



**The Sandford  
St Martin Trust**

Promoting Excellence  
in Broadcasting about  
Religion, Ethics and Spirituality

Written submission in response to proposals to remove  
C4C's publisher-broadcaster restriction

12 April 2023

Submitted by

The Sandford St Martin Trust (Registered charity no. 277370)  
Church House  
Great Smith Street  
London SW1P 3AZ  
Email: [admin@sandfordawards.org.uk](mailto:admin@sandfordawards.org.uk)

Chair: Dr Tony Stoller CBE  
Executive Director: Anna McNamee

*“Had (Channel 4) not been there, or had it been a purely commercial broadcaster, interested only in ratings and not the sort of public service television we make, the maths behind our business plan would not have added up. The same is true for countless television production companies across the UK...”*

David Olusoga, historian, filmmaker, and founder of Uplands Television.

## About the Sandford St Martin Trust

- i. In keeping with the Trust’s activity and area of expertise, this submission will focus on how the removal of Channel 4’s publisher-broadcaster restriction will impact a key element of the public service remit - religious and ethical broadcasting – and will set out steps that the government should take to ensure industry support for independent production companies – “indies” - working in this genre.
- ii. Through its work the Sandford St Martin Trust advocates for thought-provoking, distinctive broadcasting that engages with belief 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 diverse and religiously literate media can support greater understanding, increase tolerance, and foster stronger communities at local, national and global levels. [but that d) without specific enforceable requirements, such programming is increasingly at risk.
- iii. Since 1978 the Trust has made annual awards for the best broadcast content about religion, ethics or spirituality. The Sandford St Martin Awards are the UK’s only media awards focussing on what Ofcom identifies as “core public service broadcasting”<sup>1</sup> 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, spirituality or ethics from a list published in that magazine.
- iv. In addition to its awards, the Trust advocates at industry, regulatory and government levels for the place of this content in a healthy and diverse media ecosystem. Our outreach work promotes belief, religion or ethics as important and rewarding subjects 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 Edinburgh International Television Festival, Full Fact, House of St Barnabas, 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)
- v. 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 religion or faith, nor does it engage in religious activities itself. Our board is made up of leading and senior industry figures who have experience working across a range of broadcasting sectors and platforms and represent a wide variety of perspectives and faith backgrounds.

---

<sup>1</sup> Ref: Ofcom Review of Public Service Television Broadcasting: Phase 1: Is television special (2006), para 16.

“My generation grew up thinking that religion was completely marginal to British life, which, as for the rest of the world, has been proved more and more wrong.”

Simon Schama, historian and Sandford St Martin Award winner.

## Overview

- vi. Programming on religion and belief is recognised as a core part of the public service broadcasting (PSB) remit<sup>2</sup> and the Sandford St Martin Trust will advocate for its inclusion in the new Media Bill.
- vii. While in recent years the production sector in this genre has been relatively small, the success of the indies working in this genre and the popularity of their content exemplified by previous Sandford St Martin Award winners and finalists such as *It's a Sin* (Red Production Company), *Help* (The Forge), and *We Are Lady Parts* (Working Title), suggest there are opportunities for further robust growth in this sector if it is properly nurtured.
- viii. The Sandford St Martin Trust is concerned that removal of the publisher-broadcaster restriction potentially risks the viability of these indies but particularly that of the many smaller regional production companies which are responsible for a high proportion of the UK's religious and ethical content provision.
- ix. The importance of the indie contribution to this genre is evidenced by the entries in the TV/Video category of this year's Sandford St Martin (SSM) Awards competition where more than 90% were made by UK indies.<sup>3</sup> The quality and popularity of this content is demonstrated by the Channel 4 programmes represented among the finalists including *Good Grief with the Rev Richard Coles* (Bowled Over Media), *David Baddiel: Jews Don't Count* (Mindhouse Productions) and *Disability & Abortion: The Hardest Choice* (Hey Sonny Productions).<sup>4</sup>
- x. We believe the key to nurturing and developing a sustainable indie sector in the UK is dependent on supporting smaller companies like these. This can be done via the commissioning of returning series which give companies the ability to offer sustainable and meaningful jobs locally as well as supporting the wider local creative economy.
- xi. Companies such as Clockwork Films (SSM Award winner 2021 and 2022), based in Leeds, are responsible for C4's *Ramadan in Lockdown*. As a comparatively small independent production company with strong roots in their local community, Clockwork Films is uniquely placed to reflect the UK's religious diversity as well as supporting the development of new talent. For example, Clockwork's *This Girl's Changed* (SSM Award winner 2022) supported and helped launch the career of Persephone Rizvi who has gone on to produce and present programmes for Channel 4 with another small independent companies like Cardiff Productions.

---

<sup>2</sup> Communications Act 2003: <https://www.legislation.gov.uk/ukpga/2003/21/section/264>

<sup>3</sup> 90% includes SSM 2023 entrants from all PSBs and non PSB digital platforms. Of the entries representing Channel 4, **100%** were made by indies.

<sup>4</sup> <https://sandfordawards.org.uk/the-awards/>

## Potential impact of removal of C4C's publisher-broadcaster restriction

- xii. In addition to data from the SSM Awards, we note Pact's analysis which found that primary commissions from the UK public service broadcasters represented 70% of all out of London commissioning revenue during 2020.<sup>5</sup> And further, Channel 4's own report that in 2021, 47% of its spend on first-run originations came from the Nations and Regions.<sup>6</sup>
- xiii. When Channel 4 was created by the Thatcher Government in the 1980s, key to its founding principle was its status as a publisher-broadcaster which prevents it from making and owning the IP to its own programmes. This has been the bedrock upon which the strong economic and creative health of the UK's independent production sector has been built and it ensures that Channel 4 works with a broad range of suppliers from across the UK and representative of the country's diverse communities
- xiv. We recognise that the media landscape has evolved significantly since Channel 4 was founded. However, the business model for Subscription Video on Demand (SVoD) providers is fundamentally different from that of the UK's very successful PSBs. This, we believe, reflects the different purposes and audiences served by SVoDs and PSBs. The SVoD business model is built around ownership of all rights and the ability to serve a global audience. By contrast PSBs are obliged to serve the UK audience and so focus on commissioning content that reflect local stories and content made by local producers at the grassroots of the industry. This is particularly true for content that reflects the UK's diverse faith or belief communities and which is often made by producers with personal experience of those communities.
- xv. Cat Lewis the CEO of the Manchester-based TV production company Nine Lives Media which until recently made the BBC's *Songs of Praise* in addition to programmes for Channel 4's *Dispatches* is clear that Channel 4's publisher-broadcaster restriction has been key to the growth of her company. *"It's a real concern that this important part of its public service remit will be threatened if the channel is privatised. Although Salford's MediaCityUK is a wonderful development, creating thousands of jobs – the merger of the regional ITV companies over the last 20 years has resulted in ... far fewer TV career opportunities for talented people who are based outside London. We and other companies based in the north provide vital entry points for young people to both gain work experience and kick start their careers."*<sup>7</sup>
- xvi. SSMT asked entrants to this year's awards "how will your business be affected by the removal of C4's publisher-broadcaster restriction in the context of the trends of the market?" Among the responses received which have driven the direction of this submission was this from Barry Ryan, Joint MD and Creative Director of The Format Factory based in Brixham: *"What? Another competitor – but this time, exactly like the BBC's in-house division, another competitor that is connected to our commissioning workflow in a higher level and that has inside knowledge of trends and schedule demands ahead of us. This is spectacularly in conflict with the relationship that true independents have with Channel 4 – and completely contra why Channel 4 was established in the first place. We the true indies are still here. Why does this need to change and who benefits?"*
- xvii. Other producers echoed this sentiment: *"Independent production companies must be protected at all costs",* said Leo Pearlman of Fullwell 73 Productions. *"Young talent, in particular from the regions, must be given every chance to grow and new voices from all sectors of society must be encouraged and supported."*<sup>8</sup>
- xviii. Having noted that Channel 4 commissions more programmes from small production companies than any of the other PSBs,<sup>9</sup> the Sandford St Martin Trust is concerned that the diversity of supply and programming would be

---

<sup>5</sup> Pact Census Independent Production Sector Financial Census and Survey N&R Annex 2021, by Oliver & Ohlbaum Associates Limited

<sup>6</sup> Channel 4 Television Corporation Report 2020 and Financial Statements, Channel 4 Corporation

<sup>7</sup> <https://www.manchestereveningnews.co.uk/business/business-news/opinion-privatising-channel-4-would-11803182>

<sup>8</sup> Deadline: <https://deadline.com/2023/01/channel-4-privatisation-scrapped-tv-industry-reaction-1235211135/>

<sup>9</sup> Channel 4's impact on the UK's International Competitiveness and Global Profile, O&O Associates, p18 2021

endangered if Channel 4's publisher-broadcaster restriction was removed and current commissioning slots were taken in-house.

- xix. Under its current obligations to commission UK content from the indie sector, Channel 4 works with around 300 creative companies across the UK every year. As a self-sustaining social enterprise surplus commercial revenues raised from the market have been reinvested back into British public service content from independent UK producers.<sup>10</sup>
- xx. We note research by Pact which estimated that "£80 million of content spend will be lost to a Channel 4 in-house production arm in the first year after an initial push to move content in-house. After five years ... that this would rise to £1billion. This would not only damage the UK production sector, which is beginning to recover slowly from the economic impacts of COVID, but also close the door on future generations of entrepreneurs and new businesses who use their self-sufficiency and self-motivation to break into a highly competitive market."<sup>11</sup>
- xxi. Figures compiled by the Voice of the Listener and Viewer indicate that this unique financial model has resulted in the rapid and sustained growth of the UK's creative industries sector, contributing £111.7bn to the economy and supporting around 10,000 jobs.<sup>12</sup>
- xxii. We note that these figures pre-date the move of Channel 4's headquarters from London to Leeds in 2021. It is our belief that under the current model, in keeping with the aims of the 2016 Conservative Party's manifesto, this move will stimulate business and help to rebalance the UK's economy away from London and will grow the UK's creative economy.

## Religious and ethical broadcast content

- xxiii. The Trust supports Channel 4's current public service remit and its obligation to offer independent and distinctive content reflecting the interests of different communities across the UK but believes its remit should be updated to include a quota for religious and ethical broadcasting. We believe such a change will ensure Channel 4 remains relevant and will continue to provide a critical public service within the evolving broadcast market.
- xxiv. In its most recent review of the UK's public service broadcasting (PSB), Ofcom identified religious programming as one of several "immediate issues" of concern<sup>13</sup> because of the growing risk that in an increasingly highly competitive commercial market "broadcasters and super-indies together may not want to commission non-profitable PSB genres".<sup>14</sup>
- xxv. The Trust believes all the programmes and programme strands cited earlier in this submission have contributed to the public understanding of religion in the UK. All were/are made by innovative independent production companies who have drawn on the communities from which they have sprung, the regions where they are based and the experiences of a diverse production teams to deliver Channel 4's remit.

---

<sup>10</sup> Voice of the Listener and Viewer (August 2021): <https://www.vlv.org.uk/news/channel-4-privatisation-vlv-briefing/>

<sup>11</sup> Pact with Channel 4's impact on the UK's International Competitiveness and Global Profile, O&O Associates, p60, 2021

<sup>12</sup> Ibid

<sup>13</sup> 'Public Service Broadcasting in the Internet Age', para 2.4, [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)

<sup>14</sup> Ibid, Section 6.20

- xxvi. We note comments made by a panel of media experts speaking at the Trust's "What 4? How will privatisation affect religious diversity on Channel 4?"<sup>15</sup> event who emphasised the unique place Channel 4 holds in the UK's broadcast ecology and how the existing model has enabled the channel to deliver invaluable public service content to audiences not being reached by other broadcasters or by streaming services.
- xxvii. Maggie Brown, the historian, journalist and author of two books on the history of Channel 4 spoke of Channel 4's role in bringing diversity into the mainstream via broadcast events such as its Paralympics coverage. Previous Channel 4 programming around the Hajj<sup>16</sup> and the 4thought.tv<sup>17</sup> project were cited as examples of how Channel 4 supported religious diversity and religious literacy under the direction of a head of religion.
- xxviii. Aaqil Ahmed, former head of religion at both Channel 4 and the BBC also speaking on the panel emphasised that part of Channel 4's remit which requires it to reflect and make content for diverse communities. Religiosity, he said, is "on the growth" in Britain and if public service broadcasters do not address the growing demand for content made for and by representatives of these communities then the debate over the ownership of Channel 4 "will be irrelevant because public service broadcasting will mean nothing to broad sections of the country."<sup>18</sup>
- xxix. That the public across all generational groups continues to value highly the kind of content made by Russell T Davies and the increasingly diverse cohort of British production companies is evidenced both by audience figures<sup>19</sup> and also in research by Ofcom which younger audiences particularly depend upon PSBs such as Channel 4 for "programmes that reflect the full range of cultures and viewpoints of the people in the UK" and "specialist programmes about the history, science, **religion** or the arts"<sup>20</sup>
- xxx. The Trust's own research indicates that audiences also highly value and will seek out programming that represents faith in a positive manner. Channel 4 series such as *Ramadan in Lockdown* are appreciated by audiences both within and outside Muslim communities as "an impressive snapshot of people for whom religion is central to their lives, and who can find, in the rigorous discipline of their fast, pride, celebration, and solidarity".<sup>21</sup>

---

<sup>15</sup> Sandford St Martin Media Salon: 'What 4? How will privatisation affect religious diversity on Channel 4?' (September 9, 2021) <https://www.sandfordawards.org.uk/what-4/>

<sup>16</sup> <https://www.channel4.com/programmes/the-hajj-the-greatest-trip-on-earth>

<sup>17</sup> <https://www.theguardian.com/media/2010/jun/22/channel-4-religious-programming>

<sup>18</sup> Sandford St Martin Media Salon, ibid emphasis ours

<sup>19</sup> <https://www.bbc.co.uk/news/entertainment-arts-55902840>  
<https://deadline.com/2021/01/its-a-sin-ratings-russell-t-davies-aids-channel-4-hbo-max-1234680430/>

<sup>20</sup> The Impact of Lockdown on Audiences' Relationship with PSB, pg.14-15,  
[https://www.ofcom.org.uk/data/assets/pdf\\_file/0024/199104/exploration-of-peoples-relationship-with-psb.pdf](https://www.ofcom.org.uk/data/assets/pdf_file/0024/199104/exploration-of-peoples-relationship-with-psb.pdf)

<sup>21</sup> <https://www.churchtimes.co.uk/articles/2020/29-may/books-arts/tv/tv-review-ramadan-in-lockdown-grayson-s-art-club-what-s-the-matter-with-tony-slattery-climbing-blind-and-sink-or-swim>

## Conclusions

- xxxi. As evidenced in this submission, the UK's indie sector is responsible for a high proportion of the religious and ethical content broadcast on PSBs and available to UK audiences. This is against a background where the rapid evolution of media markets, shaped by the emergence of SVoDs, declining spend and output by public service broadcasters, and, other market developments, either individually or in combination, have been detrimental to core religious output overall.
- xxxii. It is generally acknowledged that we are living in a time of increasing political disenfranchisement and hardening cultural divides.<sup>22</sup> Audiences seek to see themselves, their stories and their values depicted in the media they are offered.
- xxxiii. It follows that to be of public service, broadcasters must feature the voices of a broader range of contributors and the respectful engagement and inclusion of people with different beliefs on air. In a multi-platformed media ecosystem increasingly dominated by social media where religious stereotypes and misreporting contribute to social unrest and can even endanger lives, this social contract is ever more critical.
- xxxiv. The founding principles upon which Channel 4 was built have been key to the development and sustainability of the UK's vibrant indie sector. This must not be damaged by changes to either its unique remit or changes to the publisher-broadcaster restriction which will allow Channel 4 to make and own its own IP to the detriment of the independent production sector.
- xxxv. The Sandford St Martin Trust have long argued that to ignore religion is to leave a gaping hole at the heart of public service broadcasting. Channel 4, because of its unique remit to serve the UK's diverse communities, should be at the frontline of promoting tolerance and understanding across a range of social differences. We believe that all PSB's should be obliged to provide such coverage and to make good any current deficiency in this vital strand of public service broadcasting.
- xxxvi. Our review of the available evidence has led to concerns that changes to the publisher-broadcaster restriction would not only adversely impact the quality and quantity of religious and ethical programming and content on Channel 4, but that this content and the small production companies that make it would be at risk of extinction.
- xxxvii. The Sandford St Martin Trust therefore urges and recommends that**
- any changes to Channel 4's remit must include effective protections for the UK's indie sector with particular focus on small, medium, diverse and regional production companies
  - Channel 4's current remit and public obligations should be updated and strengthened to protect genres such as religious broadcasting
  - and Channel 4 should continue to be required to act only in the public's social and economic interests and this fundamental pillar of its PSB remit should not be jeopardised by changes to the publisher-broadcaster restriction.

---

<sup>22</sup> <https://www.nytimes.com/2020/04/21/opinion/coronavirus-india.html>  
<https://www.theguardian.com/us-news/2020/apr/04/america-rightwing-christian-preachers-virus-hoax> <https://fullfact.org/news/muslims-uk-viral-poster-factchecked/>  
<http://ciris.org.uk/wp-content/uploads/2018/02/TPNRD-Religion-and-Fake-News.pdf>