

February 26th, 2015

SUBMISSION TO OFCOM'S THIRD PSB REVIEW CONSULTATION

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Executive Summary

“Good broadcasting about religion matters –
in fact, it matters more than ever before”

1. In this submission, the Sandford St Martin Trust will deal with a key element of public service media content, namely **religious programming** since this is the focus of the Sandford St Martin Trust's activity and also our area of expertise.
2. We support Ofcom's view that religious programming is “generally considered to be core PSB territory”.¹
3. The Sandford St Martin Trust believes that this is a critical moment for the future of religious broadcasting in the UK and a significant opportunity to reassert and strengthen the PSB remit as it pertains to religion. Towards this end, the Sandford St Martin Trust supports Ofcom's ambition to address how the rapid evolution of media markets, shaped by the growth of the internet, declining spend and output by PSBs, and, market developments, either individually or in combination, have affected core religious output.
4. It is the Sandford St Martin Trust's view that the broad aims of public service broadcasting as defined in the Communications Act 2003 hold good: namely, Section 264(6) requires that public service television broadcasting in the United Kingdom must include services of a suitable quality and range dealing with a number of subjects including “religion and other beliefs”. Drawing on this, we concur with the 2005 Parliamentary Select Committee on BBC

¹ *Ofcom Review of Public Service Television Broadcasting: Phase 1: Is television special?*, para 16 (2006).

Charter Review's finding "therefore broadcasting covering religion and other beliefs is part of the remit of all public service channels."²

5. More specifically, Section 264(6) of the Communications Act 2003 also sets down that programming about religion and other beliefs fulfils the purposes of public service broadcasting if it is in one of the following categories: "(i) programmes providing news and other information about different religions and other beliefs; (ii) programmes about the history of different religions and other beliefs; and (iii) programmes showing acts of worship and other ceremonies and practices (including some showing acts of worship and other ceremonies in their entirety)". While not disagreeing with these criteria, the Sandford St Martin Trust more broadly holds with the definition in Ofcom's Broadcasting Code that "A religious programme is a programme which deals with matters of religion as the central subject, or as a significant part, of the programme."
6. The Sandford St Martin Trust remains encouraged by Ofcom's own commissioned qualitative research into religious broadcasting (2004) which found that, while, when asked to consider religious programming, participants initially defined it very narrowly – mainly thinking of Christian worship programmes - participants also identified other types of programmes which they felt could usefully be included in a more modern "religious programmes" category. These included documentaries about specific moral issues; programmes about religious and ethnic minorities; history programmes with a faith or belief based focus; and news and current affairs programmes.
7. The Sandford St Martin Trust has been making annual awards for the best broadcast-programmes about religion, ethics and spirituality since 1978. These are the most prestigious awards for religious broadcasting in the UK and previous winners have included Melvyn Bragg, Simon Schama, Rabbi Lionel Blue, David Suchet, Frank Cottrell Boyce, Ian Hislop, Olivia Colman, Rageh Omar, Sally Magnusson and many more.³
8. We have noted that of the 24 TV entries for the 2015 Sandford St Martin Trust Awards (for programmes broadcast between February 1, 2014 and January 31, 2015) there have been no entries from ITV (Channel 3) or Channel 5, and only three entries from Channel 4. Also, while there were 23 entries for the new Sandford St Martin Children's Broadcasting Award, no entries were made by Channels 3, 4 or 5. We believe that this is a reflection of a current trend on commercial mainstream channels of marginalising both the commissioning and the transmission of religious programmes

² *Select Committee on BBC Charter Review [Second Report](#)* (2006) para 141.

³ sandfordawards.org.uk/the-awards/

9. The Sandford St Martin Trust believes that knowledge and understanding of religious and ethical issues is an essential part of the communications needs, rights and interests of UK citizens in the global information society. The changing nature of the UK's own population, the role of religion in conflicts around the world, as well as the ethical issues raised by developments in medical science have all increased the public need for well-researched and well-made religious and ethical programming from trustworthy sources. We believe that this goal can only be met through religious broadcasting quotas for all public service broadcasters.
10. However, Ofcom's own research, *How Online Media Services Have Fulfilled the Public Service Objectives*⁴ and *Investment in TV Genres*⁵, concludes that without there being a strong and enforceable public service requirement, the market is unlikely to provide trustworthy religious programming of a good standard.
11. We also believe that the inclusion of religious programming with the public service requirement is further necessitated by editorial prejudice against religious broadcasting and ignorance of key issues resulting in a gap between what audiences value and what broadcasters offer. While difficult to empirically prove, it is commonly accepted that there is a lack of diversity among programme-makers. It is noted in the Report of the Select Committee on BBC Charter Review that the Bishop of Southwark described "the standard mindset of the media, and particularly the broadcasting services" as "the mindset of metropolitan secular humanism"⁶.
12. The Sandford St Martin Trust believes that all public broadcasters in the digital age should also have explicit online policies supporting their public service goals and priorities, particularly in relation to religious content. The Trust agrees with Ofcom's own assessment that without there being a public service requirement, the market is unlikely to provide "high-quality religious material that is original to online services, especially dealing with multiple faiths and when compared to television and radio content."⁷

⁴ A report for Ofcom by Enders, September 2014
http://stakeholders.ofcom.org.uk/binaries/broadcast/reviews-investigations/psb-review/psb3/1._Ofcom_report.pdf

⁵ Ofcom PSB review by Mediatique, December 2014
http://stakeholders.ofcom.org.uk/binaries/broadcast/reviews-investigations/psb-review/psb3/Investment_in_TV_Genres.pdf

⁶ *Select Committee on BBC Charter Review* [Second Report](#) (2006), para 163.

⁷ Enders 2014 Case Study: Faithology pg. 5

13. The Sandford St Martin Trust welcomes Ofcom’s concern over “the extent to which PSBs fully meet the needs of a range of audiences” and its findings that “only 46% of people across the UK are satisfied that the PSB system delivers programmes that show different kinds of cultures within the UK”.⁸ The 2011 census indicated that the population of the United Kingdom, particularly with regard to different belief systems, is becoming increasingly diverse. David Voas, Professor of Population Studies at the University of Essex was quoted in *The Times* (9 February, 2015) as saying that the future of religion in Britain will be “black and brown” as Islam and newer forms of Christianity overhaul the Church of England. The 2011 census recorded that there were 2.8 million Muslims in Britain, or 4.4% of the population; 59.3% of respondents identified themselves as Christians.
14. We make special note of Ofcom’s findings that “younger adults”, in particular, said it was more important for PSB channels to represent diversity at the level of the different groups and communities present throughout the UK, such as specific ethnicities, religions, socio-economic groups and sexual orientations.”⁹ And we welcome Ofcom’s questioning of the performance of the PSBs in meeting with the PSB purposes of reflecting UK cultural identity, and representing diversity and alternative viewpoints and the extent to which these purposes are being delivered.
15. The Sandford St Martin Trust believes that an essential pillar of maintaining a modern, democratic society and a prerequisite for active citizenship – something that has been at the heart of Government policy for more than 15 years – is a good understanding of both the central role that Christianity has played and continues to play in the development of our society as well as a fair and unbiased understanding and appreciation of the value systems and ethics of minority faith groups. The Sandford St Martin Trust’s own research suggests that such minorities can often feel isolated and undervalued when politicians, journalists and/or broadcasters, among others, do not understand or accurately represent the complexities of their faiths. For example, on 5 February, 2015, in an item on female genital mutilation (FGM), a BBC Radio 4, *Today* presenter, referred to the practice as “Muslim”, when, in fact, it is fact a cultural phenomenon practised by some Muslims as well as by some animists and some Christians.¹⁰
16. We further believe that religion needs to be recognised as a powerful motivator of communal behaviour as well as individual lifestyle and world view. In a speech on the subject of social cohesion, the Rt Rev Dr Rowan Williams, then Archbishop of Canterbury argued strongly that religious diversity can help strengthen social harmony provided that the views of faith

⁸ Ofcom *Public Service Content in a Connected Society* (2014), Section 1.25.2

⁹ *Ibid*, Section 1.27, (emphasis ours)

¹⁰ <http://www.bbc.co.uk/programmes/p02jb65h>

communities are heard. He said: “The notion that social unity can be secured by a policy of marginalising or ignoring communities of faith because of their irreducible diversity rests on several errors and fallacies, and its most serious and damaging effect is to give credibility to the idea of a neutral and/or self-evident set of secular principles which have authority to override the particular convictions of religious groups... this amounts to the requirement that religious believers leave their most strongly held and distinctive principles at the door when they engage in public argument: this is not a good recipe for lasting social unity”¹¹.

17. We wonder why, at a time when it is impossible to understand the modern world – its politics, economics, military and humanitarian events – without understanding religion, religion is not being prioritised as needing expert commissioning and interpretation in the public and broadcast sphere. We note that Channel 4 has not had a dedicated Commissioning Editor for Religion since 2009; BBC TV’s Factual Commissioning division announced in January 2015 plans to merge the role of Commissioning Head of Religion with Science, Business and History; and while BBC News has editors for science, economics, business, political, home, education, health, arts and sports, it has no religion editor.

18. In his testimony to the last Select Committee on BBC Charter Renewal, the Bishop of Southwark suggested one reason why broadcasters fail to provide the public with objective background information required to understand the context of a news story is that “the depth of knowledge is not there to handle the story”. Dr Ram-Prasad, another member of the multi-faith panel asked to report to the Committee, agreed “The lack of strategic thinking comes from thinking “Okay, we have somebody, somewhere in Asia, let’s bung him in and ask him to give a report” rather than having somebody who would have the kind of training that you would expect over a longer period of time...”¹²

19. The Sandford St Martin Trust do not believe that this lack of required knowledge exists only among general audiences or, at a grassroots level of UK broadcasting or state, and only regarding religion or geo-politics abroad. In her book *Medina in Birmingham, Najaf in Brent*, the BBC radio journalist, Innes Bowen recounted a meeting with a man who was advising a senior Cabinet minister on relations with Britain’s Muslim communities: “He told me that a mosque mentioned in an August 2005 edition of the BBC series Panorama should have been identified as Shi’ite. He was quite sure about this because the mosque in question was a prominent one in his hometown. But he was wrong. ... The same man also spoke warmly of a prominent British

¹¹ Dr. Rowan Williams, *Why Social Cohesion Needs Religion*, Building Bridges Conference, Singapore Thursday 6th December 2007 <http://rowanwilliams.archbishopofcanterbury.org/articles.php/1144/why-social-cohesion-needs-religion-building-bridges-conference-singapore>

¹² *Select Committee on BBC Charter Review [Second Report](#)* (2006), para 155.

Islamic organisation but was ignorant of its barely concealed links to a foreign political party... the fact that such an unreliable source of information was relied upon at all says something about the lack of expertise... at the highest level of government.”¹³ Speaking about the role religion has played in recent Middle Eastern conflicts, Dr Mona Siddiqui, Professor of Islamic and Inter-Religious Studies at Glasgow University has said “suddenly Iraq appeared on our screens and it was assumed that the whole population knew the difference between Sunni and Shia; yet nobody knew the difference.”¹⁴

20. The BBC journalist, Edward Stourton, wrote in the Daily Telegraph: “For millions of human beings, God is where you turn in joy or sorrow, and religion is what comes to mind when you think about who you are. Recognising that reality is not the same as saying it is a good thing, but failing to recognise it can lead to serious journalistic mistakes.”¹⁵
21. The Archbishop of Canterbury, Justin Welby was quoted in the Express Newspaper: “Some people these days firmly believe that faith and religious life should be kept behind closed doors. But if broadcasters were also to adopt the view that religion is something separate and private, then we could set off down a dangerous road. We would be cultivating ignorance where what we need is insight, and prejudice where we most badly need open minds.”¹⁶
22. The Sandford St Martin Trust believes that the audience demand for religious programming remains high. Confidential internal BBC audience figures for its factual series genre during 2014 indicate that the average audience for religious programmes was 1,512,341. This constitutes 10.2% of the available audience share and, in this aspect, religious programmes have outperformed BBC flagship programmes such as BBC 1’s *Imagine* arts series and its investigative current affairs programme *Panorama*.
23. However, despite this demonstrable public demand and need for high standard religious broadcasting, Ofcom’s own research suggests that the future of religious broadcasting is “at risk” and, over the next decade, is likely to be further marginalised by PSBs - and at ITV and Channel 5, in particular.¹⁷
24. The Sandford St Martin Trust also notes with concern, Ofcom’s findings that recent changes to the PSB regime, including the removal of output

¹³ Innes Bowen, *Medina in Birmingham, Najaf in Brent: Inside British Islam*, Hurst & Company, London 2014, p. 2.

¹⁴ *Select Committee on BBC Charter Review Second Report* (2006), para 154.

¹⁵ Edward Stourton, *Never ignore the power of religion*, The Daily Telegraph, 24 May 2014 <http://www.telegraph.co.uk/news/religion/8630553/Never-ignore-the-power-of-religion.html>

¹⁶ *Archbishop Justin Welby: TV needs religious ‘reality’ shows*, The Express, 7 May, 2013. <http://www.express.co.uk/news/uk/397504/Archbishop-Justin-Welby-TV-needs-religious-reality-shows>

¹⁷ Mediatique 2014, pg. 10

prescriptions on religious programming has resulted in their marginalisation or removal from the schedules of the commercial PSBs.”¹⁸ Of particular concern is the state of religious broadcasting at ITV, where Ofcom’s report indicates that spending on religious programme commissions has dropped from £40 million in 2008 to £2 million in 2013; and that in 2012, ITV broadcast only 2 hours of religious programming.

25. The Sandford St Martin Trust also notes Ofcom’s findings that spending at Channel 4 on religious broadcasting dropped from £49m million to £20 million between 2008 and 2013.¹⁹ This period coincided with Channel 4’s decision to dispense with the role of a Commissioning Editor for Religion and the elimination of any religious programming quota.

26. The same Ofcom commissioned research suggests that the decline in religious programming is the result of the economics “further challenged by market transition with limited availability to derive compensating revenues in on-demand windows” and “smaller audiences unable to offset production costs”.²⁰

27. The Sandford St Martin Trust welcomes Ofcom’s recognition of the role played by online platforms and services on the availability of so-called “specialist” genres for interested audiences. However, the Sandford St Martin Trust also wishes to emphasise Ofcom’s own findings that online platforms such as Faithology “(do) not represent an evolution from traditional media offerings”.²¹

28. Further the Sandford St Martin Trust wish to note the on-going proliferation of online “narrow-casting” to particular, sometimes extreme, religious interest groups. We believe that the need to balance such biased media is best done by a strong PSB network funded independently of any religious or political interest.

Question 3: Do you agree with our assessment that the PSB system remains strong overall?

29. With regard to religious broadcasting, we cannot agree that the PSB system remains strong. The Sandford St Martin Trust has noted Ofcom’s own research that growth of the independent sector has had a direct impact on the commercial nature of the market audience gain resulting in the

¹⁸ Ibid, pg. 5

¹⁹ Ofcom, *PSB Output and Spend PSB Report 2013 – Information pack*, August 2013, Figure 5.

²⁰ Mediatique, pg. 10

²¹ Enders 2014 Case Study: Faithology pg. 5

marginalisation of what are generally considered “niche” genres – such as religious broadcasting.²²

30. We are not encouraged by Ofcom’s commissioned research findings that “recent changes to the PSB regime, including the removal of output prescriptions on arts, religion and music programming has resulted in their marginalisation or removal from the schedules of PSBs”.²³

Question 4: Given the resources available, to what extent is the system meeting the needs of as wide a range of audiences as practicable?

31. We note that genres with very strong PSB attributes, such as religious broadcasting, are particularly affected by any cut in resources. Ofcom’s commissioned research marks the wide disparity in profitability and commercial attractiveness among genre and broadcaster - with genres such as religious programmes, being “commercially challenged and increasingly unattractive for the commercial PSBs”.²⁴

32. We further note Ofcom’s findings that, of the limited resources available, the share of first run content expenditure on arts, music and religion programmes for PSB core channels (peak hours, %) dropped between 2007 and 2012 from 3% to 2 %. Of particular concern is ITV’s spending on these genres with a mere 1% share of first run broadcast hours in 2013.²⁵ (Ref Mediatique p. 20)

33. In view of these figures, the Sandford St Martin Trust welcomes Ofcom’s concern and commitment, expressed in *Public Service Content in a Connected Society* (Section 1.25), to further examine i) **investment in content**: particularly regarding any further reduction in the volume, range and quality of religious output; ii) **reflecting different cultures**: the extent to which the PSBs fully meet the needs of a range of audiences given the UK’s changing demographics and Ofcom’s PSB tracker that shows only 46% of people across the UK are satisfied that the PSB system delivers programmes that show different kinds of cultures within the UK; and iii) **genre delivery**: recognising the significant decline in the delivery of certain key genres such as religious programming.

Question 6: Is declining investment affecting the quality of PSB and is it a cause for concern?

²² Mediatique, pg. 9

²³ Ibid, pg. 5 (emphasis ours)

²⁴ Ibid, pg. 5

²⁵ Ibid, pg. 20

34. The Sandford St Martin Trust is deeply concerned that declining investment has affected the quality of religious programming and notes that Ofcom's commissioned research identifies religious programming as being "at risk" within future PSB compact by 2020 with the genre "likely to be marginalised at ITV and Channel 5 in particular".²⁶

Question 7: Do you agree with Ofcom's provisional findings in the Review of C4C's delivery of its media content duties?

35. Like Ofcom, the Sandford St Martin Trust welcomes C4C's recent announcement of plans to introduce a new in-house diversity initiative, as well as the creation of the new Diversity Monitoring System from the Creative Diversity Network (of which C4C is a part) which will gather standardised real-time data on on-screen and off-screen diversity representation. The Sandford St Martin Trust believes that "diversity" in this context is taken to include "religious diversity". Since C4C's suspension of role of Commissioning Editor for Religion in 2009, it has been difficult to measure how much religious programming C4C commissions and broadcasts. We urge that, when the Creative Diversity Network reports in 2015/16, it should include specific data regarding religious output and religious diversity representation.

Question 8: To what degree do you agree with our assessment of the degree to which the non-PSB services play a role in helping to deliver the public service objectives?

36. While dismayed by the findings, we have no call to dispute Ofcom's assessment of the practically negligible existence of religious programming on non-PSB channels such as ITV and Channel 5.²⁷

37. In this context, the decline in BBC programming spend on TV services seems to us particularly significant – particularly for religious programmes, which as a PSB genre is now so heavily reliant on the BBC for its continued existence.

38. The Sandford St Martin Trust agrees with Ofcom's commissioned research that, with regard to online platforms, that while websites such as 'Faithology' offer services such as "community forums and direct links to curated content

²⁶ Ibid, pg. 10

²⁷ Ofcom, *Annex 7 – Key genre analysis, PSB Annual Report*, Fig 28: 'Religion and ethics: Programming: output hours', December 2014, p. 37)

elsewhere on the web – it is explicitly trying to sit in the same tradition as trusted offline resources” and that “the major phenomenon it highlights is a lack of high-quality religious material that is original to online services, especially dealing with multiple faiths and when compared to television and radio content.”²⁸

39. We further note Ofcom’s research findings that online platforms for original factual content such as ‘Journeyman Pictures’ cover a wide range of issues including religious issues and we welcome the possibility that a requirement for factual (or religious) content could be partially fulfilled by such online services, we wish to highlight the overall finding that “there is far less provision of this sort of content online than news or entertainment, for example, and the internet does not look poised to become the primary source for such content in the immediate future.”²⁹

Background information:

About the Sandford St Martin Trust

The Sandford St Martin Trust is a nonprofit organisation, registered as a charitable trust in the UK.

The Trust is best known for making annual awards for the best television and radio programmes about religion, ethics and spirituality. The Sandford St Martin Awards are the most prestigious in their field, and have been won by some of the best-known names in broadcasting and journalism.

As well as making awards, the Trust acts as an advocate for excellence in broadcast coverage of religion, stimulating debate about the value of this kind of broadcasting and promoting religion, ethics and spirituality as important and rewarding subjects for programme makers to engage with.

The Trust takes a broad view of what religious broadcasting is and who it is for. It works to challenge limited and limiting perceptions of the genre and to highlight and encourage the innovative, thought-provoking and inspiring coverage of religion to be found throughout the broadcast schedules and, increasingly, online.

The Trust is politically independent and is not affiliated with any media company or organisation. It does not proselytise on behalf of or promote any particular religion or faith, nor does it engage in religious activities itself.

One of our recent award winners, Ian Hislop, wrote in Radio Times: “*All programme-*

²⁸ Enders Analysis, Case Study: Faithology, August 2014, pg. 5

²⁹ Enders Analysis: Case Study: Journeyman Pictures, August 2014, pg. 8

makers are ultimately looking for good stories to tell, and audiences are looking for good stories to watch. There are few richer repositories of stories than the world's faiths and the extraordinary ways that human beings have attempted to find meaning through them."

Why does excellence in religious broadcasting matter?

The Trust believes that awareness of religion and faith – in all its diversity – is key to a better understanding of the world and its cultures, of local communities and of what it means to be human.

We're not alone in believing that good broadcasting about religion has a critical role to play in educating and informing the public. Writing in the Sunday Times, the journalist A A Gill said: *"Religion has never been more tangible in world affairs and public life. Not having more sensible and serious religious broadcasting isn't modern, it's a failure to face modernity."*

The Trust believes too that the search for meaning does not have to be conducted only by people who are religious. The very best broadcasting about religion, ethics and spirituality offers something for everyone – not only those viewers and listeners who practice a faith or follow a particular belief.

"Religion, whether you believe it to be literally true or not, provided people, and provides people still, with a place to ask questions we must ask. Why are we here? How should we live? How can we be good?" Douglas Murray, The Spectator