channel 4, FIVE, ITV, S4C and BBC Alba. 61 new projects were commissioned (over 250 hours), and a further 160 new projects were awarded development money before the scheme closed in February 2022. An independent evaluation of the fund concluded that "it demonstrated social and economic value, delivering high quality public service content across genres, increasing media plurality and content investment for young audiences (Barratt 2022).
- Ofcom agreed in advance of its **Newsround** consultation to allow the BBC to reduce CBBC originations from 400 to 350 hours and *Newsround* broadcast originations from 85 to 35 hours. Responses to Ofcom's consultation argued the proposed changes were hasty and under-researched – with no guarantee they would ensure viable online news since the BBC did not provide a discernible online distribution strategy. Steemers, Carter and Messenger Davies (2019) suggested "there should be

quantitative quotas on online news provision as a guarantee that the BBC will fulfil its remit.”  
Implementation of the cuts was delayed until late 2021 due to pandemic lockdowns (Cremona 2020).

2020

- The **Newsround** evening TV bulletin was axed after 48 years. Provision was reduced to one TV bulletin a day in the morning – repeated online thereafter. Instead of directly appealing to children, the TV bulletin is aimed at teachers for use in classrooms alongside enhanced online teacher resources (BBC Children’s 2019).

2021

- Children’s content is infrequently mentioned in Ofcom’s **Small Screen, Big Debate** (2021) consultation document on the future of UK PSM. In writing their own annual statements and setting the terms of how they are judged there is a risk that PSB accountability to the public is undermined (Steemers 2021).
- Publication of the CMF report **Our Children’s Future: Do Public Service Media Matter?** 30 contributors from industry, academia and advocacy groups conclude that public service media is now more important than ever in children’s lives.

2022

- Ofcom’s consultation on **Original Productions on CBBC** looks at **CBBC’s** request to increase animation, alongside a request to decrease quotas on transmissions of children’s original content. The purpose, some commentators suggest, seems to be to free up space and resources in the CBBC schedule to acquire animation (possibly non-UK) while the BBC develops more animation series of its own. There were concerns raised this might undermine CBBC’s distinctiveness (range and diversity) from commercial competitors. Critics suggest there was no guarantee this change will strengthen the appeal of CBBC as the BBC claims (Steemers and Carter 2022).
- In **Up Next**, the government’s White Paper and vision for the broadcasting sector (DCMS 2022), there is little mention of children apart from brief comments on BBC Education, the evaluation of the YACF pilot scheme and a passing reference to the government’s intention to restrict advertising of unhealthy foods to tackle child obesity.
- BBC Children’s and Education merges its children’s production with BBC Studios, a commercial subsidiary of the BBC Group, to create the new, commercially oriented division “BBC Studios Kids & Family.” The unit focuses on content “designed to drive an ambitious global strategy to increase the reach of in-house hits, develop new global brands and grow the value provided to younger audiences” (BBC 2022).
- BBC DG Tim Davie announces a “digital-first” policy for CBBC, indicating the CBBC channel may close. Critics suggest the move “raises serious questions about universal free access for all audiences and the danger of a greater ‘digital divide’, if growing numbers of children and families can’t afford broadband, and therefore access to BBC services, alongside heating and food” (Steemers 2022b). Others express a wider concern that cuts to CBBC’s broadcast hours in favour of digital first delivery may be “the first indication of the public service broadcaster shrinking and taking a smaller position in our national landscape”, thereby undermining the Corporation’s ideal of universal access (Bryan 2022).

2023-2024

- February 2023 – May 2024 The government briefing document, the **Media Bill – Policy Background**, initially had very little to say about children’s public service broadcasting, with only three brief references to children and young people. Specifically, there was a reaffirmation of “PSB statutory purposes and obligations”; confirm the requirement for a suitable quantity and range of high-quality and original programmes for children and young people; and reiterate Channel 4’s obligation to “provide content which appeals to older children and young adults” (House of Commons Library 2023). At report stage of the **Media Bill** (May 2024), two amendments are accepted by the then Conservative government pertinent to children’s PSB, namely: 1) reinstatement of the principle that “public service broadcasting content, taken together, should inform, educate and entertain” and 2) that PSBs would be obliged to “make available content for children and young people that is educational in nature” (House of Commons Library 2024). The Bill is granted Royal Assent on 23 May 2024, becoming the 2024 Media Act (although most of its provisions are not yet in force in late 2024).
- In March 2023 ITV announces it will close the CITV channel in September 2023 and replace it with the online-only CITVX Kids streaming service. Concerns are raised that ITV has “few plans to spend money producing original programmes for British children, regardless of where they appear (Waterston 2024).
- On 28<sup>th</sup> February 2024, children’s media producers, policymakers, strategists, and childhood experts came together in London at a CMF organised Media Summit to discuss “the ‘dramatic shift’ of the youth audience into ‘unregulated digital space’, the life changing effect of media on young lives and

engagement with society". Much of the discussion focuses on PSB and its ongoing relevance for children. Calls made for a new national digital public service ecology fit for the 21<sup>st</sup> century to regulate and fund PSB content for children who are increasingly consuming media on largely unregulated, commercially driven platforms (CMF 2024).

- CBBC announces structural changes in late September 2024. Production of *Newsround* is to move out of Children's and Education Division and into BBC News to "take advantage of opportunities for production enhancement and audience growth" (Bharanidharan 2024). It will still air on CBBC and online. At the same time, it plans to invest in Bitesize and other educational content (US \$7.5 million). To that end, 11 staffers at CBBC lost their job whilst 11 were hired specifically for Bitesize and animation commissioning.
- The CMF announce in October 2024 various initiatives in support of children's public service content. Internationally, it launched a series of meetings with children's PSM providers worldwide, the first held in Warsaw on 1<sup>st</sup> October, with 15 broadcasters attending, to share "their perceptions of the changes in viewing practice and the solutions some have been putting in place to tackle audience loss." Additionally, CMF met with Ofcom on 7<sup>th</sup> October to make representations to the Public Service Media Review on behalf of children's PSMs and young audiences. Additionally, it is scheduled to meet the new Broadcasting Minister, Stephenie Peacock MP, in December to discuss amendments to the Media Bill to ensure a timely and thorough review of the children's media sector. Additionally, the organisation is now updating its "Manifesto for Change" coming out of its February 2024 Media Summit to ensure it remains relevant and up to date (CMF 2024).

The timeline provides context for thinking through some of the challenges the children's public service media sector faces and what needs to be confronted in the coming years. It demonstrates how key issues are constantly repeated with ever-decreasing levels of PS content undermining the public service ethos to inform, educate and entertain and its related purposes and values.

### **Current challenges in policymaking**

In the absence of concerted, joined-up discussions around policy and the delivery of children's public service content, there is a risk, some suggest, of losing sight of both longstanding commitments to children's audiences and challenges in providing this content (CMF 2023d). The following outlines some of the key issues for policymakers to consider going forward.

#### **1) *Increasing commercialisation and homogenisation of children's media content***

Critics of commercial children's content often assume it is automatically of lower quality and cultural value than public service content. However, there are numerous examples which challenge this assumption (e.g., *Peppa Pig* Channel 5; *Lloyd of the Flies* and *Rubbish World of Dave Spud*, both ITV). Nevertheless, there are growing concerns about the ways in which a commercial ethos is shaping children's media production. Academics and non-profit advocates such as the CMF argue there is a growing homogeneity of children's content in the UK, as the industry becomes increasingly focused on attracting revenue from ancillary exploitation (i.e. licensed merchandise) in global media markets. In September 2024 the BBC's Children's and Education division announces further investment in Bitesize and animations, bringing its public service and commercial activities into closer alignment.

#### **2) *The public service ethos to inform, educate and entertain is under pressure***

What children see, hear and experience in the media plays an important role in shaping who they become as adults. Unlike commercial media, public service media are statutorily bound to provide a wide range of content that informs, educates, and entertains, reflecting the diversity of modern British life. They are expected to play a key role in informing children about themselves and their communities. In a rapidly changing media ecology, with a growing volume of digital and commercially produced content made for and aimed at global audiences, the UK now faces a growing set of challenges around the provision of content for children growing up today.

In 2021, Director of BBC Children's and Education, Patricia Hidalgo, suggested this challenge might be addressed by injecting more funding into UK animation to attract audiences back from Netflix. UK children's media producers, she insisted, should be directed to include "more identifiably British moments" in British animation. However, critics have suggested it is unlikely such content would fully reflect the diversity of life in the UK since the UK animation industry remains globally oriented, even if

there was a nod to inclusion of specific cultural references, such as substituting "roast beef" for turkey as part of a celebration meal (Moore 2021).

**3) Discoverability, prominence and "service neutral" delivery and regulation**

Steemers (2021: 16) argues policy needs to focus on "where young people access media, making sure there is space for non-commercial content and experiences that are inclusive, diverse and which don't marginalise children in hard-to-reach minority or poorer communities." Ideally public service content should be located on both public service and commercial platforms, where it can be easily and regularly accessed by children (Sambrook 2019).

**4) Media policy without children**

Despite a plethora of policies tabled over the past decade, including Ofcom's *Small Screen: Big Debate* review of public service media (2021) and the white paper on broadcasting "Up Next" (2023), there are few references to children's media content and even fewer include the views and voices of children themselves.

The Online Safety Act which became law in 2024 mentions children over 400 times, but almost entirely in relation to content that may be harmful to them (UK Parliament, Online Safety Bill 2023). Although human rights are mentioned throughout this document (Human Rights Act 1998), no references are made to the UN Convention on the Rights of the Child (1989) or the more recent UN General Comment 25 (2021) on children's digital rights.

**5) Children's CPSB content funding**

The three-year contestable funding (YACF) scheme proved to be successful in supporting public service content and growing the CPSB sector. Its closure prematurely in early 2022 without discussion of a possible extension, was greeted unfavourably by both CPSBs and industry advocates. CPSBs saw significant benefits from the Fund's support for new public service content partnerships, networks and projects (Layton 2022).

In an APPG Children's Media and the Arts meeting held at the House of Lords on 27 February 2023, Hidalgo repeated the BBC's commitment to public service media content, this time arguing for tax incentives that could be tied to quotas to support the creation of British public service content. However, some producers had "reservations about the viability of achieving a tax-break increase and the lack of basic funding to get projects off the ground in the first place."

**6) The politicisation of children's media**

According to Baroness Floella Benjamin, House of Lords, and Julie Elliott (2021), MP, Co-Chairs of the Children's Media and the Arts APPG, public service media have become a party-political football. In their view, there is a need to set party-politics aside in order to establish coordinated responses to the challenges faced by children's media producers and to re-commit to valuing public service media in ways that address a rapidly changing media environment.

**7) Public purposes and values: public service media for all**

Debates around effective policymaking and regulation to connect with audiences have a long history. Ofcom's 2022 Annual Report on the BBC, for instance, found that adults and children in lower income groups, constituting approximately 25% of the population, are less engaged and the least satisfied with how their lives are represented in PS content. In November 2023 Ofcom published a BBC audience review reporting on the findings of their research with D and E socio-economic groups (a culturally, ethnically and economically diverse group, with higher numbers of older and disabled members). It noted that people in these groups watch more television than other groups and are more likely to watch the BBC compared to the other public service broadcasters (PSBs), accounting for a quarter (26%) of their viewing time. However, they remain the least satisfied with the BBC for a range of reasons, including a perceived failure to authentically portray lower socio-economic groups, that it doesn't provide enough fun and risk taking content, it doesn't adequately market new kinds of content so audiences still tend to see what it produces as 'classic' (worthy but dull) rather than cutting-edge, that scandals rocking the BBC in recent years have damaged public trust in it (Ofcom BBC Audience Review 2023). As already noted, the BBC has stated that D and E children prefer animation over other genres (Ofcom 2022).

Since 2019, Ofcom has been undertaking a review of the state of PSM in the UK. In the first phase (2019-2023) focus was assessing PSB's delivery of content for audiences. The second phase (2024-2025) is assessing how PSBs are responding to changing audience habits considering technological change in ways that support the availability of high-quality content, including accurate and trustworthy news (Ofcom 2024b). This is seen to be a particular concern around young audiences who have who migrated rapidly to online content. Another broad focus across audience is on finding ways to support media literacy to enable them to spot mis- and dis-information, with no particular emphasis on the specificities of young audiences.

### **Key points for discussion and action**

Drawing on the context above we outline six points for discussion around the public purposes of public service media content for children, starting with universal provision; the importance of children's news; the role of public service-oriented provision of complementary education; building and valuing children's civic cultures and identities; broadening children's international horizons; and strengthening regulatory oversight and policy frameworks. According to Home (2023) in the recent APPG meeting mentioned above, today's discussions amongst key stakeholders have not substantially moved on over the past two decades. What is needed, in her view, is more radical thinking and agreement to speak with one voice in the interests of children across the UK to avoid returning to the same issues without a set of practical solutions to address them. So, what might those long-term solutions be?

The following are not new points of discussion and possible action, but each one places children at the centre of future discussion and, ideally, directly or indirectly involves them in debates, policymaking recommendations and subsequent actions.

1. **There is a need for high quality, engaging content that is accessible and prominently placed for discoverability by all** (rethinking 'digital-first' as a blanket policy). This links to tackling ongoing issues around inequalities of access to public service media content. Should Ofcom regulate to ensure content is both accessible to all and easily found/prominently featured on broadcast media and online?
2. **Funding** -- Children's public service content needs to build on the work of the YACF to come up with ways to financially support CSPBs. Discussions about funding should involve consultation with the children's media industry and, where possible, with children (especially in content creation) to generate a range of initiatives. For CPSBs, it has long been argued there is a need for more tax incentives for first run originated British content. In the Spring Budget statement of 15<sup>th</sup> March 2023 (published 1 January 2024), the most generous credit rate was for animation and children's TV at 39%. (BFI 2023). However, the Budget did not mention quotas to underpin these or the importance of discoverability and prominence to ensure at least some of the content reflects the diversity of British society and that children are able to find it.
3. Government should ensure **child audiences are at the centre of its policy formation**. If the provision of public service content for young audiences is important for the future of their civic belonging, what structures need to be put into place to ensure their needs are at the heart of media policy? Children's input into policy is well illustrated by young people's recent participation in drafting the UN General Statement 25 on children's digital rights (2021), as an amendment to the UN Convention on the Rights of the Child (1989). In this process, a wide range of children and young people were consulted about their experiences of digital technology, how it is impacting their rights, and what action they want to see taken to protect them and their views (BFI 2023).
4. **Media literacy** – There is an urgent need to extend Ofcom's statutory powers and responsibilities to enhance media/digital literacy. This might include government and industry-supported initiatives in schools and through children's public service media. There is also a related requirement for deeper and sustained qualitative research with children to better understand, what *they* think about the most pressing challenges they face engaging with media today (misinformation, disinformation, online safety, etc) to feed into policy formation and regulation.
5. **Children's media rights/building partnerships with children**. There should be greater emphasis on the importance of children learning about and engaging with UK culture in all its diversity to enhance their sense of civic inclusion and active citizenship.<sup>4</sup> This could include content co-created by adults and children that reflects children's experiences. A good example of this type of initiative was the BFI's

“Seeing Yourself on Screen” (2020-2021) competition which encouraged children and young people to come up with programme ideas that represented their lives.

6. **Rethinking assumptions about the child audience** and what children want and have the right to expect of public service media. What adults think about children shapes what media content they think children want, what is appropriate, and where they access content. How many decisions have been made that result in a failure to connect with child audiences? To what extent have assumptions made by a largely white, middle class, London-centric children’s media industry contributed to an erosion of children public service media? (Ofcom 2022b).

### **Back to the future for children’s PSBs**

Rosen (2021: 9) suggests children are often treated by adults as if they are a marginalised group: “they are often overlooked, marginalised or excluded from decisions even when those decisions affect them directly.” Adults talk about what children need and want from the media, rarely “listening to them, or finding ways of expressing their needs, desires and imaginations.” However, public service media are in a special position to offer opportunities for children because they are less encumbered by market pressures. Rosen persuasively argues that “children are not in the waiting room of life; they are alive, thinking, reflecting, interpreting, re-imagining the world around them (ibid). If there is insufficient attention paid to the bigger picture of the current health of children’s public service content, there is a risk of failing to foster in young people a sense of civic connection today, and for future generations of children. As Home (2021) suggests, the time for action is now, setting out a positive, forward-looking future for children’s public service media content provision.

To that end, the CMF announced in November 2022 the launch of the UK Children’s Media Plan (Boardman 2022) aiming to bring stakeholders together to develop options “to develop a robust and sustainable children’s public service media sector in years to come,” encompassing a mixture of responses including tax credits and government funding, regulation, co-operation, private investment and working with other sectors such as education (CMF/APPG Children’s Media and the Arts Media Plan 2022). Likewise, Steemers (2021: 17) has called on government and regulatory bodies to look for solutions that “recognise that universal access to quality information and cultural experiences in new formats across multiple platforms is what makes the UK a functioning democracy.” Important in this endeavour, she argues, is the creation of support for “media literate young people [who] contribute to the future stability of a diverse and inclusive democracy; where public service media content and experiences enhance citizenship and active participation” (ibid). To do so, she concludes, “requires sustainable regulatory, financial and structural interventions in the digital sphere that allows children to benefit from their communication rights, rather than having those rights curtailed by lack of adult care and communication practices that undermine society” (ibid).

According to Home (2021: 7), the inability to sustain cooperation amongst supporters of children’s public service media in the past, has resulted in a failure to take concerted action. She points out “when there are enquiries and consultations about the future of children’s media, we always seem to be chasing our tails, trying to catch up, tinkering with the past, defending the status quo.” Many suggest we are still reacting in this fashion, despite the experiences and lessons learned from Covid-19 when public service media, available free-to-air, played a crucial role in getting children through lockdowns. These experiences, Home concludes, have “made us stop, think and consider whether public service media for kids still really matters and if it does, do we have a unique opportunity to rethink the whole issue and plan a new and different future?” (ibid).

### **Notes**

<sup>1</sup> This report is a revised and updated document based on our original report for the Creative Industries Policy and Evidence Centre (2023). <https://pec.ac.uk/wp-content/uploads/2024/01/CAR-Carter-ChildrensPSB-DP-29-June.pdf>

<sup>2</sup> The YACF was a three-year pilot run by the BFI (2019-2022) providing £44.1m from the UK government to support the commissioning of 61 projects creating “high quality public service content for young audiences across different genres and techniques, contributing to a more plural landscape in the industry and directly encouraged additional investment for projects, targeting this age group.” <https://www.bfi.org.uk/get-funding-support/create-films-tv-or-new-formats-storytelling/young-audiences-content-fund>

<sup>3</sup> PSB purposes and characteristics outlined in “Chapter 2: The BBC’s accountability framework” (2016) - <https://publications.parliament.uk/pa/ld201516/ldselect/ldcomuni/96/9606.htm> summed up from Ofcom’s Public Service Broadcasting in the Internet Age, Ofcom’s Third Review of Public Service Broadcasting.

<sup>4</sup> For a discussion of the public value as a strategic concept, see Chivers, T. and Allan, S. (2022) "What is the Public Value of Public Service Broadcasting? Exploring Challenges and Opportunities in Evolving Media Contexts." Creative Industries Policy & Evidence Centre and Cardiff University. <https://pec.ac.uk/discussion-papers/what-is-the-public-value-of-public-service-broadcasting>

<sup>5</sup> An example of the participation of young people in policy planning and formation is a consultation with over 700 children and young people worldwide to ensure their views were central to the General Comment 25 on digital rights, an amendment to the UN Convention on the Rights of the Child enshrining into law children's rights in the digital world. (2021) <https://5rightsfoundation.com/in-action/children-offer-their-views-for-general-comment-no--25-on-childrens-rights-in-relation-to-the-digital-environment.html>

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