

Australian
Children's
Television
Foundation

Prominence Framework for Connected Television Devices Proposals Paper

Incorporating a new proposal for an Australian
Children's Content App

February 2023

Executive Summary & Recommendations

Why Australian children's content matters

The screen stories we watch influence how we think about others, as well as how we think about ourselves. Quality Australian content exposes children to a range of faces and voices that are genuinely representative of their community. Australian children's television is building empathy, kindness, social cohesion, and shared values.

Today's children gravitate toward screens during their formative years, right at the time when they are developing their values, identity and self-esteem. It is vital that they are provided with screen content made especially for them.

As children grow up in a world inundated with screens, the need for local content for children is more important now than ever before.

The issue of discoverability

Current research from Swinburne University in association with RMIT, confirms that parents and children struggle to find Australian content on streaming platforms and YouTube services. In today's fragmented media landscape, parents favour streaming services that are "child-friendly" and have clearly demarcated kids sections. It is vital to address the visibility of Australian content in a fragmented and crowded media market by supporting the promotion and placement of Australian children's content on the user interface of the devices that audiences are using.

The ACTF Recommendations

We are recommending:

- The creation of an Australian Children's Content App specifically for Australian children's content that is prominently positioned on all smart TVs (and related devices) purchased in Australia. This App would also be available on App Store/Play Store, so that Australians are able to install the App on their tablets, phones and other devices.
- A requirement that all remotes sold in Australia carry a "KIDS" button that will lead consumers straight to the Australian Children's Content App.
- A "must-carry" framework to guarantee the availability of Australian TV services (and their on-demand platforms) on all regulated TV devices.
- A "must-promote" framework that ensures Australian service applications are prominently positioned on the primary interface of devices, and that local Australian content on streaming platforms is easily discoverable.

Why Australian Children's Content Matters

When Australian children see their lives reflected on screen, they experience recognition and affirmation, with characters and stories that help them imagine all the possibilities for someone like them. Children's screen content is both a mirror and a window in a child's life, with the capacity to influence in profound and positive ways – to bolster a child's own sense of identity, as well as to encourage them to walk in someone else's shoes. In this way, Australian children's screen content is truly nation building. Of course, our nation's children are not a homogenous group. We need an array of stories – including First Nations stories – from diverse producers around our country, to ensure the visibility of all our children on screen, and on all the platforms children turn to for entertainment.

"Little Lunch helps me understand the local culture better, not only Australian culture but Melbourne culture when it comes to kids, and it also helps me understand how the school system works here. We started watching that before my son started primary school earlier this year, and of course every country has a different system, but school seemed to be familiar when he started because we had watched that show together."

INTERVIEW WITH CÉSAR, VICTORIA (ORIGINALLY FROM MEXICO), TWO CHILDREN UNDER SEVEN

From a children's rights perspective, Australia should and could do more to meet the United Nations Convention on the Rights of the Child requirement that information of social, cultural and linguistic benefit is available to all children via the mass media.

Similarly, the United Nations Declaration on the Rights of Indigenous Peoples requires us to take measures so that media reflects the Indigenous cultural diversity existing in Australia. Shows such as *Thalu*, *Red Dirt Riders* and *Little J & Big Cuz* enable First Nations children to see themselves reflected and allow non-Indigenous children to gain a glimpse into other contexts and experiences.

As children grow, they are developing their sense of self, their national identity and their understanding of place in the world in relation to others.

"I find it fascinating how often you get students to do something creative and they set it in America."

ALISON, SECONDARY SCHOOL TEACHER, SOUTH AUSTRALIA

Today's children gravitate toward screens during their formative years, right at the time when they are developing their values, identity and self-esteem. It is vital that they are provided with screen content made especially for them.

"Even in rural New South Wales where I am, we've got two students with incredibly thick and strong American accents because of the amount of YouTube and online content they watch."

ALEX, PRIMARY AND HIGH SCHOOL PRINCIPAL, NEW SOUTH WALES

When Australian children from all walks of life see their lives reflected on screen, they gain positive role models; the characters and stories help them to imagine all the possibilities for someone who looks and sounds like them.

"I work in a regional area, and I think kids seeing their lives reflected back to them, is really important as well [...] Maybe they are people who are from a migrant family or an Aboriginal family, seeing people of different ethnicities and different types of Australianness represented on the screen."

AMY, SECONDARY SCHOOL TEACHER, VICTORIA

About the Australian Children's Television Foundation ("ACTF")

The ACTF is a not-for-profit organisation with a singular purpose to deliver quality screen content about children for children all over Australia, and all over the world. We have been at the forefront in creating a world class Australian children's screen industry with an enviable reputation. The ACTF makes Australian children's lives better through screen content that reflects Australia's culture and values. We act as a catalyst to produce quality Australian children's screen content which reaches and connects with children on all the platforms they engage with. We achieve this by providing:

- Script development funding;
- Capacity building/enabling/nurturing producers and emerging talent;
- Production investment (via distribution advance and/or equity);
- Promotion, worldwide distribution, advocacy for children's screen content;
- Education resource development and scaffolding, and educational outreach.

We occupy a singular position at the intersection of the screen business, education, Australian culture and social impact. No other organisation comes to the table with the same bundle of attributes: the cultural remit, the financing expertise, the distribution insight, and the educational background and reach. We have a proven and renowned track record and internationally unparalleled expertise in how children's content is commissioned, made, promoted and distributed into the world. For over 40 years we have embraced, championed and adapted to changing times and embracing new opportunities, whilst maintaining our focus on achieving quality outcomes for the child audience.

The research informing this submission

The research informing this submission has been prepared by academics from Swinburne University and RMIT, in conjunction with the ACTF. This group of researchers are undertaking a four-year project (2021–2024) to investigate the roles of Australian children's television in people's lives, memories, families, and education.

This project examines the cultural and industrial impacts of Australian children's television and the different research strands include parents' perspectives, educators' perspectives, children's perspectives and producers' perspectives on Australian children's television. Research methods include national surveys, industry interviews, catalogue analysis and social impact studies on focus groups. All the quotes in this submission have been taken from this research.

Changing viewing habits

Australian children should be able to find Australian content on all the platforms they engage with. Recent research¹ has found that:

- Streaming services with demarcated children's sections are the most popular for Australian children and their parents;
- Australian content is often hard to find on streaming services;
- Australian parents value Australian children's content, and like a broad range of Australian children's content;
- Although the television set is still the most popular device the top ten most popular "channels" for children are almost exclusively streaming services and the ABC;
- Whilst the ABC is favoured by the youngest children, older children gravitate towards Netflix, YouTube and Disney+; and
- Co-viewing children's content together is a popular activity in Australian families.

Australian households are using smart televisions to access mostly Subscription Video On Demand (SVOD) platforms and Broadcasting Video On Demand (BVOD) platforms, demonstrating that the use of television sets is no longer tied to linear broadcast television. The Swinburne/RMIT research featured surveys, with one respondent noting that they only use apps to watch television programs, and used voice assistant on their TV to find those programs, indicating that television devices are now serving different purposes than they did only a few years ago.

Parents reported that older children (school aged) moved away from free-to-air options (and their associated streaming services) and towards SVODs and YouTube, with 8 out of 10 older children watching YouTube, and 77% watching Netflix. By comparison, only 40% of younger children (preschool) watched YouTube and 33% watched Netflix. This result is consistent with research conducted in Europe, the UK, and the US, which found that children favour linear television until they become teens.² Swinburne/RMIT University research indicates that "Australian Content" is an important SVOD feature for parents (74%).³

This shift in viewing habits shows that Australian children and families watch children's content increasingly on non-linear platforms, with the market share of linear channels declining in particular for older school aged children. An Australian Children's Content App that points Australian children and their families to Australian children's content is likely to be very popular, as it supports these developing viewing habits.

¹ *Parents' Perspectives on Australian Children's Television in the Streaming Era* (April 2022), available here: <https://actf.com.au/research>.

² Ryan Tuchow, 'Kids love linear...until they become teens' *Kidscreen* 21 January 2022, available [here](#)

³ Swinburne University and RMIT *Australian Children's Television Cultures Research Overview*, unpublished (2023)

The issue of discoverability

Recent findings by the Swinburne/RMIT research note that parents and children struggle to find Australian content on SVODs and YouTube, particularly for older children.

"[Netflix and YouTube] don't have much Australian shows [...] I try looking for Australian shows and when I recognize it's not Australian I just turn it off instantly. And then I'll find another Australian show."

SEVEN-YEAR-OLD BOY, PARTICIPANT IN THE SWINBURNE/RMIT RESEARCH BABY LAB

The Swinburne/RMIT University research found that in the current fragmented media landscape, parents favour streaming services that have "child-friendly" apps and platforms. The ABC's success is linked to its variety of trusted streaming options for children, with parents selecting ABC iview (65%), ABC Kids (62%), and ABC ME (29%) among the top services their child regularly uses.

Parents trust streaming services that have clearly demarcated "kids' sections"; these services are more frequently used than those without clearly organised or promoted kids' sections. The Swinburne/RMIT University research found that parents seek out trusted, child-friendly "walled garden" platform designs in which their children can stream content. The Australian Children's Content App could provide a "walled garden" with a wide array of Australian quality stories for Australian children and families.

"I literally just turn ABC Kids on and whatever program is on at that time, I know will be suitable for my daughter to watch."

INTERVIEW WITH DALLAS, QUEENSLAND, ONE CHILD UNDER TWO YEARS

In a sea of content from overseas, it is vital to address visibility of Australian content in a fragmented and crowded media market by supporting promotion and marketing, as well as prominent placement of Australian children's content on the user interface of the connected TV devices.

"We're becoming swamped with [...] so many streaming services, and all those things that we have to compete with. So yeah, I hope that we do get more and more Australian television in front of our children."

MARK, ASSISTANT PRINCIPAL, NORTHERN TERRITORY

International jurisdictions are also grappling with prominence issues. The United Kingdom is looking at implementing a framework to support prominence for public service broadcasters (PSBs) on relevant TV platforms (including smart TVs), particularly their on-demand services. The Broadcasting White Paper discusses a new prominence regime for on-demand services framework that will be "proportionate and flexible, so it can adapt to the differences across the market and ongoing changes"⁶. This will be enforced by Ofcom and will require PSBs to offer their on-demand services to all TV platforms who will in turn be required to carry those services.

Other jurisdictions have dealt with the discoverability of local content on media services with recommendations and regulations regarding the visibility and prominence of local content on homepages and the ease of search tools to find such content.⁷

Implementing similar measures as part of a broader framework will help to ensure Australian stories and voices are able to reach the Australian audiences in an increasingly fragmented media landscape. In this context it is important to ensure that the child audience is also able to access Australia content made especially for them. Children's content is already at a disadvantage because it is more difficult to finance than adult content, and it must therefore be specifically considered as part of any legislative prominence framework.

"I would much rather them watch Australian content, but there is so little of it on the streaming services. Especially for 9-14 year old kids."

SURVEY RESPONSE FROM VICTORIAN FATHER OF TWO CHILDREN UNDER 15 YEARS

⁴ John Woodhouse, 'Media Bill: policy background' *House of Commons Library* (15 June 2022), available [here](#).

⁵ Commonwealth of Australia *Prominence framework for connected TV devices Proposals Paper* (December 2022).

ACTF's Recommendations

It is crucial to address the visibility and discoverability of Australian content on all platforms (public and commercial) to ensure that they are easier for Australians to find, and we strongly support the moves proposed by the Department of Communications to address these concerns. It is equally important to specifically address the visibility and discoverability of Australian children's content, and to support the marketing and promotion of children's content so that all Australian children and their families are aware of the available Australian programs. This is why the ACTF is urging that the Commonwealth take the additional step by supporting a proposal for the development and positioning of an Australian Children's Content App.

In response to the Australian Government's request for feedback on design options for a framework to ensure that Australian TV services can easily be found on connected TV devices, we recommend the following:

1. Development of an Industry Code

We support the development of an industry code supported by legislative requirements that ensures the prominence and accessibility of Australian content, in line with other international jurisdictions (such as the UK or Germany). Ensuring Australian content is readily available to Australian audiences is important for the health of the media sector, the integrity of news, the flow of information at times of crisis such as floods or fires, as well as the health of Australian democracy as a whole.

We therefore agree with Proposal 8.3 of a "must carry framework" which would require all local TV service applications to be visibly located on the primary user interface of devices from start-up. In conjunction, we also support the must-promote framework of Proposal 8.4, particularly the requirement that local content and programming is to receive positive discrimination in recommendations and search functions on connected TV devices.

2. Visibility of Australian Children's Content – the Australian Children's Content App

We also propose a mechanism that allows for better visibility of Australian children's content on connected TV devices.

Our proposal is for the Australian Government to conduct a feasibility study for the development of an application, the Australian Children's Content App, that lists all Australian children's programs available at any time on any platform and directs users to where that program is available for them to view.

We envisage the Australian Children's Content App would aggregate all Australian children's screen content, highlighting newest and favourite content; making it possible to search for content on the basis of age range, genre, etc, with the capacity for the user to be able to go straight to play in the case of content available on free platforms (such as ABC iView, SBS On-Demand, Ten Play) or platforms to which the household is a subscriber (such as Netflix, Stan, Disney+, Paramount, etc).

A very general mock up is attached to this submission to illustrate the proposal. (Please note, for the purposes of this submission we have used the ACTF logo as the App logo, but for the avoidance of doubt, we stress that the proposed App should incorporate all Australian children's content available on all platforms, regardless of who contributed to its funding. The design is very simple for illustration purposes only, and at this stage does not incorporate the potential for differentiating age group settings within the App, or setting individual profiles for differently aged children.)

We propose that all smart TVs and related devices available for purchase in Australia be required to carry the Australian Children's Content App at start-up.

The Australian Children's Content App would also be available on App Store/Play Store, so that Australians are able to install the App on their tablets, phones and other devices.

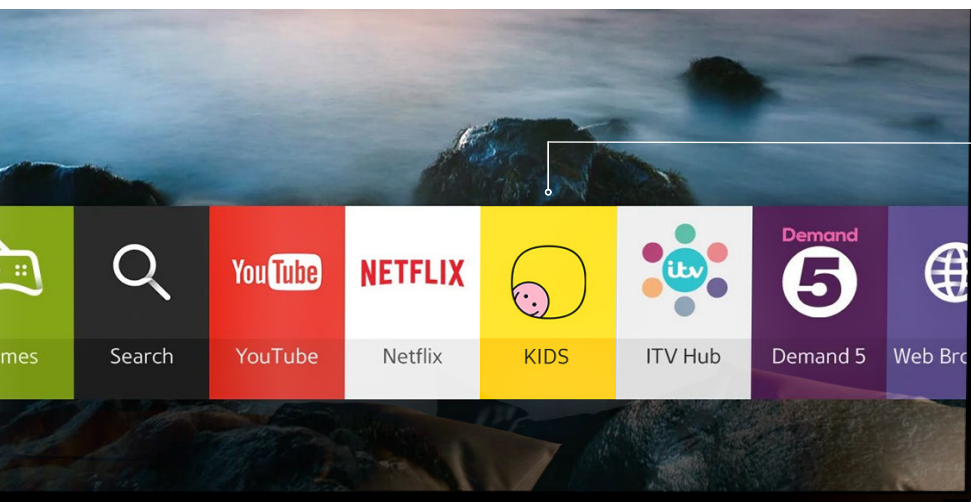
Remote Control: In addition to the Australian Children's Content App itself, we propose that it might be possible to require the remote control of connected TV devices purchasable in Australia to come with a built-in "KIDS" button that immediately directs viewers to the Australian Children's Content App.

These measures:

- address the difficulty Australian children and families currently have in finding Australian screen content for children;
- provide parents with an easy solution to the "walled" garden they like to have for their children to ensure that they watch age-appropriate children's content;
- make it easier for Australian children's content, which is supported by the tax payer, to reach and find large audiences;
- support the public broadcasters, ABC and SBS/NITV, by ensuring that the large volume of Australian children's content they are commissioning, is reaching the audience, regardless of competition from other platforms and lack of familiarity with public broadcasters in some households;
- supports all commercial platforms who invest in Australian children's content as it will also direct audiences to the content on their platforms; and
- ensures that the Australian community receives the cultural and social benefits of quality Australian children's screen content.

The Australian Children's Television Foundation (ACTF) would welcome further discussion with the Department of Communications – Online Safety, Media and Platforms Division to discuss and shape this proposal further.

'KIDS' App



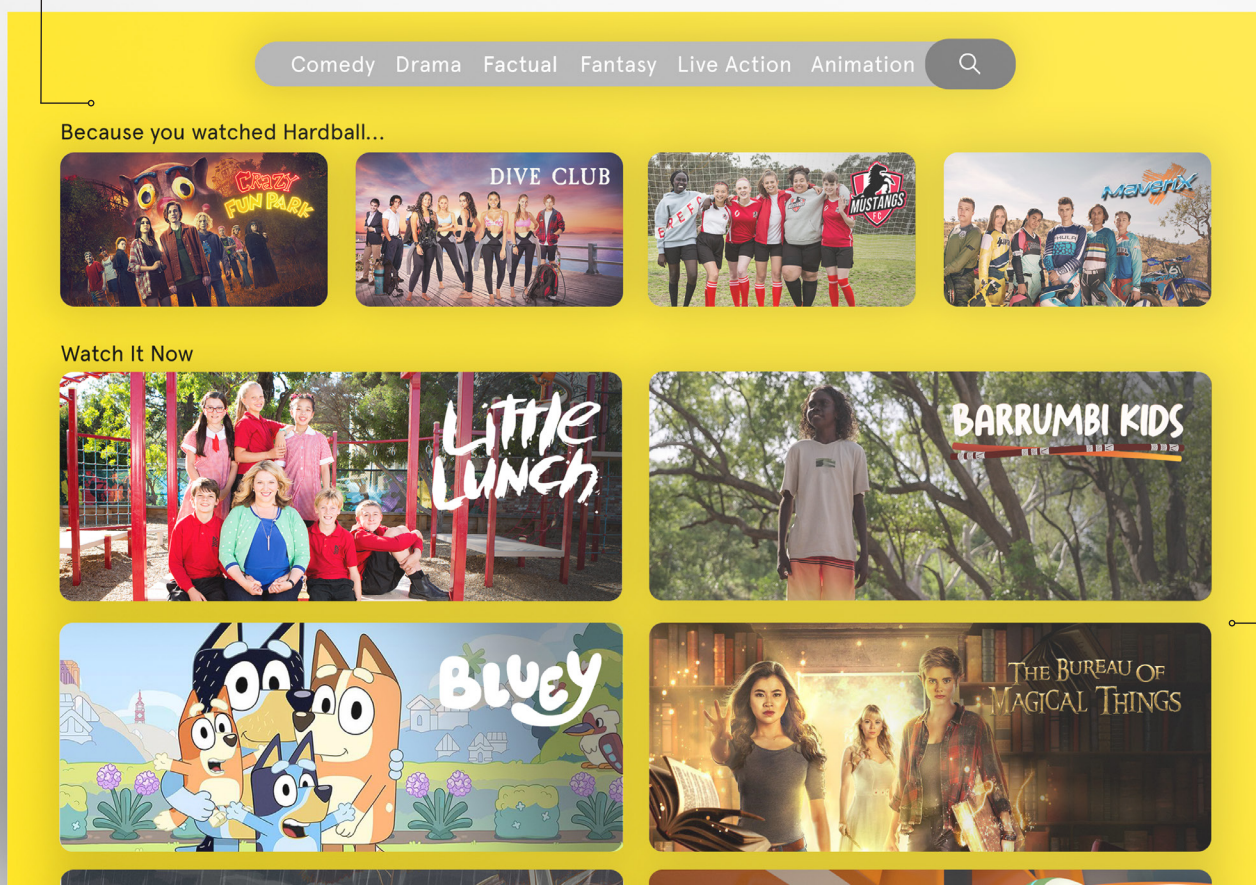
'KIDS' App on all
Australian TV's

'KIDS' App button
on all Australian
TV remotes



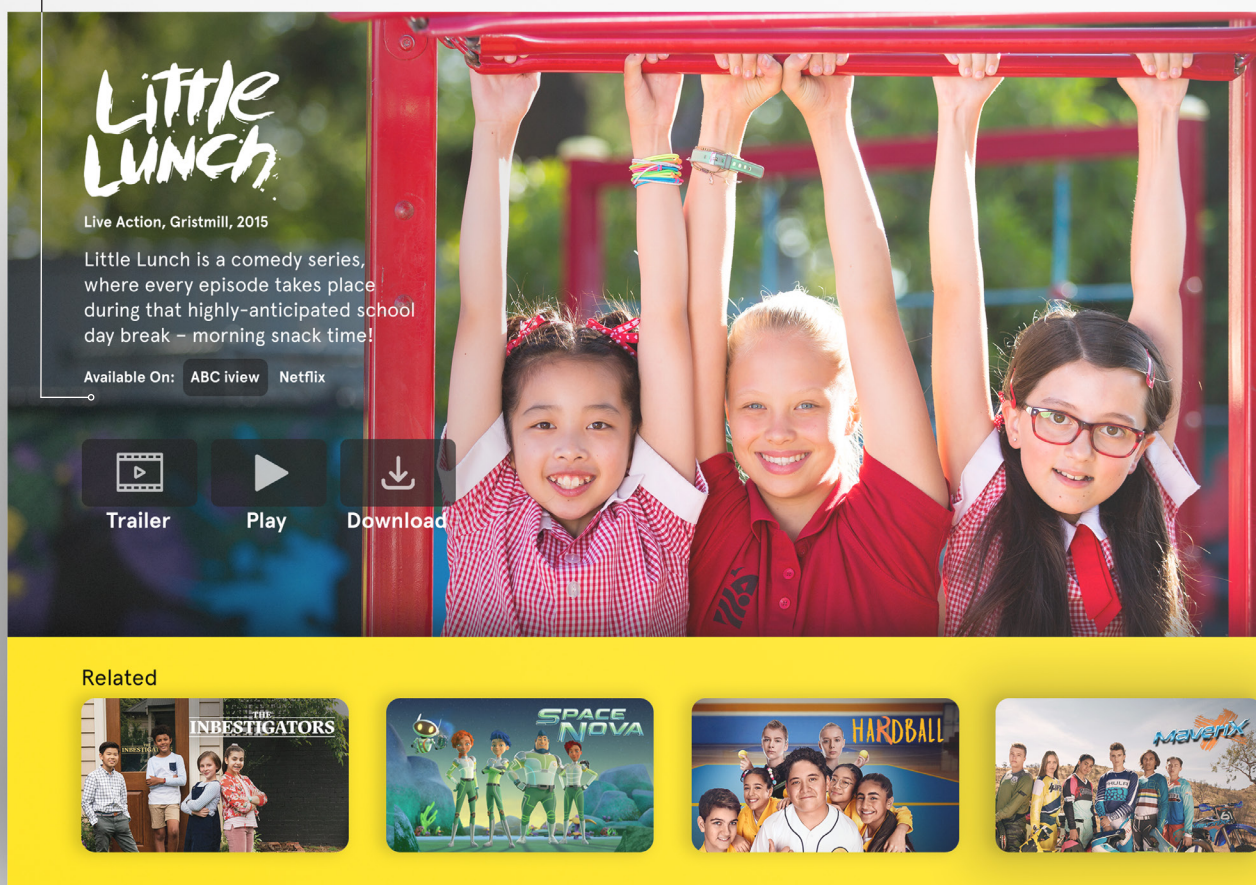
'KIDS' App

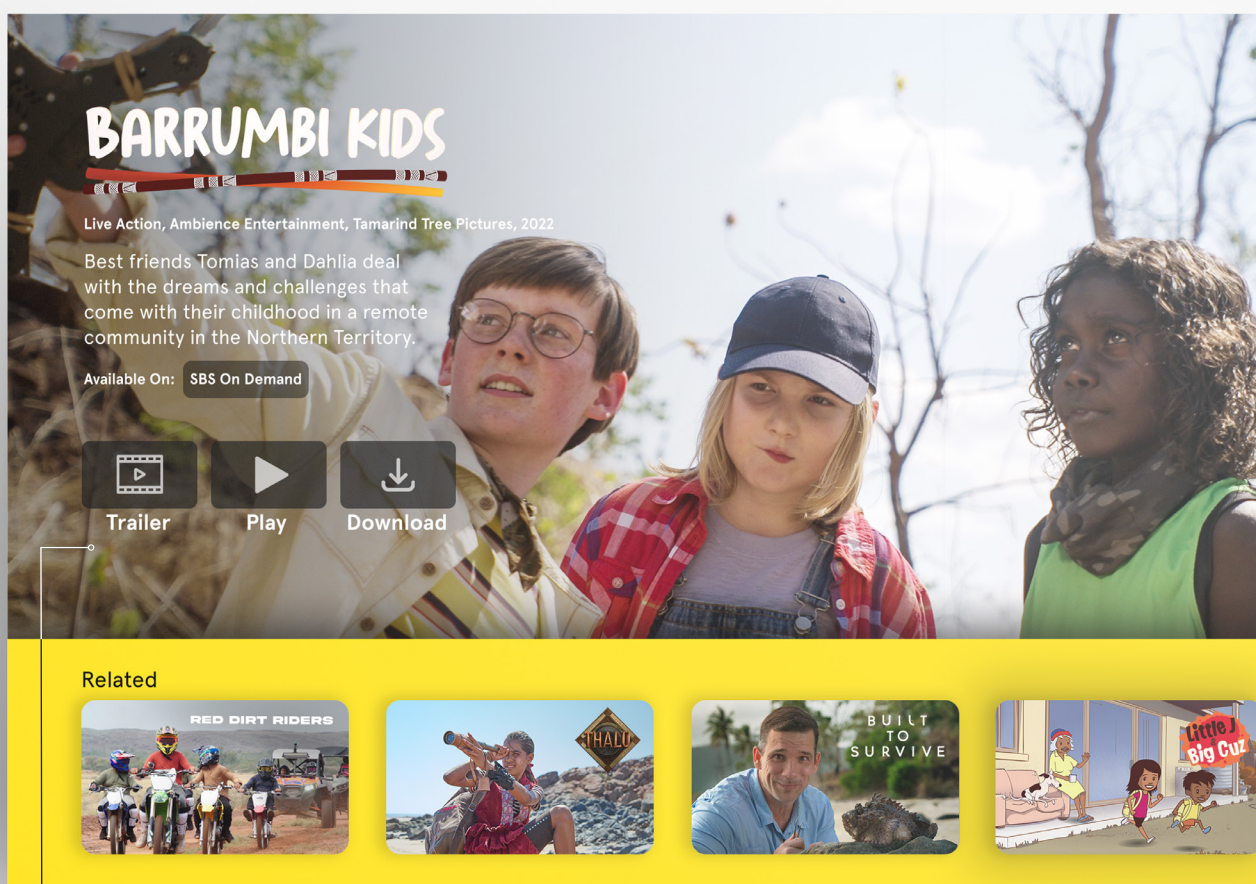
Recommendations based
on previous viewing habits



All Australian children's
film and TV in one place

Links to VOD platforms





Viewers can watch the trailer,
or play the show directly from the App