



SUBMISSION

TO THE DEPARTMENT OF COMMUNICATIONS

AUSTRALIAN AND CHILDREN'S CONTENT REVIEW

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Review of Australian and Children's Content

September 2017

Introduction to ACCM

The ACCM is the peak not-for-profit national community organisation supporting families, industry and decision makers in building and maintaining an enjoyable media environment that fosters the health, safety and wellbeing of Australian children.

ACCM has a national Board representing the states and territories of Australia, and a membership of individuals and organisations including Early Childhood Australia, the Australian Council of State Schools Organisations, the Australian Primary Principals Association, the Australian Education Union, The Association of the Heads of Independent Schools, the Parenting Research Centre, The NSW Parents Council, the South Australian Primary Principals Association, and the Council of Mothers' Unions in Australia.

ACCM's core activities include the collection and review of research and information about the impact of media on children's development, and advocacy for the needs and interests of children in relation to the media.

This submission has been prepared on behalf of the Board of the Australian Council on Children and the Media by Prof Elizabeth Handsley (President), Ms Barbara Biggins OAM (Hon. CEO), and Dr C Glenn Cupit ACCM Executive Committee member.

Enquiries about this submission should be directed to Ms Barbara Biggins.

COMMENT ON DISCUSSION QUESTIONS

1. Are the policy objectives and design principles articulated in the discussion paper appropriate? Why do you say that?

The following three **policy objectives** have been identified to guide the review:

- **securing quality content that promotes Australian identity and culture**—implement measures that encourage the creation, delivery and export of diverse and high quality Australian content
ACCM – Yes, see next dot point.

- **securing quality Australian content for children**—ensure content is developed for Australian children to help them understand the world around them and Australian values and culture
ACCM -

For children to develop a stable and positive sense of identity they need to be able to see themselves as having a valued and safe place in their society and community. One of the essential foundations for this is the narratives to which they are exposed, whether family stories, print accounts or electronic media stories. The only way to learn what are Australian values and culture is to be regularly exposed to narratives that express those values and are grounded in that culture.

It's important too for children of indigenous heritage, and from non-Australian backgrounds to see their lives reflected on television. (see more at 6.)

- **driving more sustainable Australian content industries**—develop the right policy settings to enable Australia's creative sector and talent to thrive, locally and internationally.

ACCM: Guaranteeing that the child audience has regular access to a wide range of enjoyable and life enhancing and contemporary Australian content is one sure way of ensuring the sustainability of the Australian film and television industry. If children are introduced, at a young age, to culturally and socially relevant material that reflects the environment in which they live, and which really speaks to them, they will demand more. And they will benefit from such exposure.

The production of such material needs to be supported by government regulation; it should be easily accessible, and well promoted.

POLICY PRINCIPLES identified for review

- **service clearly identified public policy goals**—Government intervention should serve transparent objectives

ACCM: Yes

- **be clear, simple and transparent**—regulations and support measures should be easy, efficient and practical for industry to access and comply with:

ACCM: Yes. However, it should be noted that the existing CTS were easy and practical for the industry to comply with, but a lack of willingness to embrace them has been a major ongoing stumbling block.

There is a need to emphasise that the industry's protected and privileged position imposes on them public interest obligations.

- [be platform agnostic—Content regulation should be driven by policy objectives rather than platform type](#)
ACCM: The answer to this depends on the degree to which the platform type has a protected position. However, all platform types operating in Australia should be subject to significant Australian content requirements, and which provide scope for relevant improvement.
- [produce benefits that outweigh the costs—funding and regulatory imposts come at a cost to both government and regulated entities—the public benefits generated should exceed those costs](#)
ACCM: Benefits should not be defined in purely commercial terms. Some benefits cannot be measured in the same currency as costs, but should be accounted for nevertheless, and for instance, could be gauged by survey sampling, public awareness campaign or other means
- [be flexible enough to cope with changing environments—a future system should be forward- looking and nimble enough to adapt to future changes in technology and audience trends.](#)
ACCM: We would support the introduction of a levy on providers (with special consideration for the not-for profit sector) to ensure that there was a continuing pool of funds to support the provision of quality screen content for pre-school and school-age children. However, we see no need precipitously to abandon the free-to-air quotas while young children in particular still spend significant proportions of their screen time with free-to-air TV (Australian Child Health Poll 2017), and while entities with free-to-air outlets still occupy a protected position.

[“This question invites submitters to comment on the objectives that the government should be pursuing in relation to Australian content and the way in which it should go about pursuing those objectives.”](#)

2. **What Australian content types or formats is the market likely to deliver and/or fail to deliver in the absence of Government support?**

ACCM: Australian content delivery depends upon Government support to ensure a robust industry for locally produced content. The market is unlikely to deliver quality Australian content specifically for children (and especially live action drama) in the absence of government regulatory and financial support. Presently, the industry treats children as a market and so delivers much toy-linked animation, some of it Australian. These programs are designed to bring a line of toys to an implied life (often with violent story lines, which provide action and seek to attract attention, and mostly contain stereotyped characters) rather than provide children with a diverse range of stories that will benefit their healthy emotional and social development.

Nor will the market alone deliver much Australian drama, and especially live action drama, for children, as has been seen with the virtual takeover of the Australian Children’s Drama Quota by animated product. Such content is more profitable, but less able to serve children’s interests as discussed in this submission.

The P and C standards have also failed to deliver diversity of program type, and this needs to be addressed. The CTS have addressed only the qualities of individual programs, not whether the range of program types available offers children diverse choices.

3. What types of Australian screen content should be supported by Australian Government incentives and/or regulation?

“The review has proposed a ‘market oriented’ design principle. Questions 2 and 3 invite submitters to identify those content types or formats which the market, alone, may not deliver. Are these formats valuable? If demand for these formats is weak, what is the case for supporting them? Should different content or formats be supported in different ways? How should we think about the role of the national broadcasters?”

ACCM:

Live action drama: While animation is clearly attractive for children because of its easy to process visuals, repetitive elements and predictable characterisations (despite honourable exceptions), it is as important for children to be exposed to ‘real’ children with whose joys and sorrows, fears and triumphs they can identify, as it is for adults (in fact possibly more so).

Given the relative costs of animation of live action, and its importance, there is a special case for Australian live action drama for children to have dedicated government support.

At the time when the Children’s Drama quota requirements were established, it was not envisaged that such distinctions needed to be made as animation was then relatively expensive.

The ABC could be expected to support this, though its present Charter only obliges it to provide programs of an educational nature.

The ABC has shown a diminishing commitment to the provision of Australian content for all its child audiences – down to about 25%. Even on its preschool channel, the number of programs that are both Australian and not toy linked is very few.

Diversity- The ABC should not be the only source of free-to air programs for children (as is being pushed by the commercial networks). The child audience’s need for diversity and for age-appropriateness is not satisfied by one or two ABC channels. Restricting children’s programming to the ABC would signal that children do not need diversity, a situation which would never be accepted for the adult audience ((Adults have at least 16 free to air channels).

4. The current system of support for screen content involves quotas, minimum expenditure requirements, tax incentives and funding (see Attachment B). What are the strengths and weaknesses of the current system? What reforms would you suggest?

ACCM: Since the commercials have not willingly ever provided quality age-appropriate content for children (except in the very early years of TV), the quality quotas have been necessary.

However, the quality aspect of the quotas is only ever satisfied if the industry is willing to put the necessary funds in, and ALSO that the assessment of the product has been rigorous enough to ensure that only quality content is accepted for the quota.

Since children are still watching free-to air TV (and many cannot afford the alternative platforms) quotas should be maintained but minimum spends introduced and assessment processes reviewed.

5. What types and level of Australian Government support or regulation are appropriate for the different types of content and why?

“Questions 4 and 5 invite submitters to provide their views on whether, having regard to the policy objectives adopted by the Government, some or all of these measures should be reconsidered and if so, over what timeframe? What different effects do quota, expenditure and tax system interventions have? Are some interventions more efficient and effective at delivering certain types of content than others? What new or different approaches should be considered and why?”

ACCM: The Government should require:

- The quotas of Australian children’s production on all commercial free-to air providers to remain as in #4 above, for say the next 3 years;
- The assessment processes for P and C programs to be reviewed with an aim of improving quality of production;
- The Australian Children’s Drama quota to be set at 50% live action;
- The ABC should be required to screen a minimum of 50% Australian children’s content;
- The establishment of a levy on all content providers to support production of quality Australian children’s content.

6. What factors constrain or encourage access by Australians and international audiences to Australian content? What evidence supports your answer?

“What strategies are available to better promote and support Australian content in Australia and abroad? Are there ways in which the diversity, availability and accessibility of Australian content can be enhanced? What should the role of government be in making diverse content accessible to audiences? How can the discoverability of Australian content, by Australians but also around the world, be enhanced? “

ACCM:

For the child audience, the factors constraining access by children have included a lack of commitment to quality by commercial networks and consequent lack of belief in their product, and a resultant lack of promotion and screening in unpopular time slots.. We note, however, that the networks have been more than willing to utilise their unlimited repeat screening rights for C dramas. They have , far exceeded the prescribed quota of hours (8hrs per year) vs (43- 96 hrs per yr over the past 3 years)- perhaps indicating an underlying belief that drama attracts children. (Australian Communications (and Media Authority 2017) By comparison, ABC’s promotion of *Little Lunch* and its screening in a family friendly time slot reflects their justified belief that this is a quality program that will draw and hold an audience.

Live action Australian children’s drama has done well in overseas sales over the years showing that a “mid Atlantic” orientation is not necessary for success with an international child audience.

Diversity of program type for children can be fostered by requiring some children’s content to be provided by all providers.

An additional factor that does constrain children’s and adult access to Australian content is the failure to include many Australians of Indigenous and non-anglo heritage backgrounds in so many programs including dramas, or if they are included, they are the “exotic other” or a villain.

What would the Government need to consider in transitioning to new policy settings?

ACCM: Issues such as:

- 1) the public interest obligations of the free-to-air networks;
- 2) the fact that the free-to-air networks are also active participants in the new digital platforms to which they attribute loss of audience and advertising, and their current failure adequately to develop the potential of those platforms;
- 3) what families can afford by way of screen entertainment - the fairness and equity in access to more expensive sources needed to access new digital platforms;
- 4) where the child audience is actually spending most of its time, especially the early childhood audience; and
- 5) the obligation of the ABC to be a leader in providing Australian content for children.

In regard to 3) and 4), ACCM notes the following findings from the Australian Child Health Poll viz “logistic regression showed that children aged 13 years and under with parents who earned less than \$999 per week were 1.3 times more likely to watch TV everyday than those with parents earning more than \$999 per week. Children living in a regional or remote area were 1.4 times more likely to watch TV everyday than those living in a metropolitan location.” (Email communication from ACHP to ACCM)

7. Is there anything else that you would like the Government to consider that has not been addressed in your responses already?

It is noted that Australian produced content that is funded by the Australian Government by individuals, organisations, institutions, screen and television groups and others including ABC, SBS and National Indigenous Television (NITV) is owned/restricted to those people and organisations. It could be argued that there’s then a problem in that this content is not shared/hired across all the wider Australian networks and thereby inhibits the access of the Australian public to a rich and culturally diverse Australian content. The Australian Government could consider requiring, in the allocation and distribution of Australian Television Content /Production film and television grants, that the content be subject to being shared across the wider community broadcasters and television networks. This could provide greater public viewing of Australian content, lessen the duplication and competition for Australian content grants, increase the quality and content production and create a more robust collaborative and viable industry in Australian and marketed across the world.

References

Australian Child Health Poll (2017)

<https://www.childhealthpoll.org.au/polls/screen-time-whats-happening-in-our-homes/>

Australian Communications and Media Authority (2017) Australian content compliance results

<https://www.acma.gov.au/-/media/Community-Broadcasting-and-Safeguards/Information/pdf/Comparison-of-Compliance-Results---2007-to-2016-pdf.pdf?la=en>

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