

CHILDREN AND PUBLIC SERVICE BROADCASTING

Submission to the Puttnam Inquiry, 'A Future for Public Service Television: Content and Platforms in a Digital World'¹

By Sonia Livingstone and Claire Local, Media Policy Project, Department of Media and Communications, London School of Economics and Political Science.²

KEY MESSAGES

- **RESEARCH.** Current data on children and their media usage no longer permit effective evaluation of children's use of public service broadcasting (PSB) content, particularly taking into consideration on demand content accessible through online platforms. As a result, regulators, policymakers and the public lack crucial information on the impact of PSB content on children, and the role it plays in educating and entertaining future generations. Regulators should develop new tools including, but not limited to, surveys, to monitor new markets and to inform policy decisions.
- **TRENDS.** Children are consuming audio-visual content through a variety of devices and platforms, including tablets and laptops to view on demand television content. However, current data confirm that viewing live broadcast television on a television set remains one of the most popular activities across all age ranges of children and therefore there remains a strong case for children's public service television that informs, entertains and educates on all platforms that children use, including on a TV set and online via digital devices.
- **LACK OF PROVISION.** No public service broadcaster in the UK offers systematic programming across the full age range of children (0-17). We urge greater provision of public service television and other content for children across the full age range of ages, not forgetting those aged 13-17, who are markedly under-provided for.
- **DISCOVERABILITY.** Insofar as children are seeking public service television and other content online, it is unclear how they are to discover the rich diversity of what is available. Problematically, many sites are 'sticky' and search tools generally direct users to 'more of the same'. This both undermines children's ability to discover public service content online and, therefore, the sustainability and scalability of new providers.

Introduction

Children are defined as persons aged from 0-17 years old in the UN Convention on the Rights of the Child, ratified by the UK.³ Children represent one fifth of the UK population (and the entirety of the future population), yet in discussions about broadcasting, they are often overlooked as a group with specific needs and are easily lost under umbrella terms ('audience,' 'public,' 'viewers,' 'households,' 'population').

Given broadcasters' practical struggle to appeal to teenagers, they appear tempted to define 'children' as under 12. Problematically, the BBC and other public service broadcasters (PSBs) have substantially cut provision for teenagers and, increasingly, for younger groups.⁴ But children's needs from infancy through to adolescence should be recognised and provided for, as children develop intellectually, emotionally and socially.

Much has been said on the future of public service content, the growth of multiple platforms, new market and regulatory pressures, and changing audience preferences and practices, among other widely debated topics.⁵ However, little attention has been paid to the role that public service television plays in educating, entertaining and broadening the horizons of children in the UK. This paper focuses on how public service television⁶ can better serve a child audience that spends on average at least 35 hours per week consuming broadcast, on demand and online content⁷.

In this policy brief, we argue that:

- Children still view public service television on a television set. It is likely that they increasingly also view public service television online, as children's use of smartphones and tablets continues to increase⁸. Thus **there remains a strong case for children's public service television that informs, entertains and educates on all platforms that children use, including on a TV set and online via digital devices.**
- Children live in 'convergence culture'⁹ engaging with all kinds of content. This creates both **an opportunity and an imperative for children across the age range from 0 to 17 to benefit from high quality, diverse and imaginative content online**, including both public service television and other public service content. But provision across the age range is problematically lacking, especially for young teenagers.
- If children are to find public service television and other public service content online, **the challenge of 'discoverability' must be met with their needs foremost; otherwise, efforts to sustain and enhance public service content of value to children will be futile.**
- While noting some **problematic evidence gaps** that must be filled before policy directions are determined, we offer recommendations regarding the above points.

Definitions

We divide the domain of children’s content by defining ‘broadcasting’, ‘television’ and ‘public service’ as shown in the table that follows.

While our focus is on the two cells that encompass ‘public service television’, we argue that it is crucial to grasp the relationships between public service television and commercial content on the one hand, and between public service television and other public service content on the other.

CHILDREN’S CONTENT		Public service content	Commercial content
Television	Television on a TV set <i>Live and recorded viewing on a TV set</i>	e.g. CBBC programmes	e.g. CITV or the Disney Channel
	Television not on a TV set <i>Live viewing on network connect device, such as a laptop, tablet, smartphone, games console etc.</i>	e.g. CBBC programmes via iPlayer live	e.g. CITV online live
	Other television <i>On demand viewing on a network connected TV or other device, such as laptop, tablet, smartphone, games console etc.</i>	e.g. CBBC programmes viewed via iPlayer or YouTube	e.g. CITV or Disney programmes viewed via CITV online or YouTube
Other content	Other content <i>Includes audiovisual (e.g. games, film) and print, web, music and other content</i>	e.g. information and games on www.bbc.co.uk/cbbc , NASA Kids’ Club site, Wiki_for_Kids, KidzSearch	e.g. CITV or Disney web content, Miniclip, MovieStarPlanet

1. Children still view public service television on a television set

Care is needed regarding popular claims about children’s changing media practices as they are easily overstated and often under-evidenced¹⁰. Despite pessimistic predictions about children and TV, **children are not deserting broadcast television in general, or public service television in particular.**

According to Ofcom’s 2015 *Children and parents: media use and attitudes report*, “the amount of time 8-11s and 12-15s spend online has more than doubled since 2005, with **12-15s now spending more time online than watching TV**” – where “watching TV” is defined as watching TV exclusively on a TV set.¹¹

- But for children aged 3-11, viewing on a TV set exceeds internet use. For 12-15 year olds, although internet use now exceeds television viewing on a TV set, they

nonetheless watch as much or more television on a TV set as do 3-11 year old children.¹²

Indeed, **96% of children aged 5-15 use a TV set to watch television and the majority (87%) of viewing of broadcast TV among 4-15 year olds is of live television**¹³. This matters because of the social situation that such viewing is typically associated with:¹⁴

- The television set in the living room remains a key device for shared family viewing, supporting positive family dynamics, and the shared conversation that supports **media literacy education** in the home.

It also matters because of **issues of social and digital inequality and inclusion**. The assumption that all children are able to access content via the internet neglects the minority who lack internet connectivity at home:

- Ofcom estimates one in ten 8-11 year olds and one in twenty 12-15 year olds are without internet at home at around¹⁵.

In short, children's public service broadcasting on television continues to serve a valuable and valued function in UK society.

Is children's television viewing really in decline?

The above data are insufficient for claims and predictions about children's changing media practices. While it may seem obvious that children are increasingly watching television on devices other than a TV set - usually a tablet or laptop - to the best of our knowledge this trend has not been measured.

- We know 96% of children aged 5-15 view television content on a TV set, and 45% of the same age range view television on other devices.¹⁶
- **We do not know how much time children spend watching TV on devices other than a TV set, nor how many of the hours spent 'using the internet' include viewing television content. Thus we do not know the balance between time spent watching TV on a TV set and on an internet-enabled device, nor the balance between time spent on TV content and other online content.**¹⁷
- Children's appetite for television content, including public service, is not declining. Ofcom observes no move from PSB broadcasters to other (commercial) channels.¹⁸

In short, discussion of PSB in the current media landscape must distinguish television content from television viewing devices and measure both, by age group. Are children moving away from live TV to on demand services? Are they replacing TV content with other activities such as (non-TV content on) YouTube or online games? **Without answers to such questions, we cannot say how much time in total children spend consuming PSB services offline or online, or evaluate how valuable (or not) PSB provision may be to children.** It would be premature to determine future provision of public service television viewed by children without clear answers.

Yet this has already happened. BBC Three, the BBC's 'youth' channel whose target audience includes 16 and 17 year olds, will exist online only from February 2016¹⁹ and **no**

PSB in the UK offers systematic programming across the full age range of children (0-17).²⁰ This contravenes Article 17 of the UN Convention on the Rights of the Child, ratified by the UK, which stipulates that, concerning media, children should have access to a variety of information and material.²¹ This lack of provision is often framed as broadcasters responding to children's preferences for accessing content, but it cannot be distinguished from the alternative, that children are responding to broadcasters' reduction in provision for them.

The case for online provision of children's public service television

Can online provision compensate for a decline in broadcast television, providing greater public service television and other public service content for children on the internet? Here too the evidence gaps are pressing, with little quantitative or qualitative data regarding either content provision or children's usage.

The BBC is the only PSB to have an online platform dedicated to children's content that neither collects their personal data nor carries commercial sponsorship or advertising.²² ITV and Channel Five have online platforms targeted at children (CITV and Milkshake TV) but both include adverts.²³ Channel 4 does not have an online platform dedicated to children nor a dedicated space on its online website, 4od. **For children, therefore, options for viewing non-commercial public service television content are limited.**²⁴ **This matters both because of the adverse effects of exposure to advertising²⁵ and because commercial broadcasters tend to omit a range of content of value to children.**²⁶

Meanwhile commercial services increasingly target the child audience (or 'market'). Either providers of children's online content collect and exploit children's personal data or the boundary between advertising and programming is increasingly blurred.²⁷ Paid advertising on digital platforms is subject to guidelines, but ['commercial content' is not](#). This is problematic insofar as Youtube becomes increasingly popular with children, where they can watch vloggers, 'unboxing' videos (where presenters discuss new products they have bought), and other 'endorsement' videos²⁸.

- Ofcom (2015, p.96) shows that **only 47% of even 12-15s who go online are aware that the content may have been paid for through commercial endorsement.**
- YouTube Kids has recently launched as an app service in the UK, and it remains unclear who will regulate it and how.

In addition to legitimate concerns surrounding children's increasing exposure to commercial content, any decline in public service provision risks the loss of positive opportunities for children to engage with quality content that informs, inspires, and entertains them.

The case for online provision for children of other public service content

It is increasingly difficult (and inadvisable, in terms of children's experiences of content) to evaluate the contribution of television content separately from the proliferation of other forms of online content and services available to children online – think of web content, games, quizzes, parental guidance, links to further content options (both television and other), online communities, and so forth.

It seems obvious that online content of all kinds can, and do, enhance the experience of television content, including public service content.²⁹ It also seems obvious that the choice to spend time on television content - broadcast or not, public service or not – along with the benefits to be gained will be shaped significantly by the wider online environment in which television content is positioned and viewed. PSBs and other providers have long been working on exactly this assumption. Our point here is that **a range of other public service content must be considered when evaluating the situation for public service television.**

But here we face a further evidence gap that impedes effective decision-making. **We know remarkably little about what content children engage with on the internet.** The main systematic measurement of online content use relies on Ofcom's³⁰ reporting of comScore data of the "top 50 web entities accessed by children aged 6-14 from desktop and laptop computers." This is problematic for our present purposes as it excludes tablets, smartphones and other devices. The use of the concept 'web entity' is also problematic, as this includes entities which are not updated with content such as Microsoft, or websites for downloading apps. Still, it shows that children's top twenty web entities accessed in 2015 were, in rank order:

- 1. Google, 2. MSN, 3. BBC, 4. YouTube.com, 5. Facebook and Messenger, 6. Yahoo, 7. Amazon, 8. Wikipedia.org, 9. Windows Live, 10. Roblox.com, 11. Mode Tend Parenting, 12. O.UK, 13. eBay Sites, 14. Disney Entertainment, 15. Microsoft, 16. Steam (App), 17. Safesearch.net, 18. Origin, 19. Animaljam.com, 20. Adobe.com.

Even if one considers all 50 sites, it is immediately apparent that children are accessing considerable amounts of commercial content, much of it designed for a general (adult) audience. It is also clear that these data tell us little about children's choices of television or other content, public service or commercial content, child-appropriate content or other.

Nor is it clear where such data are to come from. Children's online activities constitute a major part of their media experiences, but there is little information about the content involved or the consequences of engaging with it available in the public domain to inform policy. Such data as are collected rarely evaluate content and use against child-specific criteria of value or benefit.³¹

Beyond the challenge of identifying high quality – including public service – content for children, there is also a challenge for broadcasters and other content providers to earn revenue to pay for it. The main options are:

1. Payment by subscription – but this is likely to increase social inequalities insofar as wealthier parents are better able to pay.
2. Public provision (e.g. by public, foundation or third-sector funded organisations such as PSBs, museums and galleries, charities, etc.) – this option (including in relation to the licence fee) is under severe financial pressure at a time of austerity.
3. Selling advertising – this is widely criticised by researchers, parents and others concerned not to promote commercialisation in childhood.³²

4. Selling children's personal data – this option is relatively new and currently the subject of EC Draft General Data Protection Regulation #13TO16 (which raises to 16 the age at which children's online data can be collected only with parental consent).³³

In short, all options are problematic. Nonetheless, strategies for meeting such challenges should, we argue, be considered within the present debate.

The case for enhancing the 'discoverability' of children's public service content

Insofar as there is good quality content – television and other – available for children online, how are children (or their parents) to discover it? **Discoverability poses a new and pressing challenge for public service content providers – and for the children and their families who could benefit from such content.**

- The top 'web entity' accessed by children in 2015 was Google, but what content did they find? We can ask the same about their visits to YouTube or Yahoo.
- 41% of 12-15s and 63% of 8-11s only use sites and apps they have visited before (Ofcom, 2015: 86).

Insofar as commercial sites have far greater power to ensure their content is 'discoverable' but also 'sticky',³⁴ and insofar as children are conservative in their searches (itself partly a problem of media literacy and partly a feature of search algorithms), there is a major challenge for public service content providers to ensure that their content is being found by children. This in turn poses a major challenge to the scalability and sustainability of public service providers, especially those that are small, niche or catering to minority groups. PSBs have traditionally played a valuable role in exposing their audience to mixed diet schedules, thereby encouraging viewers to watch programmes on subject matter that they may not seek out unprompted but may yet enjoy. **A concern with children locating content through search engines or YouTube is that these 'mainstream' as many people as possible towards highly ranked sites (or to other sites like those the child has already visited³⁵).**

Safety considerations also lead parents to restrict their children's freedom to search the internet widely,³⁶ as well as favouring the 'walled gardens' built for children online by both public and, especially, commercial providers. Our risk-averse society worries about – rather than welcomes – support for children's freedom to search in creative ways online, discovering new and surprising content and exploring at will according to interest.

What can be done? We are intrigued at the investment of the German government in [Ein Netz für Kinder](#), a search engine designed for children to increase the discoverability of high quality content for children online.³⁷ We also note the efforts of Google to produce [KidzSearch](#), and possibly other initiatives exist. We are not aware of independent evaluations that show how many children these reach, whether they are effective, or whether they help in the discoverability of public service content by children.

Conclusions and Recommendations

This brief addresses the risk that public service broadcasters are neglecting children, with those aged 12-15 being the age group most likely to be under-catered for (if catered for at all). But why does this matter? Without public service broadcasting commitments to children, there is a risk that children will be exposed to greater levels of advertising as well as content which may not encourage children to explore and discover the world and broaden their horizons.

This lack of provision to children by PSBs may well have far-reaching consequences; not only in terms of the social value that PSBs provide to their audiences and society as a whole, but also in terms of PSBs losing their entire future audience. If children are forced to search for content elsewhere (as they will be if PSBs continue to desert them), there is no guarantee that they will return later in life.

In summary:

- We urge **greater provision of public service television and other content for children across the full age range of ages**, not forgetting those aged 13-17.
- We hope and expect that **such content could be provided and distributed by a range of producers** including but not limited to the BBC.³⁸
- We call for **more research on children's consumption of content**. There is a need to carefully distinguish by type of content (television or other), provider (public or commercial), device (TV set or other) and platform (broadcast, online or other) so that we are able to understand the role of public service television for children today, anticipate future trends and seek to shape them in children's best interests.
- **We welcome the proposal by the BBC to launch iPlay**, 'a single online platform where we would make the full range of BBC content for children available as well as content from carefully chosen partners.'³⁹
- We urge the **development of, and support for, initiatives to ensure greater 'discoverability' of public service content** to allow children to explore, and be exposed to, content online that broadens their horizons beyond what they know from previous viewing habits.⁴⁰
- We support the BBC's argument that **regulation is required to ensure that public service children's channels (along with other public service content) are prominently positioned and easy to find** across all electronic programme guides, on demand services and other online content gateways.
- We recommend that **new platforms for children should: include editorial and curated content to ascertain quality and age-appropriateness; be transparent and accountable to users; be independently evaluated; support pathways to exploration, imagination and learning rather than keep children within narrow restrictions; be widely promoted so that all children have the chance to discover and enjoy them; and be safe, and encourage critical media literacy.**

- We recommend that **public service broadcasting continues to be funded through public provision** to ensure that all children have the opportunity to access high quality content, regardless of income, without being subjected to the negative effects of advertising and without becoming subjects of data collection (to which they cannot provide consent).

Sources

- Bailey, R. (2011). *Letting children be children. Report of an independent review of the commercialisation and sexualisation of childhood*. London: Department for Education.
- Calvert, S. L. (2008). Children as consumers: Advertising and marketing. *The Future of Children*, 18(1), 205-234.
- Davies, M. M., & Thornham, H. (2007). *Academic literature review: The future of children's television programming*, London: Ofcom.
- House of Lords (2015) The Select Committee on Communications, Inquiry on BBC Charter Renewal (Evidence Session No. 6, 27 October 2015).
- Jenkins, H. (2008) *Convergence culture: where old and new media collide*. New York University Press.
- Lemish, D. (2007). *Children and Television*. Oxford: Blackwell.
- Livingstone, S. (2008) *On the future of children's television – a matter of crisis?* <http://eprints.lse.ac.uk/27102/>
- Livingstone, S. (2014) What does good content look like? Developing great online content for kids. In Whitaker, L. (ed.), *Children's Media Yearbook 2014* (pp.66-71). Milton Keynes: The Children's Media Foundation. See <http://eprints.lse.ac.uk/62223/>
- Livingstone, S., Haddon, L., and Görzig, A. (Eds.) (2012) *Children, Risk and Safety Online: Research and policy challenges in comparative perspective*. Bristol: The Policy Press
- Lunt, P. and Livingstone, S. (2012) *Media Regulation: Governance and the interests of citizens and consumers*. London: Sage.
- Ofcom (2007) [The Future of Children's Television Programming](#)
- Ofcom (2015) [Children and Parents: Media Use and Attitudes Report](#)
- Pariser, E. (2011) *The Filter Bubble*. Penguin Books.
- United Nations (1989) [UN Convention on the Rights of the Child](#)
- Valkenburg, P. M. (2004). *Children's Responses to the Screen*. Lawrence Erlbaum.

Notes

¹ See <http://futureoftv.org.uk/>

² See www.sonialivingstone.net and <http://blogs.lse.ac.uk/mediapolicyproject/> We thank Emre Ayaydin, Georgina Born, Greg Childs, John Carr, Emily Keaney, Peter Lunt, Alison Preston, Jeanette Steemers and Damian Tambini.

³ See <http://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

⁴ See Livingstone, S. (2008).

⁵ See Lunt, P., and Livingstone, S. (2012).

⁶ The notion of public service television is that specified by the remit of this inquiry, but we note here and in our main text that this conflates public service broadcasters with public service content in ways that can obscure.

⁷ See Ofcom (2015), p.64.

⁸ See Ofcom (2015), p.37, p.41.

⁹ See Jenkins, H. (2008).

¹⁰ For example, <http://www.theguardian.com/technology/2015/apr/15/traditional-tv-viewing-teens-tweens-awesomenesstv-meg-deangelis>

¹¹ See Ofcom (2015), p.22.

¹² For 3-4 year olds, TV viewing (14.5 hours per week) is more than double the internet use (6.8 hours per week), and it is considerably greater for all age groups except 12-15 year olds (TV viewing 15.5 hours per week, internet use 19.8 hours per week).

¹³ See Ofcom (2015), p.215.

¹⁴ We base these claims on a sizeable body of qualitative research observing and evaluating family interactions around shared viewing. See, for example, Lemish, D. (2007). *Children and Television*. Blackwell; also Valkenburg, P. M. (2004). *Children's Responses to the Screen*. Lawrence Erlbaum. Ofcom data supports this claim insofar as it shows the majority of children's "live viewing" (and time-shifted viewing) occurs with adults.

¹⁵ See Ofcom (2015), p.23.

¹⁶ See Ofcom (2015), p.50: Figure 21.

¹⁷ Indeed, in the aforementioned figures, watching TV on an online device is presumably counted not under 'TV' but under 'internet', confusing further claims that children have shifted from TV to the internet. Relatedly, Ofcom reports a large increase in the popularity of YouTube amongst children in recent years, and even that among 12-15s, more prefer watching YouTube to TV (29% v. 25%)(Ofcom, 2015: 27). But viewing YouTube can include watching television programmes, so it is not easy to claim that children are shifting their attention from television to the internet (though certainly they are shifting from the TV set to viewing on other devices). Further, in its claim that "hours of total viewing of TV are in decline among all children" (p.213), Ofcom refers to data from BARB, which appears to include viewing live or time-shifted on a TV set (or on other devices connected to a TV set) but not to time spent viewing television on other devices (such as iPlayer on a tablet), as BARB does not measure this yet. In Ofcom's Digital Day research (2014) with some 359 children, 52% of 'watching' (for 11-15s) and 64% (for 6-11s) was of 'live' TV, the rest being viewed via streaming, on demand, recorded and short clips. This

suggests that viewing TV on other devices – seemingly not counted in either Ofcom or BARB statistics – is considerable and growing, but still a minority of TV viewing. See <http://stakeholders.ofcom.org.uk/market-data-research/other/cross-media/digital-day/2014/digital-day-childrens> and http://stakeholders.ofcom.org.uk/binaries/broadcast/reviews-investigations/psb-review/psb2015/PSB_2015_TV_Viewing.pdf

¹⁸ For its comparison of children’s viewing by channel, Ofcom compares BBC, other PSBs and commercial channels, noting no significant decline of BBC/PSBs in recent years (but for this comparison it has switched to measuring “children’s airtime”, something that occurs both on a TV set and on other devices. Of the 20 top-performing programmes among all children in 2014, 14 were on BBC One and the rest were on ITV (p.218). In its 2007 report, *The Future of Children’s Television Programming*, Ofcom found that children’s PSB viewing more than held up despite a marked decline in PSB provision (especially from PSBs other than the BBC) - regrettably this report has not and is not being updated despite major changes in the children’s media landscape.

¹⁹ See BBC website, <http://www.bbc.co.uk/blogs/aboutthebbc/entries/c15f39ce-8978-4c6c-9c8b-d03178d3fcc6>

²⁰ Even the BBC, which currently has the most comprehensive provision for children amongst UK PSBs, neglects children in the age bracket 13-15. The BBC target audience for CBeebies is children aged 0-6, for CBBC it is 6-12, and for BBC Three, 16-24, thereby leaving a significant gap between 12 and 16. Older children will soon have even less provision as BBC Three moves online and will cease to broadcast live.

²¹ Article 17 of the UN Convention on the Rights of the Child recognises “the important function performed by the mass media and shall ensure that the child has access to information and material from a diversity of national and international sources, especially those aimed at the promotion of his or her social, spiritual and moral well-being and physical and mental health. To this end, States Parties shall: (a) Encourage the mass media to disseminate information and material of social and cultural benefit to the child and in accordance with the spirit of article 29 [development to the child’s full potential]; ... (d) Encourage the mass media to have particular regard to the linguistic needs of the child who belongs to a minority group or who is indigenous; (e) Encourage the development of appropriate guidelines for the protection of the child from information and material injurious to his or her well-being, bearing in mind the provisions of articles 13 [freedom of expression] and 18 [parental responsibilities].” The state is responsible for ensuring that the provisions of the Convention are fully enacted.

²² No account is needed to watch its content and, unlike the other PSBs, the BBC distinguishes between accounts for ‘under 16s’ and those who are ‘16 or over’. When watching content on CBBC iPlayer, all recommendations are child-friendly and include a variety of programmes and genres within children’s content.

²³ In the case of ITV, there are click-through adverts (which cannot be skipped) screened during on demand content. The Channel Five platform is sponsored by FisherPrice and although there are no screened adverts, there are adverts at the top of each page, many of which might not be considered age-appropriate (such as, on the same page as Peppa Pig, the UK Government’s Drink Driving Campaign with a link to a video containing disturbing content of a road traffic collision – accessed 16/12/15).

²⁴ For detailed information on this point, including the claim based on Ofcom data that 97% of money spent on children’s productions is spent by the BBC, see House of Lords, The Select Committee on Communications, Inquiry on BBC Charter Renewal (Evidence Session No. 6, 27 October 2015).

²⁵ Bailey (2011), Calvert (2008), Valkenburg (2004).

²⁶ See Ofcom (2007), House of Lords (2015) and Davies & Thornham (2007).

²⁷ In the US, the Federal Trade Commission is investigating numerous complaints about YouTube Kids over 1) inappropriate content; and 2) advertising. See <http://techcrunch.com/2015/11/24/youtube-kids-faces-further-ftc->

complaints-related-to-junk-food-ads-targeting-young-children/ and
<http://www.commercialfreechildhood.org/sites/default/files/CFBAI.pdf>

²⁸ Ofcom (2015), p.27.

²⁹ See, for example, <https://www.common sense media.org/website-lists>

³⁰ Ofcom (2015), Annex p.224. Most recent data available, as reported here, are from May 2015.

³¹ Having observed the reluctance of policy makers to define “what good looks like” for children online, the first author has attempted to gather guidelines for providers so that online content for children could be created that is high quality, diverse and imaginative, meeting the expectation of this inquiry that it ‘informs & inspires, entertains & educates, connects & challenges’. See Livingstone, S. (2014).

³² See Bailey, R. (2011).

³³ See <http://www.statewatch.org/news/2015/dec/eu-council-dp-reg-draft-final-compromise-15039-15.pdf>

³⁴ By ‘sticky’ sites, we refer to site designs aimed at encouraging users to choose to remain on the same site for as long as possible; this is different from ‘walled gardens’ which actively prevent users from moving from one site to another as part of a process of exploration or learning.

³⁵ See Pariser, E. (2011).

³⁶ See Livingstone, S. et al. (2012).

³⁷ See <http://enfkd.de/> - Ein Netz für Kinder is a programme of the German Federal Government of Culture and Media. It aims to encourage the production of high-quality, nationwide content in the areas of information, education and entertainment for children aged 6-12. The programme budget amounts to a maximum of 1 million euro annually. Ein Netz für Kinder aims to increase the number, quality, as well as discoverability, of high-quality content for children on the internet. The initiative encourages children to use the internet as playful way of learning and to develop their creative potential to express themselves in the digital world.

³⁸ The Children’s Media Foundation is currently campaigning for resources to ensure (and research to underpin) such diversity of provision for UK children across the age range. See <http://www.thechildrensmediafoundation.org/>

³⁹ See the BBC’s submission to this inquiry at <http://futureoftv.org.uk/wp-content/uploads/2015/12/BBC-evidence.pdf>

⁴⁰ As James Bennett points out, it is hardly the role of a public service broadcaster to employ algorithms that just recommend “more of the same.” So what is the equivalent of scheduling in the online world? And what can counter, in children’s interests, the dominance of Google and other commercial search engines? See <https://www.opendemocracy.net/100ideasforthebbc/create-public-service-algorithms/>