



About the BFI

The BFI is the UK's lead organisation for film, television and the moving image, an Arm's Length Body of UK Government and a distributor of National Lottery funding. As an organisation it works to promote these media in a number of ways:

- Actively seeking out and supporting the next generation of filmmakers, including as the administrator of the Young Audiences Content Fund
- Curating and presenting the greatest international public programme of world cinema for audiences; in cinemas, at festivals and online
- Caring for the BFI National Archive – the most significant film and television archive in the world
- Acting as industry's representative to Government, helping to make the UK the most creatively exciting and prosperous place to make film internationally.

Founded in 1933, the BFI is a registered charity governed by Royal Charter. The BFI Board of Governors is chaired by J. Timothy Richards.

Question 1: What do you think about the potential public value of our proposals for a BBC Three broadcast TV channel, including the extent to which our proposals contribute to the BBC's mission to serve all audiences through the provision of high quality and distinctive output and services which informs, educates and entertains?

The BFI recognises the potential public value of a new BBC Three broadcast TV channel and supports the BBC's proposal.

As set out by the consultation document, many 16-34s maintain a strong broadcast TV habit: this includes many young people recognised as particularly underserved by the BBC at present, including those from C2DE backgrounds and those based outside London and the South East. Figures supplied by the BBC demonstrate the rate at which many such audiences have been lost from broadcast services has outstripped the pace at which they have been captured by online services. A broadcast channel could help remedy this issue, providing a 'shop window' via which to reach such audiences and attract them to explore the wider range of content on offer too.

The 'shop window' function of broadcast TV may also better enable the BBC to fulfil its mission to "[serve] all audiences through [...] services which inform, educate and entertain" by exposing

viewers to a greater range of content than may be enabled by online services. While uptake continues to increase, some people in the UK still do not have access to Smart TVs or online services. Furthermore, varied broadcast schedules and 'passive viewing' habits can help engage viewers in content they would not have considered to be of personal interest, broadening their horizons and expanding personal tastes.

This is not always achieved by online services, which often use algorithms to suggest content to viewers based on established viewing habits - potentially narrowing rather than broadening the range of content to which they are exposed. The risk posed by such technologies was recognised by the BBC as part of its digital offer in the Lords Communications Committee's recent report *Public Service Broadcasting: As Vital As Ever*, in which it committed to 'develop systems that are [...] shaped by audience interest, but which do not create filter bubbles or echo chambers'.¹ Broadcast channels provide an effective tool with which to combat this effect.

While we note that the proposed reduction to CBBC broadcast hours is a loss for children, evidence cited in the consultation paper shows that those watching the channel after 7pm make up less than 2% of its audience. At the same time, the BBC currently has very limited broadcast offer for the 13-15 year age group BBC Three intends to attract with its pre-watershed content, with a scant offer across the wider UK broadcasting landscape. As such, we believe that the potential benefit to younger audiences outweighs the loss of additional CBBC programming hours.

Question 2: What do you think about the benefit to audiences who will watch the channel, as well as wider potential social and cultural impacts?

We believe a new BBC Three broadcast channel has the potential to deliver considerable social and cultural benefit to its audience. Ensuring content is 'distinctive' will be central to delivering on this, and we applaud the BBC's stated intention to ensure this is so.

One of the most valuable aspects of public service broadcasting in the UK is that it enables the creation and distribution of works that reflect the lives of people across the UK in a way that would be impossible without public-private collaboration and is unavailable in the global commercial marketplace. It is this authenticity that ensures BBC shows such as *Fleabag* and *I May Destroy You* are hits not only at home, but around the world too. Any new BBC Three broadcast channel should prioritise provision of content which delivers such distinctiveness to its target audiences, rather than compromising this in the interests of anticipated commercial benefit in the global marketplace.

We would encourage the BBC to deliver such distinctiveness on behalf of those 13-15 year olds which BBC Three intends to attract during pre-watershed broadcasting hours too. The BBC

¹ <https://publications.parliament.uk/pa/ld201919/ldselect/ldcomuni/16/1602.htm>

currently has no other broadcasting offer for this demographic, with very scant provision across the wider UK broadcast landscape either. We would therefore encourage the BBC to work to ensure a share of its pre-watershed content reflects and explores the lives of young people in this age group specifically, rather than simply offering the most age-appropriate selection of content commissioned for its 16-34 audience.

Question 3: What impact (positive or negative) do you think our proposals for a BBC Three broadcast TV channel might have on fair and effective competition?

We believe that a BBC Three broadcast TV channel will have a positive impact on fair and effective competition. An enhanced BBC Three offer will help drive investment in content for 16-34s by competitors too, improving the range and quality of content available to young people. The consultation document notes that the BBC's own decision to double BBC Three's budget is in large part driven by 'unprecedented competition for young audiences' time', including from 'well-funded' SVOD services. Expanding BBC investment on behalf of this audience will in turn drive greater spend by other broadcasters and platforms.

The positive impact of enhanced broadcaster investment on competition, and thereby audience choice, is precisely the logic which led the Government to establish the Young Audiences Content Fund in 2017. Administered by the BFI, the Fund makes production and development funding for audiences aged up to 18 available to public services broadcasters. It has significantly stimulated competition in the market, helping remedy the historic underserving of audiences up to 18, supporting 29 new productions and making 107 development awards by the end of 2020.

For further information, contact: Jack Powell, Senior Policy Analyst, jack.powell@bfi.org.uk