Channel 4 submission to the Bailey Review on the Commercialisation and Sexualisation of Childhood

Channel 4 welcomes the opportunity to provide its views to the independent review to address parents’ concerns about pressures on children to grow up too quickly.

Channel 4 is the UK’s only publicly-owned, commercially-funded public service broadcaster, with a statutory remit to be innovative, experimental and distinctive. Unlike other broadcasters, Channel 4 is not shareholder owned—commercial revenues are the means by which Channel 4 delivers its public purpose ends, and Channel 4’s not for profit status ensures that the maximum amount of its revenues are reinvested in the delivery of its public service remit.

Education has always been a key part of Channel 4’s remit, which requires it to make a “significant contribution to [...] include programmes of an educational nature and other programmes of educative value”. As a result Channel 4 has a strong educational ethos and a proven track record of providing educational content, both across the schedule generally (e.g. Jamie’s Dream School, Time Team – Wars of the Roses) and also as part of its dedicated output for 14-19 year olds (e.g. Battlefront, Smokescreen).

This remit was recently updated in the Digital Economy Act 2010, which required Channel 4 to participate in the making and distribution of UK film and digital media content, as well as to promote alternative viewpoints and support and develop new talent. In particular, the Act introduced a new requirement on Channel 4 to provide content for older children (10-14 year olds), which will build on its current commitment to 14-19 year olds.

In response to changing viewer demand, Channel 4 has broadened its portfolio to offer a range of digital services. In addition to the main Channel 4 service, the Channel 4 portfolio includes E4, More4, Film4 and 4Music, as well as an ever growing range of online activities including channel4.com, Channel 4’s bespoke video-on-demand service 4oD and stand alone digital projects.

These innovations have allowed Channel 4 to stay in touch with audiences—especially 14-19 year olds—who are rapidly migrating online. Among the existing public service institutions, Channel 4’s brand resonates particularly strongly with these audiences and the organisation speaks with an authenticity of voice which is not easily replicated by other public institutions. Channel 4 also has a strong sense of social responsibility and a track record of tackling social issues.

It is in this context that Channel 4 would like to make three broad points to help inform the review:

1. As Channel 4 has a unique relationship with young audiences, particularly 14-19 year olds, it can play an important role as a trusted, credible guide to help children and young people address social issues as they are growing up. It can also help to increase children’s life skills and media literacy of both parents and children.
2. Operators across a wide range of media rely on commercial revenue to support original content. Indeed, commercially-funded public service broadcasters such as Channel 4 rely on advertising revenue to fund public service content. Any decisions regarding the policy framework for commercial communications
should bear in mind the direct relationship between media plurality, quality content provision and commercial revenue.

3. There are a range of mechanisms and sources of information currently available to help parents address and voice concerns about content and commercial issues, and Channel 4 would be happy to consider how these could be accessed more readily by parents.

The remainder of this response discusses these issues in further detail. Channel 4 has looked closely at the review’s terms of reference and the questionnaire for industry and wider stakeholders, and has sought in this submission to address in the round the specific questions posed in the consultation.

Parents’ concerns about children “growing up too quickly”

The Bailey review’s terms of reference state that it will build on the recent major policy reviews of children’s issues in this area. These include Professor David Buckingham’s report on the impact of the commercial world on children’s wellbeing (2009), Dr Linda Papadopoulos’ report on the sexualisation of young people (2010) and Professor Tanya Byron’s report on child safety in a digital world (2008).

Given the ongoing interest and scrutiny in this area, it is clear that both parents and the Government are concerned that “children are being pressured into growing up too quickly”. Parents express understandable concerns that their children might be unduly influenced by what they see and hear as they are growing up in general, and also by what they experience as they engage with the media.

However, Channel 4 believes it is important not to create a “moral panic” around the pressures on children as they grow up. In the context of the risks to children from exposure to new technology, the Byron Report noted that there is a “climate of anxiety that surrounds new technology” which has “created a fiercely polarised debate in which panic and fear often drown out evidence”.

The Byron Report added that this “distracts from the real issue and leads to children being cast as victims rather than participants”. Indeed, the Byron Report noted that new technology has a positive role to play, concluding that “Web 2.0 offers new opportunities for communication, participation and creativity to a degree never witnessed before, and inherent in these benefits is the ability to overcome many of the disadvantages and inequalities of real life”.

In a similar vein, the Buckingham Report and Papadopoulos Report also advised that it was necessary to approach the debate with a sense of perspective. The Papadopoulos Report recognised that in the context of a “very emotive issue” it was essential to “ensure that the evidence was presented as objectively as possible [so that] informed decisions about how to address these issues could be made” and the Buckingham Report noted that “debate on these issues is polarised and often sensationalised, making it hard to arrive at a balanced view” and cautioned that “simple cause-and-effect explanations do not do justice to the complexity of the issues”.

Given these findings, Channel 4 believes it is important to approach the debate in an objective, evidence based manner and to not ignore the benefits that the commercial world, and commercially-funded public service broadcasters such as Channel 4 in particular, bring to children and young people.
Public service content can help educate children and parents about the issues

Channel 4 also plays a role in addressing social issues involving children, including concerns about commercialisation and sexualisation. Channel 4’s brand resonates strongly with younger audiences, especially 14-19 year olds, and the organisation speaks with an authenticity of voice which is not easily replicated by other public institutions. Channel 4’s approach of ‘show not tell’ has created a genuine bond with younger audiences, and this makes it well placed to act as a trusted guide to help them engage with the commercial world.

Hollyoaks, for example, addresses issues of social relevance in a way that appeals to teenagers. In 2009, the programme included a storyline on binge drinking, which encouraged younger people to think again about their attitudes towards alcohol. One of the programme’s major strengths is the way that viewers feel close to the characters in the show. Viewers feel real ownership of the show, and see it as a “no adult” territory. This means that many children seek a great amount of support and information from the storylines.

In addition, Channel 4’s acclaimed sex education programmes—including The Sex Education Show and Underage and Having Sex—as well as the informative website sexperienceuk.channel4.com, help younger people to understand the issues and answer questions they may have in an area not generally well-covered by traditional education. In particular, The Sex Education Show vs Pornography series set out to address the potentially harmful information and impressions about sex that teenagers are receiving due to the accessibility, quantity and graphic nature of internet pornography. This latter programme/website provides a perfect example of how Channel 4 believes it should respond to the new challenges being thrown up by the digital world. Clearly parents would prefer that pornographic material was not becoming more widely and easily available to their children, but as this is the case Channel 4 sees its role as helping young people to navigate their way in this new environment and avoid harm.

Through its online education projects, Channel 4 has a track record of empowering young people with life skills to help them understand the world around them. A number of projects, aimed at 10-19 year olds, cover a range of subjects from financial literacy and mental health to ethical fashion and personal identity:

- Two projects for 10-14 year olds—Who I Am, an app dedicated to help children explore their identity and share and compare their opinions with friends, and Truth Specs, a web-based format featuring games and videos to help children transition from pre- to post-puberty and from little to big school—demonstrate how Channel 4 content can help younger people understand the world.

- Battlefront is a campaigning initiative for young people. It provides young people with information and tools to run campaigns on issues they care about—a current campaign is for natural beauty and positive body images; another focuses on cyber-bullying.

- Cover Girl is a new online game aimed at 10-14 year olds that addresses issues around sexualisation and media literacy. The game player is a newly recruited picture editor of a gossip magazine under pressure from a fictional media publisher to airbrush photos for commercial reasons. The game was developed
with help from doctors, psychologists, schools, those in the industry and teenagers, and aims to spark a conversation about how glossy magazines can change images for effect, and consider the impact airbrushing has on public attitudes.

- *Smokescreen* is an online game centred on issues around online privacy and identity.

These kinds of projects and games provide young people with the opportunity to learn about social issues relevant to their lives in an immersive and experiential way.

Channel 4 believes that many of the concerns expressed about the impact of the media can be addressed through initiatives to educate young people and parents so that they are more media literate. Media literacy has a key role to play in helping children and parents to understand communications and new technologies. Beyond the projects above, Channel 4 has been a strong supporter of a range of media literacy initiatives, including as a member of the Broadband Stakeholder Group and the MediaCSR Forum.

In addition, Channel 4 was a founding member of the (now disbanded) Media Literacy Task Force, which was established to promote media literacy. It is also a signatory of the Charter for Media Literacy, which sets out a range of aims and principles for advocating and developing media literacy in the UK. In particular, the Charter advocates “the importance of media literacy in the development of educational, cultural, political, social and economic policy” and supports the principle that “every UK citizen of any age should have opportunities, in both formal and informal education, to develop the skills and knowledge necessary to increase their enjoyment, understanding and exploration of the media”.

**Commercial communications fund public service content and sustain media plurality**

Channel 4 relies on commercial revenue to support the provision of original content, including the content for younger audiences discussed above. Commercial references therefore play an important role in supporting media pluralism and, in particular, the provision of public service content.

As outlined above, Channel 4 is a publicly-owned, commercially-funded public service broadcaster. Its services are provided free-to-air, and are funded predominantly by advertising. Around 85% of Channel 4’s revenues are derived from advertising, and consequently advertising revenue is critical to sustaining Channel 4’s delivery of public service content. As Channel 4 is not shareholder owned, surplus revenues are reinvested in the delivery of its public service remit, and not paid out as shareholder dividends.

More broadly, commercial revenue supports the provision of content by a wide range of groups, including television broadcasters, such as ITV and Five, radio broadcasters, print media and digital media operators, who together provide a range of voices in the UK’s media landscape. Much of this content is accessed and enjoyed by children and young people.

Channel 4 therefore believes that the debate about parents’ concerns about commercialisation and sexualisation should not be viewed in isolation of the potential effect on the provision of public service content and media plurality.
Mechanisms to help parents to address and voice their concerns

There are currently a range of mechanisms in place to help protect children under 18 years of age, such as the Ofcom Broadcasting Code (the Code), the established 2100 watershed, and the Audiovisual Media Services Regulations for online content. Channel 4 makes every effort to ensure that its programming is sensitive to children and young people’s needs, wherever it is accessed.

Linear content

Channel 4 is directly accountable to Ofcom under the terms of its licence for both the making and the content of its programmes. Accordingly, Channel 4 has put in place comprehensive editorial and compliance processes and guidance aimed at ensuring best practice and compliance with its obligations under the Code.

The Code places particular emphasis and importance on protecting under 18s, that is, both viewers and those involved in programme-making. Material that might seriously impair the physical, mental or moral development of under 18s must not be broadcast. Further, broadcasters must take all reasonable precautions to protect under 18s; a rule that reflects the importance of the need to always consider carefully the potential effect of programming on younger viewers.

Children must also be protected, by appropriate scheduling, from material that is unsuitable for them. What is “appropriate” is judged according to the nature of the content, the likely number and age range of children watching, the start and finish time of the programme, the nature of the particular programme and the likely expectations of the audience.

Specifically, rules 1.20 and 1.21 of the Code state that any discussion on, or portrayal of, sexual behaviour must be editorially justified if included before the watershed and must be appropriately limited, and that nudity before the watershed must be justified by the context.

In addition, Section Two of the Code requires that generally accepted standards must be applied to protect viewers from the inclusion of material which may cause harm or offence. In applying generally accepted standards, the Code directs broadcasters to ensure that material which may cause offence is justified by the context. Context includes, but is not limited to, such factors as the editorial content of the programme, programmes or series, the service on which the material is broadcast, and the likely size, composition and expectation of the potential audience.

In terms of programme content, editorial staff in consultation with programme lawyers (or compliance advisers), where appropriate, review all material in the light of the channel’s obligations under the Code. Channel 4 also reviews acquired content—ie. Hollywood movies and imported programmes—to ensure they are compliant and appropriately scheduled. In relation to videos, Channel 4’s music channel 4Music employs a dedicated Compliance Manager who reviews every video and requests appropriate edits to ensure compliance with the Code.

For example, programmes such as Hollyoaks are considered carefully to ensure they are appropriate for a pre-watershed audience. The story lines are viewed by an editor and compliance adviser very early on in the process, scripts have to be signed off and
all episodes viewed. In particular, staff are very careful about any sexual language used, underage sex storylines are always, ultimately, portrayed as something “not to do” and storylines always avoid a link between sex and alcohol. These strict procedures demonstrate Channel 4’s responsible approach to content, especially content broadcast before the watershed.

**Online content**

Channel 4 has a significant non linear, online presence and also ensures that appropriate safeguards are in place in respect of content which may be unsuitable for children. For instance, short form content which includes sensitive or more adult material is preceded by warning boards containing clear guidance.

Furthermore, in respect of Channel 4’s on-demand television service, 4oD, Channel 4 worked with colleagues across the broadcasting sector to develop a ‘G’ for Guidance system for on-demand catch up services that provides audiences with information about the content of the programme.

Parental controls are clearly and prominently promoted on 4oD, which provide parents with the ability to restrict access by their children by the application of a PIN access system. This PIN access system can be set to restrict access to all content rated to be suitable for those of 16 years of age and above or content rated to be suitable for those aged 18 and above. These parental controls are in addition to the appropriate warnings and information provided in respect of all programmes on the service, which ensures that parents are able to make informed choices about their and their children’s viewing. These safeguards and appropriate editorial supervision and processes ensure full compliance with the relevant regulation in this area under the Audio Visual Media Services Regulations, enforced by the Authority for Television on Demand (ATVOD) and the Advertising Standards Authority (ASA).

Channel 4 also ensures that comparable safeguards are in place in respect of the other platforms and websites offering 4oD content.

In relation to Channel 4’s online games, a clear age-based sign-up and data protection policy in place. For example, where relevant, age guidelines are clearly signposted to the end user, and in the main Channel 4 adheres to a 13 year old plus policy. For games that are designed for under 13s and require sign-up to interact, age guidelines are clearly marked.

**Viewer Enquiries**

Channel 4 also provides viewers with an easily accessible route to contact Channel 4 should they have any concerns about content. Channel 4’s Viewer Enquiries centre is contactable by phone, email and letter and the address and telephone number are in Directory Enquiries as well as on the Channel 4 website.

All contacts from audiences are logged and then each day this log is distributed throughout Channel 4. In addition, Channel 4 proactively monitors the conversation about Channel 4 and its programmes that takes place online, both on its own website and on forums such as Mumsnet and DigitalSpy. Channel 4 employs a dedicated Viewers’ Editor, who is responsible for identifying themes or common concerns amongst viewers and highlighting these at the appropriate level in the
organisation. Channel 4’s monitoring has shown that concern about content being watched by children is at a very low level amongst its audiences.

These initiatives seek to ensure that viewers, including parents, are easily able to voice their views, and Channel 4 is not aware of any instance of a viewer being unable to express an opinion about Channel 4.

Concluding comments

In this response, Channel 4 has sought to draw on its experience with young people to discuss how the Bailey review might address parents concerns about children growing up too quickly. The digital revolution has opened up the world for young people. They have access to content, ideas and information from right across the globe from a very young age. This poses challenges for parents today that were never present for those in the past. Controlling access to what their children see and experience is much harder and there are evidently some understandable concerns about commercialisation and sexualisation issues.

Channel 4 believes that, while it is important to take appropriate steps, where necessary and feasible, to regulate access to unsuitable material—e.g. the 2100 watershed, PIN protection systems etc—it is also important to recognise that children today live in a globalised and open world. This in general is a good thing and Channel 4’s approach is to focus on helping young people to find their way in this world; not hide it away from them.

Channel 4 believes it can play an important role in helping children and parents navigate these areas, including by improving life skills increasing media literacy and improving social engagement through its programmes and content. In addition, Channel 4 believes that the review team should bear in mind the fact that commercial income is a key source of funding for original content—especially content for children—and policies that may have a negative impact on that funding should take this into account.

Channel 4 would be happy to discuss any aspect of this response with the review team.

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