

ABC SBS Review
Department of Broadband, Communications and the Digital Economy
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To Whom It May Concern

We are pleased to enclose a submission in response to the discussion paper:
"ABC and SBS: Towards a Digital Future".

This submission is prepared jointly by the NSW Commission for Children and Young People, WA Commissioner for Children and Young People, ACT Children and Young People's Commissioner, Queensland Commission for Children and Young People and Child Guardian and Commissioner for Children Tasmania. These organisations constitute the Commissioners across Australia that have a broad mandate to promote the well-being of children and young people. One way we do this is by making recommendations on issues that impact on children and young people.

We will be placing a copy of the submission on the Commissions' websites. Making work such as this publicly available is one way of demonstrating our accountability to the children and young people in our jurisdictions.

If you require any further information, please contact the NSW Commission for Children and Young People's Manager, Policy, Maj-Britt Engelhardt on 9286 7205 or at maj-britt.engelhardt@kids.nsw.gov.au.

Yours sincerely

Gillian Calvert
Commissioner
(on behalf of the other Commissioners)
December 2008

**Submission to Department of Broadband, Communications and
the Digital Economy
ABC and SBS: Towards a Digital Future**

ACT Children and Young People's Commissioner
NSW Commission for Children and Young People
Queensland Commission for Children and Young People and Child
Guardian
Commissioner for Children Tasmania
WA Commissioner for Children and Young People

December 2008

Introduction

Thank you for providing us with the opportunity to provide a submission to "ABC and SBS: Towards a Digital Future" (the "Discussion Paper").

Our response is guided by two primary principles:

- that the safety, welfare and wellbeing of children is paramount; and
- that the relationships between children, their families and their communities are important for children's safety, welfare and wellbeing.

Additionally, our response is informed by the Australia's obligations under Article 17 of the *United Nations Convention on the Rights of the Child*, which recognises the important function the mass media plays in promoting the social, spiritual and moral well-being and physical and mental health of children.

We therefore welcome measures, such as those proposed in the Discussion Paper, which are designed to:

- improve children's access to appropriate content on television, and
- limit children's exposure to certain advertising and age-inappropriate content.

Summary of key recommendations

We recommend:

- establishing a dedicated digital ABC children's channel broadcasting from 6am to 9pm and comprising at least 50% local content.
- further development and broadcasting of high-quality programs for early childhood, with the ABC taking the lead in broadcasting such programs
- ABC1 programming increases preschool content
- ABC develops and expands educational programming for school age children, including developing programming that is available to and appropriate for both classroom and home use
- SBS programming includes children's content
- SBS develop and broadcast programs with particular regard to the linguistic needs of the child who belongs to a minority group or who is indigenous.
- SBS provide children's programming without advertising content, except for announcements of sponsorship or presentation arrangements.
- SBS bans advertisements of high fat, salt and sugar (HFSS) foods, and the use of animated characters, celebrity endorsements or toy giveaways in commercial advertisements targeted at children during all programs the C and P periods and in the broader C and P bands.

Improving children's access to age-appropriate content

We strongly support the two proposals in the discussion paper relating to children's television: to establish a dedicated digital ABC children's channel and to include children's content in SBS's programming. We believe these proposals would have a significant, positive effect on the wellbeing of children, by improving children's access to appropriate content on television on the one hand, and – by providing "safe harbours" for child viewers and alternatives to adult content - reducing children's exposure to inappropriate content on the other.

Television is a powerful agent of socialisation because of its ubiquity and influence. Recent research has suggested that viewing of children's programs with pro-social messages enhances children's own pro-social behaviour¹, understanding and managing emotions and learning interpersonal skills. A child's exposure to quality, appropriate television can be a positive influence on his or her development of personal and cultural identity. Conversely, lack of access to television programs that depict positive and relevant representations of characters is considered to be harmful to a child's development².

As a result, it is imperative that children can access programs containing positive messages about childhood, growth, development and identity.

¹ The Australian Children's Television Foundation, Senate Inquiry into the Sexualisation of Children in the Contemporary Media, *Submission 55*, p. 1.

² Dr Estelle Irving, Senior Research Fellow, Murdoch Children's Research Institute, *Submission to ACMA Review of Children's Television Standards*, August 2007.

Importantly, a 'free-to-air' children's channel such as that proposed by the ABC ensures universal access – providing equity across socio-economic distinctions.³

The existing disconnect between audiences and content

The Commissioners note that while quality children's programming is produced in Australia every year, this content is currently made available by broadcasters during narrow timeslots that are largely inconvenient for the child audience.

Close to half of all C programs are screened on weekdays between 4.00pm and 4:30pm when many children are at after-school activities, doing homework or in childcare and unable to watch television. Instead, the vast majority of child viewers aged under 14 watch television between 6.00pm and 9.00pm⁴. The downfall of the current regime is that far too few Australian children are able to watch the children's shows that could provide positive and age-appropriate role models for them. Instead, at the times when children wish to watch television, the only content available tends to be aimed at adults.

With that in mind, we strongly support the ABC's proposal that its dedicated children's channel should broadcast from 6am to 9pm and comprise at least 50% local content. This would go a long way to rectifying current shortcomings, where in Australia there is "no local children's content on free-to-air television at the time children most want to watch it".⁵ Additionally, the high local-content level would give children more opportunities to see and hear their language and life experiences reflected in the media, and in so doing, affirm their sense of self and community as Australians.

Preschool programming

The Commissioners consider there is currently a paucity of appropriate content for early childhood audiences. We strongly encourage the development and broadcast of high-quality programs for early childhood – a recognised critical stage in brain, emotional and social development.

We recognise that timetabling preschool content is difficult. Under the current system, commercial broadcasters must show 130 hours of preschool programs every year, which in practice, means approximately half an hour each weekday. The ABC screens preschool content above and beyond the commercial broadcasters' obligations, but is limited in a practical sense by its obligation to provide broad programming throughout the day. The limited window for preschool viewing means that the preschool audience's access to appropriate content is narrow. While the Commissioners recommend that a dedicated channel would be the most appropriate forum for the broadcast of preschool programs, we think that, in practical sense, the transfer of ABC's older

³ Australian Children's Television Foundation and ABC: *A Digital Australian Children's Channel*, p 2

⁴ *Children's Viewing Patterns on Commercial, Free-to-air and Subscription Television*, Australian Communications and Media Authority, May 2007
<http://www.acma.gov.au/webwr/assets/main/lib310132/children_viewing_patterns_commercial_free-to-air_subscription_television.pdf>

⁵ Australian Children's Television Foundation and ABC: *A Digital Australian Children's Channel*, p 2

children's content to a separate channel would "free up" time on ABC1 for preschool content.

Multicultural/multilingual programming

While the Discussion Paper does not provide much detail about the proposal to extend SBS's charter to include the provision of children's content, we would encourage the Australian government to do so to deliver further on its responsibilities under the United Nations' *Convention on the Rights of the Child*. Specifically, the unique nature of SBS provides the opportunity to encourage the media to have particular regard to the linguistic needs of the child who belongs to a minority group or who is indigenous.

Educational programming

The Commissions suggest that the new digital and multimedia environment could provide further opportunities for improved schools and educational programming. The ABC is best placed to undertake this function as it has a charter commitment to educational content, an existing, solid reputation amongst schools and parents, and a large education audience, on which it could expand. The Commissions strongly support the development and expansion of educational programming on ABC for children of school age, particularly if such programming were available to and appropriate for both classroom and home use.

Limiting exposure to inappropriate content

Age inappropriate content

As we move into a digital media environment, with all the choice and diversity of programming that environment entails, it is increasingly important for children and their parents to have a dedicated, safe broadcast and online space. A publicly funded dedicated children's channel would provide a safe media space, providing entertaining programming made especially for the child audience, and where parents can be assured that their children will be exposed only to high-quality, appropriate children's content.

Importantly, such a channel would provide alternatives to adult content for a child audience at times they watched. Under the current regime, if children wish to watch television at their preferred times, they must by necessity watch programs created for older audiences. As a result, *Big Brother* is amongst the most popular programs for children aged 5 to 14⁶.

However, this is not because children, as a rule, prefer to watch adult content. Research shows a significant attraction by the local child audience to children's programs. For the past two years, Roy Morgan's *Young Australians Survey* has demonstrated that Australian children between 6-13 have a preference to watch children's programs over programs made for an older or more general

⁶ Australian Communications and Media Authority, *Children's Television Standards Review Issues Paper*, June 2007, p 51 and 52

audience.⁷ The same research also demonstrates that Australian children have a strong attraction to Australian content.⁸

A publicly funded dedicated children's channel would ensure that if a child wished to watch television at 8.30 at night, their choices would not be limited to adult content.

Junk food and other undesirable advertising

Many parents wish to minimise their children's exposure to unhealthy food and beverage advertisements. Many health professionals believe there is a link between such advertising and childhood obesity. However, little has been done to regulate the use of such advertising.

An advertising-free publicly funded dedicated children's channel would provide children and parents with a viewing destination free from unwanted advertising influences.

In this vein, the Commissioners suggest that if SBS were to program children's content, it should commit to providing it without advertising content, except for announcements of sponsorship or presentation arrangements. Programming for children should not be interrupted for advertisements.

We also think that SBS should take the lead in banning advertisements of high fat, salt and sugar (HFSS) foods, and the use of animated characters, celebrity endorsements or toy giveaways in commercial advertisements targeted at children during all programs the C and P periods and in the broader C and P bands.

As we have also submitted to reviews by the Australian Communications and Media Authority, reduction in broadcasting revenue should not be a paramount consideration when addressing children's health issue. As Professor Daube, Professor of Health Policy at Curtin University of Technology submitted to the ACMA Review on Children's Television standards:

It is unethical to put the health of our children at risk on the basis that funding for commercial television (and large corporations) is more important.⁹

Conclusion: the two proposals provide solutions to these problems

At the moment, there is a disconnect between the times when children are watching television, and when appropriate content is broadcast. This means that on the one hand, children are being exposed to age-inappropriate content and advertising, and on the other hand, they are not able to access the high-quality age-appropriate content produced specifically for them.

⁷ In each of 2005 and 2006, more than half of the top 50 programs children between 6 and 13 'especially choose to watch' were children's programs: Roy Morgan.

⁸ In each of 2005 and 2006, just under 50% of the top 50 programs children between 6 and 13 'especially choose to watch' were Australian programs.

⁹ Professor Mike Daube, Professor of Health Policy, Curtin University of Technology, *Submission to ACMA Review of Children's Television Standards*, 31 August 2007

As public broadcasters, the ABC and SBS have the ability to measure program success in terms other than ratings or revenue. If ABC and SBS were mandated to provide increased children's programming, the likely result would be an increase in pro-social programs that reinforce positive self-identity amongst children. There is also a significant opportunity for SBS to provide programming that helps address the linguistic needs of Indigenous children and children from minority groups.

An advertising-free children's channel would provide a viewing destination where children know they will always be able to access content made for them and where parents can be certain their child will not be exposed to advertising or inappropriate programming. Importantly, appropriate content will be available at the times children want to watch, providing alternatives to advertising and adult-audience-driven content during peak viewing times in the evening.

SBS, as a public broadcaster, also has a role in terms of leading banning advertising that may negatively impact on children's health and well-being. We would welcome any measures undertaken in this regard by SBS.

The Commissioners strongly support the establishment of a dedicated, digital ABC children's channel and the inclusion of children's content in SBS's programming.

References

The Australian Children's Television Foundation, *Senate Inquiry into the Sexualisation of Children in the Contemporary Media*, Submission 55, p. 1.

The Australian Children's Television Foundation and ABC: *A Digital Australian Children's Channel*, p 2

Australian Communications and Media Authority, *Children's Viewing Patterns on Commercial, Free-to-air and Subscription Television*, May 2007
<http://www.acma.gov.au/webwr/assets/main/lib310132/children_viewing_patterns_commercial_free-to-air_subscription_television.pdf>

Australian Communications and Media Authority, *Children's Television Standards Review Issues Paper*, June 2007, p 51 and 52

Estelle Irving, Response to the Review of the Children's Television Standards Review, August 2007

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http://www.acma.gov.au/webwr/assets/main/lib310132/69_dr_estelle_irving.pdf>

Mike Daube, *Submission to ACMA Review of Children's Television Standards*, 31 August 2007