

*Championing
excellence and diversity
in broadcasting*



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ORIGINAL PRODUCTIONS ON CBBC

VLV RESPONSE TO THE OFCOM CONSULTATION ON THE BBC'S REQUEST TO CHANGE THE OPERATING LICENCE

April 2022

INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of Public Service Broadcasting (PSB). VLV is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

Introduction

1. VLV welcomes the opportunity to respond to this consultation.
2. Ofcom has consistently highlighted the decline in the investment in new, UK-originated public service content for children since 2006. While the streaming services do provide high quality content for children, it is aimed at global audiences and mostly does not reflect the lives and cultural experience of children in the UK. All the UK's public service broadcasters, but the BBC especially, play a crucial role in providing content which reflects and is relevant to children's lives in the UK.
3. As Ofcom notes in the consultation document, in 2020 more than a third of children aged 8-15 believed that there were not enough TV shows that showed children in the same part of country as them¹ and a quarter said there were not enough programmes which showed children that looked like them².

Question: Do you agree with Ofcom's provisional assessment and the proposal to reduce the original productions quota (condition 2.32) 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.

4. VLV does not agree with Ofcom's provisional assessment and the proposal to reduce the original productions quota on CBBC. VLV believes that Ofcom should take a more considered approach to these changes. Before allowing them it should put in place measures to ensure that they do not undermine the BBC's delivery of its mission to children's audiences.
5. While Ofcom considers that the scale of the changes requested by the BBC to be 'modest'³, VLV believes there is a risk that they could compound the existing market failure in content for British children unless Ofcom puts in

¹ *Original productions on CBBC - Consultation on the BBC's request to change the Operating Licence*, Ofcom, 10 March 2022, paragraph 2.16

² Children and parents: media literacy tracker 2020, Ofcom's Children's Media Literacy 2020 Aged 5-15 data tables.

³ *Original productions on CBBC - Consultation on the BBC's request to change the Operating Licence*, Ofcom, 10 March 2022, paragraph 2.10

place proper safeguards to ensure that they do not not lead to a further decline in the volume and range of UK culturally specific content for children.

6. VLV notes that this request occurs at a time when hours of original content have already been significantly reduced on CBBC since 2020.
7. The BBC is under considerable financial pressure and one of its current key strategies to plug the shortfall in its public funding is to increase income from international sales of programmes. This is likely to mean there will be increased pressure to commission content which has international as well as domestic appeal which could dilute the Britishness of content.
8. VLV does not oppose the proposal to commission more animation on CBBC in principle, if it is popular among audiences and genuinely reflects UK culture. This change could be beneficial, but VLV considers that more detailed information on the BBC's plans and how Ofcom will safeguard CBBC's distinctiveness and relevance to UK children's lives are required to ensure that the channel continues to fulfil its public service objectives.
9. VLV is concerned that this quota change could lead to less live action in the schedules and a less balanced media diet for CBBC audiences. These changes could lead to reduced representation of British children on screen, due to fewer live action shows. This could lead to a reduction in voices from the four Nations of the UK and fewer regional voices.
10. While Ofcom says it is its 'preliminary view that a modest increase in acquisitions would be reasonable provided the BBC continues to invest in new content and maintains the distinctiveness of CBBC, as suggested by the spend it has allocated to first-run UK originations'⁴, VLV questions how Ofcom will ensure the BBC's maintains the 'distinctiveness' of CBBC. VLV would only support these changes being implemented if Ofcom puts in place safeguards to ensure that any acquisitions or new animations on CBBC genuinely reflect the diversity of UK culture and ensure regional and national representation.

Impact on output

11. From the consultation document VLV understands that the BBC is asking to increase the amount of acquired content (which could include non-UK content) and animation it commissions for CBBC. Since acquisitions generally cost less, it appears that the BBC will plan to use the budget released to fund 3 new UK specific original animation series, increasing animation on the channel from 8 hours a year to 32 hours a year.
12. We understand that the BBC is requesting a reduction in the quota for original productions on CBBC from 72% to 66% in 2022/23 and then for it to rise to 68% in 2024 onwards.

⁴ *Original productions on CBBC - Consultation on the BBC's request to change the Operating Licence*, Ofcom, 10 March 2022, paragraph 2.21

13. VLV estimates that a reduction of 6% (2022 and 2023) in the quota for original programming on CBBC will equate to 262 hours less original programming available for audiences, based on existing output hours.
14. This change will be in addition to the already reduced total number of CBBC hours since the return of BBC Three to TV in 2022. Since the return of BBC Three VLV estimates that CBBC is now broadcasting 4380 hours per year rather than 5110 – a reduction of 730 hours.
15. This reduction comes on top of a reduction in the number of "first-run originations" from 400 hours to 350 hours in 2020 so the BBC could broadcast fewer hours of Newsround on TV.
16. Having 3 new animation series will reduce the hours of other originations and their repeats. While VLV does not oppose additional hours of animation, if such content is genuinely 'rooted in British culture', VLV is concerned that this could lead to a reduced range of other genres on the channel. VLV notes that there are no quotas specifying the volume of content or spend on specific genres.
17. VLV also notes that there is no provision for regional quotas on this animation spend. In the past these quotas used to guarantee some level of regional representation on screen - especially in live action productions.

Impact on Budgets

18. We understand that the BBC has reassured Ofcom that these changes will not affect overall funding for UK first-run original programming, with the CBBC budget 'remaining broadly the same'.
19. However, it is clear that funding will be need to be taken from non-animation original content, such as live-action, in order to commission the 24 hours of new animation which is planned. This will shift the balance between genres available for audiences.

Recommendations

20. If this change in the quota for original content on CBBC is allowed, VLV would wish Ofcom to ensure that it puts in place measures to ensure that the genre mix on CBBC is maintained and that the new acquisitions and animation content genuinely reflect UK culture, promoting diversity and regional representation. We make a number of recommendations below.
21. VLV recommends that Ofcom should consider asking the BBC to specify the proposed volumes of genres it plans to broadcast in order to ensure there is a good balance between animation, scripted live action drama, non-scripted live action entertainment and scripted factual content.
22. VLV would like the BBC to specify the actual number of hours of original programming the BBC plans to commission and broadcast, rather than relying on percentages.

23. VLV would welcome a guarantee that there will be no reduction in the CBBC budget.
24. VLV believes that it would be beneficial to have greater transparency and monitoring of budgets and expenditure on specific genres so that there is accountability and clarity. We would welcome greater detail on the BBC's plans regarding non-animation origination hours and repeat slots. How will budgets be balanced across animation, drama, entertainment and factual?
25. VLV would like clear criteria to be established to define 'rooted in British culture' so that Ofcom can ensure that content, whether it is acquisitions or animation, genuinely reflects the lives of children in the UK.