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*BROADCASTING STANDARDS AUTHORITY  
TE MANA WHANONGA KAIPĀHO*

**CLASSIFICATION AND STANDARDS IN  
CHILDREN'S TELEVISION PROGRAMMES**

**A DISCUSSION PAPER**

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This paper was written as a background paper for Members of the Authority. It is neither a comprehensive literature review nor does it cover all the issues definitively. It is made available to interested parties to foster discussion of the standards issues involved in children's television programmes.

# **CHILDREN'S PROGRAMME CLASSIFICATION AND STANDARDS**

## **DISCUSSION PAPER**

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**Broadcasting Standards Authority****CLASSIFICATION OF CHILDREN'S PROGRAMMES****DISCUSSION PAPER****INTRODUCTION**

This paper was prepared for members of the Broadcasting Standards Authority to help in the consideration of their responsibilities under the Broadcasting Act 1989:

*to issue to any or all broadcasters, advisory opinions relating to broadcasting standards and ethical conduct in broadcasting,*

*to encourage the development and observance by broadcasters of codes of broadcasting practice appropriate to the type of broadcasting, undertaken by such broadcasters ... in relation to the protection of children ... and*

*to present appropriate warnings in respect of programmes, including programmes that have been classified as suitable only for particular audiences.*

The Authority stated in two of its early decisions (4/90 and 7/90) that there are inadequacies in the present codes and this paper will explore those inadequacies.

It explores whether there is a need for a P classification for pre-schoolers, C for primary children and YA for young adults. At present the G classification covers everything from pre-school programmes through to programmes designed for adults which are shown during times when children "may be generally expected to be viewing". Consequently, caregivers of children have no way of knowing, in advance, if a programme shown during family viewing time is in fact suitable for children.

It also looks at the 8.30pm "watershed" to see whether it is still appropriate.

In writing this discussion paper the author has consulted with the Children's Media Watch and The Children's Television Foundation and referred to literature from Australia, the United States, Japan and Britain (see bibliography).

**PART I****SOME VIEWS ON CHILDREN'S PROGRAMME CLASSIFICATION AND STANDARDS IN NEW ZEALAND**

The Children's Television Foundation and Children's Media Watch were consulted independently for their views; however, even though there was no consultation between the groups, with one based in Christchurch and the other in Auckland, their opinions were remarkably similar.

The members of these groups are from a wide variety of backgrounds. Some are caregivers, educators, advertisers and programme producers while others represent specific organisations e.g. Early Childhood, Parents Centre, Play Centre, Kohanga Reo, Kindergarten, Children's Literature Association, Play for Life, Society for Research on Women and Media Tutors. Many of their members are well read and well-informed on media issues especially in the area of children's television.

This section substantially reflects the views of these two groups.

### **P Classification (Pre-School)**

There is no strong demand for a specific preschool label for programmes designed for children under five years of age. Many members of the Children's Television Foundation and Children's Media Watch were satisfied with what was happening on morning programmes and *After Two* on TVNZ. Disappointment was expressed that *Play School* was finishing but caregivers of preschool children are awaiting its replacement with interest. It was thought that a P classification may discourage a young school age child from viewing these programmes because they might see them as "baby-stuff".

### **C Classification (Children)**

The real concern arises with 5 - 12 year old children. "Children's viewing times" in this paper refers to the afterschool time and Saturday morning. Children's programmes are currently shown (spring 1990) between 3.45 - 5.00pm on Channel 2 and between 3.00 - 5.00pm on TV3 each weekday; and on Saturday mornings between 6.30 - 10.00am on Channel 2, and between 6.30 - 9.00am on TV3. Caregivers want to be able to leave their children during these times with confidence, knowing that they will be exposed only to appropriate programmes - before, during and after - children's time.

Many parents want age-specific classifications within this age range, e.g. up to 7 years of age (early childhood), 7 - 10 years of age (middle childhood), and 11+ (late childhood). They also want diversity - a wide range of choice to meet as many individual differences as possible.

The high proportion of cartoons in children's viewing time, especially on TV3, was of concern to the groups canvassed. This concern is threefold.

- (i) Cartoons generally contain high levels of violence to which children could be exposed.
- (ii) Most cartoons come from America when there are more children in New Zealand from British, Dutch and Yugoslavian backgrounds than American backgrounds. Why not show some European cartoons?

- (iii) Cartoons in such high number preclude the showing of higher quality programmes such as are *Narnia*, *Sunday Science Programme*, *The What Now* - craft programme.

Views about children's programmes are strongly held and there is particular concern that programmes for adolescents, such as rock video shows, were encroaching on the time reserved for children, further diminishing the quality of children's programmes.

Promotional trailers for other programmes and rock videos concern the members of these groups. If they must be shown then they should have the same classification as the programme in which they are shown. AO or PGR promos or rock videos should not be shown during a G or C classified programme.

Some caregivers expressed concern about the presenters used in children's programmes. The role models represented by the presenters are sometimes verging on anti establishment and deliberately "illiterate". Furthermore the diversity of ethnic groups found in New Zealand often is not reflected in the programme presenters.

Another frequently raised concern is advertising. Advertisements interrupt the atmosphere, especially of drama. The screening of *The Lion*, *The Witch and The Wardrobe* is a case in point. If a programme cannot build atmosphere, there is a real temptation for the producer to go for fast action and/or violence because impact must be made within the allotted 10 minute segment between commercial breaks.

The number and type of advertisements during children's programmes is also an issue. Some questioned whether advertisements are really necessary during children's programmes. If advertisements are unavoidable, there is a strong feeling that they should be relevant and appropriate to the age group viewing the programme carrying the advertisements. Alcohol sponsorship is not wanted during children's viewing nor at other times when children could reasonably be expected to be viewing, that is during G programmes time.

### **YA Classification (Young Adult)**

A YA classification, is felt by some to be marginally useful but, as Children's Media Watch pointed out, the "young adults" books have become a distinct genre - all to do with problems of adolescence - and this might have negative connotations for television programmes classified as YA. Consequently there is not strong support for a YA classification.

### **"Watershed"**

The "watershed" is a time, usually 8.30pm or 9.00pm, after which the programmes shown are deemed to be designed for adults rather than for children or family audiences.

There is uncertainty about the "watershed" time and many did not know what time it actually is. Some remembered when TVNZ ran a promotion several years ago which informed caregivers and their charges that it was time for children to go to bed. This is considered most helpful and reinforced the "watershed" time. Caregivers would appreciate a reminder of this type from time to time. However it is also recognised that such a warning may titillate young viewers' interest and encourage them to stay up longer (or video the programme for later viewing) in order "to taste the forbidden fruit".

There are mixed views about whether 8.30 or 9.00pm is the more appropriate "watershed" time. Parents of preschoolers and early primary aged children are satisfied with the current 8.30pm cut-off time whereas parents of older children prefer a later "watershed" time, arguing that many children have a 9.00pm bedtime.

Julian Mounter, Chief Executive of Television New Zealand, in a speech to the Mental Health and Peace Studies group in 1986 stated that it was up to the public to decide when adult time starts and when children's time stops.

"I believe that 8.30 is probably too early for the start of adult time. So what I've said is that there should be a move of that time and for the next quarter the time is being moved back to 9.00. We will study the effectiveness of and the reaction to that".

Apparently Television New Zealand interpreted public reaction at that time to be in favour of the 8.30pm "watershed" time.

## PART II

### WHY AGE SPECIFIC PROGRAMMING?

#### Children's Programming

Glenn Cupit, of the Australian Broadcasting Tribunal, in his book *The Child Audience* discusses child development according to Piaget, Freud, Erikson and Sullivan. He identified three age groups -- up to 7 years of age as early childhood, 7 to 10 years as middle childhood and 11 years plus as late childhood -- and he believes that age specific television should target each one of these groups.

Cupit states that we cannot cater for all children as a homogenous group within a single programme. Not only are global programmes bland but no single format and concept can adequately respond to children's individuality. Their interests, their background and the needs of their developmental stage.

Patricia Palmer in her book *The Lively Audience - A Study of Children Around the T.V. Set*, states that many Australian children's favourite programmes did not include those specifically shown for them. Often popular drama, family life and domestic situations which revolved around a "child" character, such as *Different Strokes*, were the most popular. Cartoons are particularly popular with 8 - 9 year olds, especially those which have animal characters, are adventurous and have a story which is easily understood. On the other hand, Adults Only (AO) programmes were not popular with a great many children because of their scary content and because the language was hard to understand.

When the children were asked to list their favourite programmes 44% of those listed were C classification programmes. Palmer states that children want to be entertained, want to learn about the world and relationships, they want to be able to understand the programme and they want the programme to be worth watching. Children enjoy viewing with family members, but wonder why their programmes are often scheduled at the same time as news broadcasts.

The American authors Marie Winn, in her book of *The Plug-In Drug* and Neil Postman in his book, *Amusing Ourselves to Death*, describe television as "dehumanising", "passive", "non-participatory" and they assert that the very act of watching television is harmful. Marie Winn says that negligent, selfish parents have become dependent on television for child control and suggests that parents need to triumph over the mechanical rival. Television should be abolished. Those who seek to improve programming for children should be treated with suspicion. Both authors seem to base their views on the theory that children view TV passively and that school is regarded by children as "down time" from electronic media.

Other writers (Berry-in P Palmer *The Lively Audience*, 1986, and E Palmer 1988) hold a contrary view. They believe that television can be a constructive interactive medium by which children can learn more about coping with a complex world.

*Buster and Me* for 8 year olds is an example of good children's television. It has entertained, touched lives, developed characters and dealt with important issues, i.e. adoption, privacy, single parent families, self control and latchkey kids. It provides more compassionate and practical ways to get along in the real world.

This show has won four Emmy Awards and numerous other national awards including an achievement citation from Action for Children's Television.

## **Violence**

Violence is one of the more important issues in children's television. George Gerbner, Professor of Communications and Dean of the Annenberg School of Communications at the University of Pennsylvania has spent the last 20 years studying television viewing habits in the United States.



His research has shown that 80% of children's viewing takes place during network prime time which is targeted at adults. As a result, children are subjected to an "accelerated impact of the adult environment before they can go out and read". And while violence is portrayed an average of 6 - 8 times per hour during prime time, special children's programming is a "national disgrace" with a stunning 20 - 25 episodes of violence every hour.

Parker Page a social scientist and founder of the Children's Television Resource and Education Centre (CTREC), says much of the violence comes in the form of a repetitive string of battling robots blowing up evil rivals in the name of democracy, muscled men armed with swords and axes conquering hapless, evil wimps, and male heroes crashing cars and walking away without a scratch. No matter how dangerous your neighbourhood may be, it's never as violent as television on any given day.

Much of the violence, especially cartoon violence, is humorous, but Page says children cannot distinguish easily between fact and fantasy and they do not understand complex plots or philosophies like fighting for democracy. "What they understand is the way to solve problems is by beating people up".

The American Author Pamela Tuchscherer, writes in her book *TV Interactive Toys - The New High Tech Threat to Children* about the importance of teaching children how to use the media. She says that we need thoughtful caring adults who will show us the way to deal with the world and the people in it. Parents, caregivers and teachers have a responsibility in the teaching of media literacy skills.

### **Programming for Teen-Agers**

Adolescents who watch large doses of television are being influenced in choices they will make about their education, sexuality, careers, health and personal relationships. Television is a major socialising institution for adolescents, often stronger and more influential than the family unit. It's argued that sexism, racism and ageism constantly surface on the screen and prevent the development of healthy attitudes in teens.

Television is a major arbiter of values and identity for this age group. Therefore, some level of responsibility is required by broadcasters regarding teenagers' physical, mental and social development. Young adolescents are caught in a void between childhood and adulthood. Therefore, they too need appropriate programming specifically for them which reflects their individual diversity.

A strong message from teenagers is that they do not want to be preached at. They refuse to watch some programmes with their parents because this means that they will get a "lecture", on whatever the topic is that is being exposed. A preferable concept is that teenagers produce their own magazine format programme. New Zealand's own *L.I.F.E.* has been highly praised for its research, format and the involvement of teenagers.

**PART III****APPROACHES TO CHILDREN'S PROGRAMMING****United States: Deregulation****Background**

Edward Palmer in his book *Television and America's Children - Cause of Neglect* outlines the struggle over children's programming between Action for Children's Television (ACT) and the Federal Communications Commission (FCC), the US Government agency responsible for regulating television. In 1970 ACT appeared before the FCC asking for regulated reforms that included adequate, daily programming for children and the elimination of commercials, including selling by programme hosts on children's television.

In 1974 the FCC published the Children's Television Report and Policy Statement which left no room for ambiguity about broadcasters' responsibilities towards children. They noted that the 1934 Broadcasting Act is broad, and charges the FCC to licence each broadcaster to programme "in the public interest, convenience and necessity". (Peggy Charren, a long time campaigner for American children's television and president of ACT, stated that those seven words are what the ACT hung its entire programme for change on. They based their argument upon the "in the public interest" standard).

The 1974 FCC policy statement also acknowledged the special status of children and the broadcasters' unique obligation to them because of their immaturity, lack of experience and sophistication. It noted that children need to be educated and television has value as a means to help meet this need. It felt that there should be a larger range of children's programmes including those designed to educate and inform as well as to entertain and suggested schedule improvements. The FCC also favoured full compliance with the industry's own limits on the number of commercials in children's programmes and the elimination of host selling and subtle variants of that practice. The FCC advised the commercial television industry to self-regulate in the children's area or face the FCC's imposed requirements. There was a difference between what the FCC perceived was "in public interest" and what the broadcasters were convinced was essential to their well-being. However, under instructions from the FCC, the broadcasters instituted a code of practice in advertising to children.

In 1978 a FCC task force measured the progress. The results issued in 1979 were that the broadcasters complied with the advertising guideline, but not with programming guidelines. Both sets of guidelines were voluntary. There had been no increase in the amount of educational or informative programmes. The FCC took no further action to ensure compliance.

This led to a protracted and drawn out legal battle as the ACT sought to make the FCC enforce the guidelines. Thirteen years later the FCC decision in December 1983 finally ruled against the ACT petition. The public outcry was lost in the moves to deregulate the television industry in the US. The FCC retreated from federal regulations and in the 1980s when the deregulation philosophy took over, broadcasters rescinded the advertising code they had issued in the 70's under pressure from the FCC.

Most of the information/education programmes were dropped after the 1983 ruling, eg, *Captain Kangaroo* (CBS), *Thirty Minutes* (NBC), *Animals, Animals, Animals* and *Kids are People Too* (ABC). On December 22, 1983 the FCC formally ratified that broadcasters had no imposed obligation whatsoever to schedule weekday programme time for the child audience. It was left to the broadcasters to interpret their obligation. Some broadcasters argued that an imposed schedule requirement for children would in itself constitute a form of control over programme content.

Congress inherited this issue and in October 1990 the Children's Television Act was passed.

This act had three major features:

- a) The provision of educational and informational programming for children became a condition for licence renewal by the FCC.
- b) Advertising during children's programmes is restricted to 10 1/2 minutes an hour on weekends and 12 minutes an hour on weekdays.
- c) A National Endowment for Children's Educational Television was established by Congress, to provide grants to create educational programmes for children.

This bi-partisan bill had the support of the National Association of Broadcasters and the Broadcasting industry as well as consumer groups through out the country. However former President, Ronald Reagan pocket vetoed the bill two years ago and the current President George Bush let it pass into law in October 1990 without his signature.

### **Current Children's Television in the United States**

Compared to Britain and Japan, it would seem that U.S. children are poorly served through public and commercial television. The exception is pre-school children who are well-served in public television. The Children's Television Workshop, who produced *Sesame Street*, *3-2-1 Contact* etc. is independent and outside the commercial television system and they must produce their own funding year by year.

However American children, with the PBS (Public Service Broadcasting) channels; *Nichelodeon*, the *Disney Channel*, and cable television channels in addition to the major free-to-air commercial networks, do have a range of choices in children's programmes.

Thomas Radecky is a practising psychiatrist at the University of Illinois School of Medicine and the Chairperson of the International Coalition against Violent Entertainment. This group and ACT concluded after the earlier FCC decision, that since regulating the content on television was not possible it was up to the caregivers to regulate their children's viewing habits. The concern then becomes those children who may not have parents with the ability or energy to maintain vigilance, in addition to the many children who view television alone.

### **Australia: Regulation by the Australian Broadcasting Tribunal**

In simple terms, the Australian approach has been that of regulation.

#### **Background**

In explaining the background to the current regulation of children's programmes the Australian Broadcasting Tribunal stated that regulation essentially was a

... response to a lack of quality, age specific television programmes for children and a concern to protect their interests. Various attempts to encourage specific children's programming have included credit loadings for Australian made children's programmes and quotas for children's programs in general. These initiatives had no real effect on the priority given to children's television

This priority was imposed by the Tribunal following its Self Regulation Inquiry in 1977. The C classification, C time and the Children's Programme Committee were set up as an initiative to improve the quality and increase the quantity of children's programmes, and led to the regulatory framework of the children's and preschool children's television standards (CTS/PTS) introduced in 1984.

However, with the BS channels (Public Services Broadcasting), *Nikelodeon*, the *Disney* channel, and other cable television options, American children in most areas do have range of choices for children's programming.

In 1984 children's programme standards were adopted with the understanding that they would be reviewed after 2 years. That review included research, consultations and public hearings held all around Australia.

In the Adelaide hearing on the children's programme standards, Barbara Biggins, the TV Officer for the Australian Council for Children's Television and Film (ACCFT), and Glenn Cupit, author of *The Child Audience* told the Tribunal that the classification system should reflect the community's concerns on violence. They stated that some G programmes had heroes who consistently solved all problems with violence and this is inappropriate because of their potentially large audiences of school children. They called for heroes in G programmes who did not resort to violence, and argued that during G time there should be no re-enactments of domestic or other violent crime in a setting

which children find familiar or recognisable. Violence in short was often glorified and sensationalised. They argued that a children's programme should be based on responsibility shared among parents, TV industry and regulators. They called for simplicity, that is, easy to understand and implement, and consistency.

At the end of that two year review the 1989 report a *Review of Children's and Pre-school Children's Television Standards* was published. This report observed that the underlying arguments for regulation were not reviewed because the Tribunal had not changed its mind about the need for regulation, but rather the existing regulations were examined, particularly the amount and timing of C programmes and the regulations regarding advertising.

The introduction to this report stated:

1.1 In making the following decisions the Tribunal reaffirms its longstanding policy that children are entitled to a viewing choice of quality television programme which take into account their special interests and experiences and are made from their point of view. Children should also have the opportunity to view contemporary Australian programmes made especially for them...

1.2 On the basis of the considerable information and debate put forward within this inquiry the Tribunal still accepts the need for regulation in the area of children's programming. Children have particular needs and interests in relation to television. However they do not have the purchasing power to make them attractive as a discrete group to advertising buyers.

1.3 For this reason the Tribunal maintains that industry initiatives and market forces cannot be relied on to provide programmes to meet the special needs of the child viewer.

The review concluded that

... overall, the existing regulatory framework was not *delivering the goods* to the child audience. Although it guaranteed a regular amount of programmes specifically for them and at a regular time during the day, it did not ensure a commitment of resources to the production of 'quality' children programmes.

Consequently the ABT adopted a more flexible regulatory regime aimed at *encouraging a commitment of more resources to children's programmes*. The essential components are:

- revised criteria for C and P programmes
- adoption of wider C bands rather than a set C time (because all the C programmes were competing for an audience at the same time)
- fewer advertising restrictions but more certainty
- an increase in the amount of Australian C drama required.

The details of the findings and changes can be found in Appendix I of this paper.

### **Classification Criteria and Standards**

#### Classification

The revised ABT Children's Standards were released on November 28 1989 to be implemented at the beginning of 1990 together with the ABT's Content Standards.

A **C** programme is a programme suitable for primary school children and a **P** programme is one suitable for preschool children. In order for a programme to qualify as a **C** or a **P** programme it is viewed by the Children's Programme Committee of the ABT and given a **C** or **P** classification if it meets the following criteria.

- a) made specifically for children or groups of children within the pre-school or primary school age range
- b) is entertaining
- c) well produced, using sufficient resources to ensure a high standard of script, direction, editing, shooting, sound and other production elements
- d) enhances a child's understanding and experience.

#### Number of Hours and Time of Day

A broadcaster is required to broadcast during certain hours a minimum amount of children's programmes (which have been classified as such by the Tribunal). The requirements are as follows:

- \* A licensee shall broadcast a minimum of 130 hours of **P** programmes per year, and not less than 30 minutes every weekday between 8.30am and 4.30pm
- \* A licensee shall broadcast a minimum of 260 hours of **C** programmes per year
  - not less than a 30 minute period between 4.30 and 8.30pm on weekdays (at least 130 hours per year)
  - not less than a 30 minute period between 7.00am and 8.30pm on Saturdays, Sundays and school holidays (at least 130 hours per year).

Broadcasters specify the time they will broadcast children's programmes and this can be altered only by giving proper notice of either a permanent change or a temporary change for very specific events, such as live coverage of events of national importance and major sporting events.

### Australian Content and Repeats

There are regulations which require that at least 50% of the total programmes broadcast during the C band shall be both *first release* programmes and meet the criteria for an *Australian programme*. Furthermore a programme may not be repeated more than three times within any five year period.

In addition broadcasters are required to broadcast the equivalent of 16 hours Australian C drama programmes per year and there are clear criteria for a *drama* classification. There are no restrictions on the number of times an Australian C drama programme can be repeated.

### Promotions and Advertisements

There is a limitation on both the number and kind of promotions for an upcoming programme which can be screened during, before, or immediately after children's programmes. Only one minute of promotion for a G classified programme is permitted in each 30 minutes of C programme and no AO programmes may be promoted.

No prizes may be offered or given away during a P programme and the way prizes may be offered during C programmes is carefully regulated.

No advertisements at all may be broadcast during P programmes. Each 30 minute period of C programmes may contain no more than 5 minutes of advertising and no advertisement may be repeated more than twice. Only G classified advertisements may be broadcast during C programmes and there is an additional set of standards for all advertisements (which apply to programmes also) broadcast during the C band. These standards prohibit:

- the use of images which are unduly frightening or distressing to children
- the portrayal of unsafe uses of a product or unsafe situations which might encourage imitation by children
- the advertising of products which have been officially declared unsafe or dangerous
- demeaning any person or group on the basis of ethnicity, nationality, race, gender, sexual preference, religion, or mental or physical disability.

There are other commonsense limitations such as a requirement that advertisements and sponsorship be clearly distinguishable by the child viewer; advertising must not be misleading; no advertisement should encourage children to ask parents or other people to buy a product or service; and advertisements must not imply that the product or service will make the child superior to his or her peers. These requirements are spelt out in some detail.

Alcohol advertisements and sponsorship are expressly prohibited during the C band.

Finally there are specific regulations prohibiting the endorsement, recommendation or promotion of a commercial product or service by a principal personality or character from a C or P programme for 12 months after a programme has finished screening.

Appendix II is a summary of an internal staff memo of Capital Television Limited which gives the guidelines for children's programming on that station.

### **Comment On the New Standards**

The Australian Council for Children's Film and Television commented on the ABT's proposed children and pre-school standards in *Small Screen* June 1989. They said that the "good news" was:

- \* the doubling of Australian children's drama quota - presently only 8 hours a year
- \* new standards regulating the nutritional claims for foods.

The "bad news" was that:

- \* C time totalled only 260 hours a year
- \* Children's hours are fragmented. The 4.00 - 5.00pm weekday slot was replaced and now half of the total 130 hours must be scheduled between 4.30 and 8.30pm. The other half could be in that time or 7 - 8.30am weekends or during school holidays. C programmes could end up in peripheral timeslots.

*Small Screen* stated that any improvements in children's programming and advertising practices ultimately hinge on the networks' moral integrity and sense of responsibility. Thus children's lobby groups had suspended their judgement until the programming under the new regulations could be assessed.

*Small Screen* further comments:

The truth is that kids like drama. There is simply precious little to find in the past six years with the 8 hour quota. Such low level production also fails to allow the industry to develop some real expertise in children's drama. The networks need to take some risks and to go further for high quality drama. To their surprise, they might find it attracting a wide audience. After all, such excellent series as Canada's *De Grassi Junior High* are programmed in prime time both in Canada and the United States and could pull big audiences.



*Small Screen* is concerned at the loss of the easily recognisable 4.00 - 5.00pm C hour. What has happened, according to *Small Screen*, is that on weekdays the obligatory half hour per day is being shown at the same time on each channel. Much C programming is being "buried" in the weekend morning line up, the C classification is not being printed in guides and C programmes are often surrounded by inferior "hosting" programmes.

### Children's Television in other Countries

In Japan and Britain especially, but also in many other countries, broadcasters are required to fulfil a special responsibility to children while still guaranteeing freedom of expression.

In Japan NHK has in-school education programmes and lighter education/information programmes. Television is used as part of the children's education eg, children may have television schooling in the morning and go to school in the afternoon. The children have school five and a half days - no Saturday morning cartoons. Public television is well supported and there is a family network which lets the commercial broadcaster "off the hook".

In Britain as in Japan there is a wide spectrum of choice, equitable time programmes every day which are renewed yearly, sensitive cartoons, diversity, creativity, well-balanced regularly scheduled, child orientated offerings. Great Britain has two public television channels and BBC is supported, as is the NHK, (Japan), by a monthly tax per household. The BBC 1986 annual report stated that there were 785 hours of children's programmes, of which a quarter were repeats, over and above 483 hours of school programmes.

The Independent Broadcasters Association (IBA) has the right of prior approval over all children's programmes that are to be broadcast on a commercial station. Regional commercial television stations can lose their licences to competing groups for their failure to satisfy the IBA's strict programming requirements.

Independent television (ITV and Channel 4) and the BBC both operate policies whereby programmes shown before 9pm should be suitable for family viewing. After 9pm parents are expected to share with broadcasters the responsibility for seeing that children do not view programmes unsuitable for them. A recent survey in Britain showed that the great majority (87%) of parents were aware of this policy and three out of four were able to identify the watershed time.

In Canada children also have a diversity of commercial and non commercial programme choices in both the French and English languages, including the highly respected CBC (Canadian Broadcasting Corporation) programmes for children, US Cable television and the provincial educational television programmes, particularly Ontario, Quebec and Alberta, which produce entertainment as well as educational programmes.

It is of interest to note that Canada's Supreme Court recently upheld a Quebec law on television advertising to children. The Quebec law prohibits advertising on any programme in which children under 13 comprise 15% of the audience. The Supreme

Court gave the rule strong support saying "Freedom of speech of advertisers ends at a point where the manipulative sales pitches reach the impressionable minds of children". The negative side of this Quebec law is that commercial broadcasters are no longer making new children's programmes.

It should also be noted that in these countries where it appears that children have a wide range of choices, many of the concerns that exist in New Zealand still exist there; amount and type of advertising, diversity of actors, the amount of violence, the lack of quality dramas, the content of rock video clips and the lack of age - specific programming for young teenagers.

## **PART IV**

### **PRELIMINARY VIEWS OF THE BROADCASTING STANDARDS AUTHORITY**

The Authority is aware of the wide ranging views on the subject of children's programming, classification and standards. It takes the view that television is a medium which may enhance children's and family life if handled responsibly.

#### **Shared Responsibility**

The responsibility for what children watch on television should ultimately be shared between parents, caregivers, teachers and the broadcasters.

The responsibility of teachers and parents and other caregivers is both to guide children and to participate in viewing with their children. They should attempt to equip children with media literacy skills -- skills such as how to analyse or "read" a programme, how to group programmes into genre, how to categorise genre, how a programme is produced, how editing is used etc. Children need guidance from teachers and caregivers but at the same time, there is a need for balance between the interests of children as defined for them by adults and what children themselves find interesting.

The Authority sees broadcasters as having a responsibility in age specific programming - what is shown to children must be appropriate for them.

The Authority also favours the involvement of broadcasters in media education. Most parents and caregivers are happy to accept their responsibility, but think that 30 seconds community service or even 10 second slots would be useful, as part of both children's and caregivers' education. For example a promo explaining watershed, guidance about classifications, and media literacy skills such as "did you know ... ?". These need not be heavy. In fact it is better that they are not standard features. Intermittent reminders are helpful for caregivers and reinforce what they want to teach their children about responsible viewing.

### Programme Classification and Standards

The Authority considers a classification P for pre-school children to be unnecessary and that it may discourage older children from watching programmes thus classified. There seems to be general satisfaction with TVNZ's morning pre-school programmes, and *After School* and *Jason Gunn*.

The Authority, however, has two basic concerns about children's programmes, one being the content and the other their classification. The Authority would like broadcasters to take care in the programming of those times that television is watched largely by children. There is the feeling that more and more of the "young adolescent culture", as defined by television, is creeping into these time periods which should be reserved for children thirteen years of age and younger.

The Authority sees advantages in a "safe" time when caregivers can leave their children knowing that not only the programme but what is shown before, during and after it is appropriate for children up to thirteen years of age. Programmes classified as C would give caregivers this assurance. They are generally happy to accept their responsibility and supervise viewing at other times.

Obviously, the concept of a C classification must be discussed in depth with broadcasters and criteria for a C classification would have to be developed. The Authority believes that the suggested criteria for Australian C programmes as reported by Patricia Palmer in *The Lively Audience* is a good starting point for discussion, ie C programmes should be:

- specifically designed for children older than 5 years and younger than 14 years (Australia has a P pre-school classification)
- designed to entertain children
- well produced - technically and artistically
- easily understood and appreciated by children
- making a contribution to the social, emotional or intellectual development of children
- appropriate for Australian children, not assuming too much of the culture, dialect or environment of some other country
- not outdated in content or in technical or artistic production

The Authority is aware, (as Lorraine Isaac, a TVNZ producer of children's programmes, pointed out recently), that many children prefer general programmes e.g. *Neighbours*, *Flying Doctors* or *The Cosby Show* rather than their own specific children's programmes. But caregivers know that G programmes are not designed specifically for children and consequently accept that these programmes require more careful monitoring on the part of caregivers, a view the Authority endorses.

Another request of caregivers, which the Authority endorses, is that it is helpful to caregivers and also to children when they are deciding which programmes they are to view - if the classification code is given in the *Listener*, *TV Guide* and newspapers for all programmes. While the Authority understands that there are some difficulties with this because of the late arrival of programmes into New Zealand, it is important to have those classifications available so that parents and other caregivers can provide appropriate control over their children's television viewing.

As with the P classification, the Authority at this point in time, does not see the need for a YA classification.

The Authority is aware of the lack of variety and age appropriate programming for young adults and encourages broadcasters to be aware of the needs of this age group. The Authority recognises *L.I.F.E.* as an excellent example of the standards which can be attained in adolescent programming. The preferred time, according to teenagers and caregivers, for *L.I.F.E.* to be broadcast is at 5.00 pm daily, after the children's programmes.

## Violence

Of real concern to the Authority is the portrayal of violence in children's programmes, especially in cartoons. The Authority's own public opinion survey of 670 adults and 100 teenagers throughout New Zealand in July 1989 showed that violence on television is the single most important concern regarding television in New Zealand. Predictably the level of concern among teenagers is much less than that among adults. Cartoon violence in the survey was mentioned as an area of particular concern, especially by parents of young children.

Violence is commonly shown as a way of resolving conflict, and the message given that in order to be a "winner" or good person it is okay to use violence, especially in a good cause. Sadly the portrayal of our sporting heroes who are admired by the young often reflects this macho, aggressive image. We would like to see less "glory" given to violence on the sports field.

The Authority favours a reduction in violent content in programmes for children and programmes screened when children could generally be expected to be viewing. Since children may be expected to be viewing up to the "watershed" time, this would include the early evening news.

## **Advertising**

In general New Zealand product advertising during children's programmes appears to be responsible -- it avoids encouraging children to pressure parents to buy products and portrays products realistically.

However, the Authority shares the concern that some children's programmes seem to be designed to sell products rather than entertain children and would like to see this kind of programming restricted. It is also aware of the concern about the promotion of war toys and believes that such promotions are inconsistent with the public desire to reduce the amount of violence on television.

Furthermore, a reduction in advertising during the children's programmes is highly recommended and the limited advertising shown should be appropriate for children. For instance, as noted earlier, the advertising of AO films is not appropriate during children's programmes, neither is the promotion of alcohol either by advertising or sponsorship.

## **Watershed**

Many caregivers are unaware of the 8.30 pm watershed time and for some, particularly caregivers of pre-school children the watershed for AO programmes did not seem to be an issue. In the Authority's nation-wide opinion survey conducted in July 1989, 58% of parents with school-age children expressed a preference for a 9.30 pm "watershed" time.

The Authority recognises that the preferences of other sectors of the New Zealand public need to be addressed by television broadcasters, not just those of families with children. Consequently, it suggests that the movement of the watershed back to 9.30 may be unrealistic and that instead a 9.00 pm watershed should be seriously considered. Another option may be to have a "soft" watershed at 8.30 and a "hard" watershed at 9.30 or 10.00pm. Some kinds of AO programmes - with harder language or more explicit sex, for example -- and some kinds of advertising -- such as alcohol promotions - could be restricted to after 9.30pm.

The appropriate time for the beginning of AO programmes and even certain G programmes, which may not be harmful to children but unsuitable for them, needs to be fully debated.

Regardless of the actual "watershed" time, caregivers would like the occasional reminder (for them) and reinforcer (for their children), by broadcasters that now is the time for younger children to be going to bed.

## **New Zealand Content**

Caregivers are concerned about the lack of New Zealand content and wish their children to be exposed to their own culture much more consistently. They strongly commended programmes such as TV3's *Black Beauty* and TVNZ's Kidult series such as *The*

*Champions* and *All for One*. There is a cry from concerned teachers and caregivers all over New Zealand that New Zealand children are being raised on programmes made in the United States (considered the most inappropriate) and other countries. Their own New Zealand culture is not being presented to them. There is a need for New Zealand role models of different ages from a wide range of life styles and cultural mixes. The cultural mix of New Zealand should be portrayed more often in children's programmes in a variety of ways.

The Authority acknowledges that New Zealand television has the creative talent and committed production crews to make culturally diverse, age specific quality children's programmes, if the resources are committed to children's programmes. Although the Authority recognises that the issue of New Zealand-made children's programmes is part of the larger question of how a small country such as New Zealand can afford to make many of its own programmes, it supports the idea that a significant amount of New Zealand programmes must be targeted at our children and young people.

### **Conclusion**

In conclusion the Authority recognises that children have a special status and that broadcasters have a responsibility to recognise that status. We look forward to discussing the use of a C classification and the standards criteria for children's programming with broadcasters and other interested groups.

## APPENDIX I

**CHILDREN'S TELEVISION STANDARDS 1990**

**An Inquiry Conducted by the Australian Tribunal  
to review the Children's and Pre-School Television Standards November 1990**

Extracts of the findings and changes made to the standards

**5. Children - Definition**

- 5.1 There is a revised definition for children (CTS 1(1)). The previous standard defined children by their age (6 to 13 Years). This method created problems in determining the relevance of programs at the top end of the age range. Once children enter high school they identify with the older teenage group and so themes relevant to this older group also become relevant to them.
- 5.2 This standard is not intended to provide for that market. Identifying primary school children and distinguishing them from high school children will assist producers and licensees to concentrate on those stories and ideas which are relevant to children at primary school but may not be relevant to children at the bottom end of high school.

- 5.3 Although most children start high school at approximately 12 years of age, there are some differences across different states and so some 13 year olds may still be at primary school. However, it is generally accepted that although all children are different, it is possible to generalise about different stages at which children have similar needs and interests. The purpose of these standards is to ensure that programs are provided specifically for primary school and preschool children.

## 6. The Criteria

- 6.1 There are revised criteria for children's programs.. (CTS 2). These criteria must be met for C and P classification.
- 6.2 The essential elements of the existing CTS 2 criteria have been maintained and in the case of 'production values', expanded to spell out a commitment of resources. The criterion for age specification also encompasses the preschool audience. The criteria are broad enough to enhance creativity but narrow enough to be a useful test for determining whether a program should be granted C or P classification.
- 6.3 These revised criteria reflect the following:
- a) a C or P program does not have to cater for all children, the clause "or for a group of children within the age range" has been included. "A group of children" can mean a group of children aged between say, six and nine, or children who share a common interest or enjoy a particular activity.

Consideration was given to submissions from the Australian Children's Television Foundation that child development spanned the P and C classifications and that it should be possible to make Australian programs for both and get credit in both classifications. It was decided that these standards did not preclude a program, if it met the specific criteria for both the C and P audience, from being classified for both C and P. This would allow such a program to be shown as a first release Australian C program in the first instance and also to be shown in a P period. In terms of limits on repetition, such a program would therefore be able to be shown three times in five years as a C program and three times in five years as a P program.



- b) a children's program can be drama or non drama, designed to educate or to be just good fun, but the aim of all C and P programs should be to entertain children.
- c) although money does not necessarily equate with 'quality' it is accepted that without the commitment of sufficient resources the high production values required would be difficult to achieve. Therefore, the Tribunal accepts that money and resources should be committed to producing children's programs in order to ensure appropriate production values.
- d) children's program producers and programmers should understand the emotional, intellectual, social and other characteristics relevant to specific age groups of children and create and broadcast programs that address the specific needs and interests of those children. This has been discussed extensively in the information paper to the inquiry.
- e) programs produced for children in other countries and shown in Australia may assume knowledge and understanding of their country of origin, and children in Australia may be unfamiliar with these areas; and children's television producers and programmers should always take into account the multicultural nature of Australia.

## 7. Freeing up C time

- 7.1 There was considerable debate in the inquiry as to the effectiveness of what is regarded as a "moratorium" time period for C programs, where each licensee is required to show C programs at the same time. It ensured a regular time slot, a daily hour requirement and no competition from non-C programs.
- 7.2 Under the revised standards the amount of C programming has not been increased but there is the opportunity, with the adoption of C bands, for children to see three times the amount of C programs across metropolitan and aggregated markets if licensees do not schedule their C programs against each other.
- 7.3 The previous 4pm to 5pm weekday period was nominated as C time because that was the time when the proportion of primary school children in the viewing audience was higher than at any other time; they had a greater chance of controlling the television set; that was the time that adult viewers believed was appropriate; and the community supported a special time being set aside for children.

- 7.4 The question of timing and amount of C time emerged as a major issue within the inquiry. An initial recommendation to increase C time was canvassed in the Information Paper. Public interest groups strongly supported extra C time. Some maintained this extra time should be 'fixed', others recommended that extra hours only be floated on weekends. The networks rejected the 'burden' of any extra C time and recommended that C time be maintained at 4pm to 5pm "across the board". They did not want to compete and lose the moratorium effect of parallel scheduling. Some preferred an 'encouragement' for production under the existing requirements, pointing out that 'quantity' would not necessarily produce 'quality' in children's programming.
- 7.5 The advertisers strongly opposed any extra C time. From their point of view the current C time was not a viable option and any further regulation would not improve the situation. There was a decline in the child viewing audience during C time and they argued that competition would solve the problem.
- 7.6 They recommended a de-regulation of C time and adoption of "flexible C" with the onus on the stations to schedule C programs to achieve the best possible audience. Competition would improve the quality of overall C programming and bring back the child audience. Higher audiences would attract more advertising revenue and more revenue would improve the quality of production.
- 7.7 Taking into consideration the wide range of concerns and recommendations, a number of options for CTS 3 (C time) were put at conferences. The list of options increased with each conference as did the counter options.
- 7.8 What clearly emerged was a need for an up to date survey of children's viewing to determine whether 4pm to 5pm was still the most appropriate time and whether children were tuning into the programs being provided.
- 7.9 The decline in viewing during C time had been explained by submitters as either evidence that C time did not work; children did not like the programs being shown; or children had more to do after school and were no longer available at that time. The subsequent research clearly showed that the child audience was still available but that they were not satisfied with the programs being shown. For them it was not a question of more, but 'better' programs.

- 7.10 The concept of the compulsory C hour between 4 and 5pm has now been abandoned and the times when C programs can be shown have become more flexible. This is an attempt to encourage quality programs through competition with popular programs in prime time and at weekends and to provide the child viewer with more C programs, ie. if licensees do not schedule C programs against each other.
- 7.11 The amount of C programs made available to the viewers through scheduling will be monitored. The dilemma has been to ensure some regular programming for children while enabling more flexible scheduling. The identification of time bands is seen as a logical solution.

## 8. Other Regulatory Options

- 8.1 As indicated the Tribunal is determined to see an improvement in the commitment to children's programming, in terms of quality and access (how it is presented and promoted). If this is not achieved under this more flexible regime then other options will need to be considered.
- 8.2 Two further options to regulate for quality were looked at by the Tribunal but deferred without further consideration at this stage in order to assess the strategy of C bands and see if it produces an improvement.
- 8.3 The options were first put at conferences and included the budget option and the ratings option. Both were seen by the Tribunal as one way of achieving an increase in resources and therefore a commitment to quality in children's programming. One would require the attainment of an annual level of expenditure on children's programming and the other would relate a licensee's children's 'score' to the ratings achieved by the program amongst the child audience.

## 9. Displacement

- 9.1 The previous CTS 4 allowed for the displacement of C programs for the live coverage of major sporting events and events of national importance.
- 9.2 Under the previous regime of a set C time period of 4pm to 5pm Monday to Friday, the provision to displace one hour of C programs was introduced to take into account the need to "move" this set C time for special events.

- 9.3 Because children should not be deprived of their own programming, any displacement of C programs also required a "make-up" of those programs at other times suitable for viewing by children and within the same week.
- 9.4 Every year, since the introduction of the standards in 1984, the standard has been varied to allow a longer period to "make up" the amount of C programming displaced because of the networks' commitment to extended live coverage of sporting events especially during the summer viewing periods. In particular the Seven Network's commitment to the summer tennis season and the Nine Network's commitment to cricket.
- 9.5 Within this inquiry, networks argued for a relaxation of the "make-up" provisions, advertisers argued for a flexible C time which would eliminate displacement problems and public interest groups argued against any provision for displacement. Some argued for a provision with "conditions" such as a limit on the number of displacements, stricter make-up provisions, no displacement for "violent" sport and penalties for excessive displacement such as doubling the amount of C time to be made up.
- 9.6 Within the new regulatory framework there is no longer an inflexible C time period of one C hour between 4pm and 5pm, Monday to Friday.
- 9.7 In addition, licensees can change their C and P periods with advance notice to the Tribunal and the child audience. The requirement of one month's notice is considered reasonable given the advance planning needed for all programming. This will ensure that children's programming has a secure and predictable place within the overall structure of a network's programming even during periods of extended live sport coverage.
- 9.8 For these reasons, the Tribunal initially proposed not to include a provision for displacement in the new standard. However, following network submissions on the practical implications of the proposed C and P requirements (outlined in CTS 3) the Tribunal has decided that the compulsory C period requirement between 4.30pm and 8.30pm weekdays can be displaced to another C band. Also included is provision for 'urgent' displacement when the one month notification cannot be met due to unforeseen postponement or overrun of an event which prevents the broadcast of such programs.

## 10. Preschool Programs

- 10.1 Preschool children are a significant part of the child audience. They have very specific needs and care and resources must be provided for the production of their programs. The Tribunal is of the view that just as for C programs the requirement for preclassification under the revised CTS 2 criteria will ensure that P programs also meet the standard of quality and suitability required.

### No Australian quota

- 10.2 All preschool programs currently broadcast are Australian and it was not considered necessary to include a quota for Australian programs. The intention of these standards is that preschool children should continue to have access to Australian programs made specifically for them and if there is a substantial change to this situation then it might be necessary for this standard to be reviewed.

### P scheduling

- 10.3 The period when P programs can be shown has been extended by an hour to commence at 8.30am and conclude at 4.30pm. This is to assist networking arrangements but it is not intended to allow for P programs to be regularly shown at times when older children are still at home and more likely to have control of the television set. It will therefore not be acceptable for these programs to be networked so that that the receiving station is forced to show them at times unsuitable for the preschool audience.

### Amount

- 10.4 The amount of P programs required to be broadcast each weekday has not been increased. Submissions were received to increase the amount of P programs however it was decided that if networks continue not to schedule P programs against each other then preschool viewers have three times the amount of P programs to view in metropolitan and aggregated markets. If however networks schedule their P programs competitively against each other, which will mean a reduction in the 1 1/2 hours of P programs available, then a standard relating to the amount of programs broadcast may have to be reconsidered. The extension of P time to 8.30am and 4.30pm should assist complementary scheduling.

## 11. Australian Children's Drama

- 11.1 Australian C drama is an essential element of the drama/diversity score outlined in the new TPS 14. The score is to ensure Australian adult and children's drama and to encourage diversity of program types.

- 11.2 The standard has been expanded to include classification at pre-production stage (old CTS 13A) which up until now had been introduced for a trial period only. The standard was introduced for a trial period in order "to prove itself in the marketplace", in that production interests maintained that it would "raise the level of children's television production". (An extract of the Decision and Reasons is included in the Regulation Of Children's Programs - Discussion Paper - September 1987)
- 11.3 The trial period has been extended in view of the consideration of this particular issue within this inquiry. Although the C drama classified under this standard has been slow in coming to the screen, the Tribunal is of the view that the provision should be maintained. This decision has been taken after considering the significant increase in the annual requirement for first release C drama and the perceived 'production' benefits in achieving C drama classification at pre-production stage.

## 12. Amount of Australian C Drama

- 12.1 It is the Tribunal's view that more Australian C drama needs to be encouraged. The Drama format is an essential ingredient in children's television and it is important that children see a reasonable proportion of Australian drama made specifically for them so that they too can identify with Australian themes and language. The minimum annual C drama score will require an increase of C drama programming, by all licensees. An increase to 10 hours was foreshadowed when the 1984 standards were introduced and some increase has been anticipated by both the industry and the community. An initial increase to 13 hours per year was flagged in the Discussion Paper.
- 12.2 The 8 hours per annum required in the past has rarely been exceeded. All parties to the inquiry (ie. the Australian content aspects of the children's standards) supported an increase in the amount of C drama required, although the amounts varied.

## 13. Score

- 13.1 The Australian Content Standard for drama/diversity has three components: adult drama, C drama and diversity. Rather than a specific quota of hours the standard allows for flexibility of formats (ie. serial, series, mini-series etc), based on a quality factor and a test for 'Australian'.

- 13.2 The minimum annual Australian C drama score to be met is 170. This is to be phased in with a score of 125 from 1 January 1990 and a score of 170 from 1 January 1991.
- 13.3 A score of 125 is the equivalent of 12 hours of one-off drama and 170 is equivalent to 16 hours of one-off drama.
- 13.4 Individual C drama scores will be calculated and added according to the same formula used for drama. The same Australian test and factors will apply as for drama generally.
- 13.5 Australian C classified non-drama programs which meet the definitions and tests for diversity may also contribute to the overall diversity score. To meet the minimum C drama score, or contribute to the diversity score, C programs must be first release and must be shown in C bands.

#### Credit for C drama

- 13.6 Any excess in a licensee's Australian C drama score can be counted towards its drama and/or diversity score as explained in TPS 14.

#### 14. Quality Factor

- 14.1 Quality factors for Australian C drama are based on the purchase price per hour averages for drama, despite the fact that the average purchase prices per hour for C drama program formats are accepted as being lower than those accepted for drama generally. The reason for this decision are that the drama factor relativities appear to provide greater encouragement to licensees to broadcast quality C drama than would any based on accepted C drama purchase price averages.

#### 15. Advertising

- 15.1 Those advocating fewer commercials and more restrictive standards for children's television within this inquiry, also wanted more money spent on children's programs. The Tribunal has taken the view that in order to encourage more money to be spent on children's programs the advertising standards should be simplified and clarified. Uncertainty and unnecessary wording has been eliminated. The specific changes are outlined in the explanation of the standards.

**16. Amount of Advertising**

16.1 There was considerable public concern about the amount and number of advertising breaks in C programs and a number of submissions were made to restrict the number of advertising breaks and introduce block advertising. The Tribunal however recognises that the quality of children's programs depends partly on the advertising revenue generated and to make advertising too restrictive would work against quality children's programs.

16.2 However, the Tribunal was concerned at the number of breaks within children's programs, simply "filled" up with community service announcements. The Tribunal will be looking at the number of breaks in C programs during the Advertising Time on Television review.

Dated 23 November 1989

DEIRDRE O'CONNOR  
Chairman

PETER WESTERWAY  
Vice-Chairman

KIM WILSON  
Member

BRUCE ALLEN  
Member

SUE BROOKS  
Member

MICHAEL RAMSDEN  
Member



**APPENDIX II****A Children's Advertising Guide**

From Australian Capital TV Pty Ltd (Guidelines).

This is a guide for promos and commercial classifications.

**Commercial Classification (Mon - Fri)**

G - suitable for G or C programme

GA - suitable for G, not C programme

GM - suitable for G time except between 4 - 6pm weekdays or in programmes directed to children or likely to be seen by many children

PGR - 5 - 6pm  
8.30am - Noon (except during pre-school programming i.e. Mulligrubs-  
10am - 10.30am  
3.00 - 4.00pm  
4.30 - 8.30pm

BPG - Not Sundays, Christmas Day or Good Friday. Suitable at other PGR times and between 8.30am - 4pm Saturdays

AO - 8.30pm - 5.00am  
12 Noon - 3pm

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