

Response to the Media Reform Green Paper, Modernising television regulation in Australia by the ARC Centre of Excellence for the Digital Child

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About The ARC Centre of Excellence for the Digital Child

The ARC Centre of Excellence for the Digital Child, funded by the Australian Research Council with AU\$34.9M over its seven-year life, is charged with leading national and global research, policy and practice to ensure that all Australian children are healthy, educated and connected in a rapidly expanding digital world. An internationally esteemed team of 21 interdisciplinary researchers who have demonstrable expertise, diverse perspectives, and disciplinary expertise address the significant risks and opportunities of digital technologies in everyday lives of families and educators, including screen time, children's digital rights, e-privacy, commercialisation, digital technology innovation, relationships, healthy wellbeing, sociality, education and learning, and digital play. The Centre involves six Australian universities, 13 international universities, and 19 global partners such as Google, and national partners such as Early Childhood Australia. The Centre is well placed to respond to this Media Reform Green Paper.

The Centre recognises that significant engagement with technology and media begins before birth. Babies emerge into a digital world, setting a life-long trajectory with connected technologies based on early experiences¹. The Centre recognises that young children benefit from digital technologies, even though public and policy discourses often focus on attendant risks². These foundation years determine physical, emotional, social, and educational development, informing every child's understanding of themselves and of their place in the world, and building their connectedness and relationships with people and place.

Our Submission

The ways that children consume televisual and media content has changed dramatically in the past decade, while the demand for high quality Australian children's programming has not diminished.³ Indeed, judging by the success of specific shows such as *Bluey*, the demand for reliable, high quality children's content produced in Australia, representing Australian lives, is higher than ever.⁴ Nor have there ever been more pathways to children's televisual content before, although many of these new options include new costs for Australian families.

¹Early Childhood Ireland, Carnegie UK Trust.

²Carnegie UK Trust.

³ Following the Australian Research Alliance for Children & Youth, quality children's television, as a minimum, should be: age-appropriate, engaging, respect children as individuals, not specifically targeting children with commercial messages, promote cognitive and social development, and reflect children's own cultural and social environments. See Australian Research Alliance for Children & Youth. (2011). *Television and young children. Quality, choice and the role of parents: What the experts and parents say*. Australian Research Alliance for Children and Youth. <http://www.aracy.org.au/projects/report-card-the-wellbeing-of-young-australians>.

⁴ Knox, D. (2020). Bluey breaks Timeshifting record [TV Tonight]. <https://tvtonight.com.au/>. Retrieved May 17, 2021, from <https://tvtonight.com.au/2020/04/bluey-breaks-timeshifting-record.html/>. Perry, K. (2020, May 11). Second season of BLUEY sets new records for Australian online viewing. TV Blackbox. <https://tvblackbox.com.au/page/2020/05/12/second-season-of-bluey-sets-new-records-for-australian-online-viewing/>

Children are highly vulnerable to commercial advertising messages, especially younger children. Existing policies, which require advertising-dependent commercial stations to broadcast a significant amount of children's television content (with advertising) has long been at odds with the best interests of children. Yet it is a real public concern that Australian children be able to see and hear themselves and their communities represented in the televisual content they consume, whether that is on broadcast television or online streaming services.

Putting the interests of Australian children first, our response to the 'Modernising television regulation in Australia' Green Paper, makes four recommendations to sustain high quality children's content provision in Australia for today and into the future, recognising that such an approach needs to make the most of the opportunities of the changing digital landscape in a manner that best meets the needs of *all* Australian children.

[1] We support the recommendation that a strict requirement to broadcast a specified number of hours of children's television should be lifted from the commercial broadcasters. Sustained research has demonstrated that television advertising has a particularly direct impact on younger children⁵, which has always made advertising-dependent commercial television less appealing for many parents as a source of children's content. Given that the requirement to produce children's television has long been cited by commercial broadcasters as a financial and practical burden⁶ (something tacitly recognised when this requirement was paused due to COVID-19), removing this requirement as it currently stands would benefit both commercial broadcasters and Australian children, parents and carers. However, any such relief should be matched by an obligation for commercial broadcasters to contribute to the production of children's content in Australia (outlined below).

[2] We propose that dedicated mechanisms be established to ensure funding for high quality children's televisual content persists and grows in Australia. If the burden of producing and airing Australian children's television is lifted from the commercial broadcasters, then a proportion of their profits should be contributed to a specific fund dedicated to children's televisual production in Australia. Similarly, to create a level playing field, regulation should also require streaming video services of a certain size and financial maturity to also spend a specific proportion of their Australian revenue on Australian children's content *or* contribute a specific amount (or specific percentage of revenue in Australia) to a fund supporting the production of high-quality Australian children's televisual content. Such a fund might be run by a significantly expanded Australian Children's Television Foundation⁷ or a new body, possibly modelled on the BFI's Young Audiences Content Fund⁸ in the UK, which attempts to meet a similar aim. If the proposal to shift to a 'new license' for broadcasters occurs, then it is similarly vital a meaningful proportion of the government revenue received by auctioning off the additional frequency spectrum is cordoned off for such an Australian children's televisual content fund.

[3] We propose that the definition of 'Australian children's content' should specify that content must reflect the diversity of Australia's population and geography to meet this standard, at least when initially broadcast/streamed in Australia. Like all Australians, children respond positively to seeing themselves, their regions, and their communities represented in the televisual content they engage with. For this reason,

⁵ Borzekowski, D. L. G., & Robinson, T. N. (2001). The 30-Second Effect: An Experiment Revealing the Impact of Television Commercials on Food Preferences of Preschoolers. *Journal of the American Dietetic Association*, 101(1), 42–46. [https://doi.org/10.1016/S0002-8223\(01\)00012-8](https://doi.org/10.1016/S0002-8223(01)00012-8). Dalton, M. A., Longacre, M. R., Drake, K. M., Cleveland, L. P., Harris, J. L., Hendricks, K., & Titus, L. J. (2017). Child-targeted fast-food television advertising exposure is linked with fast-food intake among pre-school children. *Public Health Nutrition*, 20(9), 1548–1556. <https://doi.org/10.1017/S1368980017000520>.

⁶ Samio, Z., & Hunter, F. (2020, February 25). Seven halts children's production in Australian content quota protest. *The Sydney Morning Herald*. <https://www.smh.com.au/business/companies/seven-halts-children-s-production-in-australian-content-quota-protest-20200225-p5445r.html>.

⁷<https://actf.com.au/>

⁸<https://www.thechildrensmediafoundation.org/archives/9741/updates-on-the-bfis-young-audiences-content-fund>

narrowly defining Australian content purely in terms of local jobs produced (direction, production, scriptwriting, actors and so forth) is insufficient. Australian children's content should include representative diversity of Australian children's voices, faces, families, communities and regions. From *Skippy* to *Play School*, Australian children find common ground and common language around their televisual content.⁹ Content creation by Australians is important, but telling authentic Australian stories to Australian children is also paramount. Clearly, any specification must be flexible enough to include the raft of high-quality animation and computer-generated imagery created for children. While it would be ideal for these voices to persist when programming is sold globally, if that is not palatable to overseas markets creating multiple voiced iterations is increasingly normalised and accepted in the era of streaming video.

[4] We propose that changes in the amount or type of frequency spectrum allocated to each channel should only take place if both subtitles and audio description can be included in the broadcast experience, and that older digital televisions should not be made technically obsolete.

The needs of Australian children with disabilities must not be forgotten in any shifts in the way television is broadcast in Australia. While there are clear standards about captioning provision in Australia, the standards around Audio Description for blind and vision impaired Australians and Australian children have not yet been clarified.¹⁰ Currently international streaming services such as Netflix are held to a higher accessibility standard as they tend to meet the most comprehensive accessibility of any nation in which they sell subscriptions, thus having both captions and audio description available, often in a number of different languages. However, the Australian government's Audio Description Working Group suggested three models for Audio Description provision by broadcasters, but this process has not yet been finalised.¹¹ One of those models involves Audio Description being embedded in television broadcasts; therefore it is vital to thoroughly test whether the reduced frequency spectrum and new compression techniques can support the addition of audio description. Indeed, it would be ideal if the model of Audio Description provision in Australia was resolved prior to any commitments being made to changes in the broadcast frequency spectrum.

The 'new license' model proposed has significant ecological benefits in reducing both the number of transmitter towers needed and the power required to broadcast each channel. However, testing must take place to ensure the new methods of digital compression needed to reduce the amount of frequency used does not make older digital televisions obsolete. If older digital televisions are made redundant, then the ecological burden in disposing of these, combined with the financial burden on families to replace these, nullifies any ecological positives. However, if the compression techniques are incompatible with older digital televisions, then the government could compensate by offering families free or very low cost conversion devices. These initiatives would encourage the sustained use of older digital televisions for the duration of their serviceable lifespan.

We would be pleased to expand on any of the above recommendations in more detail if that would be of help as the issues raised in the Green Paper are further investigated.

⁹ Harrison, C. (2013). A look 'through the windows' at ABC Play School: 45 years in a changing media landscape. *Early Child Development and Care*, 183(1), 137–148. <https://doi.org/10.1080/03004430.2012.658513>

¹⁰ Ellis, K., Kent, M., & Locke, K. (2018). Audio Description and Australian Television: A position paper. 58. <http://ccat.curtin.edu.au/wp-content/uploads/sites/33/2018/06/ADPositionPaper.pdf>.

¹¹ Department of Infrastructure, Transport, Regional Development and Communications. (2018). Audio Description Working Group—Final Report [Text]. Australian Government. <https://www.communications.gov.au/documents/audio-description-working-group-final-report>.