



**The Sandford  
St Martin Trust**

## Ofcom Consultation Response: Changes to the framework for assessing the BBC's performance

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Submitted by

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## About the Sandford St Martin Trust

- i. The Sandford St Martin Trust promotes thought-provoking, distinctive broadcasting that engages with belief, ethics or morality and enhances the public understanding of religion. We believe a) the media have an increasingly important and challenging role to play in interpreting world events, b) this cannot be done without acknowledging the complex roles religions play in both contemporary and historical human experience and c) a religiously literate media can promote greater understanding, increase tolerance, and foster stronger communities at local, national and global levels.
- ii. The Trust 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 content-makers and audiences to engage with. 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](http://www.sandfordawards.org.uk)
- iii. Since 1978 the Trust has made annual awards for the best broadcast and more recently online content about belief, religion, ethics and spirituality. The Sandford St Martin 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. 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. Our Trustees include people with many years' experience of broadcasting and representing a wide variety of perspectives and faith backgrounds.
- v. In keeping with our area of expertise, our response to this consultation addresses how the proposed legislation will affect the provision of core public service broadcast content in general, while focussing on religious and ethical content more specifically. Our recommendations concern how the Bill might be improved to safeguard these.

**Question 1: Do you agree with Ofcom's proposed changes to the performance measurement framework (PMF)? If not, please provide reasoning.**

- vi. The Sandford St Martin Trust (SSMT) welcome moves by Ofcom to expand the scope of its approach to monitor the BBC's performance across new platforms. However, we believe the proposed changes outlined in the consultation document would result in less rigorous regulation of the BBC and, further, would jeopardise core public service genres such as religious broadcasting. We are particularly concerned that the new PMF does not adequately distinguish or safeguard against the wholesale transfer of key PSB genres to online platforms.
- vii. Last year the BBC announced its new 'digital first' strategy and its plans to move more services and full channels - such as CBBC - entirely online over the next three years.<sup>1</sup>
- viii. SSMT recognises the increasingly prominent role digital and other online services now play in reaching audiences. However, there remains a significant and important part of the audience who rely on the BBC's analogue offering and we do not believe the proposed changes to the PMF do enough to a) distinguish between digital and analogue provision or b) monitor accessibility and prominence for less populist genres across the BBC's various platforms.
- ix. We are particularly concerned that commercial and financial pressures will result in a reduction in the quantity of religious broadcasting being commissioned and its removal from linear services – similar to the BBC's strategy for CBBC.
- x. SSMT believes it is Ofcom's responsibility to monitor the BBC's digital first strategy carefully to ensure key PSB genres continue to be represented across all BBC platforms.
- xi. Research conducted by the Digital Poverty Alliance (DPA) charity last year which found at least 6% of the population are 'permanently offline'<sup>2</sup> provides evidence that a digital only strategy for core genres will mean a significant proportion of the population will not be able to access this content. The negative impact of such a development is put more starkly in relief by DPA data indicating that low-income inner-city areas and low-income coastal communities are the most adversely affected by limited internet and digital access because the financial barrier for entry is too much.<sup>3</sup>
- xii. Further, Ofcom's own Media Nations report in 2019 found that homes with only free-to-air digital terrestrial television amounted to 40% of all households.<sup>4</sup> While surveys suggest lockdown conditions during the pandemic resulted in a growth in migration to online-only services, we note that the number of homes with subscription video on demand services appears to be in decline.<sup>5</sup>
- xiii. SSMT believes that to deliver on its public service remit, the BBC must continue to serve and provide value for all audiences whether they have digital access or not. The PMF's platform-neutral approach to monitoring BBC content provision will not safeguard against either the ghettoisation of less commercial content to less prominent platforms or linear time-slots in the future.

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<sup>1</sup> <https://www.bbc.co.uk/mediacentre/speeches/2022/digital-first-bbc-director-general-tim-davie>

<sup>2</sup> <https://digitalpovertyalliance.org/>

<sup>3</sup> <https://www.local.gov.uk/parliament/briefings-and-responses/tackling-digital-divide-house-commons-4-november-2021>

<sup>4</sup> [https://www.ofcom.org.uk/data/assets/pdf\\_file/0019/160714/media-nations-2019-uk-report.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0019/160714/media-nations-2019-uk-report.pdf), p. 59

<sup>5</sup> <https://www.broadbandtvnews.com/2023/02/20/quarterly-fall-in-uk-svod-take-up/>

- xiv. We note Ofcom’s own research on the decline of key PSB genres since the removal of quotas. These genres have been in decline for the past decade and it is predicted they will continue to decline unless affirmative action to protect them is quickly effective.
  
- xv. Ofcom noted the particular urgency around a proper assessment religious of 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.’<sup>6</sup>
  
- xvi. With reference to content provision, the report went on to say ‘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 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.’<sup>7</sup>
  
- xvii. The critical situation for non-commercial 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.’<sup>8</sup>
  
- xviii. At a time when the BBC is under considerable financial pressure, SSMT is concerned the BBC will be forced to increase its commercial income leading to a reduction in core public service content which is culturally specific to the UK. This scenario will be enabled by a PMF which is neither robust nor detailed enough to guard against such developments.
  
- xix. We have noted Ofcom’s assertion that with the proposed changes to the PMF, it will be better able to ‘hold the BBC to account on behalf of audiences’ and to ‘step in quickly’ if there are concerns. SSMT does not understand how this will be so when Ofcom will be largely dependent on the BBC for data and the new PMF is a ‘step back’ from detailed regulation.
  
- xx. The proposed PMF will use the BBC’s yet-to-be-published own targets as a measure of its success. We strongly believe this form of internal marking effectively makes the BBC answerable only to itself and will make it impossible for either Ofcom or the public to properly assess BBC performance with any real rigour.
  
- xxi. The threat to core PSB genres such as **religion** is enhanced by the lack of detail in the BBC’s Annual Plans, particularly with regard at risk genres, since the existing regulatory model was introduced in 2017. Again, if the new PMF is so heavily dependent on what the BBC sets out in its annual plan and

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<sup>6</sup> [https://www.smallscreenbigdebate.co.uk/\\_data/assets/pdf\\_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf](https://www.smallscreenbigdebate.co.uk/_data/assets/pdf_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf)

<sup>7</sup> [https://www.ofcom.org.uk/\\_data/assets/pdf\\_file/0025/63475/PSB-statement.pdf](https://www.ofcom.org.uk/_data/assets/pdf_file/0025/63475/PSB-statement.pdf), Section 3.16

<sup>8</sup> [https://www.smallscreenbigdebate.co.uk/\\_data/assets/pdf\\_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf](https://www.smallscreenbigdebate.co.uk/_data/assets/pdf_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf), Section 4.23

the BBC's own assessment of its performance against the targets it has set for itself, we do not believe the PMF can be considered independent.

xxii. SSMT believes it is critical that the assessment of the BBC's performance needs to be independent, robust and timely. The proposed changes to the PMF do not support this.

xxiii. It follows we would recommend:

- a. The BBC should be required to maintain or increase the quantity and quality of 'at risk' content genres such as **religious programming**
- b. The new PMF should be modified to allow a detailed and robust measure of the quantity of new content and percentage spend dedicated by the BBC to core PSB genres such as **religious broadcasting**, and be open also to public scrutiny
- c. Ofcom should develop a framework to measure the discoverability and prominence of PSB genres across all the BBC's platforms and these results should be included in the PMF
- d. Analysis of the BBC's performance across genres should also include details of scheduling, audience-reach and audience-satisfaction
- e. Ofcom should publish the methodology or metric it will use to assess the accessibility and discoverability of PSB content, and should make this available for further consultation
- f. In the absence of quotas, the BBC should publish its targets well in advance allowing adequate time for public and regulatory scrutiny and response