

Australian Council on Children and the Media (trading as Young Media Australia)

Submission to the Australian Broadcasting Authority Review of the Guidelines for C and P classification

Criteria for a Children's Program

As the only national community body with a primary focus on the provision of better choices for children as consumers of the media, the Australian Council on Children and the Media (YMA) is deeply concerned at the inroads being made, and proposed to be made, into the C classification's ability to cater to the needs of young children.

In this first section we deal at length with our major objections to the proposals raised in the ABA's Issues paper, viz.

The issues paper suggests that the presumption that C programs will be G-classified could be removed. It is stated:

Over time the notion has arisen that C and P programs are equivalent to 'G' programs, in the sense that parents assume that they are suitable for children to watch unsupervised. In fact this is not necessarily the case.

This last observation is correct, strictly speaking. The regulatory documents to date have not in terms specified that C and P programs must meet the criteria for 'G' classification. We submit, however, that this is because it should go without saying that C program meet those criteria. If it does not go without saying, our strong submission is that the C criteria should be revised to include the requirement that programs satisfy the 'G' criteria.

This is not to say that C programs should not be aimed at older children ('twens') to appeal to their tastes and address their interests. However, C programs should meet the needs of all children, in the sense that they should be suitable for them to watch unsupervised.

It is this distinction between tastes and interests on the one hand and needs on the other, that we believe the ABA has not fully appreciated. In our view the policy underlying the establishment of the C quota is the same as that which underlies any number of aspects of the law relating to children. Children's tastes and interests (in the sense of things that they are interested in or curious about) do not necessarily coincide with their needs (or their interests in the sense of what is good for them).

YMA has been disturbed in recent years to see this distinction glossed over more and more in public debate on children and the media. There are commentators who seem to think that children should be provided with a media diet that satisfies their subjective demands (their tastes, or interests in the former sense) and that any attempt to satisfy their needs (or interests in the latter sense) is merely patronising or a waste of time.

If this were the case, and if it is true that children's tastes are growing more sophisticated (ie adult-like), there would be no need for the C quota. Licensees would be able to meet the objectives of the C quota by broadcasting programs aimed at teenagers and young adults. There is already sufficient commercial inducement to broadcast this material so there is no need for a quota.

If there is to be a C quota, it must meet some imperative where there is not sufficient commercial inducement, namely that of catering to the needs and interests of the pre-tween audience. YMA fears that if the C quota can be met with PG-rated, tween-aimed material, then each station's whole quota will be filled with such material. There will be nothing left for the 6-11 year olds. The spending power of the tween audience is well-documented, and they are of increasing interest to advertisers. These factors suffice to ensure that programmes that interest, or cater to the tastes of, tweens will be broadcast whether or not there is a C quota. The role of the C quota is to provide an inducement to show material that meets the needs of audience segments who would otherwise be left out.

Therefore YMA believes there is a strong case to reduce the age range for C programming, substituting the age of 11 for the age of 14, as the upper end.

In default of this revision, however, our concerns could be largely met by a combination of two measures: introducing a requirement that all C programming meet the G classification, and dividing the C quota into further sub-quotas addressing the tastes of tweens and pre-tweens.

YMA's concerns over the relationship between the C criteria and the G classification are further deepened by the suggestion in the discussion paper that C programs falling into the PG category could be broadcast in a G time zone. This would make a mockery of the whole concept of a G time zone.

We take the view that a sufficiently skilled producer, who has devoted sufficient resources to the development of a program, should be able to make tween-targeted programs without exceeding the bounds of the G classification. It should be remembered that the C quota gives producers a captive market, and they should be willing to play their part in return, to make the system work in the interests of children. In our experience, numerous producers have met this challenge with alacrity.

Pre-tween children might well not be interested in watching tween-aimed programs, but the realities of family life are that they might have no choice. This is especially the case in families that contain tween and pre-tween children. The system should not force parents to choose between switching off a C program, that a 12-year-old wants to watch, and removing a 7-year-old from the room. Children's television should be appropriate for all children, irrespective of whether it caters to the tastes of all children.

The second measure we submit is required, is the introduction of sub-quotas for different ages of children. If the C quota can be filled solely with tween-aimed programs, it will be. There are strong commercial imperatives to aim the programs as high as possible, to maximise the spending power of the audience and therefore their value to advertisers. If pre-tweens are to be catered to, they need a sub-quota. We would suggest this should be at least half of the C quota.

So far we have implicitly accepted, for the purpose of argument, the claims in the discussion paper about the 'evolution' of the child audience. We question these claims, and we believe the ABA has a responsibility to back them up with evidence coming from more than one source. We further submit that if there has been such an evolution in Australia, it is due in large part to the impact of media which have been inadequately regulated in children's interests. Commercial interests, with strong motivations for 'adultifying' children, have been finding ways of circumventing the protections for children built into the regulatory system. Using any results of this process as a justification for further watering-down the regulatory scheme has deep flaws.

Issues:

1. Appropriateness of the wording of the document "Criteria for Children's programs" (CCP).

As argued above, YMA does not support the extension of the C age to include "children under 14 years" [regardless of whether they are in primary school], as foreshadowed in the Australian Content review.

Rather, YMA believes that the age range most in need of the quota presently, is the 6 to 11 age group.

If this is not accepted, then the quota must be split between 6-11 yr olds and "tweens"

2. The Nature of tween programming:

see points made above in general comment.

3. Suggestions for checks and balances to ensure that the child driven focus of Criterion 2(a) is retained.

YMA contends, as above, that the child driven focus will only be retained, either if the upper age range is lowered, or if all C programs are required to also meet the G classification guidelines.

The interpretation of the Criteria

4. Is the information provided in the document "CCP" too detailed?

YMA is of the view that the information in the "CCP" document is largely helpful in explaining the intent of each criterion.

However, the section under CTS 2 (d) seems to be a bit of a mix between explaining what an "age specific" program is and what "enhancing a child's understanding and experience" means. To this end, para 4 ("producers should take care ..." belongs better under CTS 2 (a).

5. Would it be preferable to simply outline the intent of each criterion, or is it more useful to provide examples?

Rather than examples, it might be more useful to add in each criterion, "Indicators that a program meets this criterion would include ...", and "Indicators that a program does not meet this criterion ..."

Time zones

YMA does not agree with the statement that "over time, the notion has arisen that parents assume that they are suitable for children to watch unsupervised. In fact this is not necessarily the case. "

One of the writers of this submission was for 9 years a member of the Children's Program Committee of the Australian Broadcasting Tribunal, and knows for a fact that "C" programs were always considered by that Committee, as having to be first of all, G programs and then within that, to be specifically made for children. Far from being a notion that has arisen over time, it was a basic assumption in the introduction of the C classification in 1978. Parents were told from the early days of the C classification that these were programs that children could watch without supervision, because they were specifically made for them.

To change this basis, will be to cause great confusion among parents.

Issues for comment

6. When are tween programs likely to be scheduled?

It seems likely that programmers will want to schedule "PG" type tween programs in the early evening, or after 5pm, or at weekends. This seems to fit with the current industry push (CTVA Code Review) to cut G time back to 4-5pm in the week day afternoons, and to cut G time significantly on weekends- a push which YMA is strongly opposed to.

7. To what degree should licensees be guided by the time zones articulated in the code in their choice of timeslots for these programs

Licensees should adhere to the time zones for G and for PG programs. To do otherwise is to make a nonsense of the time zones, and to totally confuse parents. a

Assessment procedures for C or P classification

Current process

Consultants

Issues for comment

8. The effectiveness of referring programs to external consultants for advice on whether the program satisfies the CTS 2 criteria

9. Alternate means of ensuring that such expert input is obtained

YMA submits that it is imperative that any consultants or experts whose views are taken into account in the assessment process should be independent. They should not be on the payroll of the producers themselves, nor even selected by the producers.

10. Possible safeguards against actual or perceived conflicts of interest which may occur when a program is referred to a consultant

The ABA's role

Issues for comment

11. The usefulness of the ABA's current report style

12. Preferred options for giving feedback from the ABA ...

Inflexible processes

Issues for comment

13. the feasibility of an accreditation system for experienced producers

YMA also opposes the suggestion of benchmark accreditation of producers. This would be an unnecessary measure providing a kind of aristocratic privilege without any corresponding responsibility or accountability. All programmes should be assessed on their merits, and personal identity should not be treated as a surrogate for this.

- i) whether less onerous (in terms of quantity) requirement should apply to accredited producers
- ii) whether ... less stringent assessment process
- iii) the optimum duration of accreditation
- iv) mechanisms for reviewing accreditation

14. The appropriateness of the current ABA I3 application form

- i) for subsequent programs

- ii) to accommodate different info requirements for subsequent series of different genres of programs
- v) Addin happy to make public

Add in happy to discuss further