

Introduction

The DCMS consultation is seeking views on whether the Government should proceed with the decriminalisation of TV licence evasion by replacing the criminal sanction with an alternative civil enforcement scheme.

https://dcms.eu.qualtrics.com/jfe/form/SV_4SYtlb6X5UhQCO1

The Sandford St Martin Trust submitted its response March 30, 2020

If you consider that TV licence evasion should remain a criminal offence, why is this the case?

The Sandford St Martin Trust believes decriminalisation of TV licence evasion would weaken the BBC's ability to collect the licence fee and lead to an increase in evasion, having a serious impact on the BBC's programming budget which, in turn, would result in a decline in the quality and quantity of religious and ethical programming made and broadcast in the UK.

Ofcom identifies religious broadcasting as "core public service broadcasting territory". The Sandford St Martin Trust agrees and has worked to advocate for this genre since 1978. It is our contention that, whether you are a believer or not, religious literacy is essential to understanding society, politics and identity both within the UK but also internationally. In an increasingly secular society, good, unbiased broadcast content that explores, reflects and sometimes challenges faith is ever more important as, for many, it will be a primary source of knowledge concerning the world beliefs.

Details of our work can be found on our website: www.sandfordawards.org.uk

If you have a view, what alternative enforcement scheme models do you consider to be the most appropriate? Why?

No view.

What steps could the Government take to mitigate any impacts that may result from decriminalisation of TV licence evasion?

The Sandford St Martin Trust is primarily concerned with the impact decriminalisation of TV licence evasion would have on the BBC's religious and ethical programming. In order to protect this key element of the BBC's output, we would urge the Government to put into place measures that would recognise, protect and support religious and ethical programming as a fundamental part of the public service broadcasting (PSB) remit across all channels.

We have also noted with dismay the dramatic decline in hours and investment by ITV and Channel 4 in religious programming since this element of the PSB requirement was removed. The most recent Ofcom research shows the total PSB spend on religion and ethics programming dropped from £23m to £13m between 2006-2016. This drop in spending was matched by a drop in the total volume of hours of religion and ethics programming aired which fell below 200 hours in 2016.ⁱ Against this background it is important to recognise the key role the BBC's provision played as it was **the only PSB whose religion and ethics programming held steady over that ten year period.**

With regard the audience demand for and social benefit of programming in this genre, the Trust references Ofcom's research identifying different religious groups as feeling under-represented and poorly portrayed by PSB broadcastersⁱⁱ, and would encourage the Government to set new quotas or targets for PSB delivery in this area to be monitored by Ofcom.

To support this we would advocate that new research should be undertaken (by Ofcom) to

- Investigate perceptions, both at a consumer and citizen level, of religious programmes on TV/video, radio/audio and online platforms in its narrowest and widest forms in order to update the definition of religious broadcasting for general use by PSBs;
- To explore the role of, and attitudes towards, religious programmes amongst different groups;
- To investigate perceptions of religion/religious broadcasting and its perceived value;
- To understand how religious broadcasting could be developed – particularly with regard to new digital and online platforms – to maximise relevance/accessibility; and
- To investigate and invest in the use of creative techniques, alternative formats or programme ideas that seek to broaden the appeal/relevance of religious broadcasting.

At a time when religion is recognised as a powerful influence on world events, the Trust believes the need for religious literacy has never been greater and, in an increasingly secular and religiously diverse country, we would advocate for religious and ethical programme provision to be formally recognised and protected across all PSB channels.

ⁱ https://www.ofcom.org.uk/_data/assets/pdf_file/0018/80046/psb-annual-report-2016.pdf

ⁱⁱ Para 2.4, http://stakeholders.ofcom.org.uk/binaries/consultations/psb-review-3/statement/PSB_Review_3_Statement.pdf