



**The Sandford
St Martin Trust**

Promoting Excellence
in Broadcasting about
Religion, Ethics and Spirituality

The Future of Channel 4

Response to the House of Lords, Communications and Digital Select
Committee's Call for Evidence

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Submitted by

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“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, the evidence submitted here will focus on how a change of ownership at Channel 4 will impact a key element of public service broadcasting - religious and ethical content.
- 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 religiously literate media can support greater understanding, increase tolerance, and foster stronger communities at local, national, and international levels.
- iii. Since 1978 the Trust has made annual awards for the best broadcast content about religion, ethics, or spirituality. Entries 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 Commission for Belief in Public Life, 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
- 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.

“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 2014 Award winner.

Question 1: What, if any developments over the last five years give cause to re-evaluate the ownership of Channel 4 Corporation?

- vi. The Sandford St Martin Trust is not aware of any developments since 2016 when the government undertook its last review of the sustainability of Channel 4 that give cause for its ownership to now be reviewed.
- vii. Further, having reviewed the documents published by the Department of Media Culture and Sport as part of their consultation, we are concerned at the lack of any detailed analysis or impact assessment regarding how a change in ownership of Channel 4 would affect either the provision of a high quality and quantity of public service broadcast content – including religious and ethical programming - or the future viability of the many British independent production companies making content in this genre which depend on Channel 4 for their business.

Question 2: If Channel 4 Corporation were privatised, what would be the benefits? What would be the risk and to what extent could they be mitigated?

- viii. We believe that the privatisation of Channel 4 would result in no benefits for audiences or for the many thousands of people working in the UK's independent production sector.
- ix. It is our belief that a change in Channel 4's ownership would necessitate a shift from the corporation's current prioritisation of its public service remit to a new set of obligations aimed at satisfying and serving shareholders.
- x. Having reviewed the evidence provided by our own stakeholders in tandem with research produced by other expert organisations in this field, we believe one of the many risks associated with privatisation would be the further demise of religious and ethical content provision on Channel 4. Unless this core area of public service broadcasting is protected through a strengthening of the channel's remit and its public service obligations, we believe, the standard of religious and ethical content development, production and transmission will flounder, similar to what has happened at ITV since that channel's PSB religious obligations were reduced ¹ in order to make the ITV more commercially viable. ²
- xi. In its 2015 review of the UK's public service broadcasting (PSB), Ofcom identified religious programming as one of several "immediate issues" of concern³ because of the risk that in an increasingly highly competitive commercial market "broadcasters and super-indies together may not want to commission non-profitable PSB genres".⁴
- xii. Concurrent research by the strategic advisory firm Mediatique has described PSB expenditure on religion and ethics first-run, original content as a "stark illustration of declines". Its report said "This (decline) is in effect a 'best case' scenario... 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**".⁵
- xiii. Mediatique's warning has proven apt. In the absence of quotas or a strengthening of the PSB obligations, Ofcom's most recent review (2020) found the provision of original programmes in the religion and ethics genre had declined **by a further 6%** since its 2015 warning that religious programmes were at risk. Grouped together with arts, children's and formal education, religion programmes represent the smallest part of the 6% total PSB investment in these genres. ⁶
- xiv. Between 2016-2019, PSB expenditure on religious and ethical programming experienced a larger drop than that in any of the other 12 genres identified.⁷
- xv. This 'hole' in the broadcast schedule has not been filled by other mainstream channels, keen to attract audiences or to commission content neglected by PSBs. The most recent published data from commercial

¹ <https://www.ofcom.org.uk/research-and-data/tv-radio-and-on-demand/tv-research/ofcom-statement-on-the-delivery-of-public-service-programmes-by-itv-network>

² <https://www.telegraph.co.uk/news/religion/7846218/ITV-will-broadcast-just-one-hour-of-religious-programming-this-year.html>
<https://www.theguardian.com/media/2004/aug/26/ofcom.itv>

³ 'Public Service Broadcasting in the Internet Age', para 2.4,
http://stakeholders.ofcom.org.uk/binaries/consultations/psb-review-3/statement/PSB_Review_3_Statement.pdf

⁴ *ibid*, Section 6.20

⁵ *ibid*, pg 35 (emphasis ours)

⁶ 'Small Screen: Big Debate – a five-year review of Public Service Broadcasting (2014-18)
https://www.ofcom.org.uk/_data/assets/pdf_file/0013/192100/psb-five-year-review.pdf

⁷ 'Future models for the delivery of public service broadcasting' Mediatique, Dec 2020, ref: pg. 22-23,

https://www.smallscreenbigdebate.co.uk/_data/assets/pdf_file/0025/208771/future-models-delivery-of-psb-mediatique.pdf

broadcasters supplied to Ofcom indicates **there was no original UK content spend in religious and education programming in 2018 by any major UK channel other than the PSBs.**⁸

- xvi. When these facts are considered together, it is clear that “without a strong and enforceable public service requirement the market is unlikely to provide trustworthy religious programming of a good standard”. Indeed, this was the conclusion of two additional pieces of research commissioned by Ofcom looking at the future shape of public service media provision: *How Online Media Services Have Fulfilled the Public Service Objectives*⁹ and *Investment in TV Genres*¹⁰.
- xvii. As distressing as this grim outlook might be from an audience perspective, the Trust would go further to caution that the failure of mainstream broadcasters to provide a good quality and quantity of religious and ethical content poses a significant danger to the public good.
- xviii. Along with other industry experts and government agencies, the Trust has noted the proliferation in recent years of online and digital “narrow-casting” to specific, sometimes extreme, religious interest groups in the UK.¹¹
- xix. It is the Trust’s contention that if mainstream, secular public service broadcasters such as Channel 4 do not provide trustworthy religious and ethical content, audiences will have no alternative to the more partisan and politicised content increasingly available via internet platforms.
- xx. The All Party Parliamentary Group (APPG) on Religious Literacy in the Media recently concluded in their comprehensive “Learning to Listen” report, “*religion and belief (have) always been vital to the political and cultural life of this country and are a growing part of international life and politics... we all deserve a media which recognises this...*”.¹²
- xxi. The Trust believes that a lack of religious literacy or understanding of religion fuels prejudice and intolerance, hindering cooperative endeavours at community, national and international levels and contributing to social unrest. Insomuch we must agree with the APPG’s recommendation that “*the remit of public service broadcasters should be redrafted to include the purpose of promoting religious literacy and all public service broadcasters should explore how they can use the full width of their output to increase religious literacy*”¹³.
- xxii. While 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, we believe that to remain relevant and to mitigate against the dangers of any future changes in ownership, its remit should be updated to include a quota for religious and ethical broadcasting.

“If our cultural arbiters vacate the field on which our young people wrestle with the great questions, then other forces will step in. And if we don’t help young people grapple with the complexity of those questions, then there are other people who will cheerfully come along with murderously simple answers.”

Frank Cottrell-Boyce, Sandford Award winner and Chair of Judging Panel.

⁸ Small Screen: Big Debate Consultation - The Future of Public Service Media, p. 16

https://www.smallscreenbigdebate.co.uk/_data/assets/pdf_file/0032/208769/consultation-future-of-public-service-media.pdf)

⁹ https://www.ofcom.org.uk/_data/assets/pdf_file/0024/75075/1_ofcom_report.pdf

¹⁰ https://www.ofcom.org.uk/_data/assets/pdf_file/0027/78714/investment_in_tv_genres.pdf

¹¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/263181/ETF_FINAL.pdf

¹² ‘Learning to Listen: Inquiry into Religious Literacy in Print and Broadcast’, p. 86

<https://static1.squarespace.com/static/5d5a90a11f704e0001e94404/t/6076cfa162110f59120a4fcd/1618399140254/APPG+Learning+to+Listen+12+04+21+%282%29.pdf>

¹³ *ibid* p. 87

Question 3: If Channel 4 were to remain in public ownership, what would be the benefits? Insofar as they are valid, how could concerns about its longer-term viability be addressed?

- xxiii. We believe that Channel 4 remaining in public ownership would be accompanied by many benefits. Among those which are of direct relevance to the provision and accessibility of a high standard of religious and ethical content are:
- The continuity of a remit committed to reflecting and engaging the UK's diverse audiences¹⁴
 - Commitment to public service including its responsibility to deliver publicly valuable content for the benefit of audiences
 - Contribution to the economic and cultural benefit of the UK through its focus on supporting independent production companies specialising in the production of non-commercial public service content
 - Provision of opportunities for content creators representing diverse communities and perspectives
- xxiv. That it is publicly owned and therefore exists only to contribute to the greater public benefit while being commercially funded is, we believe, Channel 4's greatest asset. It is the corporation's need to balance these two interests that has fuelled its creativity but also its flexibility with regard key public service content such as religion and ethics.
- xxv. The value of this is clear given the continuing evolution of religious Britain. The most recent census findings suggest the representation of diverse faith communities behind and in front of the cameras is becoming ever more important. Looking forward to the publication of the 2021 census results, Peter Brierley, an expert on religion statistics, has predicted both an increase in religiosity and a "quite substantial" increase in the proportion of the population identifying with non-Christian faiths because of immigration and higher birth rates in some minority communities.¹⁵
- xxvi. Which is not to say that Channel 4 could not be doing more when it comes to religious programming. Speaking at the recent *What 4? How will privatisation affect religious diversity at Channel 4?* event hosted by the Trust, Aaqil Ahmed, former head of religion at both Channel 4 and the BBC noted the decline in religious programming across PSB channels and said that if public service broadcasters including Channel 4 do not address the growing demand for content made for and by representatives of religious 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.*"¹⁶
- xxvii. As outlined in our answer to Question 2 of this consultation, the Trust would recommend that Channel 4's remit is updated to include the obligation to foster religious literacy. However, we feel it is important to note the breadth of excellent, distinctive religious and ethical British-made content Channel 4 has commissioned in the past. This is exemplified by recent Sandford St Martin Award winners such as the drama *It's a Sin* (SSM/Radio Times Readers' Award winner, 2021), *Ramadan in Lockdown* (SSM Trustees Award, 2021) and *For Sama* (SSM TV/Video Award winner, 2020).
- xxviii. Speaking to the Banff World Media Festival in June this year, the screenwriter, television producer and Sandford St Martin 2021 Award winner, Russell T Davies said privatising Channel 4 would "stifle" diverse voices. "*Part of the government's reasoning for selling is that there is more choice now because of the streamers... that means more choice of zombies, ghosts, detectives – they certainly don't make shows like (mine).*"¹⁷ Therein lies the greatest benefit that would result from Channel 4 remaining in public ownership: real choice as is only available when a wide range of diverse perspectives are represented and given space in the media.

¹⁴ <https://www.channel4.com/corporate/about-4/operating-responsibly/diversity>

¹⁵ <https://www.theguardian.com/uk-news/2021/mar/20/less-than-half-of-britons-expected-to-tick-christian-in-uk-census>

¹⁶ <https://sandfordawards.org.uk/what-4/>

¹⁷ <https://www.radiotimes.com/tv/drama/russell-t-davies-channel-4-privatisation-newsupdate/>

- xxix. That the public across all generational groups continues to highly value this kind of content is evidenced both by audience figures¹⁸ but also in research by Ofcom which found 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”.¹⁹
- xxx. With regard the rapidly evolving broadcast ecology and the rise of video-on-demand and streaming services, we note that the corporation’s Future4 strategy²⁰ addresses many of the issues that have been cited in the government’s current consultation as dangers to its longer-term viability were it to remain in public ownership while maintaining the channel’s commitment to public service.
- xxxi. We note also figures compiled by the Voice of the Listener and Viewer which indicate that viewers of Channel 4 and All 4 grew and that advertising revenues surged during lockdown.²¹ We take this as evidence that the corporation’s current strategy is proving effective.
- xxxii. Having reviewed the available evidence it is the Trust’s belief that it is Channel 4’s unique current ownership model which makes it ideally placed to thrive in a mixed broadcasting ecology.
- xxxiii. As the historian, journalist and author of two books on Channel 4 Maggie Brown said, Channel 4 is unusual in that its model means it has a “self-correcting mechanism” built into its DNA.²² By this we understand her to have meant that when compared to other broadcast corporations, Channel 4 has had to be particularly flexible and innovative in order to balance its public service commitments with its dependence on advertising revenue. The result is evident through the excellence of previous Channel 4 Sandford Award winners and such mainstream successes as its Paralympics coverage. Through the Paralympics Channel 4 “helped a world class sporting event into the mainstream,” said Brown. And, we believe, delivered huge public benefit.

“Everyone is desperately wanting to talk about what it’s like to be a human being, all the time. It’s what connects us to people. And if we don’t get to talk about those things because it seems like they’re the big poncey questions – and only certain kinds of people talk about things like that, in certain kinds of places and certain kinds of ways - then we’re all sort of diminished and we starve.”

Michael Sheen, actor and Sandford St Martin 2020 Award winner.

Question 4: Should the regulation and/or remit of Channel 4 be changed, irrespective of its ownership? What would be the risks and benefits of any such changes to the UK Public Service Broadcasting system?

- xxix. 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 now be updated to include a quota for religious and ethical broadcasting. We believe such a change will ensure the Channel remains relevant and will continue to provide a crucial public service in the evolving broadcast market.
- xxx. Our own research indicates that audiences 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

¹⁸ <https://www.bbc.co.uk/news/entertainment-arts-55902840>

¹⁹ <https://deadline.com/2021/01/its-a-sin-ratings-russell-t-davies-aids-channel-4-hbo-max-1234680430/>

¹⁹ 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

²⁰ <https://www.channel4.com/corporate/future4>

²¹ Voice of the Listener and Viewer (August 2021): <https://www.vlv.org.uk/news/channel-4-privatisation-vlv-briefing/>

²² *What 4?* ibid

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”.²³

- xxxiv. It is generally acknowledged that we are living in a time of increasing political disenfranchisement and hardening cultural divides.²⁴ Audiences seek to see themselves, their stories and their values depicted in the media they are offered.
- xxxv. 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.
- xxxvi. It is our belief that if Channel 4 were no longer obliged to provide a good quantity and quality of religious or ethical public broadcasting content – either because its remit is changed as a result of new ownership, or because the current remit is not strong enough or is not enforced – then the burden for promoting religious literacy would fall almost entirely to the BBC. This, we believe, would be a huge disservice to the public good as religious literacy is too important to be left to the responsibility of one broadcaster.
- xxxvii. We believe that it is only through the active maintenance and nurturing of a strong and equally diverse public service broadcasting system, that audiences will continue to have equal and universal access to key public service content such as religious and ethical content.

Conclusions

- xxxviii. It is the Trust’s belief that this is a critical moment for the future of religious and ethical broadcasting in the UK.
- xxxix. As evidenced in this submission, the rapid evolution of media markets, shaped by the emergence of streaming services and video on demand, declining spend and output by public service broadcasters, and, other market developments, either individually or in combination, have been detrimental for core religious output.
- xl. Yet, at the same time, there is significant consumer demand and a public need for high quality content that explores religious and ethical themes, contributing to religious literacy and social cohesion.
- xli. 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. Broadcasting, because of its reach, should be at the frontline of promoting tolerance and understanding across a range of social differences. Insomuch, all PSB’s should be obliged to provide such coverage and to make good any deficiency in this vital strand of public service broadcasting.
- xlii. **As a result, the Sandford St Martin Trust would therefore urge and recommend that**
- **there should be no change in the ownership of Channel 4**
 - **the channel’s current remit and public obligations should be updated and strengthened to protect genres such as religious broadcasting**
 - **and the corporation should continue to be required to act only in the public’s social and economic interests.**

²³ <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>

²⁴ <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>