



**The Sandford
St Martin Trust**

Ofcom Consultation Response: Statement of Programme Policy and Statement of Media Content Policy Guidance

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 this genre as part of 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 Public Service Broadcasters' (PSB's) Statements of Programme Policy and Media Content Policy guidance. In keeping with our area of expertise, our response to this consultation addresses how Ofcom's proposed changes to the Guidance on Commissioning Codes of Practice will support the provision of core public service broadcast content in general, and of religious and ethical content more specifically. Our recommendations concern how the Guidance can be improved to safeguard these.

Question 1: Do you have any comments on our approach and proposed draft Guidance?

Implementation of the new regime

- vi. SSMT welcomes proposals to update guidance for licensed PSBs on the preparation of Statements of Programme Policy (SoPPs) following passage of the Media Act (2024). Our main concerns lie with how Ofcom will mitigate omissions and a lack of specificity in the Act with regard to the simplified public service remit. We will particularly address how SoPPs and Media Content Policy can be strengthened and the requirement for licensed PSBs to make ‘*an adequate contribution*’ to the overall PSB remit¹ be more comprehensively regulated.
- vii. SSMT agrees with Ofcom that in the current climate, SoPPs have a renewed importance as they are the principal measure through which the PSBs can be challenged and held to account. However, we urge that SoPPs are enhanced beyond Ofcom’s current proposals to play an even greater role in the overall assessment of the PSBs delivery of their shared public service remit (PSR) obligations. As it is, the lack of clarity or specificity in the Act regarding what quantity or quality is adequate, means that the PSBs themselves have the power to set their own individual benchmarks and to evaluate their own performance without having to directly address their shared responsibility. In order that holes or inadequacies in the overall provision of PSM provision can be identified, the PSBs should be required to report on their delivery of the wider PSM remit beyond their individual obligations.
- viii. More specifically, we urge that the new guidance is strengthened to address what has been the major reduction in the commissioning and provision of ‘at-risk’ genres including religious programming over the past two decades.
- ix. Financial insecurity stemming from a decade of public funding cuts and the collapse of traditional commercial revenues, have accelerated what was already a steady decline in UK PSBs’ provision of highly-valued and socially beneficial content genres – including programming that engages with faith and/or represents faith communities. Instead, we are now faced with a situation where commercialism is prioritised over culture within the public service ecosystem.
- x. Ofcom itself has warned for two decades of the particular urgency around PSM and particularly religious programming provision: ‘There are some immediate issues emerging from our review: news consumption and the provision of news for young people, drama that reflects and portrays British society back to a British audience, content tailored to the specific needs of the UK Nations and their regions, **religious programming**, children’s programming and investment in other areas such as music and arts.’²
- xi. With reference to content provision, Ofcom further said ‘given the multichannel sector’s focus on a small number of key genres, it is unclear whether the wider market would fill any future gaps in

¹ Section 265(2) of the Media Act 2024

² *ibid*

provision left by the PSBs. There are already genres where PSB provision is relatively low, such as education and **religion**, where there has not been notable multichannel provision. For example, in children’s programming the multi-channel sector has grown through animation and imports rather than through UK non-animation... our understanding is that the potential for international revenue is an increasingly important consideration in commissioning.’³

- xii. The decline in the availability of non-commercial PSM genres like religion is emphasised again in research across PSBs conducted by Mediatique between 2016 and 2019. Their report says ‘This (decline) is in effect a ‘best case’ scenario, particularly in the context of distressed PSB type genres: as revenues decline, and broadcasters seek to shave costs in line, they will continue to be incentivised to spend disproportionately on popular genres (drama; entertainment; factual entertainment) to maintain audiences, reducing to a bare minimum their expenditure on specialist genres... There will be no incentive to make more than the regulatorily imposed number of hours in “pure” PSB genres where quotas exist or to spend more than the bare minimum per hour.’⁴
- xiii. Adjusted for inflation, the total investment in broadcast TV and AV content across the PSBs fell more than 30% between 2010 and 2023. Across the PSBs, first-run UK originations of **religion and ethics** fell by 50% over this period⁵ - a decline compacted by the findings of Ofcom’s Market Report which noted that by 2018 neither ITV, Channel 4 nor Channel 5 were reporting any content in this genre at all.⁶
- xiv. This decline is also evident in the PSB Radio and Audio sector where BBC expenditure dropped 20% over the same period.⁷ Among the services most impacted by this change has been the provision of range and quantity of local religion and ethics programming. Since September 2023, the BBC’s 39 local radio stations have been merged to form 13 new regional ‘hubs’. Reflecting on the change, Revd Dr Christopher Landau, a former BBC World Service Religion correspondent told the Church Times: “There is simply no way that the new regional programmes on Sunday mornings can connect with listeners and reflect their local reality with the same depth.” Canon Tim Daykin, a SSM Trustee who produced and presented BBC Radio Solent’s Sunday breakfast programme emphasised the public benefit lost when he reflected: “(BBC local radio) celebrated the achievements of faith communities and modelled conversations between people of different faiths”.⁸
- xv. The overall decline in core PSM genres like religion has taken place in the face of what research over the past decade has shown continues to be the high value audiences place on public service media and the role the UK’s PSBs play in providing accurate and trusted news and content as well as programming that accurately reflects and represents the UK’s diverse communities.⁹

³ https://www.ofcom.org.uk/data/assets/pdf_file/0025/63475/PSB-statement.pdf, Section 3.16

⁴ https://www.smallscreenbigdebate.co.uk/data/assets/pdf_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf, Section 4.23

⁵ [MRC-Phase-1-submission-to-Ofcom-2024-Public-Service-Media-review.pdf](https://www.smallscreenbigdebate.co.uk/data/assets/pdf_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf)

⁶ [Communications Market Report 2023: Interactive data - Ofcom](https://www.ofcom.org.uk/consult/condocs/mr2023/interactive-data/)

⁷ [MRC-Phase-1-submission-to-Ofcom-2024-Public-Service-Media-review.pdf](https://www.smallscreenbigdebate.co.uk/data/assets/pdf_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf)

⁸ [Opinion: BBC is weakening local religious programming](https://www.churchtimes.co.uk/news/2023/09/20/bbc-weakening-local-religious-programming/)

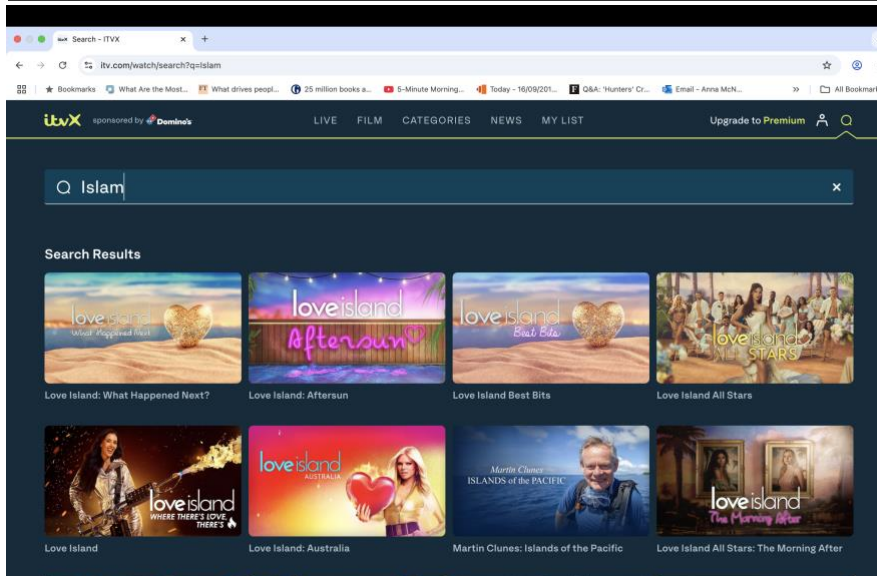
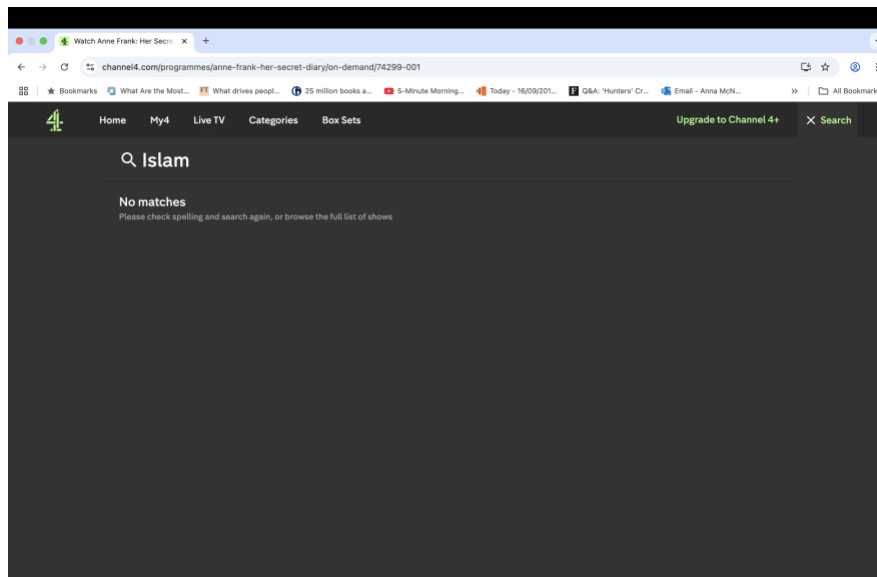
⁹ <https://www.ofcom.org.uk/siteassets/resources/documents/tv-radio-and-on-demand/broadcast-guidance/psb/psb-2020/small-screen-big-debate--a-five-year-review-of-public-service-broadcasting-2014-2018?v=324649>

Role of SoPPs in the availability and prominence regime

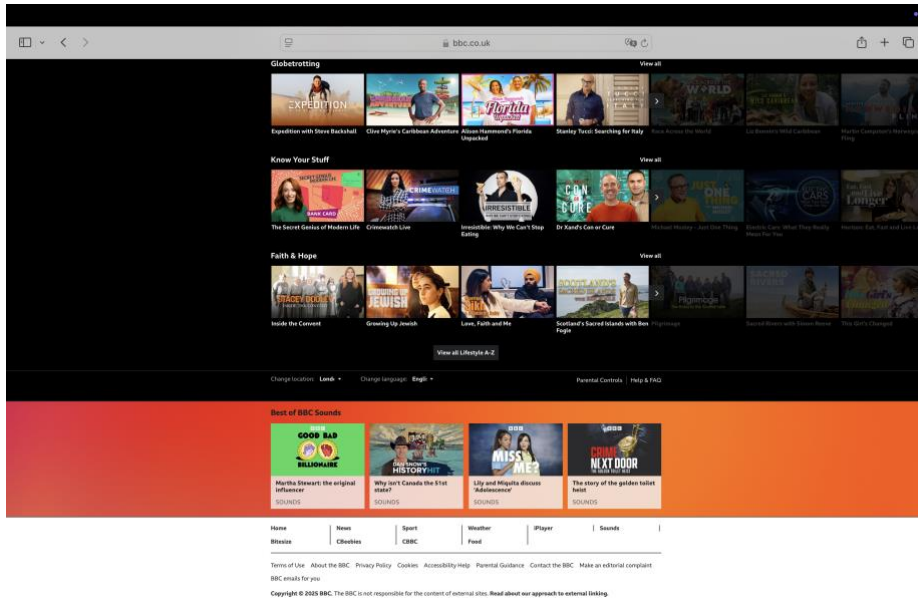
- xvi. SSMT welcomes Ofcom’s proposals to update its guidance on SoPPs to include whether and how the PSBs will use ‘relevant services’ to contribute to the fulfilment of their PSB remit as this reflects and begins to address changes in audience media consumption habits.
- xvii. We agree with Ofcom’s proposals that a) PSBs must apply to Ofcom for designation of their ‘internet programme services’ (IPs) and b) that Ofcom should ensure certain conditions are met regarding the contribution the IPS will make towards fulfilling the PSB’s remit before designation is made. SSMT also agrees that **discoverability** and **promotion** of PSB material should be primary considerations before a PSB can use its IPS to contribute to its PSB remit.
- xviii. However, given the evidenced decline in the PSBs’ provision of religious content, we strongly urge that these conditions should be extended so there is transparency and accountability regarding the availability and prominence of key PSM genres. We believe the inclusion of what individual PSBs aren’t providing is as critical to allowing Ofcom to properly assess their performance, as is the inclusion of what they are providing.
- xix. In acknowledgement of the general reluctance on the part of the PSBs to engage in ‘additional reporting’¹⁰, SSMT suggests the list of key PSM genres identified in the 2003 Communications Act are used as a template against which to measure provision.
- xx. This transparency will be particularly relevant to how the PSBs use their internet programme services (IPS) to meet their remits. The two conditions set out by Ofcom – including that PSM content is ‘*readily discoverable*’ and ‘*promoted*’ – begin to address some of the challenges around the availability and prominence of core PSM content on IPs.
- xxi. SSMT is particularly concerned that given the new flexibility the PSBs have to meet their remit obligations, some will fail to provide audiences with more comprehensive information about the availability and prominence of core PSM content on their platforms. For example, neither Channel 4 or ITVx currently feature religion, belief or anything similar as a category on their IPS. Further, if you use their IPS search facility to look for content about ‘Islam’, ITVx will offer you multiple episodes of ‘Love Island’; Channel 4’s IPS search engine finds ‘no matches’. (Refer to image 1 and 2 below: Screen shots of the results from content searches using the term ‘Islam’ on Channel 4 and ITVx IPS, 25 March 2025.)

¹⁰ Consultation doc c, section 3.4

xxii.



xxiii. Nor is content about religion or belief currently prominently on the BBC's iPlayer, despite the fact that it is now the only PSB obliged to provide audiences with this sort of content under the terms of the BBC Charter. Rather, its 'Faith & Hope' section can be found at the bottom of its 'Lifestyle' section which in turn can be found via the home page's drop-down menu. It is noted that at the time of writing, of the twelve programmes featured in the 'Faith & Hope' section, only four originated over the last 12 months, and **none** were younger than 9 months old.



- xxiv. Such current deficiencies in the prominence of religion or belief on the IPSs expose key issues to be addressed by Ofcom’s guidance with regard the ‘adequacy’ of the service being provided. 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 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 ever argue that the fact that great libraries exist means new books should no longer should be written – and yet unless Ofcom guidance and the SoPPs are 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 - then there is a real danger that the existence of this archive of the old will eclipse the societal benefit and need for new content.¹¹
- 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. More generally, SSMT would also support in principle the development of a “public service algorithm” which would help audiences navigate IPS and would provide core PSM content genres more prominence.

Ofcom’s role

- xxvii. SSMT believes the rigor with which Ofcom monitors SoPPs and holds the PSBs to account are at the very heart of protecting PSM and its purpose. The substantive deregulation of PSM objectives in the new Media Act (2024) ¹² has created a legislative and regulatory hole through which the sort of

¹¹ 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.

¹² Under Section 264:6 of the [Communications Act \(2003\)](#), PSBs were required to “include a suitable quantity and range of programmes dealing with science, religion and other beliefs, social issues, matters of international significance or interest and matters of specialist

socially and culturally valuable content legislators, the regulator and audiences agree supports the public good in 21st century UK faces extinction.

- xxviii. While recent legislation has focused on the industrial and commercial impacts of financial insecurity, new competition and the pace of technological change, it has failed to address the enormous jeopardy to socially and culturally important PSM content. While SSMT does not wish to downplay the challenges, we believe that unless urgent immediate and significant action is undertaken to specifically bolster and protect key ‘at-risk’ PSM genres and the benefit they deliver to UK audiences, the PSM ecosystem will collapse.
- xxix. If the gaps in overall provision are to be identifiable and actionable, SoPPs must reflect in as full a manner as possible the gaps in overall PSM provision. This, we believe, will necessitate asking the PSBs to include in their SoPPs full diagnostic reports of those areas (genres) of the PSM remit they are not providing.

Question 2: Do you have any comments on our impact assessments in relation to our proposals, as set out in Annex 2?

- xxx. In our answer to Question 1, we have focussed on how we believe Ofcom’s proposed update on SoPPs and the accompanying guidance should be strengthened to mitigate deficits in the Media Act including the lack of a full and proper definition for ‘public service broadcasting’.
- xxxi. We note Ofcom-commissioned research which has shown that while audiences have consistently expressed strong support and value for PSM and its purposes, a significant proportion are dissatisfied with how well the PSBs are delivering on attributes such as the provision of content which “feature my country/region” or “feature people like me”.¹³ Also relevant is data collected by Ofcom in its 2015 survey of representational diversity which found that 39% of PSB viewers with non-Christian religious beliefs said they are “under represented on TV”.¹⁴ Taken in conjunction with the overall 42% decline in Religion and Ethics programming across PSBs¹⁵ and the 50% drop in PSB spending on this genre since 2010¹⁶, it must be concluded that the PSBs are not meeting their full obligations when it comes to reflecting back audiences to themselves.

interest. Religious programmes should include news, history of different religions and beliefs and programmes showing acts of worship, ceremonies and practices.” By contrast, the Media Act (2024) only stipulates overall provision of an ‘appropriate range of programme genres’.

¹³ <https://www.ofcom.org.uk/siteassets/resources/documents/research-and-data/tv-radio-and-on-demand-research/minority-ethnic-audience-research/minority-ethnic-audience-research.pdf?v=327098#:~:text=In%20April%202020%2C%20Ofcom%20published,specifically%20serve%20their%20ethnic%20communities>

¹⁴ https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/7909-psb-review-3/associated-documents/secondary-documents/psb_diversity_report.pdf?v=333754

¹⁵ <https://religionmediacentre.org.uk/news/factsheet-the-media-bill-and-religious-broadcasting/>

¹⁶ <https://www.ofcom.org.uk/phones-and-broadband/service-quality/communications-market-report-2023-interactive-data/>

- xxxii. SSMT recognises that changes in technology, audience behaviour/consumption trends, and greater competition from international video-on-demand services have all imposed new pressures on broadcasters who are anxious about the potential administrative burden associated with changes to SoPP requirements and guidance. However, given the current existentialist crisis PSM is experiencing, we argue that strengthening the requirements and scope of SoPPs is critical to the proper regulation of the PSBs and the rebuilding of audience confidence.
- xxxiii. In order to support the PSBs in meeting these obligations and during this period of industry transition, SSMT would like to advocate now for the introduction of a Public Service Content Fund which would be aimed at providing funding for endangered PSM genres and formats which deliver societal and/or economic value. Funding sources could include government, the public (via a licence fee or similar mechanism) or even derived from new fee structures or tariffs for global tech and social media companies.