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Children's Programming

On

South African Public Service Television:

Filling the Gaps in Policy and Practice

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Abstract

This study discusses the policy and regulatory framework of the South African Broadcasting Corporation's (SABC) television programming for children. The SABC's children's programming is examined with a view to identifying gaps in both policy and practice.

The study argues that the programming needs of children require attention as children's television programming is not fully representative of the diverse needs of all South African children. It further argues that the funding and financing has impacted significantly on the SABC's ability to provide a wide range of programme genres for children. The study also contends that programmes are not scheduled appropriately for children, nor are they substantially available to the majority of children who speak languages other than English. It is further posited that a policy review be conducted to ensure that the unique needs of children are properly catered for. The study identifies media literacy as well as child participation as key components to facilitate the meaningful development of programming for children.

Declaration

I declare that this dissertation is my own work. It is submitted for the Degree of Masters of Dramatic Art at the University of the Witwatersrand, Johannesburg. It has not been submitted to any other university for degree examination in any form.

_____

Nadia Bulbulia

_____ day of _____ 2007

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List of Acronyms

AMPS	All media product survey
AR	Audience Rating
ASA	Advertising Standards Authority
BMCC	Broadcasting Monitoring and Complaints Committee
BCCSA	Broadcasting Complaints Commission of South Africa
CBFA	Children's Broadcasting Foundation of Africa
DOC	Department of Communications
IBA	Independent Broadcasting Authority of South Africa
ICASA	Independent Communications Authority of South Africa
LSM	Living standard measurement
FPB	Film and Publications Board
MDDA	Media Development and Diversity Agency
MMP	Media Monitoring Project
NGO	Non government organisation
PBS	Public broadcasting service
SAARF	South African Advertising Research Foundation
SABC	South African Broadcasting Corporation
SATRA	South African Telecommunications Regulatory Authority
SAARF	South African Advertising Research Foundation
STATS SA	Statistics South Africa

Chapter One

Children's television programming and the Public Broadcaster: developing an implementable policy framework.

> We cannot be true liberators unless the liberation we will achieve guarantees all children the right to life, health, happiness, and free development, respecting the individuality, the inclinations and capabilities of each child. Our liberation will be untrue to itself if it did not among its first tasks, attend to the welfare of the millions of children whose lives have been stunted and turned into a terrible misery by the violence of the apartheid system….(O.R Tambo -1987)

As a backdrop to this study, the statement above made by Oliver Reginald Tambo[1] at a conference in Harare on 'Children, Repression and the Law in apartheid South Africa' resonates. He expressed so eloquently, that the measure of liberation must be linked to the guarantees that need to be in place for children.

The aim of this thesis is to critique television programming for children on the public broadcaster's television channels and to identify gaps from both a policy and regulatory practice perspective with a view to suggesting new policy directions.

This chapter provides the context and rationale for focusing on the South African child and children's television programming needs. It looks broadly at the policy and regulatory mechanisms as it sets out the research questions for this study.

[1] Oliver Reginald Tambo held positions of both president and secretary general of the African National Congress (ANC), and founding member of the ANC youth league. He was exiled for 30 years, returning to South Africa in 1993.

1.1 Defining the child as audience in South Africa

The Independent Communications Authority of South Africa (ICASA) has in its South African Content Position Paper and Regulations (2002, as amended) defined children's programming as:

> programming which is specifically produced for persons between the ages 0 to 6 years and 7 to 12 years, which is educational, made from their point of view, and which is broadcast at times of the day when persons in this age group are available in substantial numbers to watch.

This definition is focused primarily on television although the regulations are for both television and radio. It is therefore meant to ensure that programmes made for children must also be broadcast at times when children are available in substantial numbers to both *listen to* and *watch* programmes.

Defining the child audience in South Africa has to be considered against the historic backdrop of the role that children played in the liberation struggle. Children took to the streets in protest of apartheid's oppressive regime and its Afrikaans language policy, resulting in what South Africa today commemorate as Youth Day on June 16. However, many would argue that children in a post apartheid South Africa ought to just be 'children'. Unfortunately, it is not that simple as many children are forced to leave school in order to work and sustain families. Others are forced to head the home as the HIV and Aids pandemic deprives the nation of a significant part of young adults. Still more children are faced with homelessness and lack of education. South Africa's children are not just 'children'. In the run up to the first democratic election, there was a call to lower the voting age of citizens to 16. Much debate on this explored the realities as detailed above, but it was finally agreed that the voting age would be 18.

For the communications regulator ICASA, considerations such as early childhood development and the separation of youth from child was necessary. As far back as 1995,

the predecessor of ICASA, the Independent Broadcasting Authority (IBA) recognised that the needs of pre-school education for 0-6 year olds in a country where early childhood facilities for black children was virtually non-existent, had to be supplemented by programme offerings of the public broadcaster – the South African Broadcasting Corporation (SABC).

1.2 Government makes a commitment to children

South Africa has a long history of child rights activism. The National Children's Rights Committee had in the late 1980's conducted a series of national workshops on the subject and in 1992, at a watershed conference in the Western Cape (Somerset West), drafted the Children's Rights Charter. This pre-dated the South African Constitution which no doubt informed the constitutional drafting process. As a country South Africa has placed the needs of children high on its political agenda. On June 16 1995, the former South African Government of National Unity ratified the United Nations (UN) Convention on the Rights of the Child (CRC). In so doing, it committed South Africa to implementing the principle of a "first call for children" whereby the needs of children are considered paramount throughout the government's programmes, services and development strategies (stated at the launch of the National Plan of Action, NPA:1996). This principle was adopted by the Reconstruction and Development Programme[2] and is the basis of South Africa's commitment to children.

1.2.1 The South African Constitution and Bill of Rights

The Constitution of the Republic of South Africa, Act 108 of 1996 is widely regarded as one of the most progressive constitutions in the world. The Bill of Rights is Chapter Two of the Constitution and states that it, "is the cornerstone of democracy in South Africa. It enshrines the rights of all people in our country and affirms the democratic values of human dignity, equality and freedom".

---

[2] Reconstruction and Development Programme (RDP) was formerly a Ministry within government, though abandoned as a specific government department, the principles of the RDP are to be implemented across all government programmes.

On equality the Bill states that everyone is equal before the law and has the right to equal protection and benefit of the law. It states further that the state may not unfairly discriminate directly or indirectly against anyone on one or more grounds including race, gender, sex, pregnancy, marital status, ethnic or social origin, colour, sexual orientation, age, disability, religion, conscience, belief, culture, language and birth.

In section 28, the Bill expands on the rights of children and defines the 'child' as a person under the age of 18 years. It also clearly states that the child's best interests are of paramount importance in every matter concerning the child.

Section 6 of the Constitution gives prominence to South Africa's languages. The official languages listed as Sepedi, Sesotho, Setswana, siSwati, Tshivenda, Xitsonga, Afrikaans, English, isiNdebele, isiZulu, isiXhosa. Attention is also paid to the Khoi, Nama and San languages with sign language included.

In section 192 of Chapter 9, the Constitution establishes a broadcasting Authority that must regulate broadcasting in the public interest. Broadcasters are expected to uphold the principles enshrined in the Constitution and the public broadcaster is particularly mandated to deliver content in the public interest.

An example of the weight given to the broadcasting sector is noted in the opening remarks by the Minister in the Presidency, Minister EG Pahad at the presentation of the South Africa Country Progress Report on the Implementation of the Convention of the Rights of the Child to the United Nations Convention on the Rights of the Child held in Geneva, Switzerland in 2000. The Minister stated that "on a national level, community radio stations, public radio and public television are the media used to educate the public about the UN Convention and the NPA". He went further to state that:

> with regard to the best interests of the child in the past, the 'best interest' applied almost entirely to children in divorce cases. He added that, 'today, the 'best interests of the child' is a Constitutional principle that underpins

every policy and programme developed by the SA government…

At the time of writing this dissertation, the National Assembly passed the Children's Amendment Bill (B19, 2006) to amend the Children's Rights Bill (B70 of 2003). The Amendment Bill had been through a public process with a range of stakeholders making submissions to the Parliamentary Portfolio Committee on Social Development. The Bill was initially criticised by a range of children's rights lobby groups for watering down a chapter on children's rights, originally proposed by the South African Law Reform Commission. According to the Children's Institute spokesperson Paula Proudlock, the Bill originally included a chapter on children's rights and 20 rights were listed. This had been reduced to 5 – the original chapter included the constitutional rights of the child, expanded and explained them. Children's Bill Working Group, a network of organisations working with children, was reported in the *Business Day* newspaper (24 June 2005) as stating that the Bill was "a major milestone for South Africa in the struggle to protect children".

The Children's Bill is meant to replace the Child Care Act of 1983 and is regarded as a holistic approach to the rights of all children and amongst other things aims to put in place a new child-friendly court system. The Bill lowers the age of majority from 21 years to 18 years, outlaws virginity testing, paves the way for a register of child abusers and cracks down on child trafficking (reported on in News24.com, 22 June 2005). It also makes it possible for unmarried fathers to enjoy full parental responsibilities. Furthermore, child headed households and refugee children will receive social work intervention and investigations into the circumstances of these children.

The passing of the first section of the Bill came after almost seven years of process and development. The Bill was separated into two parts for technical reasons in 2004, and so only the section dealing with national issues (Section 75) was passed in June 2005.

1.3 The United Nations Convention on the Rights of the Child

The Convention on the Rights of the Child was adopted by the United Nations General Assembly on 20 November 1989. The governments represented at the General Assembly agreed to adopt the Convention into international law.

The Convention comprises 54 Articles (Part I with 41 articles as substantive) and incorporates the full range of human rights – civil and political as well as economic, social and cultural rights – of all children. The four guiding principles are: non-discrimination (article 2), best interests of the child (article 3), survival and development (article 6) and participation (article 12).

The Convention defines as children all human beings under the age of 18, unless the relevant national laws recognise an earlier age of majority (article 1). The Convention emphasises that States substituting an earlier age for specific purposes must do so in the context of the Convention's guiding principles as stated above.

The UNICEF webpage on the Convention states that, the international community progresses slowly – and only relatively recently – down the path leading to the Convention on the Rights of the Child. The first legal step was taken in 1924, when the League of Nations endorsed the first Declaration of the Rights of the Child. The UN Charter (1945) also laid much of the ground work for the Convention by urging nations to promote and encourage respect for human rights and fundamental 'freedoms for all'.

Other early signs of a move to recognise and protect children's rights are evident in the Universal Declaration of Human Rights, adopted by the General Assembly in 1948. The Universal Declaration states that 'All human beings are born free and equal in dignity and rights" and also stresses that "motherhood and childhood are entitled to special care and protection" and refers to the family as "the natural and fundamental group unit of society". The General Assembly also adopted in 1948 a brief 7-point statement that built on the 1924 Declaration*: "Mankind owes to the child the best that it has to give…".*

Whilst the Declarations had no legally binding instruments as a Convention, this situation was ratified in 1989 and currently the rights of children carry the weight of international law – a law that South Africa became signatory to on June 16 1995.

Article 17 of the Convention deals with the important function performed by the mass media and states that it shall ensure that the child has access to information and material from a diversity of national and international sources, especially those aimed at the promotion of his or her social, spiritual and moral well-being and physical and mental health. To this end, States Parties shall:

(a) encourage the mass media to disseminate information and material of social and cultural benefit to the child and in accordance with the spirit of article 29[3];
(b) encourage international co-operation in the production, exchange and dissemination of such information and material from a diversity of cultural, national and international sources;
(c) encourage the production and dissemination of children's books;
(d) encourage the mass media to have particular regard to the linguistic needs of the child who belongs to a minority group or who is indigenous;
(e) encourage the development of appropriate guidelines for the protection of the child from information and material injurious to his or her well-being, bearing in mind the provisions of article 13[4] and 18[5].

These goals are very similar to those that we are currently debating in South Africa.
Issues of cultural diversity, language rights, minority rights and child protection are matters that the SA Constitution, the broadcasting legislation and now the Children's Bill/Act recognise in various forms.

[3]Article 29 relates to the education of the child

[4]Article 13 relates to freedom of expression

[5]Article 18 relates to responsibility of parent/guardian and best interest of child

1.4 South African Population Statistics: where children count

We need to consider the demographic profile of the South African population to contextualise the space occupied by children. This is necessary to provide a holistic picture of 'who' the South African child is in terms of race and gender as well as the actual numbers of children in the total South African population.

The Mid-year population estimates, South Africa 2006, were released in August 2006 by the Statistician General. The estimates were as follows:

- There are approximately 15,3 million children (32%) of the whole population aged 0–14 years;
- Approximately 3,7 million people are older than 60 (7.7%) in the population;
- Population group shows that the mid-year population is estimated at approximately 47,4 million;
- Africans are in the majority (approximately 37.7 million) and constitute about 80 percent of the total South African population;
- The White population is estimated at 4,4 million (9.2%);
- the Coloured population 4,2 million (8.9%);
- the Indian/Asian population 1,2 million (2.5%);
- Fifty-one per cent (approximately 24,1million) of the population is female;
- The estimated overall HIV-prevalence rate is approximately 11%. The HIV positive population is estimated at approximately 5,2 million and
- It is estimated that approximately 5% of the total population live with some form of disability. *(Source: Statistician General:2006 Mid-year population estimates)*

In addition to these statistics provided, the United Nations General Guidelines for the Periodic Reports on the Convention on the Rights of the Child, paragraph 7, says that reports made by States should be accompanied by "detailed statistical information…. Qualitative information should indicate variations between various areas of the country…and between groups of children".

A snapshot of the demography of South Africa's children was prepared by the Children's

Institute based in the Western Cape, published in 2005 (Meintjies, Leatt, Berry). The following breakdown supports the need to address this particular segment of the population.

Table 1

Age Group	**Number**	**%**
0-5 years	5,949,849	33
6-12 years	7, 124, 436	40
13-17 years	4,947, 541	27
Total	**18, 021, 817**	**100**

Source: Statistics SA (2005) General Household Survey 2004, Pretoria. Cape Town, Analysis by Budlender, Centre for Actuarial Research, UCT.

South African children comprise a substantial portion of the total South African population. In addition, the HIV prevalence rate of approximately 11% has been reported as prevalent in children as young as 14. This particular health issue is therefore a national concern across all age groups.

According to South African Advertising Research Foundation (SAARF:2004) almost 45% of rural households have TVs, compared to 27% in 1994. The urban television penetration is now at 84% of all households. These television figures suggest therefore that children who are part of these growing television households ought to receive the same attention as adult audiences.

1.5 South African Television: a brief overview

Television was introduced in South Africa on 5 January 1976, a watershed in the country's history of struggle against apartheid. Television programming at that time focused on the separatist policies of apartheid and even kept the targeted white audiences apart by providing content in English and Afrikaans on alternate days. In fact, there were absolutely *no* television programmes in 1976 that catered for black South Africans. The

content was largely purchased from North America and Europe and these were programmes that had long out-lived their 'sell-by' and shelf-life dates in those markets. Those were the days of '*Shane*', '*Bonanza*', '*Musik Laden*' (German music programme), '*The World at War*' and '*Little House on the Prairie*'. The equity ban on South Africa meant that quality BBC programmes were denied. Regardless of this, insightful British programmes would probably not have made it to South African screens with the nationalist government's editorial control of the SABC.

1.5.1 Separatist policies in programming practice

Children's programmes were those dubbed into Afrikaans, like '*Redding Internasionaal*' (Thunderbirds). There were also however, locally made programmes like '*Wielie Wallie'* with *Bennie 'Boekwurm'* which were hugely successful and ran for many years.

In 1982 SABC TV 2 and 3 were launched, broadcasting in isiZulu and isiXhosa and TV3 was for Sesotho languages. TV 4 was launched in 1985, and this was arguably to combat the popularity of Boputhatswana Broadcasting (BopTV) that started broadcasting in 1984 from the former homeland[6] of Boputhatswana. In 1987 the first pay TV service, Mnet was launched.

In their paper, 'The People Shall Broadcast' (1993) writers Currie and Markovitz state that:

> racial separation was the order of the day on most SABC TV programmes until the late 1980s. Blacks in TV1 drama series played subordinate servant roles, while there were few whites in black drama series on TV2/3. Racial integration on commercials was forbidden until the mid-80s. TV dramas reinforced the apartheid notion that blacks belonged in their rural homelands, a white person watching TV1 would imagine that he or she lived in an almost white world, while a black person watching TV2/3 would feel that he or she lived in a primarily black world, a citizen of one

[6] The apartheid government created homelands for separate development known as the TBVC states (Transkei, Boputhatswana, Venda and Ciskei), rulers were under the control of the apartheid state.

of the homelands.

Currie and Markovitz (1993:90) go further to note that "….in 1992 a new Channel, Contemporary Community Values TV (CCTV) was launched. This was a combination of TV2, TV3 and TV4. The channel cut down on African language programmes and was an attempt to be a cross-over station for blacks and whites, driven mainly by American series".

1.5.2 The early days of children's programming

In keeping with these policies, television programmes for children were also about keeping black and white children separate. The Afrikaans culture and language were entrenched in the programme offerings for white children. A considerable amount of resources was allocated to the development of English and Afrikaans children's television. The English '*Bangalorie Time*' and Afrikaans 'Liewe Heksie' programmes are such examples where puppeteering and fantasy were encouraged. Afrikaans children's drama like '*Trompie*' was another example of this 'investment' in children's television. In 1991, the SABC introduced a supplementary Sports television service called TSS (Top Sport Surplus). It was relayed on the spare capacity of the TV 1 signal and carried sports broadcasts that could not be accommodated on TV 1, 2 and 3 services. In 1994, the TSS Channel was replaced by National Network Television (NNTV), broadcasting sport, documentary and educational programmes (Erasmus:2004).

With the establishment of the Independent Broadcasting Authority in 1994, and the inquiry into the sustainability and viability of the public broadcaster, the SABC presented its plans to restructure the SABC and transform it from being the former nationalist government broadcaster into a public service. In 1996 the SABC re-launched its television services into SABC 1, SABC 2 and SABC 3. In the same year the pay TV service Mnet, launched its digital satellite service (DSTV). A licence was not issued at the time for DSTV as there had been a policy vacuum for such a service. The SABC also entered the satellite market and launched a service called Astrasat which was later abandoned. It must be noted that in 2006 ICASA had after finalising a policy framework

for subscription (pay services), invited applicants for licensing.

By the time the SABC integrated its children's TV service into a racially mixed audience it did so with the unfortunate baggage of apartheid. It would have a black presenter with black children engaged in cultural dancing and singing and telling African folktales. This would be juxtaposed with a white presenter in English presenting to a white group of children. The programmes made for Afrikaans speaking children were predominantly for white Afrikaans speaking children. The child actors were all white and a series like '*Trompie*' whilst a fine example of drama for children, was not reflective of a racially mixed South Africa, this in keeping with apartheid policies.

The range of programmes on offer for Afrikaans children was also more varied ranging from studio based interactive children's programmes, to dubbed cartoons and animation, to drama and music. Children's programmes were scheduled in the early morning and mid-afternoon. The dramas focused on school pranks and after-school jaunts of primary school boys. In fact, the roles of girl children were somewhat marginalised.

Today this picture has changed significantly. The child audience is now reflected in the child presenters that host these programmes – they are all urban, seem to come from either private schools or model C schools (urban based, public schools that were formally white-only schools). Their accents are no longer distinguishable as speech patterns have become homogenous.

This is largely for the older group of children, whilst the pre-school age group follows the format of having an adult presenter/s engaging with children of different racial and cultural backgrounds. The presenters are now also more representative of South African demographics and the emphasis on home language is recognised.

1.6 Broadcasting policy and regulation in South Africa

The policy framework is set by the legislature. The drafting of law is usually done by the introduction of a Green Paper then White Paper, culminating in a specific piece of

legislation or policy framework. These steps need not be followed to the letter as seen with the development of the latest Electronic Communications Act (ECA, 2006) which integrates elements of the Independent Broadcasting Act (1993 as amended) and the Telecommunications Act (1996, as amended). The ECA also integrates the postal regulator into ICASA as part of the communications sector.

Public broadcasting policy and the development of the public service system, goes back to Lord Reith who was invited to South Africa in 1934 by then Prime Minister Barry Hertzog. Reith's recommendations were incorporated into the Charter of the SABC (under Broadcasting Act no 22 of 1936).

The public service objectives of the SABC were summarised in the Annual Report of 1985 (1985:2) as follows:
The SABC operates a quality broadcasting service which:

(a) takes note of and adapts to the changing demands of the day;
(b) takes into account the wishes and needs of the various language and cultural groups in South Africa in order to inform, educate and entertain them constructively and
(c) disseminates a positive message about South Africa and its people.

Eight years later, the Green Paper (1993:4.2), and visionary planning document put forward the following:

> Internationally there is no recipe for the format of public service broadcasters. A PBS [public broadcasting service] has to fulfil its role within the framework of the unique needs of the country in which it functions. It has to reflect continually the values, norms, languages, traditions and culture of the country and its people, so the special needs of that society play a very important part in the schedules of the PBS. Its standards of taste, accuracy and impartiality have to be high and irreproachable. Technology and expertise should be utilised optimally in the pursuance of these goals….The SABC has the particularly important

task of giving voters access to information, such as news of the day, so they would be able to take informed, democratic decisions.

The IBA Act was enacted in 1993 with its primary concern at the time being a free and fair election process in 1994. Whilst the IBA Act and subsequent legislation retain the Reith-like model of public service broadcasting, a simple transfer of a cultural model from Britain to South Africa during apartheid was totally inappropriate. One could also argue however, that even in a post-apartheid era, our new democracy does not automatically give life to Reith's model as neither the SABC's funding model nor institutional composition can be directly compared to the BBC.

Chapter four explores further, the policies that have developed to enable public service programming for children.

1.7 Regulation making: catering to diverse children

In keeping with the South African Constitution and the UN Convention on the Rights of the Child, all citizens under the age of 18 are considered to be children. ICASA has defined children's programming as programming which is specifically produced for those between the ages 0 to 6 years and 7 to 12 years - which is educational, made from their point of view, and which is broadcast at times of the day when persons in this age group are available in substantial numbers to watch. Although the age breakdown clearly suggests that programmes made for children over the age of 12 falls into a different audience group, there is no category provided for children over 12 years. One assumes that 13 years and over is a youth audience. Whilst ICASA has defined the child audience as between the ages of 0 and 12 years, it is necessary to consider further *who* the audience is.

Chapter 9 of the South African Constitution refers to State Institutions Supporting Constitutional Democracy. Section 192 of that section states that the National legislation must establish an independent authority to regulate broadcasting in the public interest, and to ensure fairness and a diversity of views broadly representing South African

society.

The IBA Act (no 53 of 1993) was enacted with the primary objects of the Act detailed in Section 2. With regard to the provision of public broadcasting services, the following are to be provided for (2) e,

(i) the needs of language, cultural and religious groups;

(ii) the needs of the constituent regions of the Republic and local communities and

(iii) the need for educational programmes, are duly taken into account

In 1999 the Broadcasting Act (no 4 of 1999) amongst others, separates the SABC into a public service and a commercial service and also provides a Charter for the SABC. The Objects of that Act (in developing a broadcasting policy in the public interest) firmly place the broadcasting needs of children on the agenda with clause 2(e) to cater for a broad range of services and specifically for the programming needs in respect of *children,* (emphasis mine) women, the youth and the disabled.

The Broadcasting Act also establishes the Public Service of the Corporation and in 10.1 (g) similarly requires it to strive to offer a broad range of services targeting particularly children, women, youth and the disabled. The Broadcasting Amendment Act (no 64 of 2002) was enacted to Corporatise the SABC, and to introduce two regional television services to broadcast in the languages of Sepedi, Sesotho, Setswana, isiSwati, tshiVenda, Xitsonga, isiNdebele, Afrikaans, isiXhosa and IsiZulu on an equitable basis. The trajectory of legislation points to the need for the public broadcaster to be responsive to the linguistic, cultural and religious expression as well as the regional and provincial diversity of our country. The inclusion of the needs of children, women, the youth and people with disabilities goes further to ensure that the public broadcaster serves the needs of the public in all its diversity.

It is interesting to note that 10.1 (g) of the public service of the SABC is to *strive* to offer these services as opposed to *ensure* that these services are available. In defining the child audience, the linguistic, cultural and religious as well as disability rights must be

guaranteed. At issue is whether these can be addressed simultaneously, or whether the public broadcaster is able to show how it will *strive* to meet these objectives.

Defining the child audience requires the consideration of the widest cross section of communities to be served by the pubic broadcaster. These would include amongst others, rich and poor, urban and rural, formally and informally educated, able-bodied and differently-able, healthy and ill. Then there are also the complexities of racial dynamics and gender stereotypes as well as notions of the 'family'. The South African child audience is not homogenous – and the first step is to understand the diversity of audience that must be accommodated.

The South African Broadcasting Corporation (SABC) boasts the lion's share of the total South African television audience. However, according to SAARF (2006) there was a drop in audience numbers on SABC 1, from 70.6% in 2005 to 68.5% in 2006. This might level out as the audience numbers increased on both SABC 2 and SABC 3 from 29.9% to 31.8% and 19.5% to 21.3% respectively from 2005 to 2006. The South African child audience (under 16) is not specifically measured as an audience category by SAARF. The exact number of children who watch SABC television channels is therefore not available for this study.

The South African child (under 14 year olds) constitutes approximately 32% of the total population. This is a sizeable portion and sector of society and should not be under-served. It is necessary for independent audience research studies (not market research) to begin to turn some attention on audiences under the age of 16. This focus would need to be for both qualitative and quantitative research purposes.

1.8 The research questions

As stated earlier, the focus of this thesis is the public broadcaster's television programming from a policy and regulatory practice perspective. It seeks to identify gaps where they may exist with a view to suggesting new policy directions.

The key questions raised are:

1. What is the policy and regulatory framework on public service programming for children?
2. How does the public broadcaster cater for the needs of children?
3. Is the programming on offer in line with the policy objectives and further translated into the programming schedules of the public broadcaster?
4. Are there any gaps between policy and practice?
5. How can the policy gaps be filled?

This study attempts to answer these questions with a view to making policy recommendations.

Chapter Two

Theory and literature review

This study is located within theoretical approaches which focus on public service broadcasting and public service broadcasters as institutions which serve the public interest. In particular, the thesis focuses on theories which analyse the impacts of policy and regulation on programming.

According to Mosco (1996:11) policy studies is built on research traditions in political science, economics, and institutional political economy. It aims to evaluate alternative courses of actions, particularly, though not limited to, government or state actions in communication. In order to present policy recommendations on programming for children, government policies will be analysed later in this study.

2.1 Children and media: research areas

Buckingham (1998:164) submits that the research areas in the field of children and media have been in:

(a) children's understanding of narrative. This can be seen in cognitive research into broader aspects of television, such as narrative, for example Andrew Collins (e.g. 1981) and colleagues have looked at the ways in which children's understanding of narrative varies according to the 'world knowledge' which they bring to it,

(b) developmental studies, heavily informed by the work of Piaget where many researchers seek to provide an account of the tele-viewing styles of children at each of Piaget's developmental stages,

(c) the study of television texts which has been dominated by statistical content analysis, and

(d) cultural studies, often conceptualized in terms of an interaction between *institutions, texts* and *audiences* (e.g. Johnson 1985.86).

Buckingham adds that the study of institutional context of children's television

production has been a relatively marginal concern with early studies such as Melody (1973) and Turow (1981) adopting a broad 'political economy' approach, focusing on questions of ownership, marketing and regulation. Garnham is regarded as a leading theorist on political economy and insists that,

> in order to understand the structure of our culture, its production, consumption and reproduction and the role of the mass media in that process, we need to confront some of the central questions on political economy in general (Garnham, 1979:129).

The significance of this quote is that political economy has from its inception been interested in determining the appropriate scope of public intervention (policy). The theory of political economy is involved in evaluating competing policies – it is concerned with changing the world as well as analysing it. Political economy looks at systems and structures and the impact these have on media consumed by the public. This study deconstructs both the system and structure of public broadcasting to analyse public service programming for the child audience.

2.2 Critical political economy of the media

Critical political economy of the media is about the inter-relationship between politics and economics. It focuses on seven inter-related aspects being; the institutional roles of the media and their freedoms to do so, media ownership and management, media production and producers, funding and financing, media content as representations of reality, audiences and audiences' access to the media and, media and communication policy and regulation.

This study is focused on critically analysing children's programming on the public broadcaster as a policy and regulatory issue and is particularly concerned with aspects or elements of funding and financing, and programming for children as audiences.

2.2.1 Communication policy and regulation

There is extensive literature on regulating the communications industries, and according to Mosco (1996:201) 'one finds consistency in the view that regulation is a government reaction to market problems'. He adds that explanations range widely, including the presence of natural monopoly conditions, industry pressures on the political apparatus, public interest pressures from citizen groups etc. Whilst the 'problem' is significant, Mosco (1996) claims that it is couched within a conception of regulation as something governments do in reaction to perceived problems. He adds that as a result, when policy makers and academic analysts review industry regulation, they tend to examine government practices and contend over whether more or less regulation is needed.

According to The Royal Commission on the Press (1977:9), market liberals had only accepted more extensive regulation of broadcasting on the grounds that the limited number of airwave frequencies made it a 'natural monopoly'. The notion that scarce frequencies, (regarded as a national public resource) be protected, underpins broadcasting policy and regulation in South Africa. More importantly though was the need to 'free' the airwaves as South Africa emerged from an apartheid legacy of state controlled public broadcasting.

2.2.1.1 The 'actors' in policy making

The South African policy and regulation making system provides that government as the policy maker, creates the legal framework with prescribed aims and objectives for the communications sector, to be carried out by the regulator. This study looks more closely at the policy and regulatory practices in the landscape of children's television on the public service broadcaster.

The process of policy formulation is organic and continuous. It also engages a range of key stakeholders best described by Hutchinson (1999:125) as follows:

> Media policy is formulated as an ongoing process involving several

> principal actors. First, there are the politicians who are ultimately responsible for legislative decisions. Secondly, there are civil servants whose job it is to turn broad policy into detailed proposals, and to oversee its implementation. Thirdly, there are the regulators who, even when appointed by politicians enjoy a significant degree of autonomy. Fourthly, there are media organisations themselves which are seeking opportunities to protect and advance their interests. Fifthly, and lastly, there are citizens of the country in question, whose opportunities for involvement in policy making vary considerably. In any development or revision of policy all of these actors seek to secure particular ends, and the results usually reflect the balance of forces at differing points of time.

There are a host of responsible 'actors' in the policy and regulatory making process as indicated above by Hutchinson. He submits that we need to consider the roles of these groups. Beyond all of these he adds, are the citizens, in whose name and in response to whose wishes and needs media policy supposedly operates, and to whom those who develop and implement it must in the last resort be accountable.

Hutchinson (1999) considers regulatory bodies as an important part of the democratic landscape. He states that they are largely the creation of politicians, by whom they are given their basic responsibilities although they operate with a degree of independence. Indeed, their legitimacy depends on their being perceived to enjoy that independence. He adds that they are useful devices of governance, because they remove the detail of policy implementation from the primary political arena, and to an extent transfer responsibility for decision making into a less partisan milieu, in which the 'public interest' is seen to be paramount, although that 'public interest' has to be addressed in the context of the overall policy framework which has been laid down by legislators.

Hutchinson (1999:134) asks how these various bodies, strong and not so strong, impact on the policy process. He states that it might be thought that their function is to simply carry out the remit which has been laid down for them and let policy be decided elsewhere. But this he states is to oversimplify the nature of the regulatory process, which

has been described by one commentator as a 'continuing transaction between the governors and the governed'. Hutchinson adds that:

> ….regulatory bodies are much more likely to have an impact where the government is in an open-minded mood. If that is not the case, and what is proposed is deemed by the regulators to be desirable, it is very difficult for them to stop it by persuasion. What could happen is that sympathetic politicians might be briefed informally, in the hope that they might persuade the government to think again, and sympathetic journalists encouraged to ensure that the regulatory body's views find their way into the public realm. This can be a dangerous game, for on the one hand, if a regulator were to be seen to be openly opposing government policy, its future might be compromised. On the other hand, to take an independent line 'in the public interest' is likely to increase general standing and credibility. (1999:134))

The 'actors' in media policy making include politicians, civil servants, experts and consultants, parliament, regulators, the media sector/industry, civil society and the public. The South African policy making process has experienced the participation of these 'actors', however limited or substantial.

2.2.1.2 The influence of government policies on broadcasting

According to McChesney (2000), the study of the political economy of communication entails two main dimensions – the first addresses the nature of the relationship between media and communication systems and the broader social structure of society. Secondly, the political economy of communication looks specifically at how ownership, support mechanisms (e.g. advertising) and government policies influence media behaviour and content (2000:110). It is specifically the latter of the two dimensions that is applicable to this thesis.

McChesney (2000) adds that communication policy studies examine the influence of government policies on media performance. He makes the point that no one in communication can be neutral on the issue of whether markets equal democracy or that market-driven communication equals democratic communication. He is instructive in asserting that thinking politically and acting politically should not be regarded as something optional for the intellectual, to be pursued in one's spare time. Politics, he states, in the broadest sense of the term, 'should permeate all of our works - because, in the end, politics does permeate all of our works' (McChesney 2000:115).

The development of the broadcasting system in South Africa has been regarded as highly political and not without contest. The three tier system of broadcasting that is meant to be promoted and supported are public, commercial (private) and community broadcasting. It is arguable whether these three distinct forms of broadcasting in fact exist as 'distinctive' from each other or being regulated in a manner that ensures such distinctiveness.

Classical political economists start their present-day followers with the assumption that public intervention ought to be minimised and market forces given the widest possible freedom of operation. Whilst critical political economists on the other hand point to the distortions and inequalities of market systems, and argue that these deficiencies can only be rectified by public intervention, though they disagree on the forms that this should take.

2.2.1.3 The diminishing role of policy actors

The public intervention or participation in determining policy direction and regulation in South Africa has not been as publicly participatory as proposed and debated in critical political economic theory. There has been a tendency for only interested stakeholders (licensees or aspirant broadcasters) and organised lobby groups to participate in the policy development processes. The general public as individual citizens are seldom participants in the consultative process. The reasons for this are many, ranging from the

manner in which public processes of both government and the regulator are communicated and the languages in which these are done. Furthermore, public consultation tends to follow a norm for written submissions to be made before an oral hearing is offered. Some however, argue that lobby groups and organised sectors in society are better placed to speak on behalf of ordinary citizens.

2.2.1.4 The impact of financing on cultural product

Critical political economy links the constitution of good society to the extension of citizenship rights. It is centrally concerned with the balance between the media being business and regulating the media so they play a role in democratisation and development without being controlled by powerful social forces. Critical political economy is also concerned with how economic dynamics impact on the types and range of media content and how that relates to the needs and wants of audience as citizens.

Arguably, and most important of all – it goes beyond the mechanics of how the media works into questions of the importance of the media to the public interest i.e. the democratic role of the media. What sets it apart from other theories is that critical political economy of the media always goes beyond individual cases in particular contexts to how these instances are shaped by larger forces and the wider social systems that they uphold.

What distinguishes the critical political economy perspective is its focus on the interplay between symbolic and economic dimensions of public communications. It sets out to show how different ways of financing and organising cultural production have traceable consequences for the range of discourses and representations in the public domain and for audiences' access to them (Golding and Murdoch:2000).

2.2.1.4.1 Programming related to budgets

A personal experience of theorist Garnham (2005:476) is shared in his article 'A personal intellectual memoir'. He states that whilst working in television he became acutely aware

of the ways in which economic pressures affected creative outcomes -the form of the programme being tailored to the available budget, what programmes were made depending on departmental available budgets etc. He became interested in policy issues - questions such as the level of the licence fee, the different incomes of the BBC and ITV, the ways in which distribution controlled cinema production and so on. He submits that he has always been suspicious of the superficial understanding, indeed rejection, of economics exhibited in cultural studies. This he states was critical to develop thinking on the necessity of an economic analysis of communication.

An analysis of the South African broadcasting system will no doubt raise similar concerns about the type of content produced and the scheduling of content, since the revenue streams available to the three tiers of broadcasters as well as their ownership structure, ultimately affect the end-product of programmes on offer to the South African public.

2.2.2 The political economy and limitation on content

Garnham (2005) writes that the policy focus of his work was with a clear awareness of the extent to which it was the control and allocation of spectrum that underpinned the state's regulatory interventions, including (then) the standard defence of public service broadcasting in terms of spectrum scarcity. In terms of the media and culture, he posits that the difficult analytical and policy questions are those of the relationship between what the capitalist mode of production, left to its own devices, will provide, and what might need political intervention and at what cost both generally in terms of the efficiency and sustainability of the economic system and specifically in terms of public finance. He argues that political economy can tell us about broad patterns of cultural output, distribution and consumption, and about the broad relationship between the private sector and the public realm. He adds that it can tell us very little directly about content. He contends that this requires a detailed analysis of the production process and a focus on cultural producers as a class or status group, on the labour process and on the relationship between producers and consumers.

This study focuses on the programming (content) provided to the child audience in assessing whether policy intervention is necessary. The implications of such policy recommendation would require further analysis of how such intervention could be funded for meaningful change to be possible.

2.3 The Public Service Model

The performance of the public service broadcaster in South Africa (SABC), must be evaluated to constructively position it within the framework of a 'model' public service. There are a variety of theories on public service broadcasting, many with consistent themes and principles.

The public service view expects media to function as a public utility 'in the service of the public sphere', guaranteeing that 'all members of society have access to the information and knowledge they need in order to perform their civic duties', or simply to satisfy their interests and preferences as individual readers, listeners and viewers (Syversten 1996:6). This model, according to Beadle (1963:93), should be informative and educational, capable of stimulating thought, developing latent tastes for good art of all kinds, and encouraging a proper sense of values, as well as enhancing wisdom. It should provide content that examines public issues 'with an incisively critical eye' and services that 'provide fora for debate' (Findahl 1999:18). Public service advocates posit that collective interests cannot be served if the media are left entirely in the control of the private sector, and therefore the need for partial or total state regulation is thus required (Curran 1988:292).

The South African public service model strives to meet the objectives as raised by Syversten, Beadle and Findahl. The regulatory system that currently exists is also intended to serve the collective interests as all tiers of broadcasters (private, public and community) are regulated.

2.3.1 Public Service Broadcasting

This study is concerned with the gaps between policy and regulatory practice. The regulatory process required to advance the television needs of children is therefore assessed to gauge whether current policy and regulatory frameworks are sufficient to deliver on the needs of the child audience. The role of the public broadcaster as a public service premised on the public interest must inform how children are particularly catered for as part of the 'public'.

The interests of all citizens must be catered for by a public service broadcaster. That 'interest' must also be as wide-ranging as possible, and challenges with issues of diversity and culture are aptly framed in the quote below:

> As media become increasingly global, their role in children's development of cultural identity is a topic of ongoing concern. Children use television as a window to their world as it expands from self to family to neighbourhood, to town to country and world – but they may be unaware when flaws in that glass distort or ignore their own history or culture. The problem is both domestic and international. Within many countries, children's television fails to represent adequately the diverse makeup of its audience. Worldwide, the flood of inexpensive programming that is designed for a global marketplace makes it difficult for an increasing number of countries to sustain their own production. (Second World Summit on Television for Children Report, 1998).

The concerns described in this quote can be closely linked to the general remit of the public broadcaster to deliver programming that is culturally significant and relevant to the domestic audience it must serve. General content offerings that are reflective of the diversity of the citizenry as well as its languages and cultures are values that public broadcasters must embrace. How they manage to do this and whether they are able to target all sectors of the public that they serve will always be an issue for debate.

The World Radio and Television Council states that:

> … neither commercial nor state controlled, public service broadcasting's only raison d'etre is public service. It is the public's broadcasting organisation, it speaks to everyone as a citizen. Public broadcasters encourage access to and participation in public life. They develop knowledge, broaden horizons and enable people to better understand themselves by better understanding the world and others. (WRTC 2000:7).

2.3.2 Programme Diversity

Garnham defines an ideal model of public service broadcasting as:

> a means of providing all citizens, whatever their wealth or geographical location, equal access to a wide range of high quality entertainment, information and education, and as a means of ensuring that the aim of the programme producer is the satisfaction of a range of audience tastes rather than only those tastes that show the largest profit (Garnham 1983: 13-14).

The features of this type of state-owned broadcasting have been listed as, universal access, promotion of national cultural identity, editorial independence, impartiality, *programme diversity* and accountability. (emphasis mine).

An online search for a generally accessed definition of public broadcasting was found on a Wikipedia webpage. It stated that there is no standard definition of what public broadcasting is exactly, although a number of official bodies have attempted to pick out the key characteristics. Public service broadcasters generally transmit programming that aims to improve society by informing viewers. In contrast, the aim of commercial outlets is to provide popular shows that attract an audience—therefore leading to higher prices when advertising is sold. For this reason, the ideals of public broadcasting are often incompatible with commercial goals. Of course, public broadcasters also strive to entertain their viewers, but they can still come across as being overly paternalistic in nature.

The Wikipedia webpage lists the following as major goals or characteristics of a public broadcaster (as prepared by the Broadcasting Research Unit): (1) Geographic universality — the stations' broadcasts are available nationwide, with no exception; (2) Catering for all interests and tastes — as exemplified by the British Broadcasting Corporations range of minority channels; (3) Catering for minorities — much as above, but including racial and linguistic minorities; (4) Concern for national identity and community. This essentially means that the stations should in the most part commission programmes from within the country, which may be more expensive than importing shows from abroad; (5) Detachment from vested interests and government. In other words, programming should be impartial, and the stations should not be subject to control by advertisers or government ;(6) One broadcasting system to be directly funded by the corpus of users — for example, a licence fee or member stations asking for donations; (7) Competition in good programming rather than numbers. Quality is the prime concern with a true public service broadcaster. Of course, in practice, ratings are rarely concerned with quality, although that may depend on one's definition of "quality" and (8) Guidelines to liberate programme makers and not restrict them. In the United Kingdom, guidelines, and not laws, govern what a programme maker can and cannot do (these guidelines can be backed up in case of infringements by hefty penalties).

2.3.2.1 Minorities and community

This working definition above, of public service broadcasting can be compared to Eric Barendt's (1999) six key features of public service broadcasting: (1) general geographical availability, (2) concern for national identity and culture, (3) independence from both the State and commercial interests, (4) impartiality of programmes, (5) range and variety of programmes and (6) substantial financing by a general charge on users.

These features and others are largely captured in the White Paper on the future of the BBC, produced by the United Kingdom government in 1994. The general principles were also adopted by the IBA in South Africa during its public inquiry in 1995 on the viability and sustainability of the public broadcaster.

McQuail (1994), argues that a different variety of social responsibility theory has been

applied by the many and varied institutional arrangements for licensing or monitoring the activities of broadcasting. He states that there has never been a generally accepted version of the theory of 'public service broadcasting', and the diversity of forms is now greater than ever before. In 1986 a government appointed committee in Britain (Peacock) endorsed a view of the 'public service idea' as involving eight principles:

1. geographic universality of provision and reception;
2. the aim of providing for all tastes and interests;
3. *catering for all minorities;* (emphasis mine)
4. *having concern for national identity and community;* (emphasis mine)
5. keeping broadcasting independent from government and vested interests;
6. having some element of direct funding by the public (not only from advertisers);
7. *encouraging competition in programmes and not just for audiences;* (emphasis mine)
8. and encouraging the freedom of broadcasters.

Whilst there are variations according to national priorities and traditions, the general notion is one that ties 'the public interest' to advance 'quality' of service and which usually deploys some notion of diversity and also of a national political or cultural interest. In summary the public service idea is universal service, diversity, editorial independence, social responsibility and accountability, cultural quality and identity and public financing and/or non-profit operation, McQuail (1994).

2.3.2.2 Balanced scheduling

Like the traditional form of regulating broadcasting elsewhere in Western Europe, South Africa in 1994 was charting its unique broadcasting regulatory framework in line with meeting public service objectives. Siune (1997:22), states that in most of Western Europe, it was required that broadcasters show public service responsibility, based upon four elements:

1. *a commitment to balanced scheduling* (emphasis mine),

2. broadcasting institutions as public bodies with financial independence from governmental and commercial sources,
3. the service should be provided to all in return for a basic payment usually in the form of a licence fee and
4. political content was obliged to be balanced and impartial.

She goes on to state that the newest version of the social responsibility attached to public service broadcasting does not have much to do with public service and is a far cry from the four criteria mentioned above. She adds that as noted by Syversten:

> the element of democracy and the focus on viewers as active citizens and knowledgeable participants is no longer the prime issue in the media political debate. Citizens are not the target group anymore only as consumers and public service is more than anything else to give the public what its wants (Syvertsen,1992).

Siune (1997) insists that commodification is the magic word and the goal is to find the majority of a potential audience, to get them to listen, to watch, to buy. She concludes by stating that redefining the concept of public service broadcasting has been one of the alarming issues of late, which has taken place almost without public discussion.

The public discussion on public broadcasting began in South Africa in 1994 during the IBA's public inquiry process. The SABC had proceeded to make several submissions to the IBA before a recommendation was put to Parliament on the way forward for the SABC in the new political dispensation. Almost 10 years later, in 2004 the SABC was provided with new licences for all its services. These came into effect in March 2006. Although a public process was conducted on the new licensing framework, the *general* public participation could not be regarded as fully inclusive.

2.3.3 Elements of public service broadcasting

The key elements or features of public broadcasting are discussed separately. The list

cannot be seen as exhaustive given that the definition of public broadcasting is not definitive. What is generally accepted is that public service broadcasting must be wide-ranging and offer a full spectrum of programmes. This usually includes news and current affairs, investigative programmes, discussions and debates, cultural programmes, entertainment and sport. The public service broadcaster would need to offer services in all languages of the country and provide both local and foreign content.

2.3.3.1 Programme Scheduling: a cultural force

The scheduling of programmes on the public broadcaster requires some analysis in considering whether content is adequately or correctly placed in a specific day-part for particular audience segments. According to Timothy Havens (2007), the scant research on scheduling to date has been conducted in affluent, self-sufficient markets such as the United States of America (USA), the United Kingdom (UK) and Australia. He argues that domestic, economic, regulatory, institutional and cultural forces influence scheduling practices in complex ways and that we need to comprehend this complexity more fully to understand the origins and consequences of current scheduling practices.

In his paper, "The hybrid grid: globalisation, cultural power and Hungarian television schedules", Havens (2007:222) refers to John Ellis (2000) who in providing an overview of scheduling practices develops the theory that the programme schedule is a sedimented document of the nation's television habits. Ellis (2000) identifies several scheduling grids, distinguished by duration, including yearly, seasonal, monthly, weekly, and daily schedules, which provide clues about who watches television when, and how television viewing fits in with other leisure pursuits. One of Ellis's (2000:36) overriding arguments is that *scheduling has a cultural force,* (emphasis mine) which has heretofore been largely ignored, and that this force is largely inward-looking and domestic.

He writes that ' Any imported show is imported into this context of scheduling and its cultural identity is significantly altered as a result'. Scheduling, in this view, operates as a fortress of authenticity against imported programming because industry lore about scheduling comes from observations of domestic market by domestic programmers.

Echoing Ellis's (2000) characterisation of the domestic character on the programme schedule, Stuart Cunningham and Elizabeth Jacka (1996:19) liken scheduling to a semiotic code, in which the 'time slot is the paradigmatic aspect [while]…the sequence of programme…flow is the syntagmatic element'.

Much like language differences, difference in the mix of programmes, the favoured genres, the way they are grouped into time slots and blocks continue to 'mark television service as local'. The strength of this insight is that it reminds us that television as a phenomenon refers not just to programmes, but to the varied and complex ways that television viewing fits in with other social activities and pastimes, as well as how those relationships have developed over time.

Prioritising appropriate scheduling of children's programmes has also been mooted and supported in the International Children's Television Charter (1995) and carried over into the Africa Charter on Broadcasting for Children (1996, 1997):

> Children's programmes should be aired in regular time slots at times when children are available to listen and view, and/or be distributed via other widely accessible media or technologies.

This is consistent with the regulations as developed by the IBA and ICASA, that broadcasters should schedule children's programming at times when children are available in substantial numbers to watch the programmes.

2.3.3.2 Geographic availability

The issue of geographic availability is linked to universality, which is for the public service to be accessible to every citizen throughout the country. In addition to this, it needs to provide programming that would appeal to the entire population. 'As well as being democratic, public broadcasting programming must be "popular" – in the sense that

the public forum it provides should not be restricted to a minority' (Article 19, 1999). The public service broadcaster must be available to every member of a society regardless of their remoteness and inaccessibility. It is stressed that reception of broadcast signal has become as much a household right as the delivery of mail and water (Barnett and Dochety,1986).

Mpofu (1995:7) argues that the principle of universality demands that a wide range of programmes should be broadcast so as to serve a diversity of public needs. He adds that in a mixed system where new delivery systems and inexpensive United States (US) imports are available to both public and private broadcasters, difficult choices are posed. He questions if in such a scenario the public service should compete with, or complement private broadcasters. In addressing this question, he states that a national broadcaster cannot aspire to the title of public broadcaster unless the tastes and interests of the whole population are adequately addressed. He adds that the legitimacy of the national broadcaster as a public service is severely threatened if it opts to compete and schedule predominantly mass entertainment programming. Mpofu (1995) argues that a public broadcaster cannot become obsessed with its audience share due to its commitment to focus on wider national priorities, serve minorities and whenever possible, to be innovative and challenging.

The World Radio and Television Council (2000) asserts that universality does not merely involve technical accessibility, but ensuring that everyone can understand and follow its programming. As well as democratic public service, broadcasting must be popular (not in the pejorative sense) in the sense that the public forum it provides should not be restricted to a minority.

2.3.3.3 National identity and culture

The concern with national identity and culture also forms the backdrop to any discussion on public broadcasting. It remains closely associated with public service broadcasting and is an explicit obligation in many countries. Public service broadcasters must access the widest possible audience whilst reflecting national concerns, interests, events and

cultures. It must reflect a broad cross section of the population.

Mendel (1999) argues that the key goal of public broadcasting is to provide quality broadcasting which meets the informational, cultural and educational needs of the population while respecting and promoting diversity. The traditional Reithan model to 'inform, entertain and educate' is taken to the next level as issues of diversity and quality emerge as core indicators of public service television.

Blumler (1992) suggests that collective identities are in turmoil throughout the world. In domestically produced television fiction, then, national audiences share not only diversion and amusement, but also depictions of their societies' characteristic role patterns, issue frames, social conflicts and moral dilemmas. Blumler (1992) adds that Europeans are still wedded to their historic national and regional identities, seen particularly under threat. This explains the need to strengthen the role of television 'as a social link inside a national community' (Wolton:1990) and European-wide acceptance of the proposition that 'a country ought to produce from its own resources as high a proportion of the materials shown on its television services as possible' (Pragnell, 1985:14).

In the European Union steps have been taken to defend the value of cultural identity. These have been in the form of licence conditions to promote and strengthen the national language, creation of service for national regions with distinctive cultures and tongues, and quotas requiring both public and private channels to screen set portions of domestically produced programming.

In most European countries, the public television systems were imbued with a cultural vocation. Rowland and Tracey explain: …'[In Europe]..broadcasting was originally seen principally as a cultural enterprise … broadcasting organisations were taken to be part of the sector of society which is responsible for generation and disseminating its linguistic, spiritual, aesthetic and ethnic wealth' (1988:6-7).

Similarly, broadcasters in South Africa have local content and language obligations as

well as obligations to promote cultural and national identities. The following quote by Buonanno (1991) is instructive:

> Television tells stories, drawing on and expanding…ancient traditions which have their roots in myth. There is a greater hunger for stories, and the tales told on television satisfy a deep need, the pleasure of listening, of letting oneself be carried away (in a 'suspension of disbelief') by the flow of the story; but at the same time, these stories are about *us*, or rather about society and culture they spring from…[Such] fiction [is] very useful for understanding and deciphering values, expectations, attitudes, dreams and fears, ways of seeing the world, which at any one time go to make up the cultural identity of a society.

The basic story-telling element of television cannot be overlooked as South Africa begins to grapple with notions of African story-telling and particularly story-telling to young children as a cultural activity.

2.3.3.4 Independence

Independence is a central public interest principle which ensures editorial freedom and limits the influence of advertising on content, particularly, on public broadcasting services. Its importance is further stressed in the inclusion of a Code of Conduct for broadcasters and a complaints mechanism. Furthermore, in a vibrant democracy diversity of opinion is intimately related to the principle of independence. Public broadcasters should not be expected to compete for the same funds in the same way as a private/commercial sector broadcaster does – (this is precisely the scenario we face in South Africa). Mendel (1999) adds that independence from commercial interests has always been an important justification for public service broadcasting. Mendel (1999) posits that although many public service broadcasters now operate on a blend of public and commercial funding, relying entirely on private funding would clearly undermine the ability of such broadcasters to promote pluralism and other goals noted above. In particular, commercial dependency would inevitably lead to popularity tests rather than

making such decisions in the public interest.

It is further submitted by Mendel (1999) that the need for independence from the state flows directly from the guarantee of freedom of expression. It may be noted that independence as freedom from commercial pressures necessarily leads to dependence on public funding with the attendant risk of state interference.

Mpofu (1995:10) argues that public broadcasting has to be defined in terms of a commitment to a set of principles rather than in terms of the ownership or financing of broadcasting bodies. The ethic, he states, should not be confined to national broadcasters or state corporations. He adds that through various legislative and regulatory frameworks it should guide privately owned stations and channels as well. He cautions that such philosophies acknowledge that the legitimate objective of all private enterprise is to earn profits. However, as Barnett and Docherty (1986) observe, when applied to the ownership of TV stations, such a single -minded objective has consequences for the whole country's broadcasting system.

The impact that funding has on the public broadcaster's ability to meet the 'principles' that Mpofu (1995) argues for is questionable. The critical political economy theory provides a basis for negating a simple departure from a funding model to a reliance on 'values' or 'principles' to deliver public service programming.

2.3.3.5 Impartiality

This could be linked to retaining a distance from vested interests. Any definition of public service broadcasting must be underscored by the need for independence from the paymaster whoever that may be. According to Tomaselli (1995), the success of the claim to political independence depends on:

- the willingness of politicians to abstain from interfering with the day-to-day running of the broadcaster;
- the ability of broadcasters to resist political interference by remaining in control of the reporting and analysis of news and current affairs, and

- public confidence: the acceptance by both pressure groups and the 'general public' that the broadcasting service is indeed independent.

It cannot be assumed that the independently funded public broadcaster is protected from political interference. The credibility of a public broadcaster should not be linked to its funding model alone. The editorial independence and ability to be wholly independent from both the state and commercial pressures is what should be considered. In some instances the public service broadcaster can become captured by the market where advertisers could in fact to be a greater threat than any politician or political party.

2.3.3.6 Diversity - Range and variety of content

Another feature of public service broadcasting is that it should provide a variety of programmes, including shows of an educational and informative nature. In this, public broadcasters may be contrasted with a number of private/commercial channels in a range of countries which are oriented almost entirely towards low-cost options such as films and game shows. The obligation of diversity in programming derives from the public's right to know and serves to ensure that the public has access to information about a wide variety of issues and concerns. The German constitutional court, for example, has held that *variety* is a constitutional obligation for public service broadcasters.

The World Radio and Television Council (2000:10) suggest that programming should be diversified in at least three ways: in terms of the genres, the audiences targeted, and the subjects discussed. They add that diversity and universality are complementary in that producing programmes intended sometimes for youth, for older people, and for other groups means that public broadcasting appeals to all.

Wolfgang Hoffman-Reim (1992), distinguished between at least five dimensions of diversity: (1) substantive, opinion- oriented diversity in programming; (2) individual-and group-oriented diversity, providing important societal forces and groups with opportunities to express themselves; (3) issue-oriented diversity, i.e. covering a sufficiently broad spectrum of issues in programmes; (4) territorial diversity i.e. coverage

of views and news from the various regions, local and supra-national areas and (5) format diversity, that is, a balanced provision across the various programme categories, particularly information, entertainment, education and advice (Hoffmann-Riem, 1989a: 492-3). Hoffman-Reim (1992) adds that the legislature is provided with discretion in regulating diversity and need not protect all of the above dimensions to the same degree.

It must however, provide stronger guarantees for public broadcasting than for private broadcasting, although a minimum amount of opinion and issue-oriented diversity is also required from the latter. He goes further to say that in public broadcasting, diversity of opinion is particularly ensured by the requirement that in each channel the responsible broadcaster should provide all socially relevant forces and groups with and opportunity to articulate their positions, that is, to offer an internally pluralistic programming menu.

Blumler (1992) is of the opinion that pluralism of many kinds – regional, linguistic, political, cultural and in taste levels – was a hallmark of public service broadcasting organisation and programming throughout Western Europe. He goes on to say that if society is diverse in composition, it follows that each of its sectors should be able to find material in the schedules reflective of its interests and with which it can identify. Furthermore, that individual audience members, differing in tastes and concerns, should also have a wide range of selection and choice, while the chance of coming into contact with the interests and ways of life of others should encourage the understanding and tolerance on which democracy depends.

The concept of diversity is captured by Napoli (2001) who claims that the idea of diversity is the most elusive but ultimately the most critical component of diversity. *Exposure diversity* is the third critical link. Napoli (2001) claims that despite its importance, exposure diversity is the most neglected diversity dimension. The diversity of content *received* is central to this notion. Napoli explains that analyses of exposure diversity seek to answer questions such as: how many different sources are audiences exposed to in their information consumption? Are audiences exposing themselves to a wide range of political and social views? *Are they consuming diverse types and formats of programming?* (emphasis mine) What factors affect the levels of exposure diversity

among audiences?

Napoli expostulates that implicit within this concept is the assumption that audiences – who are provided with a diversity of content in fact consume a diversity of content.

Media policy theorist Einstein (2004) adopts a comparative approach. She argues that, despite the fact that diversity is a notoriously difficult concept to define, policy makers have "coalesced around [the terms] source diversity, outlet diversity and content diversity". According to Einstein (2004:8), *source diversity* has two components – *diversity in terms of the actual number of people creating programmes, and diversity in the types of people who produce that programming.* (emphasis mine) She claims that *outlet diversity* (emphasis mine) is about increasing the number of channels through which information is distributed to the public. Content diversity, she claims, refers to increasing the variety of programming and points of view.

The actual numbers of people creating content for South African audiences as well as their residing in various parts of the country to ensure a diversity of voice and opinion, was to be addressed in regulations (ICASA, 2002) on independent production. The current requirement is for 40% of all content to be produced independently of the broadcaster as well as for these producers to be ideally provincially or regionally based.

2.3.3.7 Funding

There is usually a general charge that users pay for a television licence. It has been argued that the issue of universality of payment was rooted in the thinking that as everyone is capable of receiving the national public broadcaster, everyone should pay for it. To some, the issue of public funding is seen as fundamental to the maintenance and survival of the public broadcaster. However, there has been a re-evaluation of the principle as to whether regardless of the individual using the public service, as citizens they should still pay for the service through licence fees or other mechanisms of raising public finance. A radical principle of consumer sovereignty has caused even the BBC to move to a subscription system. In multi-channel environments with access to more

commercial services, the issue of paying a licence fee becomes questionable. Traditionally however, the licence fee has been linked to the ownership of receivers, and has been the historical form of financing the public service.

2.3.3.8 Quality programming

The issue of *quality programming* must also be considered as a principle to be upheld by a public service broadcaster. The notion of 'quality' is subjective, as what might be a quality production for one person might simply be mediocre for another. Mpofu's (1995:16) view on the issue is worth considering:

> Broadcasting should be structured so as to encourage competition in good programming rather than competition for numbers. No theorist has been adequately able to define the notion of 'quality' as an objective characteristic.
>
> What should be reflected in this principle is a commitment to diversity of source and provision of opportunity for subject location in the viewing experience. Programmes which can be seen to cohere with the ethical commitments of public service philosophy should be seen as imbued with quality. Notions of 'high' and 'low' culture with corresponding 'quality' values are not appropriate (Mpofu:1995).

Lady Warnock, a former member of the Independent Broadcasting Authority in the United Kingdom defined a 'quality programme' in terms of its 'depth-giving and fascinating' aspect with the 'effect of making [the viewer] feel that horizons are being opened as there is more to be discovered because his imagination and that of the programme-maker are working *together*' (1990:16). Blumler submits that such aspirations were also linked to notions of programme range. He adds that the concept of quality in television has 'multiple meanings' (Ishikawa and Muramatsu, 1991:209). This follows from the fact that quality is best understood as 'a relation between sets of [programme] characteristics and sets of [assessment] values', which cannot be reduced to

some single criterion (Rosengren etc al 1991:50). What matters for good broadcasting arrangements, Blumler adds (1992:31), is not that some particular criterion of quality should prevail over all others but (a) that the system as a whole should regard the pursuit and evaluation of programme quality as a priority goal and (b) that a wide- ranging spectrum of the several types of excellence to which programme makers could aspire should be encouraged.

In the UK the Independent Television Commission (ITC) that succeeded the former Independent Broadcasting Authority, took the quality threshold seriously and in acknowledging that they could not reduce a quality programme into a single formula, they included 'special once-off character' programmes of 'marked creative imagination' or programmes of 'exceptionally high production standards' (Hearst,1992:72). The British political system concentrated on programme 'diversity' and 'quality' as the core vulnerable values that they considered would need protection in the television system of the 1990's.

The principle of diversity is entrenched in the South African broadcasting system, whilst the 'quality' debate has not resulted in an official policy or regulatory announcement or ruling, nor does it seem likely to occur.

The globalisation of media and the threat to national cultural sovereignty that countries throughput the world are experiencing shows an overriding public interest in that of nurturing a sense of nationhood. 'More than any other broadcaster, the public broadcaster must be national in content. Public broadcasters must first promote the expression of ideas, opinions and values current in the society where they operate'. However there is need to guard against identifying quality with national content as they are not always synonymous - World Radio and Television Council (2000:16). As discussed earlier, 'quality' programming cannot be easily defined. What the World Radio and Television Council put forward is that national content is not equal to or necessarily 'quality' content.

2.3.3.9 Minority interests

There has been a groundswell of local and international debate on the role that broadcasting and in particular public broadcasting must play in solidifying national identity whilst embracing diversity. The many conflicts in parts of Africa, Asia and the Middle East have arguably found root due to intolerance of different race groups, religions, ethnic minorities and xenophobic tendencies.

A key area of concern raised by Mpofu (1995:15) is *minority interests*. He opines that minorities should not only be classified in terms of race, but also in terms of gender, language and socio-economic status. He adds that the conceptualisation of what constitutes minorities in South Africa is different from the European and American situation. In South Africa some racial minorities wield a disproportionate amount of economic power and their languages occupy privileged positions. Consequently, in relation to the South African context, the protection of 'minorities' should not merely be necessitated by numeric disadvantage, but rather disadvantage according to analysis of social power relations.

The World Radio and Television Council (2000:11) states that the public service broadcaster must be distinctive from other services, and that it is not merely a matter of producing the type of programmes that other services are not interested in, aiming at audiences neglected by others, or dealing with subjects ignored by others. It is a matter of doing things differently, without excluding any genre. This principle must lead public broadcasters to innovate, create new slots, new genres and set the pace for other broadcasters.

Mpofu (1995:7) explores the public broadcasting service ideal as argued by Scannel and concluded that the democratic thrust of broadcasting should lie in its accessibility to virtually the whole spectrum of public life. By placing political, religious, civic, cultural events and entertainments in a common domain, access to public life is equalised. As they come into contact with one another in common national broadcast channels, what

were previously discrete and self-contained 'nationalities' take on new meanings and connections.

Public Service Broadcasting is described succinctly, by Jonathan Powell and quoted by Keane (1991) as follows:

> the broad commitment to provide and to protect mixed and complementary programming schedules. It includes a commitment to certain minority programmes and to covering, as far as possible, different genres of programme making. Public service broadcasting is driven by higher aspirations than solely to provide entertainment. Public service broadcasting is an attempt to make quality popular programmes. It does justice to human experience. It deals with more than stereotypes. It adds quality to people's lives. Its programme genres reflect the complexity of human beings (Keane 1991:117).

2.4 Television programming for Children

Programme policies and regulation might vary from country to country, but in the sphere of public service broadcasting, content for children would need to be in keeping with the principles and objectives of the public broadcaster.

Buckingham (1998:164) views the definition of what it means to be a child as an ongoing process, which is subject to a considerable amount of social and historical variation. This can be taken in the same way in the South African context as the 'child' was initially defined in television regulation as 15 year olds, and later brought down to 12 year olds.

Buckingham goes on to say that the construction of the 'child' is both a negative and a positive enterprise: it involves attempts to restrict children's access to knowledge about aspects of adult life (notably, sex and violence) and yet it also entails a kind of pedagogy – an attempt to 'do them good' as well as protect them from harm. He argues that the central tenet of public service provision for children is the pedagogical motivation.

However, he adds that more recently the increased 'commercialisation' of children's television and the apparent retreat from the public service tradition have generated a growing body of research and debate.

He states that there has been concern about the decline in factual programming for children and the extent to which production is increasingly tied in with merchandising, yet there have also been calls for a more positive account of 'consumption' and a more thoroughgoing discussion of what is meant by 'quality'. The other challenging questions are about 'taste cultures' of children, and the ways in which their specific needs as an audience are to be defined.

2.4.1 Children's programming range: no different to adults

The range and diversity of content available to children must be as interesting and varied as programming offered to adult audiences. Kunkel (1993:273) challenges us to imagine what a different experience television would be for adults if the only programmes offered were situation comedies and action-adventure shows. No evening news, no *'60 minutes'* (American investigative journalism programme), no music, culture, or drama – only endless episodes built around laugh tracks and good-versus-evil fantasy themes. He argues that in such a world, television would no doubt be criticised for a lack of diversity and an overall failure to realise its full potential. He claims that this characterisation encompasses most of children's programming aired on commercial television in the United States (US), and so suffers from a serious lack of diversity.

The picture in South Africa cannot be wholly compared to this US model as presented by Kunkel (1998). However, what Kunkel does is present the very issues that this study is concerned with, i.e. investigating the gaps in children's programming. Furthermore, Kunkel (1998) provides the warning signs of what might be imminent in the South African context if no mechanisms are put in place to promote diversity in programming.

Kunkel (1998:275) also points out that serious drama programmes for children, news or information, series to stimulate children's curiosity about science, or the arts are simply

not available. Whilst a range of programmes like these might be available across the three SABC channels, this study seeks to focus more closely on the link between the policy and practice of providing such programmes.

The World Radio and Television Council (2000:11) assert that the principles of public broadcasting : universality, diversity and independence remain today, like yesterday, essential goals for public broadcasting. To these three principles must be added a fourth, particularly important when the public broadcaster exists side by side with commercial broadcasting, that is - distinctiveness.

2.4.2 Children's Programming values

Blumler (1992) argues that the disparity between public and commercial provision is probably nowhere so dramatic and stark as in children's programming. He states that public broadcasters throughout the world have aimed to provide a goodly amount of educative fare, intended to inform, stimulate and broaden the horizons of children. Private broadcasters concentrated instead on cartoon programmes, featuring robots, animated and stuffed animals, dolls and a range of animated adventure characters, including space fantasy heroes. It is also observed by Kunkel (1993) that the USA's crass commercialism has been blatant in this area with the screening of massive amounts of advertising in and around children's programmes, commercials delivered by programme presenters, and close ties between leading programme characters and toys on sale in shops.

Blumler (1992) sums up European recognition of children as potentially vulnerable viewers in terms of three related values:

1. respect for their developing educative needs,
2. fairness in the sense of not exposing them to sophisticated advertising messages before they have developed a protective awareness of persuasion and,
3. avoidance of exposure to overly adult fare.

To address the first of these concerns Europeans are likely to depend mainly on a continuing *commitment of their public broadcasters to educative programming for children* (emphasis mine), though in Britain, the 1990 Act requires commercial licence holders to give a 'sufficient amount of time' to 'programmes intended for children'. As to the second, several countries have banned advertising before, during and following children's programmes (for example Italy) and promulgated rules intended to restrict programming produced primarily to promote toys (though according to Blumler (1992) 'much vigilance and monitoring by parents' and consumer bodies may be needed to keep regulators on their toes in this difficult area to police'). On the third concern, Blumler (1992) suggests that so-called 'watershed' scheduling times apply to most European societies – that is certain specified times before which broadcasters should presume that children would be in the audience and should not therefore be inadvertently exposed to more adult portrayals.

In the past couple of years there has been concerted efforts made locally by the Film and Publications Board as well as broadcasting complaints bodies to create public awareness of television programming that is not suitable for children due to its violence and/or pornographic content. British academic, Buckingham is an expert in the field of children and media, and observes as follows:

> The relationship between children and television is a topic that provokes a considerable anxiety for many people. Television is held to be the root of most, if not all, evil among the young. It destroys the imagination, provokes delinquency and violence, undermines family life, and is the primary source of sexism, racism, consumerism and any other obnoxious ideology one might care to name – I have encountered these concerns in many areas of my work and leisure (1993:134).

These concerns as expressed by Buckingham (1993) are the kinds of concerns often presented to regulatory agencies in many countries. Regulators are expected to develop rules to address issues as varied as gender stereotyping, restricting and even banning

advertising to children, creating educational content that stimulates the imagination and even to develop regulations that promote 'morally' good programmes.

2.4.3 Educated, informed and entertained

Franklin, Rufkin and Pascual (2001:508) from the United States, work in the public broadcasting sector and observe the following:

> Our society's ambivalence about declaring what is good and healthy for children's development is so unsettled that we have no mandate for what our young, in particular our preschoolers, truly need from television…there are perpetual challenges to public broadcasting and to any non-commercial producer who tries to create programmes to meet children's developmental needs. By that we simply mean that, as it entertains, TV should educate and complement what parents are trying to teach their children about getting along in the world, especially when the average child spends 3 to 4 hours a day viewing rather than doing.

In the US, Fred Rogers launched a series in 1954 that became known as *Mister Rogers' Neighbourhood.* Reinforced by his training in child development, he created a model for what public broadcasting services children's programming still aspires to be – half an hour or so of quality entertainment that respects and enriches the world of the child, intellectually, emotionally, and socially. His advice to parents on guiding a child's viewing has never varied: would you want your child to emulate the characters he or she meets on TV? Do the programmes that your child watches reflect your values? (Pascual,1999).

In the US, defining and producing what is 'healthiest for children' has been an evolutionary process for public television. After writing a 1966 report for the Carnegie Corporation on television's potential to educate preschoolers, Joan Granz Cooney formed the Children's Television Workshop (CTW) along with Harvard Professor Geral Lesser and others. CTW married research on children's television with new production

sensibilities. In 1995, reflecting on *Sesame Street*, Cooney wrote:

> "I wanted our new children's programme to use the short segments and multiple formats that made *Laugh In* so entertaining and the most popular show on television at the time. Because I knew that children paid attention to TV, I wanted to use 'commercials' to teach letters and numbers, I wanted to see a multiracial cast and both sexes on the show – no one star….. CTW was positioned to give new form to public broadcasting service's mission of providing enriching, educational programming" (Cooney,1995: 511).

CTW has become a global phenomenon as it has co-produced in a host of countries in many languages. South Africa has partnered with this global model as well in the creation of *Takalani Sesame* made specifically for pre-schoolers. The programme's success depends on the ensemble of all characters and there is no 'one star' as initially conceived by its creators. It is a commonly held view that children's programming must follow the principles of public service – to educate, entertain and inform. The primary focus has also been on pre-school or early childhood development, especially in countries where broadcasting is used to enhance and or supplement the formal education system.

2.5 Charters as Guidelines in the absence of policy

A global focus on children's television was initiated in 1995 at the first World Summit on Television for Children. Three world summits have been held since 1995 and the 5th Summit is planned to take place in South Africa in 2007.

The International Children's Television Charter Drafted at the World Summit on Children and Television (Melbourne 1995), set the tone and principles to guide broadcasters, producers and policy makers. The International Television Charter as well as the Africa Charter on Broadcasting for Children (Ghana 1997) has been widely used in setting the backdrop for policy development. In fact some of the principles and actual drafted clauses have been lifted verbatim in the South African policy and regulations.

(see Appendix 1 and 2 for full text of Charters).

In jurisdictions that do not have specific regulation around children's content, the Charter process that began in 1995 has been used as a guideline/framework for children's programming. (Brazil, 4th World Summit, 2004).

Lisosky (2004) in her article 'For *all* Kids Sakes', states that policy discussions have focused on whether government itself should be responsible for setting standards for children's television or whether the industry should take control. Additional debates have centred on whether the marketplace or children's television advocates should set the guidelines for the programming.

2.6 Policy and Regulation – to what end?

It is widely accepted that children need to be protected and at the same time provided with programming that caters to their educative and entertainment needs. According to Hoffmann-Reim measures to protect vulnerable values require two types of regulation, one model works with command and control regulation. Here direct attempts are made to steer the conduct of broadcasters, including the content of their programming through particular requirements, orders and prohibitions, with violations being negatively sanctioned. The other regulatory model sets up a structural framework, such as the basic economic structure or rules specifying a pluralistic organisational structure and is expected to influence conduct directly (Hoffmann-Riem, 1990: 16-23).

The South African regulatory model presents both options as in the case of content regulation in which clear programming quotas and requirements are set for each broadcaster. South Africa has a three tier broadcasting system (community, commercial and public). The community tier is confined to a target community with limited geographic reach. What follows is that community services have limited revenue streams based on their locality i.e. not being national services. The commercial/private services are able to reach larger audiences but are generally located within urban cities. The public tier of broadcasting is the only tier allowed to have a national footprint. The SABC

therefore reaches the largest number of South African citizens.

The funding structure of each tier of broadcasting is also regulated. Community services are required to source funding from donor agencies, sponsorships, advertising and the community it serves. Commercial services are wholly funded by advertising revenue. Subscription services are funded primarily though subscription fees, and limited advertising. The public broadcaster on the other hand enjoys a mixture of government funding, licence fees, and largely advertising revenue.

Cuilenburg and McQuail (2003) propose that the concept of 'access to communications' applies to structure, content and audiences and it can be defined as the possibility to share society's communications resources, to participate in the market of distribution services and in the market of content and communication services, both as senders and receivers. According to Feintnuck (1999:199) the fundamental, democratic principle that justifies or legitimates media regulation [is] the objective of ensuring that a diverse, high-quality range of media are made available to all citizens in the interests of avoiding social 'exclusion'. Access has to be understood in terms of both being able to receive and to send.

An underpinning rationale for regulation and policy intervention has been based on a frequency scarcity principle. This requires some reconsideration in the context of South Africa's digital switch-over preparation. In a digitalised environment many have argued that the scarcity debate is no longer relevant. However, the need to regulate content will become more relevant in an environment where many more channels fragment audiences and the concerns of national identity and South African languages and local content are seemingly threatened.

2.7 Conclusion

Political economy of the media is interested in determining the appropriate scope of public intervention (policy) and is therefore inevitably involved in evaluating competing policies. It is concerned with changing the world as well as analysing it. Classical

political economists start with the assumption that public intervention ought to be minimised and market forces given the widest possible freedom of operation.

Critical political economists on the other hand, point to the distortions and inequalities of market systems and argue that these deficiencies can only be rectified by public intervention, though they disagree on the forms that this should take. Political economists also link the constitution on good society to the extension of citizenship rights.

In defining public service broadcasting, several theorists provide the features and characteristics of what the public service broadcaster should deliver. These range from the World Radio and Television Council (2000) to Barendt's (1999) six key features of public service broadcasting namely, (1) general geographical availability, (2) concern for national identity and culture, (3) independence from both the state and commercial interests, (4) impartiality of programmes, (5) range and variety of programmes; and (6) substantial financing by a general charge on users. It explores Siune's (1997) added element on a commitment to balanced scheduling, and McQuail's (1994) discussion of the aims that include the provision for all tastes and interests, catering for all minorities and having concern for national identity and community. A working definition sourced from Wikipedia reminds us that *competition* in good programming rather than numbers and *quality* is also the prime concern with a true public service broadcaster. Whilst Napoli (2001) claims that the diversity of content *received* is central to notions of diversity, and poses the critical question -are children consuming diverse types and formats of programming?

In focusing on television programming policy for children, Blumler (1992) argues that public broadcasters throughout the world have aimed to provide a goodly amount of educative fare, intended to inform, stimulate and broaden the horizons of children. The values of programming for children as well as its place within a full spectrum public service must be rooted in the general approach to programming for children.

For children's programming to be guaranteed, Hutchinson (1999) considers regulatory bodies as an important part of the democratic policy making landscape. However, the

structure and independence of these bodies influence how they ultimately shape broadcasting policy and regulation. The ‘actors’ that participate in the policy making process are therefore as important as the regulator itself. The regulator is required to be an ‘independent’ institution and is no doubt always under review and scrutiny.

The chapters that follow consider these theories and approaches in the development of a policy recommendation on television programming for children on the public broadcaster.

Chapter Three

Methods

"Policy research is directed towards the future..." (Bertrand and Hughes: 2005).
The aim of the research is to critique television programming for children on the public broadcaster's television channels and to identify the gaps from both a policy and practice perspective with a view to suggesting new policy directions.

The study took a triangulated approach by using several methods in a complementary manner. This study makes use of a contribution of document analysis and in-depth/ qualitative interviews. The documents analysed include those emanating from the policy and regulatory process as well as the programme schedules of the public broadcaster over the last three years.

This chapter explores the relevant research methods available for developing a policy recommendation on television for children in South Africa. The thesis is located within cultural media and communication studies. This area of work is relatively new and there is currently no comprehensive analysis or assessment of television produced specifically for South African children pre-1994. In fact, children under the age of 16 have not been consistently or specifically measured as an audience by the South African Audience Research Foundation (SAARF).

3.1 Qualitative research

Lull (1990) states that qualitative researchers typically focus on the subtleties and nuances of communication processes or the details of particular subgroups.

> The primary objective of qualitative empirical research, therefore, is not to assure that analytical accounts produced about certain families, peer groups, or subcultures can readily be generalised to other groups or

> settings (indeed, they often cannot be), but to explain well the phenomena, subjects, and contexts at hand (Lull:1990).

He adds that the concern is with situation, social action and theoretical representative-ness, not with lawful behaviour or statistical representative-ness. Similarly, Trochim (2003) in his overview in 'Qualitative Measures', states that qualitative research has special value for investigating complex and sensitive issues. It is worth reproducing in full his comment to elucidate this,

> For example, if you are interested in how people view topics like God and religion, human sexuality, the death penalty, gun control, and so on, my guess is that you would be hard-pressed to develop a quantitative methodology that would do anything more than summarize a few key positions on these issues. While this does have its place (and it's done all the time), if you really want to try to achieve a deep understanding of how people think about these topics, some type of in-depth interviewing is probably called for. (Trochim:2003).

A quick web-search on Wikipedia (http://wikipedia.org) states that qualitative research is one of the two major approaches to research methodology in social sciences. Qualitative research involves an in-depth understanding of human behaviour and the reasons that govern human behaviour. Unlike quantitative research, qualitative research relies on reasons behind various aspects of behaviour. Simply put, it investigates the *why* and *how* of decision making, as compared to *what, where,* and *when* of quantitative research. Hence, the need is for smaller but focused samples rather than large and random samples.

The qualitative analysis in this study required input from smaller and focused samples. For this study the interviews were with 'actors' or stakeholders that contributed to the development of children's television content. Some of these social actors have been at the forefront of policy development whilst others are to comply with the net result of policy in the form of regulation and license obligations. Then there are those who have influenced, (by means of lobbying or otherwise), the shape of children's television in South Africa today. Because the 'actors' involved are required to comment on the gaps (if

any) in the current offerings of content for children, they present a level of subjectivity and critique. It is this critique that begins to answer the research question of whether or not there is a policy and/or practice concern or vacuum.

Qualitative researchers are concerned with the meanings people have constructed i.e. how they make sense of their world and their experiences of it (Merriam, 1998:6). The product of a qualitative study is 'richly descriptive' as Merriam clarifies (1998:8) 'words and pictures rather than numbers are used to convey what the researcher has learnt about a phenomenon'.

The formulation of policy and regulation is usually the culmination of a range of stakeholder inputs and presentations. It could therefore be argued that a qualitative research framework is applicable in policy formulation and hence its appropriateness for this study.

3.2 Records and Documentation

Records and documentation produced by the South African legislature are key to presenting the context for this study. Both primary and secondary documentation was analysed, with primary sources being the documents of policy makers and the regulator. The secondary documentation was sourced from the global movement for quality television for children as initiated in Australia with the First World Summit on Children's Television in 1995 and the subsequent World summits held across the globe.

The advantages of using documents produced within the institution being studied are suggested as follows by Bertrand and Hughes (2005):

- it 'documents particular moment, thus allowing a researcher to follow changes in policy and practice,
- it is written in the institution's professional language, which may well be part of what the researcher is studying and
- it is relatively permanent, so can be consulted repeatedly.

The disadvantages noted are:

- documentation may be difficult to track down, if the record keeping processes within the institution have been flawed, or if documentation has been culled over time, and
- if it is incomplete (which is more likely as you move back in time), skews may be occurring which the researcher may not even know about

The study draws on the annual reports of the Independent Communications Authority of South Africa (ICASA) and the South African Broadcasting Corporation (SABC), policy papers, regulations, discussion documents and SABC licence conditions. These are all institutional documents that are available at the ICASA library and in part on the ICASA website. Information is also available on the SABC's website and in their brochures and annual reports. Policy positions from international regulators were also accessed.

The organisations from which institutional documentation were sourced are all obliged to keep records in line with open access policies as well as government policies and procedures. In addition, the case in South Africa was to follow a public consultative process in drawing up policy positions and regulation.

Additional print media was also sourced. These included trade magazines, journals and print media articles. The study did not rely on any private documents given that the thesis is about public policy formulation. The first source for documentation are libraries and secondly, audiovisual archives. This places reliance on access to the public broadcaster's archives and audio-visual records. Audio-visual archives provide materials for many different kinds of research. A record of children's programming on the public broadcaster over the 2005/6 financial years was sourced directly from the SABC in the form of programme schedules. Schedules printed in newspapers and television guides were also accessed.

3.3 Oral sources and interviews

The study also used oral sources. The forms of oral research are structured and unstructured interviewing, common in sociological research. According to Bertrand and Hughes (2005), the institutional research, personal testimony has the following advantages:

- adds a human dimension to the written records - what appears on the written record may in fact have been fiercely debated,
- allows people at all levels within an institution to have a voice, not just those decision makers whose names appear on the written record, and
- allows people to speak for themselves, and to reflect at leisure and with hindsight on their actions and decisions.

The new licence conditions issued to the public broadcaster on children's content on radio is an example of how a policy objective has to be phased-in over time as it cannot immediately be realized. To comply with the condition the SABC would have to adjust its schedule as well as develop new radio content. Interviews with the public broadcaster and the regulator would no doubt provide the context and rationale for this phased-in approach.

The disadvantages however, are that the research may be skewed by the selection of the people interviewed. This can occur, perhaps without the researcher being aware of it, because of the availability of people to give testimony, which is often serendipitous – those who have survived, and who are still living close enough to be interviewed. It is easy to forget that the interview transcripts should be read as texts, interpreted rather than taken at face value as expressions of truth.

Interviews with key stakeholders are necessary as the development of policy depends on the input of a range of respondents. Just as the regulator would call for comment on a discussion document, so too would the interviews serve as a test of assumptions and critique the status quo of television for children on the public broadcaster. A challenge is

always the possible un-availability of individuals identified, resulting in either re-scheduling or not interviewing at all.

According to Wiess, there are a number of important reasons to conduct qualitative interviews –these include: to develop detailed description, to integrate multiple perspectives, and to bridge inter-subjectivities. Weiss adds that interviews are the perfect tool with which to 'learn as much as we can about an event or development that we weren't there to see'. Qualitative interviews also make it possible for readers to 'grasp a situation from the inside, as a participant might' (Weiss,1994:10).

The interviews allow respondents to submit their own views on the policy or practice 'gaps' and make suggestions on television for children. A copy of the interview guide and interview schedule is marked as Appendix 3.

As this thesis is intended to develop a policy framework, it has to engage the relevant stakeholders to gauge what remains to be done and whether or not a policy is in fact necessary.

Any policy process requires broad consultation. Public consultation and debate has occurred around local content as well as public service programming. The re-licensing of the public broadcaster toward the end of 2004 with the licence conditions becoming effective in March 2006, was a result of such broad consultation.

The 'actors' in media policy making are traditionally politicians (the executive – President and cabinet), civil servants (public employees who are professionals and partisan civil servants), experts and consultants, parliament (ruling party), regulators, the media sector/industry (owners), civil society (organized interest groups and lobby groups and the public. Identifying key people in these categories informed the interviewing process undertaken for this thesis.

3.3.1 Interviews - ‘actors’ in media policy making

The selection of interviewees for this study was based on this wide cross-section of stakeholders who influence policy outcomes and are regarded as the ‘actors’ in media policy development.

3.3.1.1 Department of Communication: civil servants

As the policy maker, the Department of Communication has created a directorate focusing on gender, children and disability. Its policy objectives set for children were explored and assessed to gauge whether the current policy environment has produced the desired outcomes.

3.3.1.2 ICASA : regulator

The regulator re-licensed the SABC in 2004. This followed a public process and focused on the public service remit to provide programmes for all sectors of society – including children. The separation of SABC 3 as the commercial wing of the pubic broadcaster meant that the children’s quota be set in accordance with the regulations for local content applicable to a commercial broadcaster. The policy objectives and whether those were met was considered.

3.3.1.3 The public broadcaster (SABC) : industry

It is imperative that the SABC as subject of this study was interviewed. Key personnel in the children’s television division were identified. The aim was o gain a better understanding of the policies underpinning the content decisions as well as challenges facing the SABC in delivering television to children. It was also intended to extract any perceived gaps in the existing policy position. Current employees working in the children’s television unit and regulatory division of the SABC as well as the former head of SABC education were identified for interviews.

3.3.1.4 Former Head of SABC Education : expert

As an expert in the field of television for children, the former head of the SABC's Education Division and also formerly policy specialist at the Independent Broadcasting Authority prior to joining the SABC was sourced for an interview. As the only person able to provide first hand experience from both a policy and practice point of view, Ms. Nicola Galombik was approached.

3.3.1.5 Media Monitoring Project (MMP) : civil society

The MMP have released several reports about children and the media, for example: *A Resource Kit for Journalists*: Children's Media Mentoring Project (2005) and *What Children Want* (2005). Their research was conducted as part of the MMP's submission to the draft licence conditions of the SABC. The MMP has also conducted a unique project, *Empowering Children and Media* which monitored the representation of children's rights in the South African news media. The project was done with the participation of children themselves as monitors of the media. As the only non government entity monitoring the media since 1993, the MMP's insights into policy priorities for children's television was be canvassed. This interview was also be part of the secondary research and not core to the study, though relevant from the perspective of a lobby group having made a submission on the SABC's licence conditions on children's programming.

3.3.1.6 Children and Broadcasting Foundation for Africa (CBFA) – civil society

The CBFA has been at the forefront of the South African lobby and advocacy for quality broadcasting for children. It was a loose forum created in 1995, made up of interested stakeholders, including the SABC, to address children's broadcasting. The changes seen in the current programmes broadcast for children can be attributed to the work of the CBFA. It is also the organizer of the 5th World Summit on Children and the Media, (scheduled for March 2007).

3.4 Children's television programme schedules

An overview of the SABC children's programme schedules for selected periods during 2005 and 2006 was provided. The schedules presented the local content priorities of the public broadcaster and reflect the general breakdown of content streams of information, education and entertainment. The intention was also to consider if any 'South African-specific' genres have emerged.

3.5 Policy development : a consultative process

Bertrand and Hughes (2005) argue that 'Policy …ultimately cannot be 'proven' but will be accepted or rejected by readers (including government) on the basis of their accordance with previously held values and attitudes'. When South Africa began developing its own Broadcasting Authority in 1993, it looked to the Australian, Canadian and British models of content regulation. South Africa uses the same public consultation processes as Canada and Australia. Public consultation is key to any policy formulation as demonstrated by ICASA and its predecessor the IBA. All policy initiatives begin with a discussion or issues paper calling for public comment. Hearings are conducted by the regulator and submissions considered with a Position Paper (the final policy) issued. Accompanying regulation is usually drafted and implemented over a period of time until such time that a policy review is conducted.

Lobby groups also contribute to the public debate, both by presenting their own views to official inquiries and commissioning their own research and publishing the results. In South Africa lobby groups have made submissions to the regulator on a whole range of issues. Some of these are from the perspectives of groupings that do not provide any research to support their claims and with recommendations that are either totally impractical or simply pointless. The responsibility of the regulator is however to consider all proposals and submissions in preparing any policy.

3.5.1 Space for research in policy development

There has been some concern expressed by the Parliamentary Committee on Communications on inappropriate content on television. The department of Home Affairs, under which the Film and Publications Board functions, has set up a task team on pornography to 'stem the tide' as it were. However, a commissioned report on the actual situation and access to such content by children has not been forthcoming. It is also interesting to note that public complaints received by both the monitoring and complaints unit at ICASA and the Broadcasting Complaints Commission of South Africa (BCCSA) show no evidence of widespread public concern on these issues. Some would argue that it is the duty of the regulator and parliament to act in the public interest and to act on their behalf in addressing issues they ought to take up.

The policy formulation or proposals that will be set out in this study would be flawed if either relied only on the perspectives or input of one group. The policy process domestically (and internationally) depends on a widespread range of submissions. Similarly, this research focused on diverse inputs. However, policy is closely linked to values and it would be about mediating what those particular values ought to be in contemporary South Africa that would guide and shape the final policy proposals.

Buckingham (1998:23) suggests that the most immediately striking thing about research into children and television is the sheer quantity of it. He goes on to ask the questions: "Why has the relationship between children and television been such a major focus of research? Why have children been singled out for attention, and considered separately from adults? Why has television been chosen from among the myriad of other factors in children's lives? And why so much of the research concentrated on the potential harm which television might cause them?". He states that there are no easy answers to these questions and that on one level, the research might be simply a response to the relative importance of television. Thus, he adds, it is frequently pointed out that children today spend more time watching television than they do in school, or indeed any other activity apart from sleeping.

Buckingham (1998:24) adds that the identification of children as a 'special audience' for television is not simply a matter of viewing figures – "on the contrary, it invokes all sorts of moral and ideological assumptions about what we believe children – and, by extension, adults – to be".

Whilst Buckingham suggests that there is an enormous amount of research available on children's television, the focus of this study is on policy and practice as it concerns the public broadcaster (SABC). Finding relevant research material in this regard will require careful cataloging.

Policy research deals with the future, which cannot be 'known' but only speculated about (Bertrand and Hughes:2005). Part of this study will focus on what is already known and how that impacts on, and shapes what ought to be. Furthermore, it also challenges the argument that 'policy research deals with the future' as in many instances policy research is in fact developed to address current policy failures by providing immediate policy intervention. McQuail (1997:40) argues that 'the available models for implementing cultural policy are limited and technological inventiveness, and with it media expansion, have easily outrun the slow pace and limited capacity of regulation'. The South African regulatory environment has itself become accustomed to playing 'catch-up' in developing retrospective regulations to address the many developments that have superseded regulation.

3.6 Conclusion

Having used the triangulated approach as discussed in the beginning of this chapter, the research, records, documentation and oral sources were the primary methods utilized for this study. All relevant legal documents, including the IBA Act (as amended), the Broadcasting Act (as amended), the Green Paper on Broadcasting, the Broadcasting Amendment Act, the Electronic Communications Act, and all reports (IBA Triple Inquiry Report), regulations, guidelines and policy positions issued by the IBA and ICASA were sourced and analyzed. A selection of SABC programme schedules during 2005 and 2006

were also accessed and SABC children's programmes were viewed. Informal electronic correspondence with SABC commissioning editors and marketing personnel was also possible.

In addition to primary interviews with the SABC, discussions were also possible with a commissioning editor for children's television and market intelligence. An interview with the Channel Director at ETV, Ms. Bronwyn Keene-Young was also conducted as a secondary interview, not core to this study. Ms. Firdoze Bulbulia[7] and Ms. Nicola Galombik attended the First World Summit on Children and Television in 1995 (Australia, Melbourne) as representatives of the IBA and were both interviewed for this study.

Ms Galombik joined the SABC in 1996 as Head of Education and Ms. Bulbulia was nominated to chair the Children and Broadcasting Forum[8] in 1996, a forum created with the support of the Independent Broadcasting Authority (IBA) and the SABC with its then chairperson, Dr. Ivy Matsepe-Casaburri playing a critical role in promoting the needs of children.

Although several attempts were made to secure an interview with the Department of Communication, this was unsuccessful. However, attendance at a colloquium conducted by ICASA and the DOC on developing a policy and regulatory guideline on children and the media was possible and a report (February 2007) on the colloquium was prepared by the DOC as chair of the colloquium process.

[7] Declaration – Ms. Firdoze Bulbulia is a sibling of mine.

[8] The Children and Broadcasting Forum (CBF) later became the Children's and Broadcasting Foundation of Africa (CBFA).

Chapter Four

Findings

This chapter presents a policy and regulatory overview and context within which the South African Broadcasting Corporation (SABC) functions as a public broadcaster. The Independent Broadcasting Authority (IBA) Act (as amended), the IBA Triple Inquiry Report (1995), the Broadcasting Act (1999, as amended) the SABC licence conditions (2004), regulations and other documents that are relevant to the SABC's delivery on programming for children, are discussed. This chapter also presents selected SABC children's programme schedules for the period 2005/6 and findings of interviews conducted with relevant stakeholders.

4.1 The policy and regulatory framework in South Africa

Prior to the enactment of the IBA Act in 1993, the SABC was not independently regulated and was and still is a creature of statute (founded in law). The IBA Act was the first piece of legislation which pre-dates the first democratic elections of April 1994. Section 2 of the IBA Act when first enacted did not include a clause dealing specifically with children's broadcasting needs. However, as the IBA Act entrusts the regulator to act in the public interest, the entire public, in all its diversity (age included) must be catered for in the regulation of broadcasting services.

The IBA as an institution was created as an independent agency to regulate the broadcasting sector. Its 'independence' is constitutionally protected (Chapter 9, Section 192) and the selection of Councillors is done through a public nomination and interview process. Until 2006, all Councillors were appointed by the State President. An amendment to the ICASA Act in 2006 provides that Parliament interviews candidates together with a panel of experts, and then submit recommendations to the Minister of Communications as the new appointing authority.

The process of policy formulation and regulation that is usually followed (but not always)[9] is for a Green and/or White Paper process to unfold. These papers provide a broad policy approach for the sector and deal with specific issues that require policy direction and intervention. The lead government department, (in the case of communications would be the Department of Communications, DOC) will be the sponsor of such White or Green Paper. It would take on board a range of inputs in drafting the Paper, with the next step being the development of a draft Bill for a public consultation process in Parliament. The regulator of the communications sector participates in the Parliamentary process like any other stakeholder. Once the Bill is accepted and passed into law, the communications regulator is responsible for creating the rules/regulations in keeping with the Act, and to monitor the implementation of regulations by the industries that it regulates. The communications regulator might be mandated in the law, to conduct specific policy processes. However, the regulator will conduct such processes within its own timeframe. The macro policy objectives are set by the policy maker, the government.

The administrative processes adopted by the communications regulator are also meant to be public and transparent. A call for submission on its discussion papers is required in order to shape and inform a position paper (the policy) and regulations/rules are then prepared and issued. The public process is a legal requirement that is spelt out in the underlying statutes. Interested stakeholders and the general public are expected to provide comment throughout the public process. However, (as discussed earlier in chapter two of this study), the degree of public participation seems to be a major challenge as the level of participation has primarily been by organized institutions and/or aspirant licensees. There has been limited general public participation at written submission level as well as oral hearings.

4.1.1 The Founding Legislation – the IBA Act (1993, as amended)

The IBA Act (1993), was the result of multi-party negotiations that pre-dated the 1994 elections and as a 'negotiated' legal instrument to facilitate the first free and fair

[9] The Electronic Communications Act did not follow a White or Green Paper process.

election process in South Africa, did not create a specific object in the law to focus on the needs of specific sectors of society. It did however, use the principle of 'public interest' to ensure that the mandate of the regulator would be to address the entire 'public'. The initial objects of the IBA Act (1993) included the following section on public broadcasting:

Section 2 (e) ensure that in the provision of public broadcasting services -
(i) the needs of language, cultural and religious groups;
(ii) the needs of the constituent regions of the Republic and local communities; and
(iii) the need for educational programmes, are duly taken into account.

There was no reference to 'children' or other sectors of society spelt out in Section 2 of the IBA Act. The IBA as the broadcasting regulator had undertaken a mammoth exercise to conduct a public inquiry in 1994 (required by law) which provided the platform for sectoral organisations, lobby groups, individuals etc to make input into shaping the new broadcasting dispensation.

4.1.2 The Triple Inquiry Report, 1995

After months of public hearings between 1994 and 1995, the Independent Broadcasting Authority (IBA) released its Triple Inquiry Report. This report presented the IBA's recommendations to Parliament on the protection and viability of public broadcasting, cross media control and South African content. As far as broadcasting for children was concerned, the IBA report stated (1995, pages 18 and 19):

> In South Africa, where children have been, and in some cases still are, witnesses to violence and general lack of self worth, [sic] are without hope and pride, broadcasting becomes a very important medium for overcoming fears and building optimism. In recognition of the role that broadcasting can play in contributing to a happy and fruitful childhood for all our children, top priority to children's programming must be given.

The Report further stated that the IBA supports the Children's Television Charter as adopted by URTNA (Union of National Radio and Television Organisations of Africa). The Charter referred to is the International Television Charter that was presented at the First World Summit on Children's Television held in 1995 in Melbourne, Australia and attended by the IBA. The IBA attended all subsequent local and World summits, and also participated in the planning of the Southern African (1996) and All-Africa Summits (1997) on broadcasting for children. ICASA was also part of the planning committee of the 5th World Summit on Media for Children.

In the actual recommendation section of the Report, the IBA stated the following: Section 8.6.12 (page 37) Children's Programming:

> South Africa has a long and rich oral tradition that should be drawn on in drama programming on television, and particularly radio. The place of factual and knowledge building programmes also needs to be guaranteed in the heart of the children's schedules. The early morning and weekend provision of programmes for children should also be extended and improved.

In submissions to the Inquiry both at the national and sectoral level hearings were also held across the country and encouraged input from a wide cross-section of the public. Proposals were made by women's groups that a watershed of around nine o'clock in the evening be set, before which schedulers would be extra sensitive to ensuring that excessively violent or obscene material was not aired. It was further proposed that a cartoon or other insert be produced and run at nine o'clock to indicate this to children and parents.

The recommendation made specific to the public broadcaster on programme range and local content was as follows (page 47):

> The programme regulations service will specify the minimum amount of

> time for the different categories of programming. These will need to be achieved within three years and will include a full range of programmes aimed at the general audience, including: *programming in a range of genre, specifically intended for South African children and for youth* (emphasis mine).

The recommendation on children's programmes was that:

> over the course of one week, each public television channel should provide first release children's programming of which 50% should be local. This should include full range of educative, entertaining and informative programmes produced especially for children of pre-school age (0-6 years) and especially for primary school going-age children.

4.1.3 Catering for children in developing a new broadcasting law

The South African government in adopting the United Nations Convention on the Rights of the Child, has endeavoured to develop policies that are 'in the best interest of the child' as far as reasonably practicable. The consultative process in drafting the Broadcasting Act of 1999 saw lobby groups and advocacy groups like the Children's Broadcasting Forum (now the CBFA) making an input into the preceding Green Paper process of 1997. The Green Paper was published in November 1997, with public input required in January 1998. The Green Paper prepared the groundwork for the drafting of the Broadcasting Act of 1999.

4.1.3.1 Green Paper on Broadcasting, 1997

It is worth considering the issues raised in the Green Paper as published by the then Ministry for Posts, Telecommunications & Broadcasting, with regard to the needs of children specifically. The Green Paper set out the context and also put several questions to the public on children's broadcasting needs. The Paper provided (1997:sub-section of education) as follows:

> The children of South Africa will be its future.
>
> The need for the State and its institutions to facilitate a well-rounded early childhood for its people is internationally acknowledged.
>
> The socialisation of children into society is considered an important aspect in shaping the future of a people. This has to do with the assimilation of basic life skills, which range from the provision of fundamental levels of literacy and numeracy to the acquisition of knowledge about history, science and technology, health, and environmental care.
>
> A system offering South African Early Learning Centres to all segments of the South African population will take time to be constructed, denying the majority of children an opportunity to develop skills from childhood onwards.
>
> It is obviously worth exploring the role that broadcasting might play in providing more and better information and education services to the children in particular.
>
> In addition, many children in South Africa have been exposed to violence in various forms, be it in the family or in a community. The scars left by this exposure to violence remain indelible throughout the person's life, and this has a lasting effect on a child's attitude and disposition towards other people and to life in general.
>
> South African children need their broadcasting services to open their world and expose them to the realities of life in other parts of the world. This would inculcate social values and norms that will go a long way towards normalising South African society. (Green Paper: 1997)

The questions put to the general public were in section 5 of the Green Paper as follows:

> 5.7 What role can broadcasting services play in the education of children, particularly their early education?

5.7.1 In practical terms, what can each sector of broadcasting do to make provision for children's programmes and programmes for young people? In what way could children be protected from harmful advertisements and practices?

5.7.2 In practical terms, what can be done by way of information and general entertainment programmes?

5.7.3 In practical terms, what can be done by way of formal educational programmes? (Green Paper on Broadcasting:1997)

Whilst these questions seem as relevant today as they were a decade ago, the issue of advertising and the protection of children from harmful material was addressed by the IBA in its Guidelines on Advertising and Sponsorships as well as the Code of Conduct for Broadcasters. Both policy documents are discussed in this chapter.

As far as the education needs of South Africa's children are concerned, the SABC's children's programming is grounded within an educational remit. In addition, it is worth considering that since 1997, there had been numerous discussions and research on the possibility of transforming the former Bophuthatswana Broadcasting (Bop TV) service into a fully-fledged Educational service.[10]

4.1.3.2 The Broadcasting Act (1999) and Broadcasting Amendment Act (2002)

With the Green Paper process informing the contents of the Broadcasting Act, and its clear intention to include the needs of children in the law, the Broadcasting Act provides in Chapter II, clause 5(a) that the programming provided by the South African broadcasting system must be varied and comprehensive and provide a balance of information, education and entertainment and address the needs of the entire SA population in terms of *age* (emphasis mine), race, gender, interests and backgrounds.

[10] See Department of Communications Broadcasting Policy Research on Educational Broadcasting, unpublished.

The Act also deals with the public service mandate of the SABC in Section 10 and 10 (1)(e) states that the corporation must:

> include significant amounts of educational programming, both curriculum based and informal educative topics from a wide range of social, political and economic issues, including, but not limited to, human rights, health, *early childhood development,* (emphasis mine) agriculture, culture, justice and commerce and contributing to a shared South African consciousness..

Clause (g) in that section states that the corporation must…strive to offer a broad range of services targeting particularly, *children,*(emphasis mine) women, the youth and people with disabilities...

The Broadcasting Amendment Act (2002) which provided for an additional two regional television services[11], also expands on the Charter for the public broadcaster as introduced in the Broadcasting Act of 1999. The Charter is meant to be a performance guarantee on the part of the broadcaster and a living document for the public to engage in, and to keep the SABC accountable. The Charter is discussed later in this chapter.

The most recent piece of legislation is the Electronic Communications Act (No 36 of 2006) and Section 2 states that the primary object of this Act is to provide for the regulation of the electronic communications in the Republic in the public interest, and for that purpose – (in clause *S)* states:
(s) ensure that broadcasting services, viewed collectively
(s, iii) cater for a broad range of services and specifically for the *programming needs of children,* (emphasis mine) women, the youth and the disabled.

The creation of legal tools to enable the regulator and broadcasters to address children as

[11] Licences for these services have been granted but not been issued by ICASA as it was recommended that such issuance will only happen once government and/or the SABC have the requisite funding for these services.

a sector of society requiring attention has been the result of public input and consultation. Children have been given a place in the current legislation. Whether or not this is sufficient will be explored later in this study.

4.1.4 Regulations, guidelines and licence conditions

Having considered the legal instruments (Acts) and how these seek to address the needs of children, as well as the initial recommendations made on children's programming by the Independent Broadcasting Authority just over a decade ago, the next step is to focus on the regulations and rule making processes that impact on the child as audience. Local content regulations, Advertising and Regulation of Infomercials and Programme Sponsorship as well as the Revised Code of Conduct for Broadcasters will be discussed, and the SABC licence conditions insofar as these refer to children and are under the purview of the regulator.

4.1.4.1 South African content

ICASA sets, by way of Regulation, quotas of airtime, which broadcasters must devote to South African content. SA content is measured only within the performance period (05h:00 – 23h:00). The quotas are adjusted by ICASA from time to time. It is the responsibility of each station and channel to ensure that they are compliant with the local content regulations. Full records must be kept demonstrating this compliance.

As discussed earlier, the IBA Triple Inquiry process included as part of its inquiry, the issue of South African local content. The IBA also recommended that children's programming comprise 50% of South African content. It is necessary to understand the objectives of the South African content regulations. These were presented by the IBA as follows:

- To develop, protect and promote a national and provincial identity, culture and character. In achieving this, the regulations seek to promote programming which;
- is produced under South African creative control;

- is identifiably South African, is developed for South African audiences and which recognises the diversity of all cultural backgrounds in South African society;
- will develop a television industry which is owned and controlled by South Africans;
- will establish a vibrant, dynamic, creative and economically productive South African film and television industry.

These objectives would need to be adhered to for all content/programming and so is relevant to children's programming as well. Specific definitions for children's programming genres and what constitutes the 'child' audience in the context of television are included in the local content regulations. During the inquiry into the review of South African content quotas on television and radio (2001), the Authority also reviewed its definition of children's programming[12] and content quotas. The Position Paper (2002) on South African Content on Television and Radio states the following:

> In response to calls for simplifying the definition of children's programming, the Authority decided to introduce a new definition of children's programming which refers to the age specify of children's programming (0 - 6 years and 7 - 12 years old) The Authority is convinced that it is essential to separate the audience in order to address their range of cognitive, analytical and development skills.
>
> The new definition also makes reference to the need for children's programming to be educational and informative. The Authority is confident that the new definition will enable broadcasters to produce

[12]The initial regulations were: "Children's programming" means programming in any format, which is specifically produced for persons under the age of 15 years, which contributes to the well-being and social, emotional and intellectual development of persons in this age group, which are made from their point of view, and which are broadcast at times of the day when persons in this age group are available in substantial numbers to watch.

educational and informative programmes in any format.

> The Authority also decided not to set requirements for the broadcast of children's drama. The Authority decided rather to incentivise the production and broadcast of children's drama and children's informal knowledge building programmes through the allocation of points. Broadcasters are urged to provide children with the range and diversity of programmes on offer to adult viewers.

Programme range and diversity as well as drama have been raised in interviews discussed later in this chapter.

4.1.4.2 South African programming definitions

The South African Content Regulations (2002:4) set out clear definitions of terms and programme categories or genres. These are also defined for children's programmes and are intended to assist in the monitoring and enforcement of the regulations by licensees.

> **"Children's Programming"** means programming which is specifically produced for persons between the ages of 0 – 6 years and 7 -12 years, which is educational, made from their point of view, and which is broadcast at times of the day when persons in this age group are available in substantial numbers to watch;

> **"Children's drama"** means a fully scripted screenplay or teleplay, produced for children, in which the dramatic elements of the character, theme and plot are introduced and developed so as to form a narrative structure. It includes sketch comedy programmes, animated drama and dramatized documentary, but does not include sketches within variety programme or segment within a programme which involves only the incidental use of actors;

"Children Informal Knowledge Building Programming" means programming which provides information, for children, on a wide range of social, political and economic issues, including but not limited to, children's rights, health, early childhood development, culture, and justice;

"Animation" means any form of television programming in which the images of character and action are made by photographing drawings, puppets or similar images in order to create the illusion of movement and includes such images created by computers;

"Animated Drama" means a scripted fiction or non fiction story conveyed primarily through animated pictures and visuals;

"Educational Programming" means programming specifically and primarily designed to support structured educational activity whether such structured activity relates to institutional-based education or to non-institutional based learning. (SA Content regulations 2002:4).

The purpose of these definitions also serves to guide broadcasters and programme makers in developing content for children. Furthermore, it allows the regulator to monitor the programmes provided for children in each genre.

4.1.4.3 Rewarding drama and knowledge-building programmes

In order to incentivise and reward broadcasters for providing children's drama and knowledge building programmes, the regulator developed a formula to calculate South African content made specifically for children. This formula is also used in Australia by their communications regulator. The format factor came into effect in August 2003 and is as follows:

- 3 points for South African Children's drama; and
- 2 points for South African children's drama and knowledge-building

programme.

The formula for scoring children's programming points is:

Children's Score= format factor (unit) times 2 hours = 6 points. Ten points will be worth 1% towards the South African television content quota on a weekly basis.

The process of rule-making by way of regulation is not static. Regulations are therefore reviewed from time to time and in 2006 ICASA further amended the South African Television Content Regulations (Government Gazette No 28454, 31 Jan 2006). It should be noted that the section relevant to children's content was not changed.

4.1.4.4 Advertising Infomercials and Programme Sponsorship

The issue of advertising to children and the sponsorship of children's programming remain a complex and contentious issue globally. Many studies have been conducted on these issues providing a range of perspectives and approaches.

Section 57 (1) of the IBA Act states that all broadcasting licensees must adhere to the Code of Advertising Practice as from time to time determined and administered by the Advertising Standards Authority (ASA)[13].

In 1998, the IBA conducted a public inquiry into advertising, infomercials and programme sponsorship. In April 1999, the Authority published its Position Paper on "The definition of advertising, the regulation of infomercials and programme sponsorship". In this Paper, regulations on children and advertising were developed and passed. The sections relevant to children (1999:7) are that:

- No broadcaster may transmit any infomercials during the transmission of any children's programming.
- The Authority is concerned with the vulnerability of children and their ability to distinguish programme content from sponsorship. However the Authority

[13] The ASA is a self-regulatory body with its own Code.

recognised that some children's programming depends heavily on sponsorship and that prohibition may jeopardize this programme type. Broadcasters are therefore encouraged to ensure that sponsorship is appropriate to children's programming and does not promote the interest of products unsuitable for use by children.

- Broadcasters should conduct regular research to gauge viewer and listener reaction to programme sponsorship.
- Broadcasters must ensure that the line between commercial and editorial message is not blurred.
- The Authority encourages broadcasters to investigate the possibility of phasing out product placement in some programme types such as children's programmes. (This was to be reviewed in 2004).

The Position paper (1999:9) also stated that:

Whilst recognising the ASA Code, the Authority will also consider:

- placing restrictions on the advertising of tobacco products on the grounds of health considerations and in keeping with the Tobacco Products Control Act, (83 of 1993) and the subsequent regulations regarding the advertising of tobacco in Regulations 16111 of 1994;
- prohibiting alcohol advertisements during certain programmes such as children's, educational or religious programmes and
- developing general advertising standards for television.

As indicated above, the issue of phasing out produce placement in children's programmes was to be reviewed in 2004 but this has, in fact, not occurred. There has also not been an industry self-assessment on the general issue of advertising to children. The issue of alcohol advertisements during children's programming has also not been studied or reported on.

4.1.4.5 Of Watersheds and advisories – A Code of Conduct

A Code of Conduct for Broadcasters was included in the IBA Act (1993 as amended) and was largely lifted from the Press Code. It was therefore necessary for the IBA to review the Code to bring it in line with broadcasting.

In April 1999, after a public process, the IBA published a Position Paper on the revision of the IBA's Code of Conduct for Broadcasters, including a Draft revised "Code of Conduct for Broadcasters". The Code was included in the Broadcast Amendment Bill of 2002, and was (finally) effective from February 2003.

The proposed Code was guided by two elements:

1. The need for adequate viewer and listener information and
2. The need for sensitivity in scheduling, particularly during times when children form the majority of the audiences. The Authority has noted that the term "children" embraces a wide range of ages, maturity and sophistication. Broadcasters are therefore urged to distinguish between those approaching adulthood from pre-teenage audiences.

In the earlier recommendation made during the IBA Triple Inquiry process of 1995, the IBA proposed a *watershed period of 9pm for television. Programming which contains scenes of violence; sexually explicit material and/or offensive language must not be broadcast before the watershed period. This includes promotional material and music videos* (emphasis mine). Although it took several years for the 1995 recommendation to be developed into a formal regulation, broadcasters had generally scheduled their programming in line with the 9pm watershed.

In order to assist audience members make informed choices and to be warned of content not suitable to younger or sensitive viewers, the Code states that *there should be audience advisories on programmes to enable parents to make an informed decision about programming.* (emphasis mine)

The watershed time of 9pm was first mooted during the IBA's Triple Inquiry process in 1995 and re-motivated in 1999, with the implementation of the Code of Conduct being 2003. The appropriateness of the 9pm watershed has come under some criticism from the public in the wake of seemingly adult type programmes on offer by certain broadcasters before, and immediately after 9pm. A review of the watershed based on audience research is no doubt necessary.

The Code of Conduct for Broadcasters was revised and published in 2003 in Government Gazette no 24394. The specific regulations on children include (2003:8):

- Broadcasters should exercise particular caution in the depiction of violence in children's programming.
- Children's programming portrayed by real-life characters shall only portray violence (whether physical, verbal or emotional) when it is essential to the development of a character or plot. Programming for children shall not contain realistic scenes of violence, which create the impression that violence is the preferred or only method to resolve conflict between individuals.
- Programming for children shall not contain realistic scenes of violence, which minimise or gloss over the effect of violent acts. Any realistic depictions of violence and its perpetrators.
- Animated programming for children, while accepted as a stylised form of story telling which can contain non-realistic violence, shall not have violence as its central theme and shall not invite dangerous imitation.
- Programming for children shall with due care deal with themes, which could threaten their sense of security when portraying for example, domestic conflict, death or crime.
- Programming for children shall deal with due care with themes which could invite children to imitate acts which they see on screen or hear about such as the use of plastic bags as toys, use of matches, the use of dangerous household products such as playthings or other dangerous physical acts. (Code of Conduct for Broadcasters 2003:8)

The self-regulatory body, the Broadcasting Complaints Commission of South Africa (BCCSA) adopted the IBA Code of Conduct. It regularly informs the public on radio and television to report/complain about broadcasts that do not adhere to the Code. The regulator on the other hand, does not advertise its complaints procedure nor its appeals procedure (as a last resort) if and individual is not satisfied with the BCCSA outcome.

Over the years there has been some concern noted with this self-regulatory mechanism. However, there has not been a groundswell of complaints about the BCCSA itself. ICASA had indicated from time to time that a representative from its standing complaints committee, Broadcasting Monitoring and Complaints Committee (BMCC) ought to be on the BCCSA. This issue remains unresolved and with the ECA now being the law, the entire complaints process of ICASA is being overhauled with a new complaints body to adjudicate both telecoms and broadcasting complaints.

4.2 The Public Broadcaster Charter Requirements

A Charter for the SABC is laid out in the Broadcasting Act (1999, as amended). The Charter sets out a number of obligations which the SABC must deliver on. ICASA is charged with monitoring and enforcing the SABC's compliance with the Charter.

For stations and channels the significant aspects of the Charter are captured in sections 6, 10 and 11, where programming obligations are stipulated. These programming obligations are presented in broad terms. In certain cases the obligations are to be met by the SABC collectively and in other cases either by the PBS or commercial divisions respectively.

The Charter obligations are created to serve the entire nation and address all sectors of society. Children are included in the broader society and the Charter is therefore relevant to the child audience. The obligations may be summarised as follows:

The Corporation must encourage the development of South African expression by providing, in South African official languages, a wide range of programming that:

- reflects South African attitudes, opinions, ideas, values and artistic creativity
- displays South African talent in education and entertainment programmes
- offers a plurality of views and a variety of news, information and analysis from a South African point of view and
- advances the national and public interest.

The collective obligations that have to be achieved by the SABC's public services and relevant to children include the following;

- Provide significant amounts of educational programming.
- Make services available to South Africans in all the official languages.
- Reflect both the unity and diverse cultural and multi-lingual nature of South Africa and all of its cultures and regions to audiences.
- Strive to be of high quality in all the languages served.
- *Strive to offer a broad range of services targeting, particularly, children, women, the youth and the disabled* (emphasis mine) and
- Enrich the cultural heritage of South Africa by providing support for traditional and contemporary artistic expression.

There are also collective obligations to be achieved by the SABC's commercial services and these are:

- Be subject to the same policy and regulatory structures as outlined in the Broadcasting Act for commercial services;
- Comply with the values of the PBS in the provision of programmes and services;
- Commission a significant amount of programming from the independent sector;
- Subsidise the public service and
- Be operated in an efficient manner

Considering the latter two bullet points, the SABC 3 service is regarded as the commercial arm of the public broadcaster. It is therefore meant to subsidise the public

service and to operate efficiently. One assumes that the other two television services are also expected to operate efficiently, though reliant on cross subsidization.

4.2.1 SABC Licence amendment process

In 2002, the Broadcasting Act was amended and section 22 (1) thereof provided that the SABC "must within six months after the date of commencement of the Broadcasting Amendment Act, 2002, or the conversion date whichever is the later, apply to the Authority for such amendment to its existing licences".

The SABC submitted an application for the amendment of its broadcasting licences, in terms of Section 22 of the Broadcasting Act, Act 4 of 1999, to ICASA (the Authority) in March 2004. The Authority (ICASA) invited the public and interested parties to comment on the SABC's proposed amendments. After public hearings and comments on the draft licence conditions, the Authority (ICASA) issued final amended licence conditions to the SABC in March 2005. In the case of radio, the licences run for 6 years while in the case of television the licenses are for 8 years.

The purpose of the application was to bring the SABC's existing licences in line with the reorganisation of the Corporation into the public service and the commercial service division and its related obligations. Section 9 (1) of the Act provides that the SABC should consist of two separate operational divisions, namely a public service division and a commercial service division.

The effective date of the amended licenses was 23 March 2006. Until then the former licence conditions were applicable.

4.2.1.1 General requirements

The general requirements in the licence are that the SABC shall, during the South African performance period[14] provide programme material that caters for the interests of all

[14] The performance period is from 05h00 to 23h00 and local content is measured during that period.

sectors of South African society and shall provide information on and relevant to the following: people living with disabilities; health-related issues; gender issues and *all age groups* (emphasis mine).

Section 2.6 of the licence condition (2005:12) states that programming targeted at children must be broadcast at times of the day when children are available to watch and that programmes must be educational and made from the point of view of the child. The issue of appropriate scheduling, educational content and made from the point of view of the child, are themes found in the earlier International Television Charter of 1995 and the IBA's Triple Inquiry Report (1995). These themes remain core principles in the regulation of children's programming.

Programming for people with disabilities

The licence conditions are also targeted at providing services for people with disabilities and this is in keeping with the legislation. The licence conditions of the SABC (2005:12) state that the SABC shall, in the provision of the licensed service, ensure that:

- reasonable provision is made for sign language translation to be provided during news bulletins transmitted in prime time and during other programme genres broadcast throughout the day, and

- people with disabilities regularly feature and participate in its programme material in accordance with the Integrated National Disability Strategy.

4.2.2 Local content television regulations for the SABC

Local television content is defined in the Independent Broadcasting Authority Act[15] as a television programme (excluding broadcasts of sports events and compilations of them, advertisements, teletext and continuity announcements) that is produced by a South

[15] ICASA has proposed that all local content definitions be removed from the Act and be published in regulations.

African broadcaster, or by South African people or where the key personnel on the production are South African or where a percentage of the production costs are incurred in South Africa. The local content regulations specify that channels must comply with:

- **A global local content quota for each television channel.** These quotas stipulate that a percentage of the air time, in both the performance period and in prime time (between 18:00 and 22:00) should be devoted to local content. The global quotas distinguish between public and commercial television. SABC 1 and SABC 2 are considered to be public channels, while SABC 3 is considered to be a commercial channel. (ICASA Local Television Content Quota's section 3.1)

- **Genre quotas.** These stipulate that if a television channel carries a certain genre of programming (such as drama), a percentage of that type of programming is to be devoted to local content. These quotas also distinguish between public and commercial television.

- **Public Broadcasting Service genre quotas - children**

These quotas are for a broad spectrum of programme genres. Whilst 55% of children's programming must be South African children's programming, it is useful to consider the quotas for the other programme categories to provide a holistic picture.

(i) 35% of the channel's drama programming consists of SA drama;
(ii) 80% of its current affairs programming consists of South African current affairs;
(iii) 50% of its documentary programming consists of South African documentary;
(iv) 50% of its informal knowledge building programming consists of South African Informal Knowledge building programming;
(v) 60% of its educational programming consists of South African educational programming;
(vi) *55% of its children's programming consists of South African children's programming* (emphasis mine).

If taken to the extreme, the interpretation of these quotas could suggest that clauses (i) to (v) need to apply within the 55% of children's programming. This interpretation has not however been advanced by either ICASA or the SABC.

- **Commercial genre quotas - children**

SABC 3 is the commercial arm of the SABC. The genre quotas for this channel (ICASA Local Television Content Quota's:2002) are:

(i) 20% of drama programming consists of South African drama;

(ii) 50% of current affairs programming consists of South African current affairs;

(iii) 30% of its documentary programming consists of South African documentary programming;

(iv) 30% of its informal knowledge building programming of South African informal knowledge building programme and

(v) *25% of its children's programming consists of South African children's programming* (emphasis mine).

Two additional aspects of the television quotas must be noted, specifically that, there are restrictions on the extent to which repeats may count towards the quotas and additional points towards the quotas may be gained through certain kinds of programming, for example African language drama.

The Charter and the new licence conditions can be regarded as the policy objectives and the regulation for compliance. These licence conditions are to be monitored and reported on by ICASA.

This context of policy and regulation sets the background for the interviews and presentation of programme schedules. The general obligations of the SABC must be factored into its programming for children. These general principles form the basis of the public service remit. In addition, whilst the SABC has been split into commercial and public service wings, the overall ethos and public service value and objective must still be fulfilled all the same. The SABC is not suddenly a fully fledged commercial content

provider even though its funding model is not that of a traditional public service broadcaster.

4.2.3 SABC Editorial Policies

Editorial policies of the SABC are reviewable every five years. The current policies became effective on 1 April 2004. As far as children are concerned, the policies are set out in detail (SABC Editorial Policies 2004: 48) under the education mandate and found in the following areas;

- Early childhood development,
  - Children at home,
  - Formal education,
  - Youth development,
  - Adult and Human resources development and
  - Public education.

The guidelines for implementing the editorial policy on Education for Early Childhood Development (SABC Editorial Policies 2004:51) stipulates that:

> Programmes for early childhood development are aimed at supporting the holistic development of young children (from 0-7). The SABC recognises that as relatively few South African children have access to any structured early childhood education, these programmes assist in preparing young children 'to be ready to learn'. Educational programming also supports the implementation of the national Grade R (Reception Year) curriculum. Moreover, this programming will equip caregivers with the knowledge and skills to facilitate and support the growth and development of young children.

The guidelines go further to state that early childhood development programmes should meet the following standards:

- Be entertaining and actively engage the audience,

- Develop children's self-esteem,
- Enhance listeners' and viewers' imagination,
- Reflect the personal experiences and cultures of audience,
- Affirm children's sense of self and place,
- Take account of language needs and the needs of learners with disabilities and
- Be focused primarily on health, nutrition and safety.

Whether or not the SABC manages to achieve the above standards policies, and whether there are gaps that arise between the SABC policies and programming delivery will be explored in the next chapter.

4.2.4 The SABC – a look at itself

The SABC's website www.sabc.co.za provides a bird's eye view of what its three television channels are primed to be and do. It is fair to say the SABC television services have undergone various changes since 1995. The channels have been re-branded to be more responsive to the South African public. The SABC has captured its overall contemporary service as being obliged to provide a comprehensive range of distinctive programmes and services. The SABC argues that it must inform, educate, entertain, support and develop culture and education and as far as possible secure fair and equal treatment for the various groupings in the nation and the country, while offering world-class programming on television and radio.

The SABC's television network comprises four television channels - three of them free-to-air and the fourth pay-TV. Combined the free-to-air channels attract more than 17,5 million adult viewers daily, reaching 89% of the total adult TV-viewing population.

The SABC provides an Africa Channel and describes that service in the following way:

> SABC Africa allows viewers across the continent to meaningfully participate in issues currently affecting them. Though the channel offers some programmes from some of its SABC sister channels, there are more

> in-depth, insightful and exclusive programmes that are produced by the channel.

In distinguishing each of its three television services, the SABC describes these services as follows:

> SABC1's role in the overall SABC Television portfolio is that of delivering programming and entertainment that is targeted specifically at the Youthful segment of the population and is by far SA's biggest television channel delivering over 14, 5 million adult viewers. SABC1 is the only channel that celebrates youthfulness through entertaining social realism. This positioning is borne out of the viewers' needs for more honest, positive and real television. Following the successful re-positioning of SABC2's on-air look-and-feel, the channel's pay-off line, "feel at home", has touched more and more viewers' hearts, enhancing its reputation as the television channel which truly reflects the multi-faceted nature of the South African family and fulfills a nation-building role
>
> SABC 3 prides itself in reflecting a successful and stylish South Africa, with viewers who have their hearts firmly rooted in South Africa, but have their heads in the world. SABC 3 is an adult contemporary channel targeted at living standard measurement (LSM)[16] 8-10 viewers in the 25 to 49 year age bracket. (http://www.sabc.co.za)

The SABC that the public engages with and experiences today is a far cry from the formative stages of its transformation. The interviewees shared their personal and professional insights on that transformation.

It is interesting to note that in the description of each of the SABC television channels there is no focus on its programming for children. As a full-spectrum service, the SABC is meant to offer programming for *all* South Africans. Whilst the 'look and feel' of SABC

[16] LSM – Living Standard Measurement refers to household income, one being lowest (poorest) and 10 being highest (most affluent).

1 in 'youthful' SABC 2 invites the audience to 'feel at home' and SABC 3 targets viewers with their 'hearts firmly rooted in South Africa, but their heads in the world', there remains a gap in terms of where exactly children of South Africa will 'feel at home'.

4.2.5 SABC children's television – 'the early days'

The respondents from the SABC, Mr. Charles Owen[17] (Head of SABC Genre: Children) and Mr. Fakir Hassen (expert in Educational radio, dealing with licence compliance matters) confirmed that SABC introduced children's programming on television in 1976. The kinds of programmes at the time were 'live action' people in costumes, puppets and dubbed magazine programmes. The emphasis was on education – a Calvinist approach to education. Afrikaans was a priority and English was introduced a little later. Many South Africans will recall 'Haas Das se Nuus Kas' with the voice of Riaan Krywagen – a face and voice that has survived the ever changing face of the public broadcaster.

With only one television channel, the languages offered were in keeping with the Apartheid language policy of English and Afrikaans. In 1982, the language groups of Sesotho and Nguni were introduced on the additional television channel.

The content developer was Safritel, a brand that was part of the SABC and according to Mr. Hassen, 'an exclusively white run operation'. In 1995 Safritel was closed as the SABC began its transformation process. There were very few black producers at the time and so commissioning of content in reality still went to former Safritel producers who had set up successful independent production companies.

School- radio on the African language radio services was curriculum based and was phased out with the establishment of Educational Television and Radio. This brought about a decentralization of production whilst planning was done centrally. The target audience had moved from pre-school initially, to teens from 1985 onward. Currently the

[17] Mr. Owen provided a detailed response to the research questionnaire as well as notes for the interview conducted with Mr. Hassen.

division ‘education’ is placed in the content hub of the SABC, and children’s content falls within the broader education division.

The SABC is the broadcasting partner of the 5th World Summit on Children and the Media. At a media briefing held on the summit (Jan 2007) Yvonne Kgame, SABC General Manager for Content Hub commented, "…the power and the role of media in shaping the mind of a child are critical for sustainable development. The SABC has found it imperative not only to implement policy but to be an active player in informing and shaping the media policy, especially for children's content." She adds, "Sometimes the media must ensure that children speak for themselves and do things for themselves, and that adults need to listen to [children]".

From this statement, it is apparent that media policy happens at a range of levels and importantly, within the SABC as it attempts to consult children and ‘to listen’ to children.

4.2.5.1 Children’s programming evolves

Multi-lingual programming developed in 1994 along with the birth of a new democratic dispensation and the affirmation of 11 official languages. Some of the notable turning points in children’s television were listed by the respondents as:

- Implementing an inclusive approach in terms of language, addressing the urban/rural divide and accessing children with disabilities;
- Producing award-winning programmes e.g. *Takalani Sesame* and *Soul Buddyz;*
- Increasing the age of the target audience to 15 year olds;
- Using all formats for children’s programming and
- Introducing educational television.

The respondents also stated that the programme choices are informed by the agenda of the government of the day - national priorities, educational policies related to children and the media, the Constitutional rights of the child, a children’s strategy to increase Audience Ratings (ARs), the African Charter on Children’s Broadcasting, the

Broadcasting Act, the SABC board goals and most notably, the ICASA regulations.

When asked how the policy was developed, the following key areas were acknowledged in policy development: the SABC mandate, ICASA regulations, channel needs and policies (as mentioned above) that are developed in consultation with commissioning editors, the chief executive and the content hub management committee.

4.2.5.2 Programme Range

Diversity of content and a wide range of programmes should be the standard diet of children's programmes. Edutainment and infotainment have become the commonly used terms to describe anything from cartoons to magazine programmes.

The schedules presented for children's programming do not highlight the 'pure' entertainment genres as *all* content is assumed to have some education and /or information value. Apart from the successful drama series '*Soul Buddyz*', it is arguable if there has been any other post-apartheid children's drama series that managed to deliver edutainment in such a meaningful way. The *Soul Buddyz* series was not only accessible to children, but tackled key health and socio-economic issues facing the country in an entertaining and problem-solving manner. The series was targeted at the entire family, with children as the main protagonists. It was therefore not scheduled specifically for children although repeated in the afternoon slot. The obvious questions then are: should children's drama be part of the dedicated children's schedule and what of the other wide ranging genres that ought to be considered for children and are there South African-specific formats that should have emerged by now?

4.2.5.3 Impact of Charter's

The SABC endorsed the International Children's Television Charter in 1995. It did not indicate when the adoption of the African Charter on Broadcasting for Children was done, but has acknowledged and listed it as one of the sources informing its policy.

There has been a long history of the SABC's involvement in the Charter process and whilst this is not documented specifically, the respondents interviewed unanimously agreed that the Africa Charter sets the tone for the framework that guides policy in South Africa. The core principles of the Africa Charter (as well as the International Children's Television Charter) run through the policies of ICASA and the SABC.

4.3 Programming for children on the public broadcaster

The current SABC licence conditions (effective March 2006) do not seem to raise the bar in any way, given that in 2003, according to ICASA's monitoring unit, the SABC exceeded these requirements on SABC 1 and SABC 2.

4.3.1 The licence conditions

The table that follows illustrates the licence conditions for children's programming per week (2005) and the actual hours of children's programmes broadcast in 2003.

Table 2 – SABC Children's programming

Channel	**Hours Per week as per licence condition (2005)**	**Channel**	**Hours actually broadcast in 2003**
SABC 1	20 hrs per week	SABC 1	26 hrs per week
SABC 2	15 hours per week	SABC 2	43.5 hrs per week
SABC 3	7 hours per week*	SABC 3	1.5 hrs per week

(Source, ICASA Monitoring and Complaints Unit :2003 and Licence conditions 2005)

Whilst SABC 3 is the commercial wing of the public broadcaster, its ability to produce more children's content and not less than a private free-to-air service (such as ETV) has been of concern to many, most of all, ETV (the only commercial national television broadcaster in South Africa). This will be explored later.

4.3.2 How much children's programming per week?

The IBA (1995) had recommended that children have 'first release' programmes each week. The SABC's minutes per television channel for children as broadcast per week, provides the number of minutes of first release programmes as well as repeats. These figures were for the month of May 2006 only, and represent a collective allocation across all genres:

Table 3 – SABC May 2006 first release programming and repeats

SABC 1	SABC 2	SABC 3
First run local programmes – 864 min per week	First run local programmes – 696 min per week	
Local repeats – 432 min per week	International – 216 min per week	Local content – 240 min per week
International – 96 min per week Repeat international – 48 min per week	Local repeats – 96 min per week	International – 216 min per week Repeat local – 120 min per week
24 hours (actual) licence condition is 20 hours	**16.8 hours (actual)** licence condition is 15 hours	**9.4 hours (actual)** licence condition is 7 hours

In total, 2448 minutes per week (40.8 hrs) is made up of local content. This includes repeats, which is approximately 81% of all children's television. What is interesting to note is that the amount of programmes for children declined since 2003. It would seem the SABC had reduced its children's programmes particularly on SABC 2 - from 43.5 hours in 2003 to 16.8 hours in 2006.

An additional schedule below, (Table 4) was provided for the financial year 2005/6 as an annual average and so different from the figures provided for the single month of May 2006 in Table 3. This confirms that there was a reduction in the number of hours from

2003 (as per ICASA schedule). That notwithstanding, it must be noted that the 2006 licence conditions, according to Table 4 below, show that licence conditions for children's programming are not only being met, but exceed the weekly average required of the SABC.

Table 4 – SABC Children's programming: local content and repeats

Children's programming		
	Local content (%)	
	SABC 1	**SABC 2**
FY 2005/6	60.17	56.22
April - Sep 2006	77.02	71.13
	Hours/min per week	
	SABC 1	**SABC 2**
FY 2005/6	41:39:00	18:23
	Hours/min per week (repeats only)	
	SABC 1	**SABC 2**
FY 2005/6	21:59:00	1:30
April - Sep 2006	9:05:00	2:32
	Hours/min per week (English)	
	SABC 1	**SABC 2**
FY 2005/6	35:43:00	16:42
April - Sep 2006	13:12:00	13:34
	Hours/min per week (Other than Eng)	
	SABC 1	**SABC 2**
FY 2005/6	5:56:00	1:40
April - Sep 2006	12:00:00	4:04

(Source: SABC:November 2006 – Regulatory Affairs)

Of the total hours per week provided on SABC 1 of 41,39 hours, 35,43 hours of that was provided in English. That figure changed from April 2006-September 2006 with English being reduced to 13,12 hours. SABC 1 provides double the amount of hours required by licence condition. SABC 2 provided 18,23 hours per week, with 16.42 hours in English and reduced that to 13,34 hours in English by April-September 2006. The licence condition is exceeded by 2 hours on SABC 2. SABC 3 figures were not calculated in the annual average as presented in Table 2. Gauging from Table 1, it seems that SABC 3 exceeds the licence condition by 2 hours.

4.3.2.1 Language delivery

It is consistent with the licence conditions that languages other than English are promoted in the delivery of general programming. The requirement is for African languages to increase throughout the licence period. Whilst the language condition per channel does not provide a specific number of non-English children's programmes per week, the SABC is required to comply with the general condition to increase African language programming across all genres of programmes, children included.

With the implementation of the licence conditions of March 2006, there has been a shift from a predominantly English service for children. However, the move has meant that non-English programmes are at 16,04 hours cumulatively, across both SABC 1 and SABC 2, and 26,46 hours (cumulatively) in English across these two channels. The switch to African language programming will be a gradual change, and there will no doubt be some reliance on bi-lingualism and multi-lingualism with English being one of the languages used on all three SABC television channels. A full breakdown of the SABC's language requirements in terms of licence conditions follows.

Table 5

SABC 1 – Language

	FY 06/07	FY 07/08	FY 08/09	FY 09/10	FY 10/11	FY 11/12
Hours per week of official languages other than English (excluding marginalised languages) in prime time	13h45 min	14h24 min	15h42 min	15h12 min	16h24 min	16h24 min
Hours per week of marginalised languages in prime time	45min	1h	1h 6 min	1h 36 min	1h48min	1h 48 min
Total hours per week of official languages other than English in prime time	14h30min	15h24 min	16h48 min	16h48 min	18h12 min	18h12 min
Total hours of official languages other than English during performance period	36 h	37h	39h	39h	41h	41h
Total percentage per week of official languages other than English	28.5%	29.5%	30.9%	30.9 %	32.5%	32.5%

*** 18 hour broadcast day = 126 hours per week**

SABC 2 – Language

	FY 06/07	FY 07/08	FY 08/09	FY 09/10	FY10/11	FY 11/12
Hours per week of official languages other than English (excluding marginalised languages) in prime time	17h18 min	17h36 min	18h12 min	18h06 min	18h06	18h06
Hours per week of marginalised languages in prime time	54 min	1h 24 min	1h 24 min	1h 54 min	1h 54 min	1h 54 min
Total hours per week of official languages other than English in prime time	18h12 min	19h	19h36 min	19h36 min	19h36 min	19h36 min
Total hours of official languages other than English during performance period	39h	41h	41h	41h	41h	41h
Total percentage per week of official languages other than English	30.9%	32.5%	32.5%	32.5%	32.5%	32.5%

*** 18 hour broadcast day = 126 hours per week**

SABC 3 - Language

	FY 06/07	FY 07/08	FY 08/09	FY 09/10	FY10/11	FY 11/12
Total percentage per week of official languages other than English	5% (6hrs)	8% (10hrs)	8%	8%	10%	10% (12hrs)

*** 18 hour broadcast day = 126 hours per week**

The SABC respondents maintained that content produced for children far outweighs the licence requirement, and therefore enhances nation building and 'Africanness'. The SABC also implemented a language strategy to expose people to their own cultures and languages. The following quote is instructive: 'but nevertheless we need a children's channel to have a real impact' (Owen:2006).

Whilst there was a general level of satisfaction that the SABC reaches the largest possible child audience, particularly on SABC 2, the interviewees claimed that the constraints to delivering more quality children's programming is simply a matter of not enough time in the schedule to do so on each channel. They added that children's television competes with other channels and broadcasters and that budgets are not adequate for the needs of all South Africa's children to be met. Hence the suggestion to consider a dedicated children's television.

When asked what the ideal scenario would be, Mr. Owen and Mr. Hassen (interview:2006) submitted as above, for a dedicated channel as well as the development of more animation, cartoons and dramas. A specific time slot for language groups was also proposed.

4.3.2.2 SABC Programme Schedules

An analysis of the SABC's programme schedules in financial years 2005/6 to 2006/7was done by taking a sample of various months throughout the period. The schedules (Appendix 4) confirm that dedicated children's programmes are broadcast from 3pm to 5pm in the afternoons and repeated in the early mornings. SABC 3 as the commercial service of the SABC did not provide any dedicated content for children until the ICASA licence conditions came into effect in 2006.

According to SABC Commissioning Editor for Children's programmes, Ms. Lolli Goodson, 'the inclusion of children's programmes on SABC 3 has become very popular. It had a strong build-up and is in English, whilst SABC 1 and SABC 2 have had to reduce

their English content in favour of African languages' as per licence conditions. On closer inspection, it is apparent that the initial English content provided was not South African, but foreign, especially from the United States of America. The SABC is producing local content for SABC 3.

Ms. Tisani in the SABC marketing division claims that SABC channels reach at least 50% of the available children's audience (who do not have access to DSTV, but have access to ETV). According to her, YOTV has reached an Audience Rating (ARs) of 4 and 5. In the past however, changes in the schedule to meet licence obligations have seen that drop to Audience Ratings of 2 and 3.

The scheduling of programmes at times when children are available in large numbers to watch (as per the regulation) cannot be an easy task, but one that any broadcaster providing for children must consider. The SABC places its children's programmes in the afternoon band of 15h00-17h00 with morning repeats from 05h00-06h30 on SABC 1. Children's programming is also broadcast from 05h00- 06h00 on SABC 2 as Morning Live (the breakfast programme) is aired from 06h00-08h00.

SABC 3 children's programmes are on from 15h00-16h00 thereafter talk show programmes *Oprah* and *Tyra Bank*s take centre-stage. In the case of SABC 2, the news is aired at 17h30 when the children's slot ends. On SABC 1, soap operas are broadcast immediately after the children's slot.

It is assumed that all children are home after school ends each day. Whilst this might be the case for many children, there are those who commute to school and so are not home before 17h00. There are also instances of children having additional chores and responsibilities and so unable to watch television during the 14h00-17h00 band. Arguably, for some children sporting activities and school clubs might also detain children at school beyond the 14h00.

There has been ongoing debate as to the most appropriate times to schedule children's programmes. Given that according to SAARF, the most watched programmes by children

are soap operas, this begins to test the notion that children should to be doing homework when soaps are on. Perhaps children are in fact doing homework or other chores when YOTV is scheduled to be on.

The following tables available on the SAARF website (http://www.saarf.co.za) is instructive. It shows the highest AR rated programmes (most watched programmes) by children and by adults across all television channels.

Table 6

Children's most popular TV programmes

Week 24: Mon 03/06/2006 - Sun 09/06/2006			
SABC 1	**AR**	**SABC 2**	**AR**
GENERATIONS	20.4	7DE LAAN	13.1
GENERATIONS	20.2	7DE LAAN	12.9
GENERATIONS	19.5	7DE LAAN	12.6
GENERATIONS	18.3	7DE LAAN	12.3
NOMZAMO	17.0	MUVHANGO	11.6
GENERATIONS	17.0	MUVHANGO	11.2
THE BOLD AND THE BEAUTIFUL	16.9	7DE LAAN	11.0
THE BOLD AND THE BEAUTIFUL	16.8	NUUS	10.9
THE BOLD AND THE BEAUTIFUL	16.4	NUUS	10.1
ZULU NEWS	15.9	NUUS	10.1
SABC 3	**AR**	**ETV**	**AR**
ISIDINGO:THE NEED	9.2	INTERNATIONAL SMACKDOWN	15.1
ISIDINGO:THE NEED	8.9	LIVE LOTTO DRAW	12.3
TOTALLY OUTRAGEOUS BEHAVIOUR	8.6	INTERNATIONAL RAW	9.1
ISIDINGO:THE NEED	8.3	BECKER	7.7

NEWS	7.9	INTERNATIONAL VELOCITY	7.7
MUSIC	7.8	HOLY MAN	7.3
CRICKET:SA VS AUSTRALIA	7.8	A LEAGUE OF THEIR OWN	7.0
NEWS	7.8	NEWS UPDATE	6.9
SABC 3	**AR**	**ETV**	**AR**
NEWS	7.6	NEWS	6.9
ISIDINGO:THE NEED	7.4	SCANDAL	6.7

MNET	**AR**
EGOLI-PLACE OF GOLD	4.3
EGOLI-PLACE OF GOLD	4.1
EGOLI-PLACE OF GOLD	4.0
EGOLI-PLACE OF GOLD	3.9
RUGBY VODACOM CUP BULLS VS HILANDERS	3.7
CARTE BLANCHE	3.2
EGOLI-PLACE OF GOLD	3.0
PRISON BREAK	2.9
EXTREME MAKEOVER:HOME EDITION	2.9
MILLION DOLLAR BABY	2.

Table 7

Adults most popular TV programmes

Week 24: Mon 03/06/2006 - Sun 09/06/2006			
SABC 1	**AR**	**SABC 2**	**AR**
GENERATIONS	20.4	7DE LAAN	13.1
GENERATIONS	20.2	7DE LAAN	12.9
GENERATIONS	19.5	7DE LAAN	12.6
GENERATIONS	18.3	7DE LAAN	12.3
NOMZAMO	17.0	MUVHANGO	11.6
SABC 1	**AR**	**SABC 2**	**AR**
GENERATIONS	17.0	MUVHANGO	11.2
THE BOLD AND THE BEAUTIFUL	16.9	7DE LAAN	11.0
THE BOLD AND THE BEAUTIFUL	16.8	NUUS	10.9
THE BOLD AND THE BEAUTIFUL	16.4	NUUS	10.1
ZULU NEWS	15.9	NUUS	10.1
SABC 3	**AR**	**ETV**	**AR**
ISIDINGO:THE NEED	9.2	INTERNATIONAL SMACKDOWN	15.1
ISIDINGO:THE NEED	8.9	LIVE LOTTO DRAW	12.3
TOTALLY OUTRAGEOUS BEHAVIOUR	8.6	INTERNATIONAL RAW	9.1
ISIDINGO:THE NEED	8.3	BECKER	7.7
NEWS	7.9	INTERNATIONAL VELOCITY	7.7
MUSIC	7.8	HOLY MAN	7.3
CRICKET:SA VS AUSTRALIA	7.8	A LEAGUE OF THEIR OWN	7.0
NEWS	7.8	NEWS UPDATE	6.9
NEWS	7.6	NEWS	6.9

ISIDINGO:THE NEED	7.4	SCANDAL	6.7
MNET	**AR**		
EGOLI-PLACE OF GOLD	4.3		
EGOLI-PLACE OF GOLD	4.1		
EGOLI-PLACE OF GOLD	4.0		
EGOLI-PLACE OF GOLD	3.9		
RUGBY VODACOM CUP BULLS VS HILANDERS	3.7		
CARTE BLANCHE	3.2		
EGOLI-PLACE OF GOLD	3.0		
MNET	**AR**		
PRISON BREAK	2.9		
EXTREME MAKEOVER:HOME EDITION	2.9		
MILLION DOLLAR BABY	2.8		

It is interesting to note that there are no children's programmes featured on the rating, and that the lowest AR's on the SABC channels are in fact the News programmes. The other factor is that children do not constitute the majority South African audience and their programmes are scheduled during the day and not at prime time (19h00 to 22h00). Furthermore, in single television households, it is unlikely that children will be in control of what the entire family would watch from 17h00 onwards. The norm would be for adults to determine what programmes or channels to watch.

It is no surprise therefore that children are watching soap operas with a combination of South African and foreign soapies. Local soapie, *Generations* leads in the ratings game, and *Isidingo-The Need* falls behind an old foreign favourite *The Bold and the Beautiful*.

The local content regulation requires that children's programming be broadcast at times when children are available in substantial numbers to watch. The viewing trends

according to Ms. Tisani, a member of the SABC (marketing division) can be explained as follows:

> Across the week, the peak viewing time for children is in core prime time (20h00-21h00). The highest AR recorded was in the week at 20h00/ 20h30 - with the audience sitting on SABC1 (Generations 20h00 and Local Drama 20h30). If you consider that 81% of SA households that have TV - only have one set (AMPS 2005/6), then it follows that shared viewing is the standard, and in most instances the adult in the household will determine what is watched.- 22h00 seems to be the general "cut-off" when ARs for children start declining.

What this suggests is that children are part of the prime-time audience and perhaps more so than they are for the programming made specifically for them. Furthermore, that adults are definitely in control of what programmes are viewed in the evenings.

4.4 Perspectives from specialists, experts and lobbyists

Interviews were conducted with specialists who offered professional and personal views on the policy gaps and the practical challenges facing the SABC on programming for children.

4.4.1 Better marketing versus more content

An interview with Ms. Nicola Galombik was prepared for December 2006 and January 2007. She is regarded as an expert in the field of educational television and provided her perspectives on content for children. Her expertise was both as former head of SABC Education (between 1996 and 2001) and television strategy (2001-2003 now the content hub). In addition to her practical experience, Galombik was also policy specialist at the Independent Broadcasting Authority in 1995. She is therefore an ideal source to match policy and practice, having experienced both.

According to Galombik, the SABC had transformed during her time and the general quality and standards of content were raised. This is evident in the global recognition it gained for its children's programmes, over which she said, "many international awards were received". She argued that the work in children's television was innovative and that it had great social impact. The main concern at the time (and currently), would be, "whether content being produced is appropriate, effective, interesting, engaging and socially appropriate". She maintains that the answer to all this is a resounding 'yes'.

On the issue of language delivery, it was argued that there is no 'right way' to meet the needs of diverse audience segments and social segments. The hard question on this is linked to nation-building. "This is complex as separation and integration have to be considered, so too are considerations of cultures talking to themselves or to each other" (Galombik: 2007).

4.4.2 Research and evaluation: necessary to gauge impact of children's programming

According to Galombik, the SABC had embarked on broad consultation to determine what the 'right way' would be to address complex audience needs. Audience research also showed that African parents were in a dilemma as some wanted their children to learn English, and others were ambivalent towards language. She added it was a struggle to get parents to agree to Schools TV being done in Zulu or Xhosa.

The single most important contribution was a new approach to using research in the design of content and finding intersections between needs of the audience and public policy objectives.

The impact of the research was demonstrated in the education remit of the SABC. What children did with the content was being measured for the first time in a post-apartheid South Africa. According to Galombik, there had not been a comprehensive research, monitoring and evaluation component to assess the impact that certain television programmes had on children. It must be noted however that

such an impact assessment approach was only specific to educational television, mainly *School TV* and later *Soul Buddyz*. Galombik stated that the education division had to constantly prove the impact of its content in the battle for funding.

4.4.3 Children's self esteem as currency

The approach to content for children was to focus on self-esteem. This Galombik argues is 'currency' and has huge power. She adds that the 'born-free' generation have a great sense of pride and enjoy having self-worth reflected back at them. "The focus had to be on self-esteem for young people and some of the representation debates in local content for children was about making children feel valued and loved… to make good citizens" (Galombik:2007).

As to gaps that exist on television or in the current policy environment, Galombik felt that the SABC had made enormous strides since 1996. However, the single biggest challenge and almost failure for her would be the lack of marketing children's content and television in particular. According to her, the SABC has not understood how the market place of children's attention and time and parents attention and time works. She argues that the SABC had a generally weak marketing strategy, "*and, after all, children's media is marketing led*". She adds that massive marketing machines are needed to compete for space in the child's world. She submits that Mnet understands smart marketing and that since its inception when only one local production was offered (Carte Blanche) the audience were made to view Mnet as a totally local and South African brand. Similarly, Mnet's introduction and marketing of KTV was unmatched by the SABC.

Although the SABC is a public entity, it competes with commercial broadcasters for both revenue and audience share. It is within this context that Galombik argued for a greater marketing opportunity for SABC children's television.

4.4.4 Getting children to consume more of the SABC

According to Galombik, the challenge for children's television is not to create more content but to make sure that content is in fact consumed. "*To get it consumed you need to engage parents and children themselves"* (Galombik: 2007). She questions what of the 'local is lekker' movement for children? The proudly South African campaign does not filter down to children and that children are in fact brand conscious and aware. Galombik believes that even poor children are brand aware. This claim would require an in-depth study as a recent outreach programme conducted by the Department of Communications and ICASA in preparation for the 5th World Summit on Media for Children showed that children across the country do not have the same access opportunities to television, with some not having seen a television screen at all. It would therefore be problematic to assume that all children understand brand identity and loyalty.

Galombik compared the United States of America movement on kids television to South Africa and argued that in the USA children's television was consumer-led whilst in South Africa it is primarily government-led. She observes that the most successful policy environments have been those led by the consumer and the public.

> "If one considers that the discourse that predominates is 'a safe space and good space for children' then some connection needs to be made between what is good is also local" (Galombik: 2007).

4.4.5 Children's drama - to fund or not to fund

The issue of local content and the lack of children's drama was not of particular concern to Galombik. Having been in the forefront of content and budgeting considerations, she argued that high investment must equate to high audience ratings. Her approach was that a high investment needed to go into fewer programmes and budgets into marketing these programmes to yield the necessary audience numbers. This she acknowledges, will mean a change of perspective on local content. She was also of the opinion that children's

drama would be too costly to justify because 'a cost benefit analysis must inform a decision'; furthermore, that children have access to adult dramas and soap operas and so have high quality expectations. She adds that children's drama would have to be done really well and the authenticity and narrative as well as aesthetics would need to be no different from making drama for adults and this is at a high cost.

4.4.6 Repeats: we've seen this all before gogo (grandma)

On the issue of programme repeats for children, Galombik, ETV and the SABC concur that children require a certain level of repeated programmes. The cognitive development of a child exposed to repetition whether through nursery rhymes or songs has been cited as an example. It was suggested that the lifespan/shelf-life of children's programmes be extended to accommodate the need for repeats (Galombik and Keene-Young interviews 2007/2006). However, ICASA's quota obligations and point allocation for repeat programming does not reward repeat broadcasts. This it was felt, should improve the format factor calculation and have *children-only* repeated programmes promoted and rewarded. The definition of repeat programming as per the SA Local Content Regulations is as follows: *"Repeat" means television programming that is not first broadcast by a South African television licensee and has been broadcast by another South African television licensee.*

The 'Repeats Score' as per the regulations is as follows:

a) *for first repeat of a South African programme = 50%;*
b) *for a South African programme originally screened on another South African television channel = 50%;*
c) *for broadcast of the week's episodes = 50% and*
d) *any further repeats of the programme shall not count towards compliance with the South African content quota.*

For Galombik there are greater challenges on the horizon for the SABC. This is due to the multi-channel environment and new services that will become available to audiences. "Choice is growing exponentially. No longer is the SABC the only choice as

the monopoly broadcaster" (Galombik: 2007). New services will become more affordable and audiences will move across channels and services more quickly. She underscores her statement that the SABC's marketing will need to dramatically change if it is to compete for audiences and critically in this case, the child audience.

These views and observations will be explored further in Chapter five of this study.

4.5 Lobbyists and the policy scope of children's television

The Children and Broadcasting Foundation for Africa has been chaired since its inception in 1997, by Firdoze Bulbulia. Having worked in the children's rights sector, she was nominated by the IBA to attend the First World Summit on Television and Children held in 1995 in Melbourne, Australia. Together with Ms. Galombik as policy specialist at the former IBA, they attended the Summit from the perspectives of broadcasting policy and children's media rights.

Ms. Bulbulia has also chaired the 5th World Summit on Media for Children and is regarded as a specialist in the field of content development with and for children. She has also introduced a course on Media and the African Child at the Ohio University in the USA where she teaches annually. The CBFA has conducted research with primary school learners as well as workshops across South Africa. According to Bulbulia, South African children are avid viewers of YOTV, with the majority of children watching the SABC. She notes that programming is still racially fragmented and that white children still have better access to services like DSTV and Mnet, and seem to watch more foreign (USA product) soap operas than black children. She also observes that the producers of children's content are predominantly white South Africans, many of whom left the SABC to form independent production companies. The values and aesthetics that prevail on television are shaped by a limited number of producers. Creating an Afrocentric television service would need the aesthetics of a wider pool of South African tastes, values and images.

Her view of children's television on the SABC is that it has transformed dramatically over the past decade. However, African language programmes are still a challenge. She argues that South African children do not see themselves in all their diversity and that rural children are particularly absent on screen. Her response to children's drama was diametrically opposed to that of Galombik as she argued that children are less concerned about the technical quality as they are usually gripped by the storyline or main protagonist. Having worked with children locally and across the continent in many communities, she is not convinced that children's drama be bench-marked against foreign or adult drama. She agrees that budgets are usually the prohibiting factor, but argues that the quintessential South African children's drama is still to be made.

Bulbulia also observed that a new amalgamation of languages spoken by young people with distinctive phrases and words is emerging, leaving older audiences less familiar with the lingua-franca of the youth. This can be seen and heard in racially mixed schools, especially with older learners. Bulbulia suggests that lessons be learnt from countries that use mobile telephony to support second language learners. The mobile phone is used to reinforce the pronunciation of words that are used in television programmes for both adults and children.

4.5.1 Children's perspectives : deserving and necessary

In addition to the need for more diverse representation of children on television, Bulbulia also proposed that the child presenters be sourced from across the country and ideally from public schools.

Whilst she advocates for greater opportunities for children to participate in the creation of programmes she cautioned that children are not trained professionals in television production. They would therefore require guidance and must work closely with qualified personnel. She also proposed that producers be trained in working with children and that specialized skills are needed to produce content for children just as producing documentaries and film demands distinctive expertise.

For Bulbulia, the diversity and range of genre available for children must be improved. She argued that ritual, dance, art, food, ancestry and heritage are areas that are lacking in programmes made for children. In workshops conducted in all nine provinces, it was found that children did not see value in their ritual and spiritual activities and tended to avoid discussing these in favour of the urban image they see in the presentation style of the SABC's *YOTV* or *Take 5* programmes.

Bulbulia also argued that not enough audience research was being conducted that focuses on the child as a citizen and not a consumer. She also claimed that in the past, some research had been shaped and designed to support a specific outcome to promote certain programme concepts. She said, 'Research is skewed at times and needs to be addressed'. Here she was also skeptical of 'research for research's sake' and felt that dedicated resources be allocated by the broadcasting sector for in-depth studies.

4.5.2 Value and self-worth – indigenous knowledge

Like Galombik, Bulbulia is of the opinion that children must feel valued and have a sense of self-worth if they are to embrace the SABC's 'total citizenship' principle. She suggested that value and self-worth are reinforced when children feel proud of their cultures and ancestry. At the moment, she contends, children are presented on television as foreign to the local experience. The entire mis-en-sense of the SABC's children's programmes are based on an urban, "cool" and Americanised setting. This does not augur well for indigenous and local content and cultures.

Bulbulia commended the SABC on *Takalani Sesam*e due to its groundbreaking introduction of 'Kami' the HIV positive (Muppet) character. In addition, she stated that this particular imported format is totally localized making it hugely appealing and successful. The multi-media package in which *Takalani Sesame* brings radio, television and print together provides wider access and so greater audience impact. She added that the SABC's *Schools TV* as a supplement to pre-school and primary school education has made a huge impact on learners, especially in under-resourced schools.

Given that Bulbulia is also a former educator, she is concerned with the celebrity status given young television presenters and suggests that broadcasters adopt a more progressive approach in grooming presenters to be positive role-models (e.g. for reading and schooling) as opposed to looking "cool" and 'speaking American'. Presenters should be more attuned to the image they portray to younger children and also the values that they inculcate.

4.5.3 Investing in children's television: what a drama

The cost per minute to produce a quality children's drama is far less than that budgets allocated to an adult drama. The financial resources are simply not forthcoming and coupled with the notion that children's programmes are revenue deficit, the paradigm will not shift. Bulbulia argues that there is a global demand for African programmes (especially in Europe and on Public Broadcasting Service in the USA) and that packaging these for an international market ought to be explored.

The item exchange (bartering) concept allows for a broadcaster to produce one part of a 12 part series and receive 11 programmes from the participating broadcasters. This reduces costs whilst providing unique content from participating broadcasters. The SABC has not to date developed an item-exchange in the region for its children. A simple series on the foods we eat in different parts of the continent or the games children play at school, are examples that have been offered over time.

4.5.4 Children and adults – watching responsibly

The scheduling of programmes for children is constantly debated and according to Bulbulia requires some attention. She submits that whilst the effectiveness of the watershed time of 9pm must be researched, parents and caregivers or guardians must become responsible in the home with regard to the child's access to content. She suggested that the approach needs to be for more adults to be watching programmes with their children and sharing the learning and entertainment experience.

On the way forward for the SABC, Bulbulia argued for quotas to be spelt out for specific genres so that issues of diversity and plurality are actively fostered by way of regulation. She believes that set hours be put to drama for children as well as documentaries for children as children learn from life experiences and documentaries present such histories and living testimonies. She also advocated the African storytelling tradition to be used and for African literature to have a firm place on television for children.

Her final recommendation was for the SABC to support the development of children's film, be these in short film, TV dramas or docu-dramas.

4.6 A regulatory perspective on programming priorities

In 2004 ICASA proceeded to amend the SABC's licence in accordance with the Broadcasting Act. Whilst the regulations for local content for the public broadcaster clearly spell out the quota requirement for the SABC, former Councillor Lumko Mtimde (2007) was asked what the key elements were when developing the final licence conditions for the SABC's children's television programming. His response was:

> It was in the main whether the programming does reflect a full spectrum, thereby covering every sector's interest including children. Also, considered was the relevant time for airing children's programmes. Finally, the languages used in such programmes.

On the issue of national policy objectives at play when looking at television for children in South Africa, Mtimde's response was, "promotion and protection of our cultures and languages – and educational empowerment".

As to his view on possible 'gaps' within the current television offerings for children, Mtimde offered the following:

> Gaps still exist to some extent on the language front. More programming in indigenous languages needs to be produced and aired. The other gap is

> with respect to television offerings that are during the times when children are watching, which promote violence and nudity. These need to be reviewed.

As far as the regulatory environment goes, Mtimde suggested that the regulations are sufficient. He did add however that "these may need to be strengthened during the review period". In response to a final question on what he considers as a 'burning' issue on television for children, he commented: 'the issue of languages, non-violence and locally produced children's programmes'.

4.7 A media 'watchdog' perspective on programming for children

The concerns raised by the Executive Director of the Media Monitoring Project (MMP) and representing the MMP, William Bird, were linked to the general programme spread for children as well as the relevance of content to rural children. According to the MMP, issues of human rights ought to be more integrated in programmes for children. It was felt that the rights of all children do not necessarily form part of the SABC's general approach to children's content.

The MMP regarded the watershed period of 9pm as another challenge because this seemed to have opened the floodgates for explicit content that might be inappropriate for family viewing. The Parliamentary probe into violence and pornography and access to such content by children would require better standards for all broadcasters.

Whilst the MMP argued that there should be more time allocated to children's programming, there was also a strong emphasis on government funding such content.

The issue of children's drama was raised as a genre that requires development. Coupled to this was the need to build children's drama in languages other than English. It was also suggested that, *Soul Buddyz* not be used an example of children's drama as it is not funded by the SABC, nor is it scheduled specifically for children's viewing" (Bird:2006).

There was acknowledgment that in general, children's programming has definitely improved over the past 5 years and so is a "real move in the right direction".

4.7.1 Advertising to children and sponsoring content

The MMP viewed the development of the SABC's kids news and current affairs on SABC 1 as a "step in the right direction". There was however a cautionary note that "the SABC needs to have a firm sense of public service". In this regard, the MMP proposed that advertising during children's programmes be removed. There was also a suggestion that the sponsoring of children's content be strictly regulated. The overt 'selling' to children was considered problematic.

ICASA was meant to have engaged broadcasters (2004) in a review of the Advertising and Sponsorship guidelines. This was to have addressed the possibility of phasing out product placement in children's programming as well as the sponsorship of news programming. The review is still pending.

There is a wealth of international research on marketing to children. No doubt local research has been happening as well and should form the basis of an ICASA review. Whether or not ICASA eventually addresses this issue, it is necessary to look at the implications of marketing to children.

The issue of advertising and funding children's programming will be explored in Chapter five.

4.8 The Policy Maker on programming for children

The Department of Communications (DOC) and the communications regulator, ICASA, organised a colloquium to consider a draft framework on guidelines for regulation and policy on electronic media for children. This colloquium was done specifically in preparation for the 5th World Summit on Media for Children. The colloquium was held on 15 February 2007 with a follow-up meeting on 19 March 2007.

A range of stakeholders attended from non-governmental organisations (NGOs) working in the field of children and media, children's rights, child-participation and media monitoring. As the colloquium was intended to focus on a policy and regulatory framework in the electronic media and ICT sector, broadcasters, telecoms operators, government departments and the regulator were key participants and the process was led by the Department of Communications. It was chaired by the Chief Director of the Directorate on Gender, Disability, Youth and Children (GDYC), Ms. Petronella Linders.

As a government department, it has grouped large sectors of society into one directorate. This seems to be consistent with the way in which the law captures these sectors of society in a single catch-all group (see underlying statutes). In this way, the distinct needs of each sector are simply lumped together. The rationale used to support this approach has been that these sectors have mutual needs and so can be addressed at once.

The findings of this colloquium show some consensus in what stakeholders see as gaps in programming for children. These were summarised in the Draft Report on the DOC/ICASA Colloquium: Feb 2007, as follows;

1. Not enough children's programming;
2. Lack of cultural diversity;
3. Limited African languages and a predominance of English in programmes for children;
4. Insufficient local content;
5. Children are hardly seen in the news and when they are, they are victims;
6. There is a lack of diversity in the representation of children;
7. Stereotypical roles of girl children (always as passive or victims) must be addressed;
8. The opinions and voices of children are seldom heard;
9. More programmes like the SABC's 'Kids News Room' should be promoted;

10. There is a need for positive role models;
11. Child-participation must be encouraged and trained professionals to work with children;
12. Age appropriate involvement in decision making and other levels must be adhered to if real child participation is to be achieved;
13. The scheduling of children's programming does not accommodate the availability of children to watch or hear these programmes;
14. There is limited access for children with disabilities;
15. The total diversity of children is not represented to include vulnerable children i.e. children at children's homes, street children, children outside the schooling system;
16. There is a lack of authenticity of children's voices and
17. There is limited parental guidance and awareness.

Whilst this list is not exhaustive, these were some of the significant issues raised by stakeholders attending the colloquium. Proposals put forward in the Draft Report on the DOC/ICASA Colloquium Feb 2007, include:

1. Media literacy must be promoted in school;
2. A funding model for children's programming must be developed;
3. A criteria for application to the Media Development and Diversity Agency (MDDA) for funding children's programmes should be considered;
4. Meaningful participation of children in scheduling and programme conceptualization must be considered and
5. Scheduling must be done to accommodate all children and must reflect the nation in its entirety, (example featuring children with disabilities must be scheduled for all children).

The colloquium also called for a framework to be developed on working with children to make child-participation part of the system of programming for children. There was also a call for broadcasters to work with the NGO sector and specialist child development workers in programme conceptualization.

Another concern for many participants was the perceived lack of the producer's knowledge of child's rights, the portrayal of the child and ethical considerations when working with and 'promoting' children. There was a strong motivation for children to produce their own content and that this is a powerful tool to promote children's self-advocacy. Furthermore, it was also recommended that children not only be consumers of the media but participate meaningfully in the planning, production and scheduling of programmes made for them.

4.9 Conclusion

There was a common thread throughout the inputs made by stakeholders and specialists. The through-line was for a greater investment in children's programming. This 'investment' was closely linked to the need for programming to be more relevant to all South African children. It was also for programmes to be more representative, culturally more diverse and geographically more inclusive. There was a general consensus that a review be done to determine the most appropriate times of the day for children's programmes to be scheduled. The call for dedicated funding as proposed during the Department of Communications and ICASA colloquium (February 2007), is critical to fully realizing public service programming for children.

Table 8.1

SUMMARY OF PROGRAMME QUOTAS IN LICENCE CONDITIONS FOR SABC TELEVISION

SABC 1 – Genres (FY –Financial Year)

	FY 06/07	FY 07/08	FY 08/09	FY 09/10	FY10/11	FY 11/12
News	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily
Current Affairs	2h / week 1h in prime time	3h / week 1h in prime time	4h / week 2h in prime time	5h / week 2h in prime time	6h / week 2h in prime time	7h / week 2h in prime time
Informal Knowledge-Building	10h / week 2h in prime time	12h / week 2h in prime time	14h / week 2h in prime time	16h / week 2h in prime time	16h / week 2h in prime time	16h / week 2h in prime time
Documentary	3h / week 1h in prime time	3h / week 1h in prime time	3h / week 1h in prime time	4h / week 2h in prime time	5h / week 2h in prime time	5h / week 2h in prime time
Drama	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time
Children's	20h / week	20h / week	20h / week	20h / week	20h / week	20h / week
Education	10h / week	10h / week	10h / week	10h / week	10h / week	10h / week

Table 8.2 SABC 2 – Genres (FY-Financial Year)

	FY 06/07	FY 07/08	FY 08/09	FY 09/10	FY10/11	FY 11/12
News	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily
Current Affairs	2h / week 1h in prime time	3h / week 1h in prime time	4h / week 2h in prime time	5h / week 2h in prime time	6h / week 2h in prime time	7h / week 2h in prime time
Informal Knowledge-Building	18h / week 2h in prime time	18h / week 2h in prime time	18h / week 2h in prime time	18h / week 2h in prime time	18h / week 2h in prime time	18h / week 2h in prime time
Documentary	4h / week 1.5h in prime time	4h / week 1.5h in prime time	4h / week 1.5h in prime time	5h / week 2h in prime time	5h / week 2h in prime time	5h / week 2h in prime time
Drama	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time
Children's	15h / week	15h / week	15h / week	15h / week	15h / week	15h / week
Education	10h / week	10h / week	10h / week	10h / week	10h / week	10h / week

Table 8.3

SABC 3 – Genres **(FY- Financial Year)**

	FY 06/07	FY 07/08	FY 08/09	FY 09/10	FY10/11	FY 11/12
News	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily	7h / week 3.5h in prime time 30 minutes packaged as a single programme daily
Current Affairs	5h / week 1h in prime time	5h / week 1h in prime time	5h / week 1h in prime time	5h / week 1h in prime time	5h / week 1h in prime time	5h / week 1h in prime time
Informal Knowledge-Building	11h / week 2h in prime time	11h / week 2h in prime time	11h / week 2h in prime time	12h / week 2h in prime time	12h / week 2h in prime time	12h / week 2h in prime time
Documentary	4h / week 1h in prime time	4h / week 1h in prime time	4h / week 1h in prime time	5h / week 2h in prime time	5h / week 2h in prime time	5h / week 2h in prime time
Drama	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time	24h / week 8h in prime time 4h SA in prime time
Children's	7h / week	7h / week	7h / week	12h / week	12h / week	12h / week

Chapter Five

Analysis

This chapter analyses the findings presented in chapter four. An analysis of the regulatory framework and programming practice of the SABC is provided. The gaps in policy and practice are revealed with a view to recommending new policy directions.

5.1 Catering for children: the policy and regulatory framework on public service broadcasting

The overarching policy and regulatory framework developed since 1994 with the introduction of the IBA as broadcasting regulator and custodian of the public interest, ushered in a clear intention to deliver on the needs of children. The manner in which children are served by the SABC is as a result of both the SABC's own mandate as a public broadcaster and the underpinning broadcasting legislation (e.g. IBA Act, Broadcasting Act, ICASA Act etc) and licence conditions assigned to it.

This study has found that the SABC complies with the licence conditions in so far as the weekly hours required for the SABC to schedule programming for children is concerned. The SABC, through its Charter and Editorial guidelines, claims that it caters for the child as an audience in providing daily programming on schedules across all three of its television channels.

In analyzing the history of the SABC it was found that the SABC has transformed itself over the past decade from being a broadcaster that served the needs of children within a separatist policy (keeping black and white children apart), to one that is now seemingly unifying. Substantial investment (pre-1990's) had gone into developing programmes in Afrikaans and English for children whose home languages range from one to nine of the official African languages. A dramatic shift from uni-lingual programmes to multi-lingual programmes for children was introduced by the SABC in the early 1990's.

The SABC's pre-school educational programmes also began to include more than one home language.

The diverse cultures and languages as well as spiritual and religious beliefs pose many challenges to programme-makers. Furthermore, apartheid sought to erode any development of a homogeneous society. However, in building a 'new nation', focus is now placed on national identity and public interest. Children are as much a part of the public and government policies have guaranteed their protection.

5.1.1 Objects of the Act: sectoral priorities

The initial steps taken by the IBA in 1995 to address the child audience in a more holistic manner set the framework for the development of local content regulations that defined the South African 'child' as an audience segment. The later policy interventions that catered for 'children' in the Broadcasting Act (1999, as amended), the Broadcasting Amendment Act of 2003, and the Electronic and Communications Act (2006) set the framework for placing the needs of children within the communications sector. However, the blanket 'catch-all' of placing children, women and disabilities in one clause in the overarching objects of these Acts, undermine the need to address these specific target audiences (and indeed sectors of our society) specifically. The approach is flawed and problematic in that these important sectors of our society are regarded by law makers, as having the same or similar 'special' needs. We have also seen that according to Statistics South Africa (2006 figures), children under the age of 14 make up 32% of the total population and that women make up 51% whilst people with disabilities comprise almost 5% of the total population. These sectors deserve a specialized and individualized focus in all policy development processes and legal instruments to protect and promote their rights.

Although children under the age of 17 comprise almost 18.1 million of the total 47.4 million citizens (Stats SA, 2005), much remains to be done on the relative influence which broadcasting has had on its audience in the recent history of South Africa (Tomaselli, Teer-Tomaselli and Muller:1989). It can be argued that almost 15 years later, the independent research on public broadcasting and specifically the child audience (since democracy) still requires attention. Buckingham (1998) provides an international

perspective on research in this area. He states that the study of the institutional context of children's television production has been a relatively marginal concern with communications research generally.

5.1.1.1 SABC editorial policies focus on children

This dissertation is only concerned with public service television for children. The research shows, by way of programme schedules (Appendix 4) and interviews with Hassen and Owen (2006), the earnestness with which the SABC has developed programming for South Africa's children. This is also emphasised in the SABC's editorial policies:

> The SABC's approach to programming is guided by the following principles; the programmes are underpinned by the SABC's core editorial values of equality, editorial independence, nation building, diversity, human dignity, accountability and transparency. These influence the production, commissioning and acquisition of all its programmes.

The SABC Editorial Policies:2004 go further to discuss meeting the needs of the widest cross section of South African audiences.

> Across its portfolio of stations and channels the SABC aims to meet the needs of all *audience segments* (emphasis mine). This extends to young and old, urban and rural in all the provinces, speakers of all the official languages, and people of every religious persuasion.

It is not possible for the SABC to please everyone all the time. The SABC therefore states that it will endeavour to offer a wide range of information, education, and entertainment in a variety of genres and formats, in which everyone should find something of interest some of the time. It is interesting that the SABC refers to 'audience segments' and not 'citizens' or sectors of society/public.

The increase in programming in languages other than English (as per licence conditions) over 5 years for SABC 1 is from 28.5% to 32.5 %, representing an increase of 4% over 5 years. The SABC 2 increase is from 30.9% to 32.5%, representing an increase of 1.6% over 5 years. Whilst SABC 3 is licensed as the SABC commercial public service, the increase will be from 5% to 10% over 5 years. Although the licence conditions are designed to improve on the number of African language programmes on all three channels, the overall SABC television services remain predominantly English. SABC 3 is 90% English with SABC 1 and 2 being between 68 and 70% English. It is concerning that the SABC does not conform to a key principle of public service broadcasting – i.e. prioritising the most widely spoken languages (African languages) in all its programming.

The SABC will be required to produce new content in African languages and not rely on dubbing or subtitling programmes. The budget will need to be aligned with the licence conditions and if the current scenario is about 'fighting' for funds, the situation would in all likelihood threaten further good quality and innovative programming for children. Even in a scenario where funds are allocated, there is no guarantee that the scheduling of programmes will be appropriate. Ellis (2000:36) reminds us that scheduling acts as a fortress of authenticity against imported programming. For this reason alone it must be a core element of the overall strategy of the public broadcaster.

The SABC has often argued that it cannot provide greater language diversity on television. The commonly held view is that three channels do not present enough space/time to schedule for all languages. With the impending licensing of two additional regional services, it is anticipated that greater African language diversity will finally be realised. The SABC states that (SABC Editorial Policies:2004), '*everyone should find something of interest some of the time'* (emphasis mine). Given that the SABC is not a niche service but a full spectrum public service, it should not be offering a niche children's service - it must cater to all citizens. According to Galombik however, (interview:2007) the current schedule for children is 'pretty substantial in the life of a child – especially when you consider what other activities you are competing with'. What is evident is that the activities of children across racial, gender, geographic location and class divide cannot be regarded as the same. It is therefore incorrect to suggest that programming on offer by the SABC is substantial The amount of children's

programming might even be regarded as too little for some, whilst others might regard the scheduling inappropriate and so programming ineffective.

The SABC editorial policies go further to state that:

> … as the national public broadcaster it is our duty to encourage the development of South African expression. We therefore showcase South African talent, support South African culture, and aim to develop programmes that are identifiably South African. These should contribute to a sense of national identity and of shared experience, and to the goal of nation building *(SABC Editorial Policies:4).*

The policy goes on to say that 'freedom of expression is at the heart of our programmes. We provide a home for programme-makers that encourages them to innovate; to take risks and to develop their craft so that audiences may be given a rich diversity of top quality programmes'.

For these editorial statements to be realised, funding must be a prerequisite to support innovation in programming and broadening the talent base. The innovation and uniqueness of content that the editorial policies seem to advance, is not realised in the area of children's programming. In fact, foreign programme formats are becoming increasingly available on the SABC (e.g. *Strictly Come Dancing*, *The Weakest Link, Pop Idols, The Apprentice* etc), as well as 'copying' with some artistic licence children's programmes as seen on the BBC (e.g. *Blue Couch*).

5.1.1.2 In search of a South African identity

Stuart Hall (1992) suggests that there are primarily two ways to think about identity. Identity can be defined in relation to a shared culture. Specifically, identity reflects shared historical shifts. Furthermore, identity, even if rooted in a shared cultural experience is also based upon individuality and the notion that everyone is 'different' and 'unique' in some way. Cultural theorists and scholars agree that identity is fluid, ever changing and negotiated, (Hall 1992). South Africa has been on a journey to develop a sense of nationhood and national identity. The concept of national identity is also not new to

public broadcasting as seen when Lord Reith engaged the former South African state broadcaster delivering the BBC model of public service broadcasting. What keeps content identifiably South African is local programming in African languages.

The national identity and shared experience however cannot be measured without in-depth research and analysis. Similarly, the impact of television content as a tool for nation building would require extensive research. The SABC's editorial policies that support a 'shared experience' and 'national identity' must be measured against its own campaigns. For example, a survey on the '*Simunye – we are one*' campaign on SABC 1, ought to have been done. It might have filtered through to communities as might the newly launched SABC 'Vuka Sizwe-total citizenship' campaign. Whether the intended messages of nationhood or collective citizenship are understood by younger audiences requires some investigation.

5.1.1.3 Children's programming values: public service values

The African National Congress (ANC, the ruling party in South Africa) Draft Cultural Policy states that:

> since the media also conveys values, there is a need to ensure the balanced introduction of values that will assist in the establishment of a new society, such as democracy, human rights, peace, justice, and also second-generation rights, and in general…Values also need to reinforce the place of South Africa in the subcontinent, its role in the continent, and its role internationally, and locally to strive for a positive portrayal of South African life.

The public broadcaster's role as the major electronic media in South Africa has a specific role to play in establishing a new society. The SABC conveys values whether consciously or unintentionally. During stakeholder engagements (Children's Voices: from 1996) with the SABC, children's rights activists have on occasion suggested at a very cursory level, that the on-air continuity presenters (who are revered by younger audiences), begin to represent and promote certain values. These would range from

encouraging reading, schooling, tolerance and self-discipline etc. Suggestions such as these have over time been discussed but evidently not considered by the SABC.

Blumler (1999) posits that European recognition of children as potentially vulnerable viewers presumes the validity of three related values: respect for their developing educative needs, fairness in the sense of not exposing them to sophisticated advertising messages before they have developed a protective awareness of persuasion, and avoidance of exposure to overly adult fare. In response to these values, he states that there is a continuing commitment for public broadcasters to provide educative programming for children (in the UK commercial licence holders are required to give 'sufficient amount of time' to 'programmes intended for children'). In South Africa the commercial broadcaster, ETV is also required to do at least 12 hours of children's programming per week. With regard to the second value, several countries have banned advertising before, during and following children's programmes. On the third concern, 'watershed' scheduling times apply to most European societies – and this is the case with South Africa as well. The 'watershed' is explained by Blumler (1999) as certain specified hours before which broadcasters should presume that children will be in the audience and should not therefore be inadvertently exposed to more adult portrayals.

Chapter Four of this study discussed the South African regulatory framework relevant to children's programming. As in the European scenario, South Africa's approach to these three values is found in the primary objects of the IBA Act, where the educative needs of children is spelt out. Later the development of guidelines and policies on advertising and sponsorship were issued, as well as the Broadcasters' Code of Conduct that introduced a 9pm watershed.

5.1.1.4 The SABC Charter : striving to meet the needs of children

The SABC is also governed by a Charter and in Section 10 of the Broadcasting Act (1999 as amended), the SABC is expected to (S10(1)(g)… "*strive* to offer a broad range of services targeting, particularly, *children*, women, the youth and the disabled" (emphasis mine).

Critical political economy of the media argues that a public broadcaster's ability to deliver programming for children (that responds to their educational, cultural, social and emotional needs and development) is influenced by both the funding structure of the broadcaster and the influence of government policy. Critical political economy of the media is also concerned with how economic dynamics impact on the types and range of media content and how that relates to the needs and wants of audience as citizens. As far as the SABC is concerned, the limited programme range and African language programming for children is due to a lack of financial resources as well as competing for time in the schedule (Hassen interview: 2006). The SABC's Hassen also states that children's programming budgets compete with sports and other genres. Children's programming is never scheduled outside of the dedicated timeslot of 14h00 to 17h00 to make way for soap operas and talk shows that start after 17h00. This fixed schedule it would seem is not likely to change and is in need of some public review.

Programming for children must be considered within the context of the broadcasting law. The provision is for the SABC to *strive* to offer a broad range of services targeting children. Furthermore, the provision includes women, youth and people with disabilities. It must be challenging for the SABC to choose which of these sectoral groups it will prioritise and then to what extent it will *strive* to allocate meaningful resources to making a broad range of services available.

In contrast, the Broadcasting Act (1999 as amended) makes provision for commercial broadcasting services in Chapter V of the Act -under S30(2)(c) in the following way:

> The programming provided by free-to-air television broadcasting services *must* as a whole include levels of South African drama, documentaries and *children's programmes* that reflect South African themes, literature and historical events, as prescribed by regulation.

Although the provision is framed within the principle of 'viewed collectively', it does not require the free-to-air (private) broadcasters to *strive* to provide programmes for children

that reflect South African themes, literature and historical events - it states that these broadcasters *must* make these provisions.

It is also interesting to note that the public broadcaster does not have a similar provision on programmes that require it to reflect South African themes, literature and historical events, whether prescribed by regulation or as part of its general remit. We have seen earlier in this chapter the SABC's editorial policies calling for nation building and a shared experience. Some would argue that historical events and programmes made to support the re-telling of South Africa's history (particularly to children) is critical for a public broadcaster, yet the broadcasting law assigns this to the private sector. In analysing the SABC schedules, this study has not found any dedicated children's programmes on South African historic events or general history.

In answer to the policy and regulatory framework that exists for children's programming, the legal instruments by way of the broadcasting legislation, the policy positions and regulations as well as the SABC licence conditions provide such framework. These instruments also give life to the government's commitment to implementing the principle of a "first call for children" as adopted in 1996.

Considering that children's programming must be offered within the context of the wider and more general public service mandate, a closer assessment of the public mandate as it relates to children's programming is necessary. The public service remit includes programme range and diversity, appropriate scheduling, and sustainable funding. These issues are discussed below.

5.1.1.5 Scheduling and repeats

The British Broadcasting Corporation (BBC) has been lauded internationally for developing programme scheduling into a fine art that extends and targets the essence of the public service remit. In other words, the BBC has managed over time to place programmes at the most appropriate times as well as developing innovative programmes that would be targeted at specific audience segments.

The actual times of the day that must be set aside for children's programming is not specified by the regulator. The regulations require that these programmes be aired when children are available in substantial numbers to watch. The IBA (1995) proposed that factual knowledge building programmes also need to be guaranteed 'in the heart of children's schedules'. Furthermore that, the early morning and weekend provision of programmes for children be extended and improved. At no point does the regulator state that children's programming be broadcast in the early morning, or mid to later afternoon. This trend and precedent of scheduling children's programmes has not been altered or challenged.

This study has found that the programme schedule for children also includes a greater number of repeat programmes than programming for adult audiences. Galombik (interview: 2007) argued for a higher repeat rate for children's programmes and a bigger focus (in terms of budget and resourcing) on marketing the programmes/brands. According to Yvonne Kgame (Head of SABC Content Hub) (2001) this high repeat value for children has been studied and proven to work for children. She has been quoted as follows: "It is no accident that *Takalani* has a strong repeat strategy, this worldwide strategy in educational children's television is supported by 30 years of formative research worldwide on the need to repeat programmes for children, and the younger the child, the greater the need". Whilst this might be valid, the high level of repeat programmes lead to a lower rate of investment in new programmes for children.

Ms. Keene-Young (2006) the Channel Director of ETV, (free-to-air national broadcaster) also argued for some reward system for repeated children's programmes. The policy issue here would be to consider what the cut-off for such repeats would be. A maximum threshold is necessary so that the schedule is not simply filled with repeated programmes. In addition, an assessment of the type of genre of programmes, as well as age group that would require a high repeat level would need to be done. A high financial investment required for children's drama would arguably require that such programmes be repeated. Certain series' and programmes become popular enough to warrant repeats at different times of the day so that it reaches a wider audience. The cognitive development of the

child must be considered when determining which programmes need to be repeated.

SABC 3 is licensed as a commercial public service and so has a reduced public service mandate. The core public service channels are therefore, SABC 1 and SABC 2. Re-capping on the programme schedule show the following:

- SABC 1, children's programming is scheduled from 05h02 to 06h30 in 2006, (a decrease from the 05h02 to 07h30 in 2005) with *YOTV land* and *Takalani Sesami* (repeated programmes), and then from 15h00 to 16h40 dominated by the *YOTV* brand, with segments titled; *YOTV biz, YOTV Ozone,* Kids News and current affairs, *YOTV Wild room girlz/boyz*.
- SABC 2 starts its children's programming at 05h30 to 05h55 with *School TV* and from 09h00-09h30 *Thabang Thabong* and *Tube* from 09h30-09h45.This is followed by *School TV* at 10h00-10h45. The afternoon programme brand is *Tube* from 15h00-15h30.

The programme schedule for children is also the first to be affected by national or international sporting events that the SABC might have acquired broadcasting rights to (see Appendix 4, schedules SABC 3 cricket, February 2006 and A1 Grand Prix, Oct 2006). It is usually the case that events that are broadcast live will take over the children's schedule. However, there has not been any instance of children's programming being recouped with additional time on the weekends or in the week. The scheduling changes that occur in these instances are also not addressed by alternative complementary radio or television services. Furthermore, audience information on when children's programming might be re-scheduled is not readily available.

This study submits that neither the regulator nor the public broadcaster has produced evidence or research to support the current practice. It is proposed that a national study be conducted to deduce the best time slots for children's programming.

However, no amount of research and investigation will solve the issue of resourcing the children's programming division at the SABC. Unless there is a paradigm shift on the part of government to allocate dedicated funds and additional platforms for the television

needs of all South Africa's children to be met.

5.1.1.6 South African content for South African children

According to Gross (1995) the most dramatic example of the lack of domestic control of television occurred in 1992 when Polish leader Lech Walesa pointed to a television set when asked what caused the breakdown of communist control. Gross (1995) states that new and emerging delivery systems like satellites and the Internet, continue to push the control of television beyond the purview of national governments. Whilst such access to satellite and Internet is true for industrialised nations, such access is a huge challenge in South Africa and Africa as a region. The continent is concerned with basic access to television services let alone the Internet[18]as radio is still the primary broadcasting medium on the continent. Furthermore, local content is the most popular for South African audiences and so foreign content is unlikely to have a significant impact on the political attitudes of citizens.

Programming from other countries is standard fare in the South African television diet. It is this exposure to foreign product that, according to Galombik (interview: 2007), requires local producers to improve on quality and format. She claims even young children demand high quality drama as they have been exposed to foreign soaps and dramas. Advocates for child-participation in content development would disagree. Aspirant producers, and indeed film students, tend to argue that if a story is told well visually, the technical quality of the product is secondary to the story itself. The ideal scenario would be for both the technical quality as well as storyline to be on par.

There have been attempts by international regulators to define a 'quality' programme with the emphasis moving to the principle of programme diversity. At the same time 'quality' is seldom linked to the cost of production as there is no direct on-air indicator that an expensive product necessarily equates to a 'quality' product. Claims that children's tastes are 'sophisticated' or that production values of foreign dramas should set the standard of quality would need to be tested by way of audience research and in-depth

[18] 2005 Telkom figures state South African internet access at about 5% of the total population.

analysis.

5.1.1.7 Range and variety of programmes

The programming policy for children on the public broadcaster needs to be enshrined in the principles of public broadcasting. South Africa's national cultural identities and languages are not all featured. Furthermore, independence from both the state and commercial interests in the creation of content for children has not been realised.

The variety and range of programming on offer to children does not completely satisfy the public service principle. Whilst the financial support for children's programming is also not guaranteed to ensure that programming for children conforms to the public service broadcasting ideal. Article 19 (1999) argues that public broadcasters are also educators and that their programming should promote national self-awareness, both positive and critical. More, generally, it should also engender knowledge of important issues such as social, environmental and economic concerns.

The World Radio and Television Council (2000) submit that public service programming be diverse in three ways; in terms of genres, audiences targeted and subjects discussed. Franklin, Rifkin and Pascual (2001) assert that public service television tries to invest in programmes that meet the development needs of the whole child. The 'whole' child would require diverse and varied programming for educational, entertainment and informational needs to be addressed.

Vochteloo and Emons (1995) conducted research on competing programming in Holland. They found that competition has greatly increased the degree on 'horizontal' diversity (more choice at the same time), but not added much, of anything, to 'vertical diversity' (the overall range of content), confirming that what we have is essentially, more of the same. This issue has been debated in South Africa as well and with the increase in local content quotas, the concern is that generating more hours of programming might not necessarily produce more diverse formats or range.

Any discussion on range and diversity of content for children must be aligned with what is on offer for adult audiences. The SABC has developed the magazine genre for children as well as 'reality' type programmes focusing on the environment and sustainable development. With its news programmes and some drama offerings, it has begun to diversify children's programming. However, the majority of programmes are studio-based presentations, with a strong cartoon/animation line-up. This study found that the diversity of presenters themselves and diversity of language, locale and presentation-style do not reflect South African children back to themselves. There is still need for more variety in the presentation style as well as selection of child presenters. These concerns were also noted in the Department of Communications and Independent Communications Authority (ICASA) colloquium held in February 2007.

The SABC recently introduced a '*Kids News Room*' programme on television, making this a first on the continent. The call for the creation of a children's news-type programme was made over eight years ago, the pace at which programmes are eventually developed for children is therefore concerning. However, the fact that news is being produced for children could arguably mean that the SABC is beginning to consider the child audience as an important sector of the general public it serves.

Whilst there have been shifts from the previously white presenters with white children in a programme segment to a more demographic spread of children, there are no obvious spaces provided for rural children. The particular experiences of rural children and children living in informal settlements are not visually present.

In the SABC programme *Thabang Thabong*, (a pre-school programme) segments/inserts are also still reflective of African-only children with an African male or female presenter. There is no racial mix of pre-school children in the African language inserts. The integration of children across race and class is not fully explored. The opportunity for nation building and African language instruction for this pre-school age group is thus lost. There seems to be a greater reliance on the use of puppets in pre-school programmes. These characters now have distinctive accents, from Afrikaans to Xhosa.

5.1.1.8 Music, art, literature and history: more South African themes

Public service broadcasting is meant to provide programming across a wide spectrum of interests. Another key area of concern with regard to diversity and range is the general lack of art and history programmes for children. The phenomenal growth of the 'music for minor's' series of CD's and video's and also 'young Einstein' CDs for babies from gestation to toddler is an example of the global trend to get art and music appreciation to very young children. The focus on early childhood development and the SABC's role in bridging the gap that exists in pre-school education was argued for in the Triple Inquiry Report (1995).

The African National Congress' Draft Cultural Policy states further, that:

> 'cultural industries associated with cultural products permeate every aspect of the daily lives of our people. From the management of national (and publicly owned) radio and television to the production of artefacts (such as CDs, cassettes, albums, musical instruments, etc.), there is a need to give the market an indigenous [sic] content and programme'.

From this quote it is clear that the emphasis on local (South African) and indigenous programming must be improved and intensified.

As indicated earlier, the requirement for private broadcasters to provide children's programmes that reflect South African themes, literature and historical events, is not a specified requirement in the regulations and broadcasting policy that governs the SABC. Developing unique and distinctive programmes for children must become a priority for the public broadcaster if it is to become more citizen-led.

Bulbulia (interview: 2007) suggested that more documentaries and dramas be produced for children as these are ideal formats for learning and sharing life experiences. According to Buckingham (1996) there is evidence to suggest that by about the age of six

or seven children are increasingly comparing what they watch with their own experience, or what they believe (or have been told) is the case about the real world. This study has also shown that the most popular programmes watched by children are soap operas. This genre must therefore be used as a format to deliver educative content to children. The success of *Soul Buddyz* (drama programme with children as main protagonists, made for family viewing) further underscores the popularity of the drama format.

5.1.1.9 National identity, culture and language

The national identity and cultures of children in South Africa are not fully addressed by the SABC. The notion that 'local is lekker' (local is good) does not permeate across to children's programming, though this might arguably be a moot point given that children's content is almost 71% local on SABC 1 and SABC 2. However, until 2006, there had not been any dedicated children's programming on SABC 3. The introduction of programming for children in line with the licence conditions issued in 2004 for SABC 3, will result in a gradual increase over 3 years to reach the licence condition of 12 hours per week of children's programming, certainly no big bang approach. Furthermore, there is a distinct bias towards English on SABC 3 and so no dedicated African language programmes for children. It seems there is some loose integration of languages other than English by way of greetings, and colloquial expressions.

It is interesting to note that the introduction of children's content on SABC 3 has been met with some excitement and audience interest. This, according to an SABC commissioning editor, is 'as a result of good marketing'. It might arguably also be as a result of the entire SABC 3 channel being an English only service.

It would not be accurate to say that the cultures of all South African children are reflected on television as judging from the content on offer (see schedules, annexure 4), there is still a substantial amount of programmes, though local, still being done in English across SABC 1 and 2. The language debate will persist until there are enough channels for each language. Without a policy shift toward a single national African language, the challenge of delivering on the public mandate will ensue. The question remains: were the licence

conditions appropriate to increase the levels of African language programmes? According to Galombik (former Head of SABC Education and former Broadcasting Policy Specialist at the IBA, interviewed February 2007) the increased local content requirements place a huge strain on the SABC's already contested resources for children's programming.

An analysis of the SABC schedules on children's programming shows a shift in focus toward more local content. The children's programme blocks are *YOTV* on SABC 1 and *Tube* and *School TV* on SABC 2. These content blocks of two hours each afternoon can be considered as a 'brand' (according to Galombik, interview: 2007). The 'brand' could be compared to other services like *KTV* (on the private subscription service, Mnet) or *CrazE* (on the free-to-air commercial service. Etv). These 'brands' are viewed by child audiences who are less likely to state what particular programme segment within the 2 hour 'brand' they watch – children would say they watch *YOTV*, and not a specific animation series within *YOTV*, e.g. *Pokemôn* (foreign) or *YOTV ozone* (environmental) or *Blue Couch* (magazine). What this means is that because children do not describe a particular segment in the brand, it is not easy to gauge the impact of segment/s within the brand that are culturally specific.

Programmes like *Thabang Thabong* (SABC 2) and *Takalani Sesame* (SABC 1) are targeted at pre-schoolers. The programme is considered multi-cultural and didactic. Given its audience there is a greater emphasis on culture, language and sense of self. This cultural diversity however is not true for all SABC programming for children. The presentation style and format of children's programming across the channels is standard. Multi-lingual presenters across gender, race and age are used and studio based child audiences are primarily located in Gauteng at the SABC's headquarters. Children who participate as audience members are thus usually drawn from Gauteng schools.

The Africa Charter is an extension of the International Television Charter and it captures the issue of cultural identity in clauses 2 and 3 in the following vein:

> Children should hear, see and express themselves, their culture, their languages

and their life experiences, through television programmes which affirm their sense of self, community and place.

Children's programmes should promote an awareness and appreciation of other cultures in parallel with the child's own cultural background.

A sense of the *nation* in all its diversity is represented through one province- Gauteng. Non- studio based recordings do not venture into deep rural South Africa, nor a cross sector of the population from farms to townships to informal settlements and suburbs is represented. The *'sense self, community and place'* seems to be located within studios and the occasional outside broadcast. This points to the issue of geographic reach and raises greater debate around whether access to the SABC services guarantees a universal service given that universal service refers to that which caters to the entire nation in all its diversity.

The concern that rural children and the widest cross section of child representation be included in programmes was mentioned in interviews with Bird from the MMP and Bulbulia from the 5th World Summit on Media for Children. In addition, the findings of the February 2007 colloquium held by the Department of Communications and the Independent Communications Authority, state that the under-representation of vulnerable children, i.e. children not in the school system and homeless/street children as well as children with disabilities requires attention.

The response by former ICASA Councillor, Mtimde on the gaps in programming policy (written comments: 2007) was that 'national policy promotes and protects our languages and cultures and the educational empowerment of children'. He adds that there is still much to be done in African languages. The findings of the Department of Communications and ICASA colloquium (February 2007) pointed at the apparent lack of cultural diversity and representivity of South African programmes for and about children. The gaps between policy objectives and practice is therefore apparent.

5.1.1.10 Extending the language debate – sight and sound

The SABC submitted that multi-lingualism is used as far as possible. There is also a deliberate move to reduce the use of English by presenters. The languages spoken are urban and contemporary with a very distinct private school and 'model C' school sound. For the majority of children in South Africa who do not attend these schools, their local sound (intonation) is not captured. Traditionalists no doubt have concerns with the use of language not only in children's programmes but other genres as well. Recently, a complaint was lodged with the Human Rights Commission on the poor quality of sign language interpretation on the SABC's news programming. It must be noted that general children's programming is not accompanied by a sign language interpreter. The emphasis on language must therefore go beyond what it 'heard' to what is 'signed' for Deaf audiences as well.

With only three SABC channels to accommodate 11 official languages, one suggestion made by the SABC's, Mr. Charles Owen (Head of Genre: Children), was for languages to be clearly separated and given specific time allocations. The schedule however would not be able to sustain 11 languages. The separation of language could also begin to fragment the audience even further thus negating nation-building. A further recommendation was for a dedicated children's channel to be developed. This proposal is debatable as the mandate of public broadcasting is to provide a full spectrum service across the schedule, where all age groups have a place to access programming. A dedicated service for children would no doubt be costly. Given that regional television services are still not funded (the two licenses have been issued and will only be granted once funds are secured) any additional niche services would probably have to wait. Some might also regard a stand-alone children's channel as 'ghettoising' the child audience.

According to the 2001 census, the largest language groups are; isiZulu as the mother tongue of 23.8% of the population, followed by isiXhosa at 17.6%, Afrikaans at 13.3%, Sepedi at 9.4%, and English and Setswana each at 8.2%. The additional regional broadcasting channels that the SABC is yet to launch is; SABC 4, intended to cater for Setswana, Sesotho, Sepedi, Tshivenda, Xitsonga and Afrikaans, and SABC 5 for isiZulu,

isiXhosa, Siswati and Afrikaans. SABC 4 is to broadcast in the provinces of Limpopo, North West, Gauteng, Free State and Northern Cape, and SABC 5 in Mpumalanga, Gauteng, KwaZulu-Natal, the Eastern Cape, the Western Cape and the eastern border of Limpopo.

These additional television services are required to be full spectrum and therefore to provide children's programming. The SABC's ability to produce programming in the allocated African languages per region and in diverse formats is questionable.

5.1.1.11 Diversity, disability and independent production

The SABC conceded that many of the producers of programming for children were formally SABC staff who left the broadcaster to establish independent production companies. It was also claimed by Bulbulia (interview: 2007) that the majority of commissions awarded are to the same production companies. The current regulation on independent production is for the SABC to outsource its programming from at least 40% of the independent production sector. According to ICASA's Monitoring and Compliance Unit, the SABC has not to date submitted to ICASA a full record of its independent producers or details of the children's programmes made by the independent sector. However, the SABC have submitted that the majority of independent production companies qualify as BEE (Black Economic Empowered) entities.

The 40% independent production regulation is aimed at decentralizing content so that provincial and regional perspectives, all African languages and cultural identities are integrated to provide a truly national broadcasting service. It is interesting to note that the quota of 40% is standard across both the public and private television broadcasters. The quota does not extend to specify the percentage of black producers within the 40%. There have been some critics of BEE players, suggesting that black 'fronting' takes place to secure work. This issue is currently being debated in South Africa across many sectors. A limited pool of producers for children's programming coupled with an across the board 40% independent production quota, could result in limited content diversity.

The diversity and range of programming made for the child audience was found wanting.

The SABC programme schedules (2005/6) show that there was no children's drama (neither local nor foreign). The concerns from respondents in interviews as well as the Department of Communication and ICASA colloquium (February 2007) ranged from, the under- representation of rural children, to children with disabilities not being represented in children's programming. It must be noted that 'special' times are allocated for Deaf audiences (DTV or Deaf TV is broadcast on Sundays only). It would seem that other disabilities are simply ignored. Makas (1989) cautions that personally knowing someone in a wheelchair (physical disability) does not necessarily enhance one's familiarity with other disabilities, for example people who are Deaf (audio disability). The converse is probably true, and therefore the need to create more opportunities for all South Africans to begin to understand disability issues and needs.

Having viewed children's programmes during the 2005/6 period, it was found that children with disabilities do not present any regular programmes, nor are children with disabilities consistently featured in children's programmes. It is not uncommon in international children's programming to include at least one presenter with a physical disability. Research by Langer, Fiske, Taylor, and Chanowitz (1976) suggests that even indirect contact with persons who have disabilities may facilitate actual interaction. Langer et al. found that when given the opportunity to do so unobserved, subjects spent significantly more time looking at photographs of people with visible disabilities than photos of able-bodied people. In discussing this Makas (1993:258) proposes that,

> Non-disabled people experience competing motives when interacting with an individual whose physical appearances differ from the norm: a curiosity motive to visually examine a unique stimulus, and a social motive to avoid breaking the taboo against staring at a person with a disability. Langer et al. (1976) therefore, might have identified one way by which this conflict can be resolved. If this explanation is correct, the visual media would seem to be an ideal means by which the public could covertly satisfy its curiosity about disability without breaking social standards, thus leading to more comfortable real-life interactions between persons who have disabilities and those who do not.

What Makas suggests is that television 'acquaintances' could provide insight and familiarity with people who have disabilities. This study supports the notion that such 'familiarity' at an early age through children's programming must become a priority for the public broadcaster.

Some of the key challenges on diversity and identity were found to be in the form and structure of content made for children. This can be seen in the presentation style of the children themselves who seem to emulate and assimilate an American way of expressing themselves.

The constant use of American slang such as *"yo", "bro", "whatup", "dude", "indahouse"*, "*give it up*" and so on have become the norm for child presenters. Whilst *YOTV* as a brand seems 'catchy' the "'*Yo*" in itself is an Americanism. Furthermore, the studio design and mise-en-scene of the programmes do not seem to capture a 'typical' South African setting. The constant moving camera angles and bright neon-type sets as well as the sponsored clothes of child presenters do not lend themselves to a South African 'look and feel'. This could lead to debates on issues such as Americanization and cultural imperialism which impact on policy and call for some analysis in light of the South African local content regulations.

The situation is somewhat different in pre-school programmes like *Thabang Thabong* and *Takalani Sesami* as they do not exhibit American accents. These programmes are presented by adults and adult voices behind puppet characters. There is also an emphasis on language skills development for the pre-school age and so the focus is on sounding out words in at least two languages. The presenter moves with ease between two languages and child participants are encouraged to learn either of the languages spoken in the programme. However, the same concerns with creating spaces for integrating children with disabilities as well as producing programmes in other provinces must be addressed.

5.2 Funding - the key ingredient for public service programming

The overall funding of the SABC is one of a pure commercial operation. It is advertising driven with a small mix of licence fee and government funding[19]. This translates into programming for children being done primarily on commercial terms. The participation of various government departments, and in particular education, will in all likelihood not change. And this is arguably the biggest policy failure – and a practical failure as well.

Children's programming should be treated differently from any other content stream or genre. The funding for children's programming should be ring-fenced and protected. The national education crisis in early childhood development and primary schooling has not improved substantially since 1994. There has been acknowledgement upfront on the role that the SABC must play to support the educational needs of children. Without the resources to do so this policy principle is simply not realisable.

Although the SABC's funding model is not a traditional public service model, Mpofu (1995) argues that public service broadcasting has to be defined in terms of its commitment to a set of principles rather than in terms of its ownership or financing. Put differently, if the public service upholds public service values, then its funding model is less of a preoccupation. This statement is contentious in that the findings in Chapter 4, show that during the re-visioning of the SABC from 1996 onward, there was a consistent push to get higher ratings to deliver more audiences to advertisers. The comments made by Galombik (2007) 'to get more eyes on screen' through improved marketing and her view that drama programming for children is simply too costly, suggests that 'financing' influences what will ultimately become the public service value. The intention would not be for public service broadcasting to be ghettoised in any way and so it must be popular. However, the SABC is the dominant and so most watched broadcaster in the country. It must therefore keep its focus on delivering quality programming for children and not fall prey to the commercialisation of the service. It must at all times be South African and distinctively a public service.

[19] SABC Annual Report (2006) suggests total licence fee and government funding as 15%.

In a newspaper article written by Berger (29 March 2006), SABC CEO Advocate Dali Mpofu stated that for him, the advertising model is an unstable revenue source because it depends on the vagaries of the market. Worse, it corrupts content in that "the higher the proportion of advertising, the less socially good the programming". Mpofu's chief financial officer, Robin Nicholson, echoed him -- explaining how chasing adverts affects scheduling and marginalises poor audiences (Berger 2006). It would seem from the comments made by the SABC that the public service principles are under threat given the current funding model.

5.2.1 The Public purse: to fund or not to fund

South Africans pay a licence fee to receive their television services. This fee has always been regarded as an 'access' fee to receive the television signal. Although it is meant to be for general access to a national resource (i.e. frequency) and for owning a television set (irrespective of the channels you may watch) it is not shared amongst all broadcasters. The licence fee collection has also been problematic though steadily improving year on year. Simply put, South Africans do not pay directly for the public service they receive. The only charge on users is the television licence fee and funds that are allocated directly from the national fiscus to the SABC. Advertising provides the lion's share of funds for the public broadcaster.

In the European Union in 1992, the Director General for competition policy received several complaints lodged by private broadcasters on 'unfair competition' issues. ('Television without Frontiers' directive in the European Union1993 DG IV). These were resulting from the fact that certain EU countries received revenue from public resources as well as advertising (Marton, 2001). The complaint was that public broadcasters use their public revenue (referred to as state subsidies) to for example, keep advertising fees low or boost prices of broadcasting rights for films or sports events, which affects the income and expenditure of private broadcasters (Coppens and Saeys:2006).

Member states of the EU continue to enjoy freedom to decide the scope, organisation and financing of their public broadcasting systems. However the EU urged members to make a stricter distinction between activities coming within the scope of public service and those that do not, and to strive for more transparency in the allocation of public resources. It was suggested that public resources must not be used for financing or buying sports programmes, feature films and other entertainment programmes. This suggestion did not come into legal effect and the EU stated that public financing of the public service distorts free trade in the broadcasting market and made it permissible only if a certain a number of conditions were met. These conditions included: that the tasks of the public broadcaster must be formalised e.g. in law, a licence or public service contract, and that a national agency guard over the correct implementation of these tasks.

Another condition was for a clear distinction between activities within the scope of public service and those that were not and furthermore, for greater transparency in the allocation for public resources, which must not amount to more than what is necessary for carrying out a specific task as a public service.

In the South African context, although the SABC is almost wholly funded by advertising revenue, it has to provide transparent financial accounts on the cross-subsidisation of SABC3 (its cash-cow) over to SABC 1 and SABC 2. By extension, the SABC is expected to deliver public service programming on SABC 1 and SABC 2 to a greater degree than on SABC 3, as a commercial public service with less onerous obligations than SABC 1 and SABC 2.

McQuail and Siune (1998) argue that in some elements of public broadcasting, commercial revenues are not excluded but any profit made is used for programming or service-oriented purposes, not made for its own sake, as in the private commercial system. The revenues generated by the SABC in the 2004/5 and 2005/6 financial years were met with some criticism as some argued that more funds ought to have gone to funding South African content, whilst others thought that the SABC was beginning to operate on the same principles as a private/commercial service paying little attention to citizen needs. With the changing of the guard at the SABC with a new CEO installed, the

campaign of ‘total citizenship’ seems to re-position the SABC to becoming more citizen focused as opposed to delivering audiences to advertisers. What remains to be seen is the investment into South African programming that is fully representative of the citizenry with a transparent and documented commissioning procedure.

Furthermore, the SABC’s Charter is still to be understood by the general public as a public contract to which the public can hold the SABC accountable. National campaigns have been developed to promote this notion. However, the level of critical debate has not been found during this study. There was no evidence that children’s stakeholder groupings regularly engage with the SABC on children’s programming issues.

Hoffmann- Riem (1992) states that statutory stipulation on public broadcasting finance is designed to ensure that programming is not unduly influenced by economic considerations. He adds that since advertising is permitted to a certain degree, the orientation to the advertising market should not predominate. This he contends makes it possible for example, to continue to produce high quality cultural programmes and to serve minority interests.

The Broadcasting Research Unit’s definition of public service broadcasting on Wikipedia on-line, stipulates that programming should be impartial, and the broadcaster should not be subject to control by advertisers or government. They add though that critics have suggested that the values of certain groups (e.g. middle-class, left or right wing etc) could influence the service.

The public interest principles at play in South Africa tend to follow the universal features of public service broadcasting, but in a unique way in that it does not conform to being a public service that is publicly funded. This funding model impacts on the type of programmes produced for children as well as the air-time allocated to children.

5.3 Policy objectives and programming practices of the public broadcaster

Berry (1993), in his paper *Public Television Programming and the Changing Cultural Landscape* argues that any discussion of new or old legislation aimed at reaching broad and diverse audiences ultimately must return to the special needs of children. He explains that as they are in their developing years, forming early opinions about themselves and others in society, television can for some of these developing children, present images, portrayals, places, language patterns from which they draw correct and incorrect impressions. Berry (1993) goes on to say that any faulty cultural information, if not modified by other traditional agents of socialization (e.g. family, school, religious institutions, and sometimes their peer group) can form the basis for becoming part of a child's belief system (1993:292).

This raises the all important and critical question of whether SABC television programming is in keeping with providing a true picture and reflection of South Africa's diverse peoples, cultures and regions.

Bulbulia (interview:2007) lamented the tendency of young presenters to sound American, and Mtimde (written response, 2007) noted language as a key area of policy intervention. Simply adhering to local content quotas without developing a unique South African presentation and format, does not fully engage the objectives of the South African content regulations - to develop, protect and promote a national and provincial identity, culture and character. It also seeks to promote programming that is identifiably South African and which recognises the diversity of all cultural backgrounds in South African society.

The SABC has abandoned its regional windows where television programmes were broadcast from various provinces and reflected to the country nationally. This was due to funding and resource challenges. The issue of regional windows/splits might be necessary for children's programming specifically. This requires some attention as the two regional broadcasters created in the Broadcasting Act (1999, as amended) are not likely to be funded by the public purse and so not likely to go live in the near future. Even with the

additional regional services, the challenges of creating programming that is relevant to the developmental needs of children will require attention. Berry (1993:294) provides a snapshot of what children's programming should offer:

> Children, like adults desire a diversity of form and style in their public television offerings. Like adults, they need a level of creative diversity in their programme content, style, format and characters. Children also need programming that will stimulate their imagination, assist them in their social development, inform them of their place in the world, introduce them to the world of others, and offer content that will cause them to reach for ideas. All of these needs must, of course be placed within the framework of understanding that children are not miniature adults, but boys and girls who should have the type of programme content that will meet their social, psychological, and physical stages of development.

Kunkel (1993) argues that from an economic perspective, the business of television stations focuses on attracting the largest possible audience at the lowest possible cost, which is fundamentally at odds with providing educational programmes for children. This commercialization would also impact on providing a wide range of well produced programmes for children as illustrated by Berry (1993) in the quote above. The funding of children's programming must therefore be prioritized. So too should the development of public service programming that is not formulaic of commercial programmes.

5.4 Gaps between policy and practice

Bertrand and Hughes (2005) contend that policy ultimately cannot be 'proven' but will be accepted or rejected by readers (including government) on the basis of their accordance with previously held values and attitudes. McQuail and Siune (2003) summarise the main features of the public service media policy paradigm in the following main points; it is derived especially from the needs of democratic politics; it is largely bound by the limits of national territory (national interests); it legitimates government intervention in communication markets for social purposes and it generally requires active and

continuous policy-making and revision.

The South African broadcasting policy framework was initiated in preparation for democracy. The policies and regulations are specific to South Africa (national interest). The intervention in the broadcasting market has arguably led to the transformation of broadcasting from a previously white owned and controlled sector to one that created ownership by historically disadvantaged individuals, thus diversifying and 'freeing' the airwaves. The policies and regulations have been reviewed and continue to be reviewed.

It is generally understood that a policy objective cannot easily be effected in practice. The best that happens is for such policy to be interpreted by the broadcaster. The other difficulty is for policy makers and regulators to micro-manage what the objective seeks to achieve and at worst to schedule for the broadcaster. This type of undue interference would go against the principle of editorial independence.

What is relevant however, is the way in which the policy is interpreted and by whom. The governance of the public broadcaster provides that the board determines the strategic direction of the SABC. Board members are publicly nominated and are appointed through a Parliamentary process. The actual number of board members representing the interests of children specifically since 1995, has not been clear.

The current board does not have a specialist in the field of children's broadcasting, though several academics as well as the disability sector, and the religious sector are represented. It would not be surprising if board members who represent gender issues are expected to represent disability and children or youth as the law caters for all these sectors in one simple clause.

There are several gaps that have become evident from the research conducted and captured in the findings section in Chapter Four and analysed and expanded on in this chapter. At the outset is would seem that the legislation has not been drafted in a manner that places this sector of our population on par with other sectors of society. Not only do the sheer numbers demand a specific focus, but the impact and influence that television

has on the child cannot be underplayed. Berry (1993) puts to us that "any faulty cultural information, if not modified by other traditional agents of socialization (e.g. family, school, religious institutions, and sometimes their peer group) can form the basis for becoming part of a child's belief system". In a country recently emerging from apartheid, where the belief systems of white South Africans kept an entire nation under siege, any mis-representation, under-representation and alien representation of children across the country must be strongly guarded against.

The law does not make any provision for the key ingredient of media literacy within the programming remit of the public broadcaster. The law does not protect children's programming specifically and so along with the general approach to public broadcasting, there are no special concessions made for dedicated public funds for children's programming.

An obvious gap identified by almost all interviewees was the dearth of diverse format and genre in children's programming. This was coupled with the under-representation of all official languages as well as issues of vulnerable children and children with disabilities. Granted that these have been looked at by the SABC itself, there was no proposal, apart from the motivation for a children's channel, to creatively address issues of representation.

The regulations on independent production require the SABC to out-source at least 40% of all programmes to the independent production sector. By their own admission many SABC producers were formally employed by the SABC and according to Bulbulia, (interview:2007) there is need for a broader provincial base of perspectives and values.
The SABC editorial policies are worth reconsidering as they are intended to encourage the development of South African expression, therefore showcase South African talent, support South African culture, and aim to develop programmes that are identifiably South African. These should contribute to a sense of national identity and of shared experience, and to the goal of nation building. The second aim is to provide a home for programme-makers that encourages them to innovate, to take risks and to develop their craft so that audiences may be given a rich diversity of top quality programmes.

The possibility for innovation and a rich diversity of top quality programmes to be developed must be underpinned by a commitment to sourcing the widest possible pool of talent across the country.

5.5 Conclusion

The analysis points to clear gaps in the current policy and practice of programming for children. The key policy issue is for the separation and de-linking of the needs of children from those of people with disabilities and women. Furthermore, a policy review is necessary to ensure that the programming needs of children can be addressed. This would include revising the ICASA regulations that relate to children and to include the watershed period. It would also require the development of specific standards for children's programming. Most importantly however, the public service broadcasting remit must be aligned with the principles of public broadcasting.

The practical challenges of reflecting South Africa in its entirety to itself is significant. This is key to delivering on the universal access and universal service objectives. Recent AMPS (All Media Product Survey) reports (2007) suggest that radio audiences are declining in favour of new television households as a result of economic growth. The SABC television services cannot afford to transgress as its audience numbers grow. It would be required to schedule better for children as well as provide programming that is more relevant to a diverse audience.

The funds for children's programming as well as commissioning programming outside of Gauteng must be properly motivated in line with the general public broadcasting mandate.

Chapter six explores how these policy gaps can be addressed in suggesting policy proposals on programming for children.

Chapter Six

Conclusion: Towards New Policy Directions

This chapter presents recommendations that seek to close the gaps in policy and practice identified in this study. A key recommendation is for a more diverse range of formats and genres to be developed and for these programmes to be scheduled appropriately. It is also recommended that the representation of all children be improved to include for example, children with disabilities and those in rural areas. Another key area of focus is on the SABC's ability to develop programming in the majority spoken African languages.

The recommendations include re-drafted definitions to facilitate a review of the current policy and regulatory framework. An argument for child-participation in programming as well as the development of a media literacy strategy is also recommended.

6.1 Policy review - de-linking the child audience from other sectors

This study argues that the definition of 'children's programming' is not being adhered to in its entirety even though the definition is spelt out. The policy oversight of not drafting a specific stand-alone section for *children* could result in the 'child' being under-catered for as a citizen and audience. It is expected of a public service broadcaster to serve the entire audience equally. The following statement made by the incumbent Group CEO of the SABC, Advocate Dali Mpofu, (2007) in a promotional booklet on the 5th World Summit on Media for Children is instructive:

> …The guiding principle is that our programming should and must have a positive impact on citizens, young and old of our young democracy – not as consumers, not as customers, but as CITIZENS with an interest in the social and economic value of our programmes and services so that they can effectively participate in our democracy. It is in this context that we regard children as the citizens of tomorrow and the intended long term beneficiaries of the policies and practices of today (Mpofu:2007).

For children to benefit from current policies, such policies would need to be designed specifically for children. Until the SABC engages children themselves and policy actors who work in the interest of children, the statements made by Mpofu are pure rhetoric and meaningless.

It is necessary for the policy objectives for children's programming to be distinctive from that of women or people with disabilities. The category 'child' is not homogenous. A policy recommendation is therefore that the broadcasting law be re-drafted to clearly separate the needs of the child from other sectors of society and for these needs to be plainly stipulated.

6.1.1 Revising the policy objective and regulation

Although the distribution of content for children is regulated in terms of minimum time per SABC channel, the policy must be reviewed to ensure that the broader objectives are realised by the broadcaster. The allocation of time alone cannot satisfy such objectives and this study recommends that the policy objective should state clearly that:

the public broadcaster must ensure that the needs of children are met by making available a broad range of programme genres in all official languages and broadcast these at the most appropriate times throughout the broadcast schedule. These programmes must be educational and made from the point of view of the child. Programming must be produced and broadcast from all nine provinces. A diversity of children (must be represented) from a broad cross- section of society. Diversity could cover race, gender, class, locale, language as well as formal and informal settings. Diversity should also include children with disabilities from presentation to characters and even in puppeteering.

The objective of children's television must be spelt out and could include that:
children should have access to a range of quality television programmes made specifically for them, including South African drama that reflects the diversity of children.

It is further recommended, that the regulation be framed as follows:

children's programming means programming which is specifically produced for children between the ages 0-6 years and 7-12 years. Which is educational, made from their point of view, and which is broadcast at times of the day when children in this age group are available in substantial numbers to watch. These programmes must be wide ranging in genre, language, perspective and produced in all nine provinces.

The regulation ought to be an extension of the objective as drafted in the law. The regulation should not be so ambiguous as to open interpretations which defeat the policy objective.

6.1.2 Appropriate Scheduling

This study suggests that the scheduling of children's programmes is not entirely informed by the viewing trends and habits of children. According to the South African Audience Research Foundation (2006), the most watched programmes by children are soap operas, and these are broadcast outside of the traditional children's schedule. The scheduling of children's programmes is also based on the availability of time on the three SABC television channels. This study has shown that there is no complementary scheduling of children's programmes that might allow different age groups to join the SABC during different day-parts (term used by broadcasters). All children's programmes are scheduled in the afternoon and no time is allocated to children specifically after 17h30.

The audience ratings taken from the South African Audience Research Foundation corroborate that children are watching programmes after 17h00, with the most popular programmes watched by children being soap operas. There does not seem to be a substantial number of children watching programmes made specifically for them. In a study conducted by Van Vuuren (2005), on the viewing trends of South African children,

he observed the following:

> … it is interesting to note the similarity of viewing patterns between adults and children, with a few exceptions. Taking the viewing public (the audience) as a single entity in South Africa, the relatively small difference between adults and children's viewing preferences can probably be ascribed to the large proportion of one television set households, where the family is viewing together. A further factor is the sheer numbers of the African Language speakers in the audience. Lastly, the expansion of the television network into rural areas, where communal viewing is more of a rule than an exception, results in children and neighbours viewing together, and individual choices are not as easily made as in urban areas in homes with more than one television set.

He adds that the role of the 'soapie' cannot be underestimated.

> It is clear that this genre of television programme, is the most popular and sustainable in attracting both adult and child audiences. These are the "stories" that parents are so worried about. There exists an extended literature as to why soapies are so popular, with both communication scholars and psychologists explaining the phenomenon. (See for example Moores, 1995, Zillman and Vorderer, 2000, Roberts, 2003). Some researchers mention man's need to understand him or herself and projecting into some of the characters, (Noble, 1975, Van Vuuren, 1979) others apply the so-called Uses and Gratification Approach to link certain needs to the selection of television programmes, (Blumler and Katz, 1974)

Van Vuuren (2005) states that the large numbers of children viewing after the so-called watershed time in the evenings after 9pm, makes it very difficult for all role players: parents are concerned with the content their children are exposed to; broadcasters feel that "stronger" programmes (that are pulling in the audience in a competitive environment) are under unnecessary scrutiny, and the legislator together with its BCCSA (Broadcasting Complaints Commission of South Africa) arm find it more and more difficult to regulate the broadcasting environment.

The policy and regulatory challenge is not to schedule for the public broadcaster, but to guide or 'steer' it in the direction it should take. The public broadcaster must make children's programming available, and must do so at appropriate times. The programmes should in addition to being enjoyed by the child audience, must offer educational value as well. The gap that has been identified is that schedulers need to be more attuned to the viewing trends of children as well as *what* children are viewing.

6.1.3 Creating content from a child's point of view - throughout South Africa

Finding ways to include children in the development and creation of programmes must become a programming principle. Phillipines media producer and child rights activist, Angeles-Bautista (1999:270) states that producers and broadcasters are responsible for creating programmes and media products that seek the active participation of children. She reminds us that listening to children's thoughts and ideas is critical to helping us stay attuned to their needs, their problems, their preferences, their reasons. And to helping us figure out what is really in their best interests. She adds that it is possible for adults to make assumptions about children's views without consulting them in the first place. (1999:268). The notion of child-participation could also be linked to consultation. This study did not explore elements of child- participation fully, needless to say, this is an approach that must be encouraged.

Although the definition of children's programming directs the content to be made from the point of view of the child, there is no regulation flowing from that definition on what that must entail or how it should be monitored. Child-participation in programming is a practice that seems to have been discouraged by the public broadcaster since the 1995 Television Charter process. The timing might be right for child-participation to be re-tabled as stakeholders have brought this to the attention of both the policy maker and the regulator. Furthermore, the SABC itself is on a campaign for 'total citizenship'.

The Department of Communications and ICASA led colloquium (February 2007) reported that stakeholders proposed meaningful child-participation in both the development and production of programming. In the same report stakeholders cautioned

that child exploitation and labour laws would need to be considered in when engaging child-participation. This is to guard against any exploitation of children who might participate in either the development of content and/or the presentation of programmes. Programmes made from the point of view of the child would require that producers work closely with educators, psychologists, and children themselves. Regular and consistent research on children's attitudes, tastes and perspectives must be prioritised. More importantly, there must be a move to begin to train children to produce their own content.

As discussed in chapter five, the issue of regional windows might be appropriate as a means to address the needs of all South African children. Regional windows could advance wider child-participation, regional representivity as well as language diversity.

6.1.4 Funding public broadcasting – funds for children's programming

The South African policy and regulatory context for broadcasting is specifically geared toward achieving pluralism and diversity of ownership and content. However, the current funding model of the public service broadcaster goes against international best practice.

Mbaine (2003:138) argues that government controlled broadcasters need to be transformed into public service broadcasters, with clearly defined public service mandates. National, state owned, public service media systems are yielding to commercial pressure and its emphasis on 'profit over people' (Chomsky 1999).

Former CEO of the SABC, Mr. Peter Matlare (interviewed by Judy Van Der Walt: 2007, Vodaworld Magazine) is quoted as saying "we turned the SABC around from revenues of R1.1. billion to R3.4 billion". Matlare was CEO of the SABC from 2001 to 2005, and was regarded as 'a rainmaker of commercial broadcasting'. He effectively transformed the SABC into a cash-flush broadcaster. There had been both praise and criticism (debates in Parliament and print media editorials) at this 'transformation' of the SABC and today its strategy is to place its 'citizens' first. There is a marked shift from audience to citizen empowerment promoted in recent public campaigns. However, the funding model of the SABC remains largely commercial.

The emphasis is still on revenue generation and viability. Until such time that the South African government changes its policy to funding the SABC from the national fiscus, it can do nothing else but be sustainable through commercial revenues.

A key policy recommendation submitted in this closing chapter, is therefore one that on the face of it seems obvious i.e. for the public broadcaster to be publicly funded, but more importantly that such public funding not be for the primary purpose of promoting the development agenda of the government of the day. Mbaine (2003:139) cautions further: 'the role of national broadcasters in both colonial and post-colonial Africa was mainly to support the ideology of the government and party in power and generally play a propaganda role for the government'. South Africa might be protected from such a scenario in that the Constitution protects and promotes the establishment of a regulator for broadcasting to uphold the values of the constitution and act as guardian of the public interest.

Ironically, there have been some arguments presented that favour the retention of the current funding model. During a colloquium on funding the public broadcaster (March 2006), it was reported by Berger (29 March 2006) that the dialogue reflected varying views on how the SABC's funding affects fulfilling public service broadcasting purposes: first, there was the stance that the current advertising-driven model works. It makes enough money for the corporation to thrive and achieve many public service objectives. Second, within the current model, there can and should be changes to reflect better the provinces, languages, drama and other public service programme qualities such as independence and impartiality. Third, some people believe there are inherent constraints in the status quo. Plus, looking ahead, there's concern the model cannot meet growing demands and opportunities.

Ideally the public service model and concept is underpinned by a funding mechanism that is public. For the public broadcaster to ensure that the programming needs of *all* South African children is addressed, the broadcaster must be in a position to determine at all times the type of programming and the scheduling. Funding must be assured for children' programming. There has been criticism leveled at the SABC's seemingly commercialised

presentation of children's programming. The use of cellular phone numbers for competitions and phone-in programme segments is another example of the commercial drivers of children's television. The call charges and text messaging charges prohibit the majority of children from participating in programmes or entering competitions. The SABC has not developed a toll-free line for children's participation nor any sponsorship arrangement with leading telecommunication networks.

Whilst there could be an argument for public funds to be sourced specifically for children's programming, this would be piecemeal and undermine the need for a holistic approach to making a case for a publicly funded public broadcaster. At the very least, there needs to be a 'phased-in' approach for government funding of the SABC to increase year on year (this way necessary budgetary adjustments can be accommodated by Treasury). Such a phased-in approach could also be capped at a specific percentage of government funding with the balance made up of sponsorships, advertising and other income streams.

6.2 Children and Media Literacy

Using media literacy as an alternative to mitigate the harmful effects of television as well as enhance its beneficial outcomes was proposed during the ICASA and Department of Communications colloquium (February 2007). The challenge however is that media literacy is not included in the public school curricula. Prinsloo (1999:183) states that the media are arguably the more powerful for young people than the official school curriculum. She adds that media literacy and a new vision of literacy are prerequisites in terms of preparing young people for their futures.

Media literacy is a further recommendation posited in this study. What needs to be factored into a media literacy campaign is for it not to be confined to the formal school curricula, but to take place informally as well. In the case of South Africa, media literacy is in fact needed across all age groups. It must be targeted at adults and children in a visual (image) rather than literate (words) manner. This is where the public broadcaster would be required to develop on-air symbols and techniques for adults to watch

programmes with children.

There is a considerable amount of research on the benefits of co-viewing and discussing television with children. The *School TV* series on the SABC as well as programmes just after 17h00 (when children's programming ends) could be developed to include components of media literacy for both adults and children. However, the significance of media literacy has far reaching benefits, as captured by Carlsson (2006:158). She observes that proponents of media literacy view increased media knowledge in society as contributing to participation, active citizenship, competence development and life-long learning. In this way, the population's media literacy becomes a necessary part of ensuring a democratic society.

Carlsson (2006:159) adds that the concept of media literacy has primarily engaged researchers in Western countries. She states that many researchers start with the notion that, in a democratic society, an individual who has knowledge of the media will more easily acquire a well-founded opinion on societal issues/events. Thereby being better equipped to express his/her opinion, individually as well as collectively, in public and other social contexts. A shift is now toward 'information literacy' given the increased convergence of radio, television, and computer technology.

Livingstone (2005) suggests that there is need to bring media literacy and information literacy together, to further promote the role of citizens and their participation on society. According to Carlsson (2006:161), having media-and information literate individuals in a society promotes a critical, open and all-embracing public sphere. She argues further, that media and information literacy helps to strengthen the critical abilities and communicative skills while promoting a well-oriented, democratic knowledge society.

Although we have some way to go in South Africa to getting the general public to access the internet and all broadcasting services, the impact that media literacy could have on the citizenship as described by Carlsson (2006) cannot be ignored.

The policy maker must begin to provide mechanisms to ensure that media literacy is considered and included in communication policy, in particular to encourage the public broadcaster to develop practical inroads for this.

6.3 The way forward

The SABC as the public broadcaster must make good on the promises and commitment made to the country's children. It must find appropriate time in the schedule to make space for children's voices to be heard and shared. This will demand scheduling decisions to be informed by viewing trends. The SABC must develop ways of integrating children's programmes across the schedule. It must invest in producing high quality programmes that are reflective of the entire spectrum of children with programming from around the country.

The SABC must locate itself within an African story-telling heritage (where the art of story-telling is used as an educational tool on morals and values). The public broadcaster is required and take stock of what makes its service unique, distinctive and South African. It must engage and consult with children in developing and scheduling its programming made specifically for children. The SABC must be informed by research and analysis as it evaluates and monitors its delivery of appropriate and relevant programming for children. Above all, it must influence the policy maker by standing firm in its efforts to transform itself into a public service that is publicly funded.

The SABC's promise to be citizen-led in its *Vuka Sizwe* campaign must go beyond the rhetoric and call on the South African government to abide by its own broadcasting policy. A policy that requires three distinct tiers of broadcasting - public, private and community. In turn the regulator must begin to call the public broadcaster to account in a public forum. As a licensee the SABC must comply with all its licence conditions, changes to licence conditions are usually required to be implemented within an 18 month period. It is against this background that the SABC be given an 18 month break between reporting on its licence conditions.

It might be time for a joint effort between the SABC Board and ICASA Council to address the Parliamentary Committee on Communications on the funding model of the SABC, the future of quality children's programming depends on guaranteed public funding. Funding notwithstanding, the public service value must not be compromised.

In 1995 to the First World Summit on Television and Children was held in Australia. Just a few months before that Summit was held, South Africa inaugurated its first democratic government. A message of support was sent to the Summit by former State President Nelson Mandela and quoted at almost every subsequent World Summit due to its relevance.

> …The future of our planet lies in our children's hands. All of you who are involved in television, which is one of the most powerful influences on children, have an awesome responsibility on your shoulders.

Broadcasters and indeed programme makers/producers have to recognise that television influences young people and must therefore become more conscientious, particularly in the South African context. Mandela went on to say that:

> …At a time when it appears that the moral and the cultural fabric of our society, particularly in metropolitan and so-called highly developed areas, is disintegrating, it is ever more important that we instill in our youth and children a strong sense of values, a compassion and understanding of one another's culture and humanity and offer them knowledge about the world… *(special message by Nelson Mandela, published in Final Report of World Summit on Children's Television:1995:49)*

The responsibility of broadcasters to mitigate the disintegration of the moral and cultural fabric of society cannot be looked upon lightly. At the time of completing this study, the Department of Home Affairs was proposing new laws to address the seemingly high levels of inappropriate media content accessible to children. The public broadcaster would have to become more circumspect in its programme scheduling if new laws

succeed with tighter rules around adult programming.

6.4 Further research

There are heightened debates in South Africa about the inclusion of media literacy in schools. The Film and Publications Board has initiated a pilot study (informed by research) to consider media literacy in schools and community settings. This thesis argued that media literacy be promoted and that the public broadcaster integrates elements of media literacy and awareness in its programming for children.

The diverse make-up of children in South Africa demands that cultural understanding and appreciation be fostered. The apartheid regime had despoiled African culture, heritage and tradition. The public service broadcaster's ability to advance nation building in its programming for children is an area of research that must be taken forward.

The interaction of children with television in a multilingual broadcasting space poses many challenges and threats to language purists. It must also impact on home-language, culture and schooling. The language debates in South Africa are complex and the language policy of the public broadcaster is in transition as new services are meant to be realized in the near future. This necessitates further studies on the language use in children's broadcasting.

The recommendations from the 5th World Summit on Media for Children held in March 2007 were far reaching and impacted on all the 'actors' in the children and media landscape. As far as policy and regulation was concerned, it was noted that South Africa must play a key role in sharing experience and practice in the Southern African Development Countries (SADC) region and the continent more broadly.

There was a call for a regional protocol on children's media, however with the divergent and fragmented approach to children's media across the region, this was not advanced further. The African regulators forum ACRAN (African Communication Regulation Authorities Network also known as RIARC Rèseau dès Instances Africainès de

Regulation) had agreed to place the needs of children on their agenda. Again, the extent to which ACRAN is able to engage on these issues is uncertain given the regulatory and policy frameworks of the participating countries.

For South African's the World Summit reinforced the need to create space for more research, investigation, monitoring and evaluation. It reminded participants that children must be consulted and included and that the 'actors' in the space go beyond policy makers, regulators producers and broadcasters. A research platform has also been created for a global study on the impact of the Television and Broadcasting Charter's on broadcasters. South Africa will participate in this global study with findings to be released at the 6th World Summit in 2010.

Appendix 1: The International Children's Television Charter

1) *Children should have programmes of high quality which are made specifically for them, and which do not exploit them. These programmes, in addition to entertaining, should allow children to develop physically, mentally and socially to their fullest potential.*

2) *Children should hear, see and express themselves, their culture, their languages and their life experiences, through television programmes which affirm their sense of self, community and place.*

3) *Children's programmes should promote an awareness and appreciation of other cultures in parallel with the child's own cultural background.*

4) *Children's programmes should be wide-ranging in genre and content, but should not include gratuitous scenes of violence and sex.*

5) *Children's programmes should be aired in regular slots at times when children are available to view, and/or distributed via other widely accessible media or technologies.*

6) *Sufficient funds must be made available to make these programmes to the highest possible standards.*

7) *Governments, production, distribution and funding organisations should recognise both the importance and vulnerability of indigenous children's television, and take steps to support and protect it.*

Appendix 2: Africa Charter On Children's Broadcasting

Preamble

We, the delegates of the Africa Summit on Children and Broadcasting, Accra Ghana 8-12 October 1997, affirm and accept the internationally adopted Children's Television Charter that was accepted in Munich on 29 May 1995. In addition, we amend the SADC Children's Broadcasting Charter (June 1996) to read as the Africa Charter on Children's Broadcasting.

Without detracting from the International Children's Television Charter, we further adopt in line with the said Charter and in the spirit of the said Charter, our Africa Charter on Children's Broadcasting, which takes into consideration the needs and wants of children in our region.

1) *Children should have programmes of high quality, made specifically for them and which do not exploit them at any stage of the production process. These programmes, in addition to entertaining, should allow children to develop physically, mentally and socially to their fullest potential.*

2) *Whilst recognising that children's broadcasting will be funded through various mechanisms including advertising, sponsorship and merchandising, children should be protected from commercial exploitation.*

3) *Whilst endorsing the child's right to freedom of expression, thought, conscience and religion, and protection against economic exploitation, children must be ensured equitable access to programmes, and whenever possible, to the production of programmes.*

4) *Children should hear, see and express themselves, their culture, their language and their life experiences, through the electronic media that affirm their sense of self, community and place.*

5) *Children's programmes should create opportunities for learning and empowerment to promote and support the child's right to education and development. Children's programmes should promote an awareness and appreciation of other cultures in parallel with the child's own cultural background. To facilitate this there should be ongoing research into the child audience, including the child's needs and wants.*

6) *Children's programmes should be wide ranging in genre and content, but should not include gratuitous scenes, and sounds of violence and sex through any audio or visual medium.*

7) *Children's programmes should be aired in regular time slots at times*

when children are available to listen and view, and/or be distributed via other widely accessible media or technologies.

8) *Sufficient resources, technical, financial and other, must be made available to make these programmes to the highest possible standards, and in order to achieve quality, setting codes and standards for children's broadcasting must be formulated and developed through a diverse range of groupings.*

In compliance with the UN policy of co-operation between states in the international community, the Africa Children's Broadcasting Charter recognises all international covenants, conventions, treaties, charters and agreements adopted by all international organisations including the OAU and the UN affecting children, but with particular reference to the UN Convention on the Rights of the Child.

Appendix 3: Interview Guides and Interview Schedule

The following interview guides for each of the stakeholders will guide the discussion and interview. Whilst this provides the general framework of the issues to be discussed, it will vary depending on the responses received.

The Public Broadcaster: SABC

These questions are on the Television Services only.

When did the SABC's television services first introduce children's programmes?

What types of programmes were these, could you expand on the formats used?

Which television channels had children's programming?

What languages were these programmes done in?

When did the SABC introduce African language programmes for children?

Which channels provided children's programmes?

When did multi-lingual programming for children start?

What were the turning points in children's television at the SABC?

Is there a dedicated children's television department at the SABC?

What informs the programme choices?

What policy is in place for children's television?

How was the policy developed?

Has the SABC endorsed the International Children's Television Charter and the African Children's Broadcasting Charter?

What amount of minutes per week of children's programming is broadcast per channel?

What amount of children's programming (in minutes and % of the children's schedule) is South African content?

What are your views on the amount of children's content produced by the SABC?
What are your views on the SABC's ability to addressing the entire spectrum of children in SA?

Do you think there are constraints in delivering more children's programmes, and what are these?

Which departments do you compete with (sport, religion, health, etc?)

If you had all the necessary resources, what would your first three items be for addressing the entire SA children's audience?

Interview guide for former Head of SABC Education

What were the key considerations in developing a policy on television for children given that the SABC was on the road to transforming itself into a public service broadcaster?

Reflecting on the last 10 years, what would you consider as policy failures and policy successes?

What were the challenges regarding language/s at the time?

What would you regard as the current challenges and how could these be addressed?

What are the key policy gaps (if any)?

Interview Guide for the Department of Communication

What has the DOC identified as a priority in meeting the television needs of South Africa's children?

What kind of resources (if any) does the DOC provide the public broadcaster in meeting the needs of the child audience?

Is there a portfolio at the DOC dealing with children and communication?

Has the DOC developed any policy or guideline on children and broadcasting?

As shareholder of the public broadcaster, are there annual deliverables that have to be met by the public broadcaster in the area of children's television and radio?

Identify some of the key interventions since 1995 that the DOC has spearheaded in this area.

Interview Guide for the Communications Regulator – ICASA

What were the key elements considered when developing the final licence conditions for the SABC's children's television programming?

What were the national policy objectives at play when looking at television for children in SA?

Are there any 'gaps' with the current television offerings for children – what are they?

Does SA need a specific policy on children's broadcasting or are the regulations sufficient? – (if not, how would you start with such policy development?)

What would be considered as the 'burning' issue when it comes to television for children in SA?

Interview guide for Children and Broadcasting Foundation for Africa (CBFA)

Having spent almost 10 years in this field of promoting quality children's broadcasting, how far do you think South Africa has come?

What gaps do you believe exist in the current programme offerings of the public broadcaster?

What do you believe are the inhibiting factors?

How important are programme formats/genres for children?

What relationship (if any) should there be between content producer, educator and the child?

What role should government be playing?

Interview Guide, Media Monitoring Project

The MMP has engaged in monitoring the public broadcaster's news programmes and how children are portrayed in these programmes, can the MMP comment on how the SABC portrays children in programmes made for children?

What kind of programme formats appeal best to children?

What kinds of programmes are currently lacking in the public broadcaster's offering to children?

Are there any gaps in the way the public broadcaster addresses all of South Africa's children?

Do you think there is a segment of the child audience not adequately catered for, and which segment is that?

What role do you think the public broadcaster should play in meeting the needs of the SA child audience?

Interview Guide for ETV (national free to air, private broadcaster)

What role does a national private television broadcaster play in meeting the needs of South African children?

What are the inhibiting factors to reaching these?

What do you believe are the gaps in television broadcasting?

What are your thoughts on a range of formats for children and which formats do you think are critical to reach the child audience?

How do you think these should be addressed?

Whose responsibility is this?

What relationship (if any) should there be between content producer, educator and the child?

Interview Schedule

Stakeholder	**Name**	**Date of Interview correspondence**
SABC Genre: Children, SABC Education and Regulation/Compliance	Mr. C.Owen and Mr. F. Hassen	April 2006
Former SABC Head of Education	Ms.N. Galombik	Dec 2006/January 2007
DOC (Chief Directors)		Unsuccessful
Former ICASA Councillor	Mr. L. Mtimde	January 2007
CBFA and 5th World Summit on Media for Children Chairperson	Ms.F. Bulbulia	November 2006/Jan 2007
MMP – Exec Director	Mr. W. Bird	May 2006

Appendix 4: SABC PROGRAMME SCHEDULES

A selection of programme schedules of SABC 1, 2 and 3 follow hereunder.

Appendix 4.1: SABC 1 PROGRAMME SCHEDULES

The schedules provide the actual programmes broadcast over a week. These show the core blocks as:

Weekdays
05h02 – 07h30 (in 2005) and 05h02-06h30 (in 2006)
Children's repeated programmes – YoTV.

And

15h00 – 17h00
Children's Programming block – YoTV, Kids News, Magazine and Game shows.

Appendix 4.2: SABC 2 PROGRAMME SCHEDULES

The schedules provide the actual programmes broadcast over a week. These show the core blocks as:

Weekdays
05h30 – 05h55
Children's repeated programmes – School TV.
09h00- 10h15 – Thabang Thabong, Tube and School TV.

And

15h00 – 17h30
Children's Programming block – Tube.

Weekends
06h00 – 7h45 – Tube and other children's programmes.
14h00 – 15h00 – Tube and other children's programmes.

Appendix 4.3: SABC 3 PROGRAMME SCHEDULES

The schedules provide the actual programmes broadcast over a week. These show the core blocks as:

Weekends only
06h30 – 10h30
Children's programmes – made up of foreign and local programmes.

And

The schedules also show that children's programming is suspended to accommodate sporting events like the A1 Grand Prix and Cricket matches.

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