



**The Sandford
St Martin Trust**

Ofcom Consultation Response: Designation of Public Service Broadcaster Internet Programme Services

25 March 2025

Submitted by

The Sandford St Martin Trust (Registered charity no. 277370)
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About the Sandford St Martin Trust

- i. The Sandford St Martin Trust (SSMT) promotes thought-provoking, distinctive broadcasting that engages with belief and enhances the public understanding of religion. We believe the media have an increasingly important and challenging role to play in interpreting world events and that this cannot be done without acknowledging the complex roles religions play in both contemporary and historical human experience. Religiously literate media can promote greater understanding, increase tolerance, and foster stronger communities and cooperation at local, national and global levels.
- ii. SSMT advocates at industry, regulatory and government levels for the place of broadcasting about religion in a healthy and diverse media ecosystem. Our outreach work promotes religion as an important and rewarding subject for both content-makers and audiences. In recent years, we have produced events in partnership with the Wales Screen Summit, the Bradford Literature Festival, the Commission for Belief in Public Life, the Edinburgh International Television Festival, the Media Society, NUJ Training, Sheffield Doc/Fest and many more. More details can be found on our website: www.sandfordawards.org.uk
- iii. In addition to our campaigning and advocacy work, SSMT has made annual awards for the best broadcast and, more recently, online video and audio content about belief, religion, ethics and spirituality since 1978. The SSM Awards are the UK's most prestigious prize for religious broadcasting and are open to a wide range of genres – news, current affairs factual, arts, music, drama and comedy - as well as to 'traditional' religious broadcasting. Winners are decided by panels of media professionals. Radio Times readers also vote in their thousands for their favourite TV or radio programme exploring religion from a list published in that magazine.
- iv. SSMT 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. Our Trustees include people with many years' experience of production and broadcasting who represent a wide variety of perspectives and faith backgrounds.
- v. We welcome the commencement of Ofcom's Review of Public Service Media (PSM) and are grateful for the opportunity to respond to this consultation on the Designation of Public Service Broadcaster (PSB) Internet Programme Services. Audiences are increasing accessing their media via the internet and it is clear that the PSM remit must extend to ensuring culturally relevant content that reflects our diverse communities and our society's shared values is readily discoverable and accessible via on these platforms.
- vi. In keeping with our area of expertise, our response to this consultation will focus on religious and ethical content. Our recommendations concern how proposed designation decisions can be improved to safeguard the availability and prominence of this key PSM genre.

Question 1: Do you agree with our proposed methods for determining whether the IPS makes, or is capable of making, a significant contribution to the PSBs individual public service remit?

- vii. SSMT has noted the significant increase in the amount of content available on the PSBs' IPS in recent years, however, in determining whether or not the IPS makes, or is capable of making, a significant contribution to either its individual or the shared public service remit, we believe Ofcom's guidance and requirements should be more specific.
- viii. This would particularly apply to the range of high quality and diverse content in what have traditionally been considered core PSM genres – for example religion/belief, science, children's or history – by each PSB regardless of its individual remit. We believe this is necessary if a proper determination of overall PSM provision is to be properly assessed.
- ix. Policy decisions and legislation over the last decade, including passage of the new Media Act (2024), have significantly loosened PSB obligations and have contributed to what Ofcom has identified as an overall decline in core PSM content such as religion.¹
- x. Current deficiencies in the prominence, quality and quantity of content about religion or belief on the established IPS expose what SSMT feel are key issues to be addressed by Ofcom when making its designation decisions.
- xi. While SSMT acknowledges the valuable role IPS can play in providing audiences access to a range of core PSM content, it remains that an archive of historic programming, no matter how rich, is not a substitute for new content which reflects the lives and experience of contemporary audiences. This is particularly relevant with regard to less commercial genres which deal with complex subjects such as religion or belief.
- xii. SSMT has long argued that belief and religion are not static constructs. Rather, they are historical and cultural expressions of the times, informed by and impacting wider human experience including politics, economics and culture. For these reasons it is not sufficient for PSBs to depend on historical archive material made available via their IPS to meet their public service remit. Unless contemporary content is being commissioned and made available the PSM remit will not be met.
- xiii. It follows that SSMT urges that the 'quality' and provision of new content are among the conditions to be considered when Ofcom determines whether an IPS is making "a significant contribution".
- xiv. It is critical that the range of content available via IPS should not become an excuse to minimise the quantity and quality of new core PSB content being made. A library filled with classic literature may be

¹ [Factsheet: the Media Bill and religious broadcasting - Religion Media Centre](#)

societally valuable thing, but it would be ridiculous to argue that its existence means new books should no longer be written.

- xv. SSMT is further concerned that when determining whether or not an IPS is making a significant contribution to the overall public service remit, PSBs are not being asked to report on their contribution across the full range of generally recognised PSB genres. These genres are recognised in the more granular research done by Ofcom until 2024 which showed a reduction in the first-run hours of core PSB genres such as Religion & ethics, Arts & classical music and children's. ²
- xvi. Moreover, it has become obvious that the deregulation of PSM objectives, and the removal of genres from the ITV's and Channel 4's individual remits over the last two decades have resulted in the creation of new genre 'ghettos'. This is particularly evident in the case of content around religion or belief which is now only discoverable on the BBC's IPS.
- xvii. This can be evidenced by using the IPS 'search' functions to find content about 'Islam' on either Channel 4's or ITV's IPS. SSMT notes that Islam was identified in the most recent census (2021) as the UK's fastest growing faith community. ³ It is also expected to be the world's most common faith by 2030. ⁴ These two factors alone support the conjecture that content about Islam, its practice or its community should be considered core PSM territory in that it both reflects a significant proportion of the UK population and would support better understanding among communities.
- xviii. Results of a search for content related to Islam is hindered on both IPS as neither platform currently features religion, belief or anything similar as general search categories. Yet more discouraging, if the IPS search facilities are used to identify content about 'Islam':
- ITVx will offer you multiple episodes of 'Love Island'
 - Channel 4's search engine finds 'no matches'.
 - Channel 5's search facility does not appear to recognise the term 'Islam'.

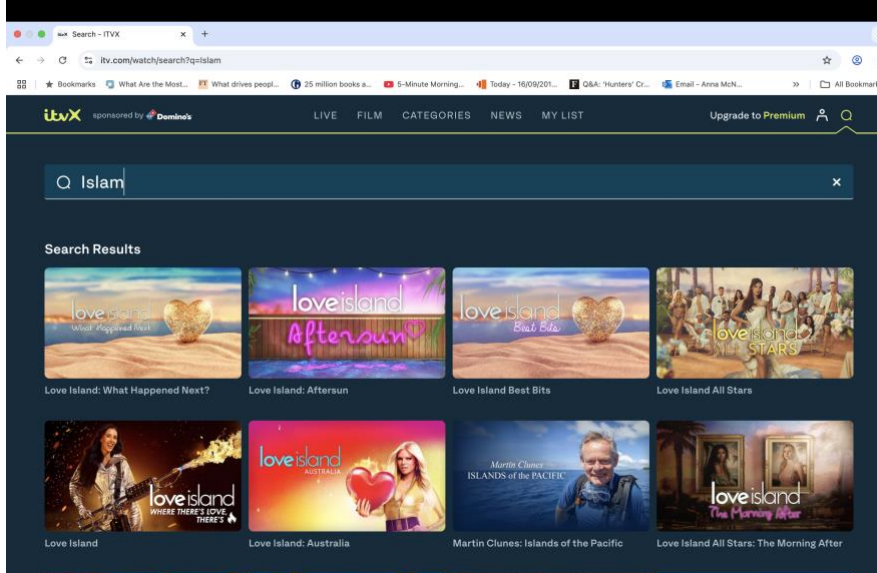
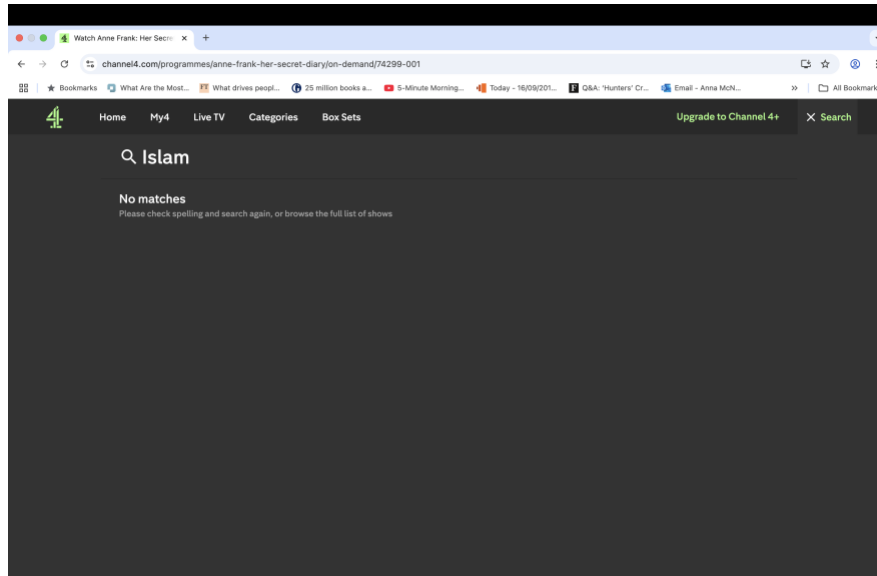
Please refer to the screenshots below.

² [Consultation Designation of Public Service Broadcaster Internet Programme Services](#) p 15

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/religion/bulletins/religionenglandandwales/census2021>

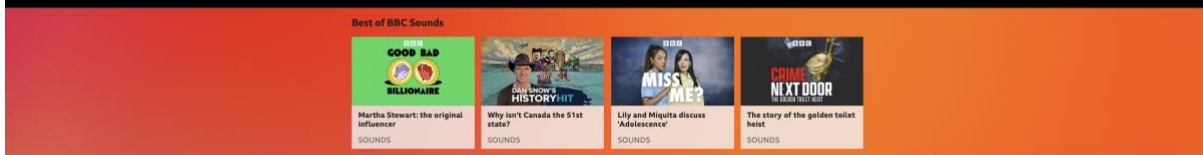
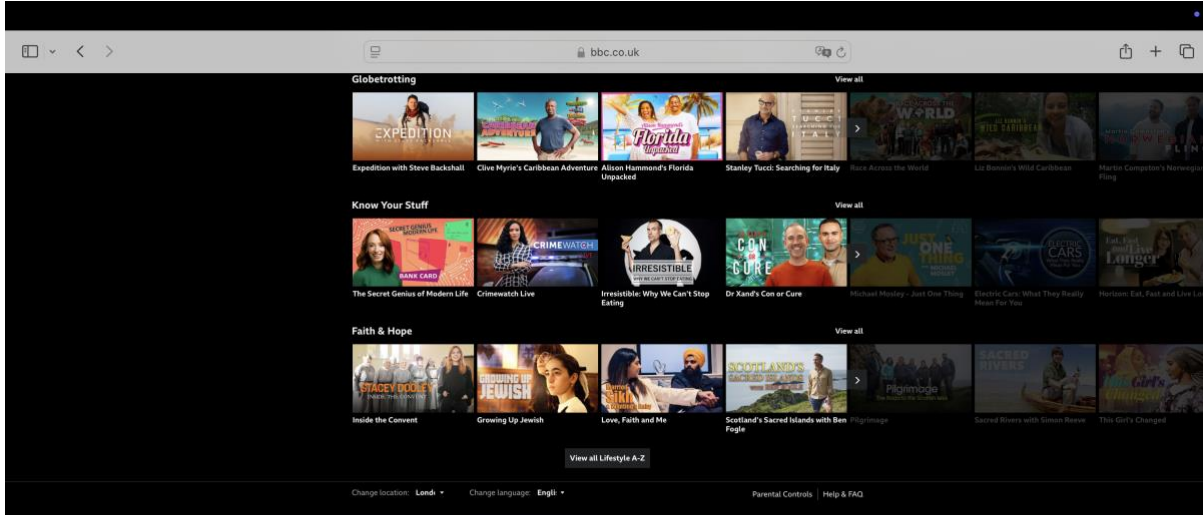
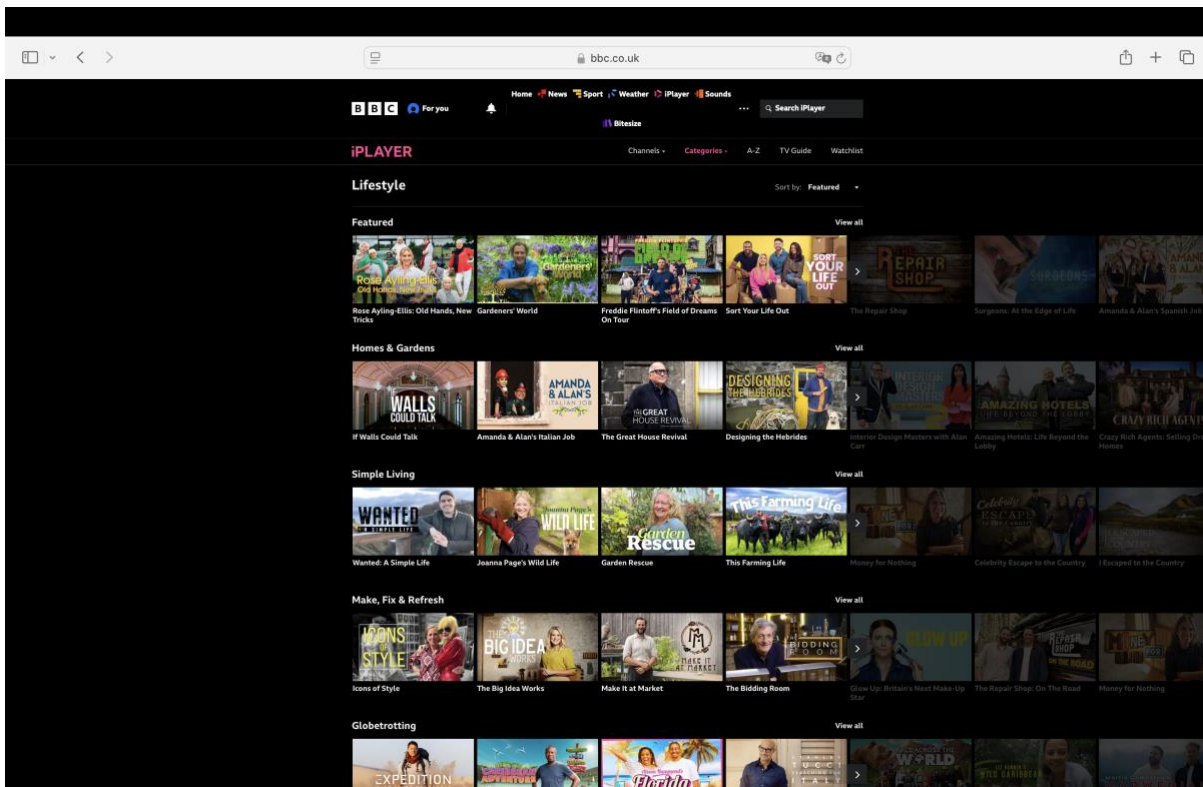
⁴ <https://www.pewresearch.org/religion/2017/04/05/the-changing-global-religious-landscape/>

xix.



xx. The retreat of these PSBs from the wider Public Service remit (PSR) and the provision or even the acknowledgement of content about religion or belief, has effectively created a 'religion ghetto' on the BBC's IPS.

xxi. Which is not to say that the BBC's monopoly is celebrated or even afforded prominence on the BBC's IPlayer. In fact, the BBC's 'Faith & Hope' section is currently to be found as a sub-section at the very bottom of the 'Lifestyle' category which itself is one of 21 categories only accessible via the home page's drop-down menu and not otherwise featured on the home page or anywhere else prominently on the site. In short, if you want to find it, even on the BBC, you have to dig. Having done the digging, it has been noted that, at the time of writing, of the twelve programmes featured in the BBC iPlayer 'Faith & Hope' banner, only four suggested programmes originated during the last 12 months; **none** were younger than 9 months old.



xxii. In addition to making core PSB content discoverable on across all the PSB's IPS, SSMT believes there is a clear argument for the need to reduce the steps audiences must take as part of their journeys of discovery.

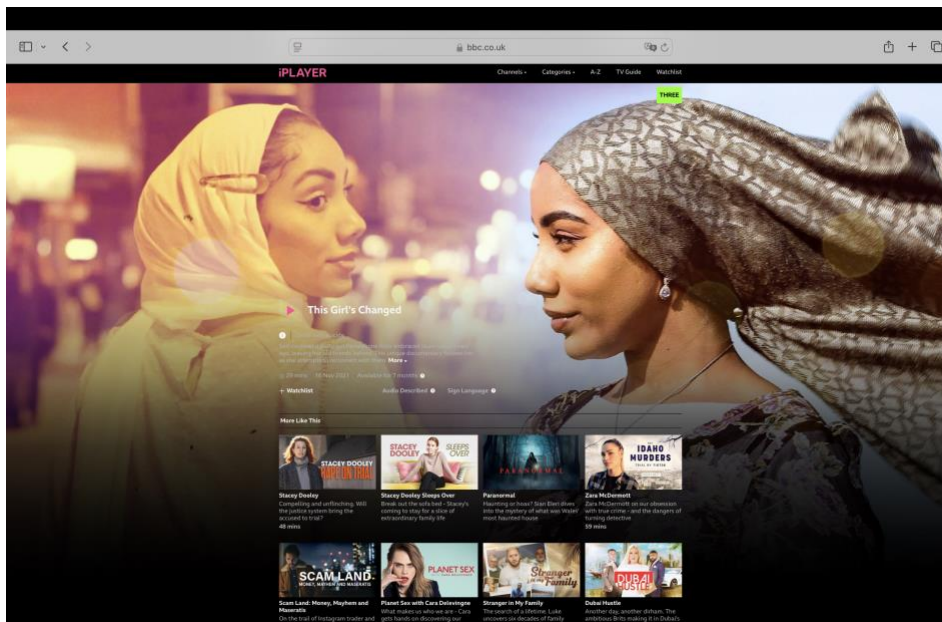
Question 2: Do you agree with our proposed methods for determining whether public service remit content included in the IPS is readily discoverable and promoted by the service?

- xxiii. The current deficiencies in the prominence of religion or belief on PSBs' IPS expose what SSMT feel are key issues to be addressed by Ofcom's guidance when the 'adequacy' of the service being provided is being assessed.
- xxiv. For instance: while SSMT would not argue that audience access to the BBC's archival material is not a good thing or that it provides no value, it is critical that the potential vastness of this resource does not become an excuse to minimise the quantity and quality of new PSB content being made. While a library filled with classic literature is a valuable thing, no one would argue that their existence means new books should no longer be written. And yet, unless Ofcom guidance is amended to reflect how the PSBs are meeting their genre obligations in the round – including what they spend, how much new content they produce and how it will promote this content on both traditional platforms and IPS - then there is a real danger that the existence of an archive of the old will eclipse the societal benefits and needs for new content.⁵
- xxv. SSMT agrees with Ofcom's recommendation that SoPPs should include an explanation of audience targets and how their output is relevant to and will reach diverse UK audiences; we would urge that this be expanded to include details of how less commercial genres will be promoted and made available.
- xxvi. It is Ofcom's assertion that the current proposals "should also help people to discover new (PSM) content that might interest them and that they might not otherwise come across".⁶ SSMT agrees that this could be a valuable IPS service, however, it is notable that this is not currently provided by existing IPS.
- xxvii. By illustration: *This Girl Has Changed* (originally broadcast on BBC3), a former Sandford St Martin Award winner, is one of the programmes featured in the BBC iPlayer's 'Faith & Hope' section. The programme description reads: "Growing up in Yorkshire, Persephone Rizvi was a self-professed party girl... Five years ago, Persephone embraced Islam...swapping parties for a life of reflection and her stilettos for a headscarf... Seven years on, Persephone's settled into her new life as a Muslim and is back in her hometown of Huddersfield but one thing remains unresolved: closure with the old friends she cut off when she converted. .. Exploring friendship, faith and growing up."
- xxviii. It is notable that none of the twelve programmes suggested under the iPlayer's 'More Like This' function feature either Islam, faith, conversion, headscarves/hijab or even "growing up".
- xxix. The first six recommendations are:
- *Paranormal*
 - *Stacey Dooley Sleeps Over*
 - *Stacey Dooley: Rape on Trial*

⁵ On a philosophical note, SSMT would like to stress that neither religion nor belief are static; what people believe and how this impacts their day to day relationships and actions evolve and change with the times.

⁶ *ibid*, Section 4

- *Scam Land: Money, Mayhem and Maseratis*
- *The Idaho Murders: Trial by Tik Tok*
- *Planet Sex with Cara Delevigne*



- xxx. While BBC Sounds features a Religion & Ethics category which is more comprehensive and focussed than that found on the iPlayer, it too is only discoverable via multiple steps from the Home Page and only if one chooses to View All categories and then scrolls through the 26 'Speech' categories found at the bottom of the page.
- xxxi. Ofcom has noted that the significant increase in the amount of content available on the PSBs' IPS in recent years have mainly been in the drama and entertainment/reality genres. This is true of both ITVx and the BBC IPlayer.⁷ This strategy echoes the commercial imperatives which currently drive gatekeeper and recommendation practices used by global streaming giants and are increasing prioritised by the PSBs.
- xxxii. SSMT recognises that the PSBs' increasing focus on "high value productions in order to attract audiences to their IPS" may be a valid commercial strategy, however, in its current form, these practices threaten to eclipse the discoverability and, through lack of investment and commissioning, the availability of less commercial, core PSB genres.
- xxxiii. In view of the current deficiencies with regard the discoverability and promotion of core PSM genres, SSMT welcomes Ofcom's proposals of strategies IPS providers can use to direct traffic towards or to feature public service remit (PSR) content within their IPS.⁸ To ensure these are implemented, SSMT recommends the PSBs be required to include details of how they will promote core PSM in their annual Statements of Programme Policy (SoPP), and that they should report annually on their implementation and effectiveness in maximising reach.

⁷ ibid Sections 3.9-3.10

⁸ ibid Section 4.9

- xxxiv. Following the receipt of SoPPs, SSMT believes Ofcom should conduct an in-depth review or audit of how the PSBs will individually manage the ‘discoverability’ of core PSB content – including home pages and the visibility of core PSB categories and algorithms or recommendations for additional viewing. This audit should be followed by the publication of recommendations and guidelines which will mandate on how the PSBs should best use their IPS to actively promote core PSM genres.
- xxxv. It follows that we welcome Ofcom’s commitment to actively monitor the PSBs in this regard and to consider to what extent the PSBs have drawn on audience research and stakeholder engagement to monitor their own performance. We urge that these assessments be expanded to address each PSBs performance with regard all ‘at-risk’ PSM genres and that Ofcom, in its evaluation and follow up response and regulation, is robust and consequential.
- xxxvi. Finally, SSMT is pleased to be currently collaborating with the University of Leeds on a research project which has been monitoring the provision of ‘at-risk’ genres the IPS of the UK’s PSBs. Due to report in July 2025, it is our hope this project will provide an evidence-base for future policy making in the area covered by this consultation and will inform Ofcom’s implementation and ongoing evaluation of the impact of the Media Act on the provision of PSM.